

August 1, 2022

VIA ELECTRONIC MAIL

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

RE: Docket No. 22-05-EE – Investigation of Misconduct by The Narragansett Electric Company Relating to Past Payments of EE Program Shareholder Incentives Responses to PUC Set 3 and Divisions Sets 1, 2, 3 and 4 (Batch 2) Motion for Extension to August 8, 2022 to Respond to Outstanding Data Requests

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”), enclosed please find the Company’s responses to the Public Utilities Commission’s (“PUC’s”) Post Decisional Third Set of Data Requests (“PUC Set 3”), Division of Public Utilities and Carriers’ (“Division’s”) First Set of Data Requests (“Division Set 1”), the Division’s Second Set of Data Requests (“Division Set 2”), the Division’s Third Set of Data Requests (“Division Set 3”), and the Division’s Fourth Set of Data Requests (“Division Set 4”).

Specifically this batch includes 40 responses: PUC 3-1(RF); PUC 3-2(RF); PUC 3-3(RF); PUC 3-4(RF); PUC 3-5(RF); PUC 3-6(RF); PUC 3-7(RF); PUC 3-8(RF); PUC 3-9(RF); PUC 3-10(RF); PUC 3-11(RF); DIV 1-4; DIV 1-11; DIV 1-15; DIV 1-22; DIV 1-29; DIV 1-30; DIV 1-36; DIV 1-37; DIV 2-4; DIV 2-9; DIV 2-10; DIV 3-2; DIV 3-3; DIV 3-4; DIV 3-5; DIV 3-6; DIV 3-7; DIV 3-8; DIV 3-9; DIV 3-10; DIV 3-11; DIV 3-12; DIV 3-14; DIV 3-16; DIV 3-17; DIV 3-18; DIV 4-4; DIV 4-7; and DIV 4-8. Please note that an “(RF)” next to a response in the above list indicates that the response is being refiled with a sponsor or updated sponsor. Some of the refiled responses contain clarifications and/or updates.

Also, enclosed, please find a Motion for an Extension of Time filed jointly by The Company and National Grid USA (the “Motion”). The Motion respectfully requests through August 8, 2022, to file the remaining responses in Division Sets 1 through 4 and the re-filing of PUC 5-4, Record Request No. 5, PUC 1-1, PUC 1-2 Supplemental, and PUC 2-1 as well as accompanying affidavits for all responses.

The Company is reiterating its motions for the enclosed re-filing of responses to PUC Set 3. For PUC 3-10, this includes *Motion of The Narragansett Electric Company Objecting to Data Request 3-10 from the Public Utilities Commission* (June 16, 2022) and *Motion of The Narragansett Electric Company for Protective Treatment of Confidential Information for*

Attachment 3-10-2 (June 16, 2022). For PUC 3-4 and PUC 3-5, this includes *Motion of The Narragansett Electric Company for Protective Treatment of Confidential Information for the Confidential Attachments PUC 3-4-1 through PUC 3-4-29 and Confidential Attachments PUC 3-5-1 through PUC 3-5-20* (June 16, 2022).

Please be advised that National Grid USA (“National Grid”) considers Confidential Attachment DIV 1-4 to be confidential. In support, please see *Motion of National Grid USA for Protective Treatment of Confidential Information* (August 1, 2022). A redacted version of Attachment DIV 1-4 is included in this filing. National Grid will file the confidential version under seal.

Please also be advised that the Confidential version of Attachment DIV 1-36 and DIV Attachment 3-1(b) contain confidential and privileged information. Pursuant to 810-RICR-00-00-1.3(H)(3) and R.I. Gen. Laws § 38-2-2-(4)(A)(I)(b), the Company respectfully requests that the Commission treat these confidential attachments as confidential. In support of this request, the Company has enclosed *Motions for Protective Treatment* (August 1, 2022). In accordance with 810-RICR-00-00-1.3(H)(2), the Company also respectfully requests that the Commission make a preliminary finding that the information redacted in the public version is exempt from the mandatory public disclosure requirements of the Rhode Island Access to Public Records Act (“APRA”).

Thank you for your attention to this filing. If you have any questions or concerns, please do not hesitate to contact me at 401-784-4263.

Sincerely,



Andrew S. Marcaccio

Enclosures

cc: Docket No. 22-05-EE Service List

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

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| _____) | |
| In re: Investigation of Misconduct by) | |
| The Narragansett Electric Company Relating) | Docket No. 22-05-EE |
| to Past Payments of Energy Efficiency) | Docket No. 5189 |
| Program Shareholder Incentives) | |
| _____) | |

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

The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”) hereby respectfully requests that the Public Utilities Commission (“PUC” or “Commission”) grant protection from public disclosure certain confidential information submitted by the Company. The reasons for the protective treatment are set forth herein. The Company also requests that, pending entry of that finding, the PUC preliminarily grant the Company’s request for confidential treatment pursuant to 810-RICR-00-00-1.3(H)(2).

The record that is the subject of this Motion and requires protective treatment is the names and identifying email addresses contained in the Company’s Response to the Division of Public Utilities and Carriers (“Division”) First Set of Post-Decisional Data Requests, Division 1-36, issued on June 17, 2022 which were filed by the Company on August 1, 2022 (“Confidential Attachments”). The Company requests protective treatment of the Confidential Attachments in accordance with 810-RICR-00-00-1.3(H) and R.I. Gen. Laws § 38-2-2-(4)(A)(I)(b).

I. LEGAL STANDARD

For matters before the PUC, a claim for protective treatment of information is governed by the Access to Public Records Act (“APRA”), R.I. Gen. Laws § 38-2-1 et seq. See 810-RICR-00-00-1.3(H)(1). Under APRA, any record received or maintained by a state or local governmental

agency in connection with the transaction of official business is considered public unless such record falls into one of the exemptions specifically identified by APRA. See R.I. Gen. Laws §§ 38-2-3(a) and 38-2-2(4). Therefore, if a record provided to the PUC falls within one of the designated APRA exemptions, the PUC is authorized to deem such record confidential and withhold it from public disclosure.

Alternatively, the Rhode Island Supreme Court has noted that the agencies making determinations as to the disclosure of information under APRA may apply a balancing test. *See Providence Journal v. Kane*, 577 A.2d 661 (R.I. 1990). Under this balancing test, after a record has been determined to be public, the Board may protect information from public disclosure if the benefit of such protection outweighs the public interest inherent in disclosure of information pending before regulatory agencies. *Kane*, 557 A.2d at 663 (“Any balancing of interests arises only after a record has first been determined to be a public record.”).

Here, the Company is seeking protection from public disclosure the names of the employees in the certain email correspondence relating to out of state parties seeking to improperly benefit from discounted goods through energy efficiency programs.

II. BASIS FOR CONFIDENTIALITY

The names and identifying email addresses contained in the Attachment DIV 1-36 to Company’s response to Division 1-36 (“Confidential Attachment”), which is the subject of this Motion, are exempt from public disclosure pursuant to R.I. Gen. Laws § 38-2-2. Specifically, the names and identifying email addresses of certain Company employees contained in the Confidential Response are “[p]ersonnel and other personal individually identifiable records,” and disclosing their names and identifying email addresses “would constitute a clearly unwarranted invasion of personal privacy.” *See* R.I. Gen. Laws § 38-2-2(4)(A)(I)(b). While generally the disclosure of a name on its own would not constitute an invasion of privacy, the very nature of this

investigatory docket into alleged wrongdoing warrant any disclosure of Company employee names, without any suggestion that all the individuals listed were involved in the alleged wrongdoing, constitutes an invasion of person privacy.¹

Alternatively, if the Commission disagrees and determines that the names and email addresses are public information, the Company requests protective treatment of this information on the basis that the benefit of such protection to these employees outweighs the public interest inherent in disclosure of information. *See Providence J. Co. v. Kane*, 577 A.2d 661, 663 (R.I. 1990). The Company believes that the benefit of protecting the names of the individuals far exceeds and outweighs any interest in disclosure.

III. CONCLUSION

For the foregoing reasons, the Company respectfully requests that the PUC grant this motion for protective treatment of the names and email addresses contained in Attachment DIV 1-36. Respectfully submitted,

RHODE ISLAND ENERGY
By its attorney,



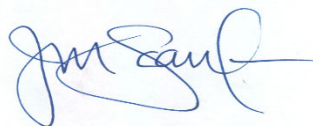
Andrew S. Marcaccio (#8168)
Rhode Island Energy
280 Melrose Street
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(401) 784-4263

Dated: August 1, 2022

¹ It is this very policy that likely led the Legislature to exclude “[a]ll investigatory records of public bodies . . . pertaining to possible violations of statute, rule, or regulation other than records of final actions taken” from the public records definition which is in itself an independent and sufficient basis for protective treatment. R.I.G.L. § 38-2-2 (4)(P).

CERTIFICATE OF SERVICE

I hereby certify that on August 1, 2022, I delivered a true copy of the foregoing Motion via electronic mail to the parties on the Service List for Docket No. 5189.



Joanne M. Scanlon

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

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| _____ |) | |
| In re: Investigation of Misconduct by |) | |
| The Narragansett Electric Company Relating |) | Docket No. 22-05-EE |
| to Past Payments of Energy Efficiency |) | Docket No. 5189 |
| Program Shareholder Incentives |) | |
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**MOTION OF NATIONAL GRID USA FOR PROTECTIVE
TREATMENT OF CONFIDENTIAL INFORMATION**

National Grid USA (“National Grid”)¹ hereby requests that the Rhode Island Public Utilities Commission (“PUC” or the “Commission”) grant protection from public disclosure of certain confidential, competitively sensitive, and proprietary information submitted in its response to Data Request Division 1-4 issued by the Division of Public Utilities and Carriers (the “Division”) in its First Set of Post-Decisional Data Requests (“Division Set 1”), as permitted by 810-RICR-00-00-1.3(H)(3) (“Rule 1.3(H)(3)”), 810-RICR-00-00-1.19(E) (“Rule 1.19(E)”), and R.I. Gen. Laws § 38-2-2(4)(B). National Grid also hereby requests that, pending entry of that finding, the Commission preliminarily grant National Grid’s request for confidential treatment pursuant to Rule 1.3(H)(2).

I. BACKGROUND

On July 11, 2022, the Commission opened this docket to investigate The Narragansett Electric Company’s (“Narragansett”) actions and the actions of its employees during the time it was a National Grid affiliate, relating to the alleged manipulation of the reporting of invoices affecting the calculation of past energy efficiency shareholder incentives and the resulting impact

¹ The confidential document at issue has been requested from The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy”), but is in the possession of National Grid USA. The confidential document at issue in this motion is proprietary and commercially sensitive of such a nature that not only need it be protected from public disclosure, but National Grid USA is also currently not able to share it with Rhode Island Energy.

on customers. See PUC Order No. 24441. The Division issued Division Set 1 on June 17, 2022. Division Set 1 includes Data Request Division 1-4, which seeks a copy of the contract executed with the “forensic consultant” referenced at page 6 of the June 7, 2022 Review of Invoices Within the Energy Efficiency Program report (the “Report”). In response to Division 1-4, Rhode Island Energy is producing a copy of an engagement letter between National Grid USA Service Company, Inc. (“NGUSA”) and the forensic consultant as Attachment DIV 1-4, with the consultant’s associated rates redacted. Certain terms of the engagement letter are also redacted because such terms are negotiated, competitively sensitive business terms of the consultant.

Therefore, National Grid requests that, pursuant to Rule 1.3(H)(3), the Commission afford protective treatment to the confidential, proprietary, and competitively sensitive information contained in Attachment DIV 1-4. In accordance with Rule 1.3(H)(3), Rhode Island Energy is producing the redacted copy of Attachment DIV 1-4 and National Grid is producing the unredacted copy of Attachment DIV 1-4.

II. LEGAL STANDARD

Rule 1.3(H)(2) of the Commission’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 the APRA, all documents and materials submitted in connection with the transaction of official business by an agency are deemed to be part of the “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 Division falls within one of the designated exceptions to the public records law, the Division has the authority under the terms of the 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 v. Convention Ctr. Auth., 774 A.2d 40, 47 (R.I. 2001). The first prong of the test is satisfied when information is voluntarily 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.

In addition, “[u]pon motion by a party from whom discovery is sought, and for good cause shown, the presiding officer may make an order when justice requires to protect the party from unreasonable annoyance, embarrassment, oppression, burden or expense, or from disclosure of confidential business and financial information.” Rule 19(E).

III. BASIS FOR CONFIDENTIAL TREATMENT

National Grid is seeking confidential treatment for the negotiated contractual pricing and other commercial terms with the forensic consultant in Attachment DIV 1-4. The pricing and other commercial terms contained in Attachment DIV 1-4 are negotiated between the parties to the contract. Such information is confidential and privileged information of the type that National Grid would not ordinarily make public. Therefore, the information should be protected from public disclosure.

There are several factors that argue in support of a finding by the Commission that such pricing and other negotiated contract information should be granted protective treatment. These factors go to both the business interests of National Grid, as well as to the contract counterparty. Public disclosure of such information could impair National Grid and/or Narragansett and the contract counterparty to obtain advantageous pricing or other commercial terms in the future, thereby causing substantial competitive harm. If National Grid were to be required to disclose the competitively sensitive pricing and other contract terms in Attachment DIV 1-4, it would likely experience difficulty in the future in negotiating successfully with potential contract partners; particularly in terms of getting potential vendors or other negotiating partners to agree to favorable pricing or other contract terms as compared to other customers or clients of the contract partner. Publicly disclosing the redacted information would put potential vendors and negotiating partners on notice that their pricing and other negotiated terms may be disclosed to the public, including persons who are seeking to procure similar services from the vendor or other negotiating partner. As a result, the disclosure of this information would have a negative impact on a company's ability to: (1) attract contract partners who may fear that their pricing or other commercially sensitive information may be released to other customers; and (2) secure attractive pricing and other terms from contract partners. In short, negotiated terms must remain confidential to preserve a company's future negotiating leverage and its ability to function effectively in the market. Accordingly, National Grid seeks protection for the negotiated pricing and other commercially sensitive contract terms contained in Attachment DIV 1-4.

IV. CONCLUSION

For the foregoing reasons, National Grid respectfully requests that the Commission grant its Motion for Protective Treatment of Confidential Information.

Respectfully submitted,

NATIONAL GRID USA,
By its attorneys,



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Dated: August 1, 2022

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

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| _____) | |

**MOTION FOR AN EXTENSION OF TIME OF THE
NARRAGANSETT ELECTRIC COMPANY AND NATIONAL GRID USA**

The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or “Narragansett”) and National Grid USA (“National Grid”) hereby request, pursuant to Rule 1.7(B) of the Public Utilities Commission’s (“PUC” or the “Commission”) Rules of Practice, 810-RICR-00-00-1.7(B) (“Rule 1.7(B)”), an extension of time through August 8, 2022, to re-file the responses to PUC 5-4, Record Request No. 5, PUC 1-1, PUC 1-2 Supplemental, and PUC 2-1 from Docket No. 5189 and to file the responses to the following outstanding data requests issued by the Division of Public Utilities and Carriers (the “Division”) in the above-referenced proceeding: Division 1-7, Division 1-12, Division 1-28A, Division 1-28B, Division 2-11A, Division 2-11B, Division 2-12, Division 3-1, Division 3-13, Division 3-15, Division 3-19, Division 3-20, Division 4-1, Division 4-2, Division 4-3, Division 4-5 and Division 4-6 (collectively, with re-files listed above, the “Outstanding Responses”).

I. BRIEF BACKGROUND

The Division issued its First, Second, Third, and Fourth Sets of Data Requests to Rhode Island Energy on June 17, 2022, June 22, 2022, July 1, 2022, and July 6, 2022, respectively. Additionally, on July 7, 2022, the Commission issued a Procedural Order requiring that by July 15, 2022, Rhode Island Energy shall refile and supplement all responses filed in this matter that

were not sponsored by an individual or individuals, to provide a sponsor for all such responses (the “Refiled Responses”). On July 22, 2022, Rhode Island Energy and National Grid submitted responses to 36 data requests and filed a motion for an extension of time through August 1, 2022, to respond to approximately 63 outstanding data requests (the “First Motion”). On August 1, 2022, Rhode Island Energy and National Grid are filing an additional 40 responses leaving the remaining 22 Outstanding Requests¹. Pursuant to Rule 1.7(B), the companies have good cause to request a final extension to respond to the Outstanding Requests, as set forth below.

II. REASONS FOR EXTENSION OF TIME

Pursuant to Rule 1.7(B), the companies have good cause to request a final extension of time to respond to the Outstanding Requests, as set forth below.

A. General Reasons for Extension of Time

In their First Motion, the companies explained the challenges to-date in responding to the data requests in the above-referenced matter and the reasons why they needed an extension of time. Those general reasons continue to apply to this request for additional time.

Due to the level of detail in the requests, Rhode Island Energy and National Grid have been diligently conducting substantial research and analyses to respond to the requests that must be reviewed and verified prior to filing. Division Set 1 and Division Set 2 were issued to Rhode Island Energy, but required significant work by National Grid and therefore significant collaboration between Rhode Island Energy and National Grid. It has taken time for the companies to develop an efficient process for collaboration. Additionally, some requested information has been difficult to compile because some of the questions seek information that goes back many

¹ The companies previously sought an extension to re-file the response to PUC 1-2 and PUC 1-2 Supplemental. The response to PUC 1-2 Supplemental will update and encompass the response to PUC 1-2, such that the requested extension to re-file the response to PUC 1-2 similarly encompasses the response to PUC 1-2.

years and some individuals are no longer employed by or available to either Rhode Island Energy or National Grid. Moreover, the work to complete these responses has fallen during a time where people involved in compiling and reviewing responses were not available due to summer vacations, thereby delaying the process and the work to complete the responses. Furthermore, in response to the July 7, 2022 Procedural Order, National Grid has identified senior level sponsors who are involved in the discovery process. Some of the Refiled Responses also have been supplemented with information. The efforts required to accurately respond to Division Set 1 and Division Set 2 in some cases has delayed the responses to Division Set 3 and Division Set 4.

B. Specific Reasons for Extension of Time

In addition to the good cause for the extension explained above, the companies are providing specific reasons for the need to extend the time to respond to the Outstanding Requests.

Division 1-7 seeks, for the years 2012-2021, specific detailed information regarding compensation to Program Managers or other employees working or connected to the energy efficiency programs based in whole or in part on specific performance goals. In addition to the information provided by the limited employees available who are familiar with the energy efficiency programs, detailed compensation information is required from National Grid's Human Resources department, which has taken additional time to compile, review and analyze, ensure its accuracy, and develop and approve as a final response that can be submitted to the Commission.

Division 1-12 consists of multiple subsections and seeks detailed information about incentive processors and field implementers, including confidential information. This response is substantially completed. The additional time is needed to assemble attachments and draft motions for protective treatment of confidential information for subsections (c) and (d).

Division 1-28A seeks a “comprehensive list of all names on all the emails submitted” to-date, with additional information regarding those individuals. The request seeks the names of all employees related to Narragansett who are in the emails and all vendor names. This response has taken significant time to compile and confirm the comprehensive, detailed information.

Division 1-28B seeks, for any Narragansett-employee identified as a Program Manager in the data requests to date, whether such employee has held positions in Narragansett prior to the Program Manager position and to indicate how many years of employment prior to becoming a Program Manager. This response requires research and information from National Grid’s Human Resources department, which has taken additional time to compile, review and analyze, ensure its accuracy, and develop and approve as a final response that can be submitted to the Commission.

Division 2-11A seeks information in response to an email from a writer who is no longer employed by Narragansett or National Grid. As a result, the effort to provide an accurate response to the request has taken longer than expected and has required more research, analysis, and review than expected.

Division 2-11B also seeks information in response to an email from a writer who is no longer employed by Narragansett or National Grid. As a result, the effort to provide an accurate response to the request has taken longer than expected and has required more research, analysis, and review than expected.

Division 2-12 also information in response to an email from a writer who is no longer employed by Narragansett or National Grid. As a result, the effort to provide an accurate response to the request has taken longer than expected and has required more research, analysis, and review than expected.

Division 3-1 consists of multiple subsections and seeks detailed vendor and manufacturer information, including confidential information. This response is substantially completed. The additional time is needed to assemble attachments for subsections (b) and (c).

Division 3-13 seeks information that derives from an email regarding a particular project, including “all documentation” for the project’s application and “all correspondence between the applicant, the program servicer and National Grid.” This response has taken significant time to research, compile, review and analyze, ensure its accuracy, and respond to the specific subparts of the request, including the request for “all documentation” and “all correspondence.”

Division 3-15 is substantially completed. The additional time is needed to assemble an attachment, including confidential information in the attachment.

Division 3-19 seeks information about an email dated November 28, 2018. The effort to engage any employee who may recall the email and provide an accurate response to the request has taken longer than expected and has required more research, analysis, and review than expected.

Division 3-20 seeks information regarding the credit to the Rhode Island energy efficiency fund of \$1,276,288.00. This response has required more discussion and collaboration between Rhode Island Energy and National Grid than other responses, and is still in the process of being finalized.

Division 4-1 is substantially completed. The additional time is needed to assemble an attachment, including confidential information in the attachment.

Division 4-2 is substantially completed. The additional time is needed to assemble an attachment, including confidential information in the attachment.

Division 4-3 seeks confirmation of whether employees provided in the response to Division 1-8 were “all on the electric side of the program.” This response has required research and information from National Grid’s Human Resources department, which has taken additional time to review and analyze, ensure its accuracy, and develop and approve as a final response that can be submitted to the Commission

Division 4-5 seeks whether costs of conducting the study and cost of responding to the out-of-period invoice investigation is being allocated to customers or shareholders. In preparing a response to this request, National Grid has had to review information regarding cost allocations to confirm the accuracy of the response, which has taken additional time to compile.

Division 4-6 is substantially completed. National Grid and Rhode Island Energy are confirming an item within the response.

The re-filing from Docket No. 5189 (including PUC 5-4, RR-5, PUC 1-1, PUC 1-2 Supp, and PUC 2-1): PUC 5-4 is the requested re-filing of a very lengthy and detailed original response filed on January 7, 2022 in Docket No. 5189. Given the significant lapse in time, the companies plan to provide a supplemental response to PUC 5-4 so that the re-filed response is up-to-date based on current events and provides accurate context, rather than outdated context. The companies are currently working on the necessary information to supplement. The other remaining re-filings are going through the same review and a sponsor will be assigned upon completion of the review.

Through August 1, 2022, Rhode Island Energy has submitted many discovery responses in this proceeding, and it will continue to make every effort to file the remaining Outstanding Responses as soon as possible. However, for the reasons stated above and to provide complete and accurate responses to the requests, the companies respectfully request a final one-week

extension of time to respond to the Outstanding Requests, through August 8, 2022. The companies remain confident that the significant work to-date for responding to the discovery requests, and to identify the appropriate individuals to review and respond to the discovery requests, will greatly minimize the need for discovery extensions for the remainder of the proceeding.

C. Request to Extend Time to File Affidavits

Lastly, the companies request that the time to file affidavits to accompany the responses to data requests, as directed by the July 7, 2022 Procedural Order, also be extended to August 8, 2022; or, in the alternative, for such affidavits to be filed at the close of discovery so the affidavits can encompass all responses sponsored by a witness in the proceeding, rather than requiring witnesses to file multiple affidavits throughout the proceeding.

III. CONCLUSION

For the foregoing reasons, the companies respectfully request that the Commission grant this Motion for Extension of Time as stated herein.

Respectfully submitted,

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

By its attorneys,



Andrew S. Marcaccio, Esq.
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NATIONAL GRID USA,
By its attorneys,



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Dated: August 1, 2022

PUC Post-Decisional 3-1

Request:

Referencing the *Review of Invoices Within the Energy Efficiency Program* filed by Narragansett Electric on June 7, 2022 (“Review”), please provide a set of schedules for each of the three methods described on pages 9 -10 of the Review showing how the performance incentive was recalculated under each method. (Please include appropriate footnotes describing each calculation.)

Response:

Please see Post-Decisional Attachment PUC 3-1, which is a live Excel workbook containing 43 tabs with all formulas intact.¹ The Excel workbook includes the recalculation of the performance incentives earned by The Narragansett Electric Company for the period 2012 through 2020 for the three methods described on pages 9 -10 of the Review. Additionally, the workbook includes the supporting schedules (i.e., E-1, G-1, E-4, G-4) for each year and each segment (i.e., electric or gas) that were used to perform the recalculation of the performance incentive earned.

Please use tab 2 of the live Excel workbook entitled “2_Out of Period %s” (in cell B9 which is highlighted in yellow) to input the method number (1, 2, or 3) that you would like to see and, after hitting enter, the subsequent tabs will update and perform the recalculation. There are notes included in tabs 2 through 5 to assist in explaining and understanding key aspects of the tab.

Please note that, during the preparation of this workbook, it was determined that one program had not been included into the calculations because the name of the program was misspelled. The spelling of the program name was corrected, and that program is now included in the workbook. It was also determined that the out-of-period percentage for program year 2021 in method 3 (actuals - highest percentage method) had not been increased to the 23.94% out-of-period percentage. The out-of-period percentage for program year 2021 in method 3 was corrected, and the calculations were updated.

The updated net downward adjustment of the Company's performance incentives for program years 2012 – 2020 for each method are as follows:

- Method 1 (actuals-average) changed from \$1,400,423.00 to \$1,564,423.00.
- Method 2 (straight average) changed from \$1,569,887.00 to \$1,842,810.00.
- Method 3 (actuals - highest percentage) changed from \$2,194,339.00 to \$1,977,707.00.

¹ Upon request, the Company will PDF and/or print each tab in the workbook for each of the three inputs.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-05-EE
In Re: 2022 Annual Energy Efficiency Plan
Responses to the Commission's Third Set of Post-Decisional Data Requests
Issued on June 8, 2022

Attachment Post-Decisional PUC 3-1

Please see live Excel workbook

PUC Post-Decisional 3-2

Request:

Please provide a version of Exhibit A that includes three additional columns (one for each method) that shows the performance incentive adjustment for each program under each of the three methods. Please add a row showing the summation of each of these three additional columns. Please also provide an explanation of what the column labeled "Actual Implementation Expenses %" represents and its significance to this review.

Response:

Please see Attachment PUC Post-Decisional 3-2 and see below explanation of what the column labeled "Actual Implementation Expenses %" represents and its significance to this review.

The Actual Implementation Expenses shown in Exhibit A represent the implementation expenses which appear in the "Table 1's" within the corresponding Year-End Report. The percentage shown, for each program, represents the allocable base when compared to all of the implementation expenses for all at-issue programs.

Actual Implementation Expenses represent a consistent and linear method to allocate performance incentive across the various programs. Since these programs appear in both the electric and gas portfolios, energy savings amounts were not used to allocate since they are not comparable (e.g., MMBtu for gas and kW/MWh for electric).

PI Adjustment by Program

PI Change: **(\$1,400,423) (\$1,569,887) (\$2,194,339)**

| Seq | Year | Utility | Sector | Program | Actual Implementation Expenses (\$000) | Actual Implementation Expenses, % | Method 1 | Method 2 | Method 3 |
|-----|------|----------|----------------------------|--|--|-----------------------------------|------------|------------|------------|
| 1 | 2012 | Electric | Non-Low Income Residential | Residential New Construction | \$1,259 | 0.70% | -\$9,762 | -\$10,943 | -\$15,296 |
| 2 | 2013 | Electric | Commercial & Industrial | Large Commercial New Construction | \$8,626 | 4.78% | -\$66,882 | -\$74,976 | -\$104,799 |
| 3 | 2013 | Electric | Commercial & Industrial | Large Commercial Retrofit | \$7,854 | 4.35% | -\$60,892 | -\$68,261 | -\$95,413 |
| 4 | 2013 | Gas | Non-Low Income Residential | Energy Star® HVAC | \$2,919 | 1.62% | -\$22,629 | -\$25,367 | -\$35,458 |
| 5 | 2013 | Gas | Non-Low Income Residential | EnergyWise | \$4,530 | 2.51% | -\$35,120 | -\$39,370 | -\$55,030 |
| 6 | 2015 | Electric | Low Income Residential | Single Family - Income Eligible Services | \$7,068 | 3.91% | -\$54,800 | -\$61,431 | -\$85,866 |
| 7 | 2015 | Electric | Low Income Residential | Income Eligible Multifamily | \$2,320 | 1.28% | -\$17,990 | -\$20,167 | -\$28,188 |
| 8 | 2015 | Gas | Commercial & Industrial | Large Commercial New Construction | \$1,844 | 1.02% | -\$14,295 | -\$16,024 | -\$22,398 |
| 9 | 2015 | Gas | Commercial & Industrial | Large Commercial Retrofit | \$3,227 | 1.79% | -\$25,020 | -\$28,047 | -\$39,204 |
| 10 | 2016 | Electric | Commercial & Industrial | Large Commercial New Construction | \$5,417 | 3.00% | -\$42,001 | -\$47,083 | -\$65,811 |
| 11 | 2016 | Electric | Commercial & Industrial | Large Commercial Retrofit | \$19,719 | 10.92% | -\$152,890 | -\$171,391 | -\$239,564 |
| 12 | 2016 | Electric | Commercial & Industrial | Small Business Direct Install | \$6,994 | 3.87% | -\$54,230 | -\$60,792 | -\$84,973 |
| 13 | 2016 | Electric | Low Income Residential | Income Eligible Multifamily | \$2,067 | 1.14% | -\$16,024 | -\$17,963 | -\$25,108 |
| 14 | 2016 | Electric | Non-Low Income Residential | Energy Star® HVAC | \$1,170 | 0.65% | -\$9,070 | -\$10,167 | -\$14,212 |
| 15 | 2016 | Electric | Non-Low Income Residential | EnergyWise | \$8,906 | 4.93% | -\$69,054 | -\$77,410 | -\$108,202 |
| 16 | 2016 | Electric | Non-Low Income Residential | ENERGY STAR® Lighting | \$7,706 | 4.27% | -\$59,747 | -\$66,976 | -\$93,617 |
| 17 | 2016 | Electric | Non-Low Income Residential | Residential Consumer Products | \$1,706 | 0.94% | -\$13,230 | -\$14,831 | -\$20,730 |
| 18 | 2016 | Gas | Commercial & Industrial | Large Commercial New Construction | \$1,664 | 0.92% | -\$12,902 | -\$14,463 | -\$20,216 |
| 19 | 2016 | Gas | Commercial & Industrial | Large Commercial Retrofit | \$3,740 | 2.07% | -\$28,995 | -\$32,504 | -\$45,433 |
| 20 | 2016 | Gas | Commercial & Industrial | Small Business Direct Install | \$134 | 0.07% | -\$1,037 | -\$1,163 | -\$1,625 |
| 21 | 2016 | Gas | Commercial & Industrial | Commercial & Industrial Multifamily | \$580 | 0.32% | -\$4,498 | -\$5,042 | -\$7,048 |
| 22 | 2016 | Gas | Non-Low Income Residential | Energy Star® HVAC | \$1,253 | 0.69% | -\$9,712 | -\$10,887 | -\$15,218 |
| 23 | 2016 | Gas | Non-Low Income Residential | Residential New Construction | \$847 | 0.47% | -\$6,567 | -\$7,361 | -\$10,290 |
| 24 | 2017 | Electric | Low Income Residential | Single Family - Income Eligible Services | \$8,211 | 4.55% | -\$63,660 | -\$71,363 | -\$99,749 |
| 25 | 2017 | Electric | Non-Low Income Residential | Residential New Construction | \$1,142 | 0.63% | -\$8,856 | -\$9,928 | -\$13,877 |
| 26 | 2017 | Electric | Non-Low Income Residential | Energy Star® HVAC | \$1,587 | 0.88% | -\$12,305 | -\$13,794 | -\$19,281 |
| 27 | 2017 | Electric | Non-Low Income Residential | EnergyWise Multifamily | \$2,039 | 1.13% | -\$15,810 | -\$17,723 | -\$24,773 |
| 28 | 2017 | Electric | Non-Low Income Residential | ENERGY STAR® Lighting | \$8,966 | 4.96% | -\$69,515 | -\$77,927 | -\$108,925 |
| 29 | 2017 | Electric | Non-Low Income Residential | Residential Consumer Products | \$2,307 | 1.28% | -\$17,890 | -\$20,055 | -\$28,032 |
| 30 | 2017 | Gas | Commercial & Industrial | Large Commercial New Construction | \$2,082 | 1.15% | -\$16,146 | -\$18,100 | -\$25,299 |
| 31 | 2017 | Gas | Commercial & Industrial | Large Commercial Retrofit | \$4,608 | 2.55% | -\$35,728 | -\$40,052 | -\$55,983 |
| 32 | 2017 | Gas | Commercial & Industrial | Commercial & Industrial Multifamily | \$795 | 0.44% | -\$6,163 | -\$6,908 | -\$9,656 |
| 33 | 2017 | Gas | Low Income Residential | Single Family - Income Eligible Services | \$3,925 | 2.17% | -\$30,434 | -\$34,117 | -\$47,688 |

| Seq | Year | Utility | Sector | Program | Actual Implementation Expenses (\$000) | Actual Implementation Expenses, % | Method 1 | Method 2 | Method 3 |
|-------------------------------------|------|----------|----------------------------|--|--|-----------------------------------|---------------------|---------------------|---------------------|
| 34 | 2017 | Gas | Non-Low Income Residential | Energy Star® HVAC | \$1,584 | 0.88% | -\$12,283 | -\$13,770 | -\$19,247 |
| 35 | 2017 | Gas | Non-Low Income Residential | EnergyWise Multifamily | \$1,145 | 0.63% | -\$8,881 | -\$9,956 | -\$13,916 |
| 36 | 2017 | Gas | Non-Low Income Residential | Residential New Construction | \$920 | 0.51% | -\$7,134 | -\$7,998 | -\$11,179 |
| 37 | 2018 | Electric | Commercial & Industrial | Small Business Direct Install | \$5,982 | 3.31% | -\$46,383 | -\$51,995 | -\$72,678 |
| 38 | 2018 | Electric | Non-Low Income Residential | ENERGY STAR® Lighting | \$10,705 | 5.93% | -\$82,998 | -\$93,041 | -\$130,050 |
| 39 | 2018 | Electric | Non-Low Income Residential | Residential New Construction | \$767 | 0.42% | -\$5,947 | -\$6,667 | -\$9,318 |
| 40 | 2018 | Gas | Commercial & Industrial | Small Business Direct Install | \$143 | 0.08% | -\$1,109 | -\$1,243 | -\$1,737 |
| 41 | 2018 | Gas | Commercial & Industrial | Commercial & Industrial Multifamily | \$815 | 0.45% | -\$6,318 | -\$7,083 | -\$9,900 |
| 42 | 2018 | Gas | Low Income Residential | Single Family - Income Eligible Services | \$4,225 | 2.34% | -\$32,755 | -\$36,719 | -\$51,324 |
| 43 | 2018 | Gas | Low Income Residential | Income Eligible Multifamily | \$2,420 | 1.34% | -\$18,764 | -\$21,034 | -\$29,401 |
| 44 | 2018 | Gas | Non-Low Income Residential | Residential New Construction | \$640 | 0.35% | -\$4,964 | -\$5,565 | -\$7,778 |
| 45 | 2020 | Electric | Commercial & Industrial | Small Business Direct Install | \$7,508 | 4.16% | -\$58,215 | -\$65,259 | -\$91,217 |
| 46 | 2020 | Electric | Non-Low Income Residential | Residential New Construction | \$950 | 0.53% | -\$7,362 | -\$8,253 | -\$11,535 |
| 47 | 2020 | Electric | Non-Low Income Residential | Energy Star® HVAC | \$3,364 | 1.86% | -\$26,083 | -\$29,239 | -\$40,869 |
| 48 | 2020 | Electric | Non-Low Income Residential | Residential Consumer Products | \$2,241 | 1.24% | -\$17,376 | -\$19,479 | -\$27,227 |
| | | | | | \$180,623 | 100.00% | -\$1,400,423 | -\$1,569,887 | -\$2,194,339 |
| Electric Commercial & Industrial | | | | | \$62,101 | 34.38% | -\$481,492 | -\$539,756 | -\$754,455 |
| Electric Non-Low Income Residential | | | | | \$54,816 | 30.35% | -\$425,004 | -\$476,434 | -\$665,944 |
| Electric Low Income Residential | | | | | \$19,666 | 10.89% | -\$152,473 | -\$170,924 | -\$238,912 |
| Gas Commercial & Industrial | | | | | \$19,632 | 10.87% | -\$152,211 | -\$170,629 | -\$238,500 |
| Gas Non-Low Income Residential | | | | | \$13,838 | 7.66% | -\$107,291 | -\$120,274 | -\$168,115 |
| Gas Low Income Residential | | | | | \$10,570 | 5.85% | -\$81,953 | -\$91,870 | -\$128,413 |
| | | | | | \$180,623 | 100.00% | -\$1,400,423 | -\$1,569,887 | -\$2,194,339 |

PUC Post-Decisional 3-3

Request:

Please provide schedules showing how the actual yearly out-of-period percentages were calculated in Phase 1. Also please identify each of the programs on Exhibit A of the Review that are included in the calculation of the actual yearly out-of-period percentages that were calculated in Phase 1.

Response:

The actual yearly out-of-period percentages in Phase 1 were calculated by dividing the "Total Out of Period Costs Identified" (as explained below) by the "Sampled Total Program Spend, Per InDemand." Please see Attachment PUC Post-Decisional 3-3. The programs listed in Attachment PUC Post-Decisional 3-3 also represent each of the programs on Exhibit A of the Review that are included in the calculation of the actual yearly out-of-period percentages that were calculated in Phase 1.

The "Total Out of Period Costs Identified" stem from a robust transaction analysis on the Rhode Island Energy Efficiency Residential Upstream Lighting Program ("Residential Upstream Lighting") conducted during Phase 1. This transaction analysis, which was sample based and focused on the top nine manufacturers - based on incentive paid to those manufacturers, looked at 1859 unique invoices. Since the analysis was sample based, the out of period percentages were adjusted (or normalized) to account for the total incentives paid out as part of Residential Upstream Lighting from January 1, 2016 to June 30, 2021. By adjusting (or normalizing) the out of period percentages, this assumes that there are no other out of period invoices in the incentive payment population.

Out of Period Percentage Calculations

| Utility | Sector | Program | Plan Year | Total Program Spend, Per InDemand | Total Out of Period Costs Identified | Out of Period Percentage |
|----------------|----------------------------|-----------------------|------------------|--|---|-------------------------------------|
| Electric | Non-Low Income Residential | ENERGY STAR® Lighting | 2016 | \$6,360,475 | \$908,744 | 14.29% |
| Electric | Non-Low Income Residential | ENERGY STAR® Lighting | 2017 | \$8,148,019 | \$660,823 | 8.11% |
| Electric | Non-Low Income Residential | ENERGY STAR® Lighting | 2018 | \$9,699,570 | \$2,322,316 | 23.94% |
| Electric | Non-Low Income Residential | ENERGY STAR® Lighting | 2019 | \$11,779,915 | \$2,307,219 | 19.59% |
| Electric | Non-Low Income Residential | ENERGY STAR® Lighting | 2020 | \$7,311,487 | \$924,503 | 12.64% |
| Electric | Non-Low Income Residential | ENERGY STAR® Lighting | 2021 | \$2,555,338 | \$480,079 | 18.79% |
| | | | | \$45,854,804 | \$7,603,684 | 16.58% |

PUC Post-Decisional 3-4

Request:

Referencing page 8 of the Review, please produce a copy of the 29 email exchanges where the Company concluded that the email explicitly demonstrated that delaying invoices was implemented. Please also identify which of the programs on Exhibit A each email chain is related to.

Response:

Please see Attachment PUC 3-4-1 through Attachment PUC 3-4-29 (Confidential) for copies of each email exchange.

Please see Attachment PUC 3-4-30 which includes a column identifying which of the programs each of the 29 email exchanges relate to.

To: [Redacted]
Cc: [Redacted]
From: [Redacted]

Sent: Fri 12/21/2012 7:38:55 PM (UTC)
Subject: RE: Dec NGRID E NC Unit/Admin Invoice - Upload

Thanks [Redacted] Take your time, have them uploaded anytime January 2nd.

[Redacted]

From: [Redacted]
Sent: Friday, December 21, 2012 2:28 PM
To: [Redacted]
Cc: [Redacted]
Subject: RE: Dec NGRID E NC Unit/Admin Invoice - Upload

[Redacted] see below. All New Construction December invoices have been cancelled. What date would you like us to re-upload?

| Invoice Number | Distribution Company | Vendor Invoice Number | Vendor Name | Invoice Create Date | Invoice Amount | Invoice Status | Invoice Status Date | |
|----------------|----------------------|-----------------------|-------------------|---------------------|----------------|----------------|---------------------|----------------------|
| 60265 | MECO | NC12_12NGRID | ICF RESOURCES LLC | 12/19/2012 | \$94,596.10 | Cancelled | 12/21/2012 | View |
| 60030 | CLW | NC12_12NGRIDL | ICF RESOURCES LLC | 12/17/2012 | \$13,728.60 | Cancelled | 12/21/2012 | View |
| 60026 | CLW | NC12_12NGRIDC | ICF RESOURCES LLC | 12/17/2012 | \$8,831.53 | Cancelled | 12/21/2012 | View |
| 60024 | BGC | NC12_12NGRIDE | ICF RESOURCES LLC | 12/17/2012 | \$6,090.86 | Cancelled | 12/21/2012 | View |
| 60022 | BGC | NC12_12NGRIDB | ICF RESOURCES LLC | 12/17/2012 | \$164,906.50 | Cancelled | 12/21/2012 | View |

Best Regards,

[Redacted Signature]

ICF INTERNATIONAL | 100 Cambridgepark Drive, Suite 500, Cambridge, MA 02140 | 617.250.4261 (f)

From: [Redacted]
Sent: Friday, December 21, 2012 2:18 PM
To: [Redacted]
Cc: [Redacted]

Subject: RE: Dec NGRID E NC Unit/Admin Invoice - Upload

As discussed and agreed with [REDACTED] all invoices pushed over to next year must be removed by the end of the day today or otherwise accrued manually for 2012. To avoid any confusion , I would you to remove them or advise me to do it in my end . Accrued payments are still going through inDemand for all our programs , and at this time and point , I have no confidence to the hear end team closing , to differentiate between the uploads in InDemand . So to stay in safer side , I will suggest removing all the ICF invoices and re upload them back in week one of January Again, I apologize for any inconvenience .

Thanks ,
[REDACTED]

From: [REDACTED]
Sent: Wednesday, December 19, 2012 1:12 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: Dec NGRID E NC Unit/Admin Invoice - Upload

[REDACTED] I have uploaded and invoiced the work package for NGRID E NC Unit/Admin. I have not filled in any admin costs because, per your discussion with [REDACTED] the admin will be "0" this month due to the credit. I am waiting for our finance department to finalize the invoice that reflects "0" for admin. When this is complete I will upload it to the system. The builder invoice is uploaded already.

Best Regards,
[REDACTED]

ICF INTERNATIONAL | 100 Cambridgepark Drive, Suite 500, Cambridge, MA 02140 | 617.250.4261 (f)

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For more information please visit <http://www.symanteccloud.com>

To: [REDACTED]
Cc: [REDACTED]
From: [REDACTED]
Sent: Mon 1/27/2014 1:45:41 PM (UTC)
Subject: RE: RI LCI-e projects

Thanks much [REDACTED]
 If it's in the customer's court, there's only so much we can do. I'm just trying to get a handle on the final number we expect to have, both on budget and savings. Fortunately, we're in a really good place for both on 2013; if it ends up going for 2014, that will be fine.
 Cheers,
 [REDACTED]

From: [REDACTED]
Sent: Friday, January 24, 2014 5:17 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: RI LCI-e projects

Hi
 [REDACTED] : Rise is working with the customer to get to a position where they can sign the Cert. This will probably go down to the wire
 Olney St. Baptist : [REDACTED] and I have made many attempts to reach the contact person. I spoke with the church secretary today and they are aware of our repeated requests. This may go to 2014
 [REDACTED]

From: [REDACTED]
Sent: Friday, January 24, 2014 4:08 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: RI LCI-e projects

Hi [REDACTED]
 The 2014 ones are mostly not on EEAs radar / we may not have invoices / signatures in yet and we will not process based on your comment below that RI 2013 budget is tight.

Regarding 2013:
 Manton : [REDACTED] has been waiting on Cert of install for awhile now. Owner has the document but won't sign it. [REDACTED] will make another call on Monday morning to the customer. [REDACTED] any additional ideas on this?
 Olney St Baptist: [REDACTED] has been trying to get the W9 from the Church admin, but still no response. [REDACTED] will try the PEX again on Monday morning. [REDACTED] any additional ideas on this?
 Union: Waiting on Vendor to issue another Invoice - [REDACTED] are on this one. Please provide update on Monday.
 Brown: Paid by [REDACTED] this week

Hope that helps.
 [REDACTED]

From: [REDACTED]
Sent: Friday, January 24, 2014 3:57 PM
To: [REDACTED]
Subject: RI LCI-e projects

Hi [REDACTED]
 There are a number of projects that were accrued that are still outstanding:
 All of these appear to be projects that were "complete" as of 12/31, even though some of them were pushed out to 2014. There doesn't appear to be an administrative reason why we can't pay these projects, though many of them don't seem to be being moved forward. The projects with 2013 expected completion dates (Manton, Union, Brown-Horace Mann, Olney) should be on the list of apps to be moved forward since they've always been on the radar for "pending 3013 apps." The remainder the 2014 apps that were accrued also should probably be paid but we're at 100% of goal and budget, and I'm not sure we can absorb the entire incentive cost within the budget we have for 2013 with out triggering regulatory review/approval.
 Are your folks specifically holding off on processing 2014 apps at this point?
 [REDACTED]

<< OLE Object: Microsoft Excel Worksheet >>



To: [REDACTED]

From: [REDACTED]

Sent: Fri 12/20/2013 5:00:21 PM (UTC)

Subject: RI Gas Overspending -- Year End Accruals and Game Plan

Everyone,

Happy Holidays! I wanted to inform everyone that our team is projecting an overspend in RI Gas that is very close to 10%. It is in our best interest to avoid overspending by 10% of our budget. This email lays out a plan for year-end and January to avoid that.

We got some advice from the RA group regarding a year end process we can use to manage the situation. First, please accrue anything that the Company has an obligation to pay in 2013. Second, it's the program managers discretion when to authorize payment on those accruals. Therefore we're asking that you not authorize payment on anything above 100% of budget until mid-January.

In mid-January, when we have the year-end spend files from the RA group, we will sit down to look at our overall portfolio level spend and then coordinate which payments should be authorized in order to maximize savings and avoid overspending. [REDACTED] or [REDACTED] will be scheduling these meetings.

A couple of notes:

- [REDACTED] & [REDACTED] spoke yesterday regarding C&I. We need the sector to remain as close to 100% of spend as possible. All invoices should be paid up to 100% of spend.
- In speaking with [REDACTED] regarding low income sector (Single Family and Multi Family), that sector is projecting approx 85% savings, and all invoices should be paid in a best effort to increase the year end sector level savings. All invoices should be paid up to 100% of spend.
- The resi sector is currently at 109% of savings (as of two days ago) and 103% of spend (through Nov.). In speaking with [REDACTED] & [REDACTED] we most closely need to monitor HVAC and EnergyWise invoices as they have the momentum to overspend. We are submitting the budget notification for EnergyWise to be \$650k overspent and HVAC to be \$500k overspent. Please do not authorize any payments above those amounts until we can evaluate the situation in January.

Attached is a preliminary quarterly report with savings through 12/18 and spend through 11/31. All updated cells are highlighted green. We have been using this since the scorecard is not ready yet.

Please let us know if you have questions!

Thanks,
[REDACTED]

~~~~~

[REDACTED]

To: [Redacted]  
Cc: [Redacted]  
From: [Redacted]

Sent: Wed 1/13/2016 11:14:43 PM (UTC)  
Subject: Re: RI 2015 Resi and Low Income Shareholder Incentive close to maxed out

No do not pay them

Sent from my iPhone

On Jan 13, 2016, at 5:49 PM, "[Redacted]" wrote:

Hi  
So does this mean I do not pay the accruals that are due by Friday?  
I just logged in to do this.  
Let me know

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Energy Efficiency – Its not a Capital Expense, it's Cost Avoidance

---

**From:** [Redacted]  
**Sent:** Wednesday, January 13, 2016 4:12 PM  
**To:** [Redacted]  
**Cc:** [Redacted]  
**Subject:** FW: RI 2015 Resi and Low Income Shareholder Incentive close to maxed out  
**Importance:** High

RI Resi Electric team - Do any of you have any resi/low income invoices that have not been paid yet for 2015? If so, please DO NOT pay until next week. Concern is we will go over the max achievable PI.

[Redacted] I'll address C&I separately....

---

**From:** [Redacted]  
**Sent:** Wednesday, January 13, 2016 3:32 PM  
**To:** [Redacted]  
**Cc:** [Redacted]  
**Subject:** RI 2015 Resi and Low Income Shareholder Incentive close to maxed out  
**Importance:** High

[REDACTED]

Would like your advice on how to proceed. The resi electric and low income electric shareholder incentive has maxed out at 125% based on spend and savings (details below). I'd like to recommend that anything accrued and not already paid be delayed until later in January and counted to 2016. This would only be for residential and low income programs. C&I needs to pay everything accrued, PI is only at 103%.

Based on the latest allocated spend file (doesn't include accruals) and today's sum by month (doesn't include accruals which aren't backdated):

- The residential PI is at 124%; RI can only collect up to 125%
- the residential electric sector is at 94.4% spend
- This is called the "bonus" because spend <95% -- that could easily tip over to "non-bonus"
- In "bonus" savings are at 125%
- Note, the spend file doesn't reflect what of the December accruals has been paid to date but the sum by month does (per [REDACTED] so spend could easily be higher and in "non-bonus" (see below)
- the savings doesn't reflect OPower Dec savings which entered around the 20<sup>th</sup> of each month, estimated as 4,000 MWh
- Even if resi spend goes over 95%, e.g. out of bonus, with the OPower Dec savings, the shareholder incentive will be at 122%
- Low Income PI is at 121%; spend at 91% and savings are at 119%

Another reason it may be good to start 2016 with savings is that Multifamily electric and gas programs will likely have fewer savings than planned as process and calculation changes are implemented in both RI & MA as a result of the RI evaluation. This is all still evolving, but it's pretty likely.

I have not looked at gas. Attached is the latest performance incentive prediction based on YTD spend and Sum By Month.

<< File: Preliminary RI Shareholder Incentive 20160104.xlsx >>

[REDACTED]

[REDACTED]

**To:** [REDACTED]  
**Cc:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Fri 12/11/2015 4:31:21 PM (UTC)  
**Subject:** RE: Goal setting - #falloutrate

So for the next analysis regarding the budget, and I better to pay everything we can this year or better to hold some for next year. Once we achieve 105% of LCI goal ( like that positive thinking), which year's budget can handle the paid units better.

---

**From:** [REDACTED]  
**Sent:** Thursday, December 10, 2015 2:19 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Goal setting - #falloutrate

Hey all,  
 I spoke to [REDACTED] about this earlier and then got this request from [REDACTED] including everyone because it bears on everyone. I expect there will be questions; we'll talk.

Basically, the question we're trying to answer is: **where do we set the sales goal such that we account both for the fallout of projects at year-end as well as for the carried projects that we start the year with?** This is especially important in RI, where the goal is a bit reduced and historically has been met or exceeded.

**The approach is to look at this as two pieces:**

- New projects that are sold in the year:
  - In order to address new projects, I'm dividing the savings from projects that were sold and paid in the same year by the total savings sold in order to get what I'm calling the "in-year realization rate". The remainder of these projects presumably were either cancelled or pushed out to be paid in future years.
- Carry-over projects sold in previous years
  - In order to address carry-over, I'm looking at the residual savings in a given year that we claimed but were sold in a previous year--this is what I'm calling "PrevYrSav." However, this does not include projects that were sold in previous years, were carried over, but were not not claimed, either because they were cancelled or because they were pushed through to a future year. By going back to the pipeline files I have from early February of 2014 and 2015, I've looked at the sold savings that we began the year with ("sold inventory") and have divided that by the "PrevYrSav" value to get the "Carried realization rate."
  - Unfortunately, because I only have pipeline data for the last two years, I only have this for 2014 and 2015.
- Once the activity has sorted itself out in January, we'll know where we stand and will have a much better idea of what the sales goals need to be for the FY17 sales year.
  - However, I suspect there's a desire to nail down goals before then...SO,
- It's probably safe to assume that ~75% of whatever's sold in a given year will be paid in that year.
- As far as what will happen with projects carried into next year, it's a little early to say.
- Upstream savings and CHP projects are excluded from this analysis. Also, nothing is weighted.

|            | RI            | 2012   | 2013   | 2014   | 2015   |
|------------|---------------|--------|--------|--------|--------|
|            | Total claimed | 44,179 | 43,797 | 52,436 | 42,850 |
| In year    | Sold&paid     | 42,051 | 34,824 | 44,491 | 30,566 |
|            | Sold          | 50,235 | 44,084 | 60,299 | 54,944 |
|            | In-year RR    | 84%    | 79%    | 74%    | 56%    |
| Carry over | PrevYrSav     | 2,128  | 8,974  | 7,945  | 12,284 |
|            | Sold inven    | n/a    | n/a    | 19,326 | 14,140 |
|            | Carried RR    |        |        | 41%    | 87%    |

|            | MA            | 2012      | 2013      | 2014      | 2015      |
|------------|---------------|-----------|-----------|-----------|-----------|
|            | Total claimed | 1,795,317 | 1,948,967 | 2,169,415 | 1,593,980 |
| In year    | Sold&paid     | 1,633,752 | 1,600,085 | 1,636,954 | 1,134,639 |
|            | Sold          | 2,080,765 | 2,142,428 | 2,258,293 | 2,427,286 |
|            | In-year RR    | 79%       | 75%       | 72%       | 47%       |
| Carry over | PrevYrSav     | 161,565   | 348,882   | 532,462   | 459,341   |
|            | Sold inven    | n/a       | n/a       | 696,099   | 750,326   |
|            | Carried RR    |           |           | 76%       | 61%       |

**From:** [REDACTED]  
**Sent:** Wednesday, December 09, 2015 4:37 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Re: Goal setting - #falloutrate

Sounds like it would work. Let's talk tomorrow

Sent from my iPhone  
On Dec 9, 2015, at 4:21 PM, [REDACTED] wrote:

Hey [REDACTED]  
Sure: the 2016 pipeline is pretty straightforward. As of Monday, the pipeline for 2016 was about 13,500 (about 12,500 for your folks and a little more than 1,000 for [REDACTED] people. That number will go up a little as more projects come into the system and as some are pushed to next year.

The fallout rate is more tricky: I need to have a starting point and ending point in order to determine the rate for that period... For example, the fallout rate is likely negative in the early part of the year; it's very high in Oct-Nov.

One thing that might makes sense is to look at projects sold and paid in 2015, divided by those sold in 2015...that would give you something like an in-year realization rate. It wouldn't necessarily provide the entire picture--projects sold in previous years but paid in 2015, but by looking at that separately, we might be able to get close. Does that sound like it might work?

[REDACTED]

**From:** [REDACTED]  
**Sent:** Wednesday, December 09, 2015 3:42 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Goal setting - #falloutrate

[REDACTED]

Next year with lower goals and budgets, there is concern that I could over goal. Can you do a little a research and let me know what our fall out rate is? I am trying to figure out, if I goal 43,000 and sell 48,000 it will result in xxxx sold.

2016 pipeline would also be helpful.

[REDACTED]





To: [Redacted]  
Cc: [Redacted]  
From: [Redacted]

Sent: Tue 11/8/2016 5:25:31 PM (UTC)  
Subject: Re: Top 20 year end strategy

We aim to please

Sent from my iPhone

On Nov 8, 2016, at 12:14 PM, [Redacted] wrote:

Ok deal. I can work with that.

[Redacted]

[nationalgrid](#)

---

**From:** [Redacted]  
**Sent:** Tuesday, November 08, 2016 12:13 PM  
**To:** [Redacted]  
**Subject:** RE: Top 20 year end strategy

It is a lot, I imagine most are with [Redacted] So I would increase to 50 units or whatever provides a reasonable number. Then when we sit with [Redacted] on Thursday we just walk through those jobs asking which one can be pushed out to 2017 and try to reduce your list like that.

---

**From:** [Redacted]  
**Sent:** Tuesday, November 08, 2016 12:04 PM  
**To:** [Redacted]  
**Subject:** RE: Top 20 year end strategy

Still quite a bit at 96 jobs. And you're talking only for 2 pal.

[Redacted]

[nationalgrid](#)

---

**From:** [Redacted]  
**Sent:** Tuesday, November 08, 2016 12:01 PM  
**To:** [Redacted]  
**Subject:** RE: Top 20 year end strategy

Ok – so let's think, if we do not look at any apps under 25 units, how much does that narrow you list ?

---

**From:** [Redacted]  
**Sent:** Tuesday, November 08, 2016 12:00 PM  
**To:** [Redacted]  
**Subject:** RE: Top 20 year end strategy

Well the entire list is only for jobs through YE so there has to be a line drawn somewhere otherwise you are talking 158 apps for my reps alone.

[Redacted]

[Redacted]

[nationalgrid](#)

---

**From:** [Redacted]  
**Sent:** Tuesday, November 08, 2016 11:58 AM  
**To:** [Redacted]  
**Cc:** [Redacted]  
**Subject:** RE: Top 20 year end strategy

And will also be looking at December projects to determine which will be ready to pay as well.

---

**From:** [Redacted]  
**Sent:** Tuesday, November 08, 2016 11:56 AM  
**To:** [Redacted]  
**Cc:** [Redacted]  
**Subject:** RE: Top 20 year end strategy

Just to clarify after speaking with [Redacted] & [Redacted] last week.

We are looking at every job with a completion date of this month regardless of size to determine if we can truly pay it this month, correct?

Thank you!

[Redacted]

[nationalgrid](#)

---

**From:** [Redacted]  
**Sent:** Tuesday, November 08, 2016 11:19 AM  
**To:** [Redacted]  
**Cc:** [Redacted]  
**Subject:** Top 20 year end strategy

Good Morning,

Here is the latest Top 20 list. Since I gave it by months on Friday, this list is by Account rep, pipeline status and MWh reduction largest to smallest.

Let me know if this works and if not I can slice & dice as needed.

I have hi-lighted in Red the projects that are have greater than 500 aMWh reduction. We will also need to watch commissioning payments.

This will be the list we use on Thursday.

Any questions please let me know.

Thank you,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, November 04, 2016 11:10 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Top 20 year end strategy

Good Morning Everyone,

I ran this Top 20 list for Strategic from 11/3/16 information. It is sorted by expected completion month.

If you want to get a head start. I expect to have the latest Top 20 available late on Monday or Tuesday morning.

[REDACTED]: Just and FYI since I already sent out information for your team

Please let me know if you have any questions.

Thank you,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, November 04, 2016 8:49 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Top 20 year end strategy

Team,

Our goal is to finish the LCI EE year at 105% of our savings goal and 95% of our budget, this will allow us to achieve 110.5% of our shareholder incentive . An excellent year ! In order to accomplish this task, we really need to manage our payments from now until the end of the year. Therefore next week's top 20 will have a slightly different focus. Our goal at the top 20 will be determine which November projects will definitely be paid in November and which December projects can be pushed to 2017. This is a very fluid process, so once the top 20 is updated we will revisit our projections and decide the next steps.

Monday afternoon, [REDACTED] will be sending out the top 20 report, sorted by expected payment date, so as you prepare for the top 20, please keep the new parameters set above in mind. At the top 20 meeting, the sales reps input on what December projects can be pushed to 2017 without too much disruption to the customer will be very important.

This is an internal strategy. Please do not share, with PEX, TA vendors , customers etc. If you have any questions or concerns, please let me know.

[REDACTED]

[REDACTED]

REDACTED



**To:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Thur 12/1/2016 4:47:11 PM (UTC)  
**Subject:** RE: EXT || RE: 2016 Final Savings for Rhode Island SBS

[REDACTED]  
No worries. We will be here in standby mode!

Regards,  
[REDACTED]  
[www.RISEngineering.com](http://www.RISEngineering.com)

---

**From:** [REDACTED]  
**Sent:** Thursday, December 01, 2016 11:46 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: EXT || RE: 2016 Final Savings for Rhode Island SBS  
**Importance:** High

Hold everything.....just got another email. We may be okay with the 2% but I have to wait to hear back for confirmation. Sheesh, wish they would make up their minds....Thanks

[REDACTED]  
National Grid  
939 Southbridge St  
Worcester, MA 01610  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, December 01, 2016 11:35 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: EXT || RE: 2016 Final Savings for Rhode Island SBS

Hi [REDACTED]

Looks like there is a strategy meeting going on in RI today and they are now telling me that they do not want me to exceed the 100% of goal and if possible to underspend doing it. I think we are okay there, but that would mean holding back on some projects on invoicing until after January 12<sup>th</sup> so that we can have them included in 2017 savings goal and spend.

Let me give you a call to discuss.

Thanks,

[REDACTED]  
National Grid  
939 Southbridge St  
Worcester, MA 01610  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, December 01, 2016 11:21 AM

**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** EXT || RE: 2016 Final Savings for Rhode Island SBS

[REDACTED]  
We are managing to utilize the entire N Grid contribution budget of \$6,625,000 to exceed the 12,165 Net MWh goal by about 2%.

As of this morning, we are tracking ~\$16,000 of incentive monies left to be utilized to capture an annual savings number near 12,400 Net MWh.

Anything beyond this that is currently in the started, scheduled or signed stages will be booked for 2017.

I am at my desk all day today and tomorrow if it's easier to talk through these final numbers.

Regards,  
[REDACTED]  
[www.RISEngineering.com](http://www.RISEngineering.com)

---

**From:** [REDACTED]  
**Sent:** Thursday, December 01, 2016 10:21 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** 2016 Final Savings for Rhode Island SBS

Hi [REDACTED]

At this time, I have RISE at 12072 Net MWH, just shy of the 12165 goal. The most recent report I pulled I have projects in following status'. I was hoping you would be able to tell me of these, which ones do you think will be completed and invoiced by the December 16<sup>th</sup> date. I am trying to obtain a final % of goal and spend that the program will come in at.

I also want to mention that once invoicing is completed, we do not want to have any projects in or moved into the installation completed status after the 16<sup>th</sup> date, as this will accrue the monies/savings for these projects for 2016 spend/budget. Please let me know if you have any questions on this.

| Vendor                        | Status                 | Data                 |                   |                    |
|-------------------------------|------------------------|----------------------|-------------------|--------------------|
|                               |                        | Sum of NGrid Contrib | Sum of Net KW     | Sum of Net MWH     |
| RISE ENGINEERING              | Contract Signed        | 2038.05              | 0.76081           | 4.30784979         |
|                               | Installation Scheduled | 479020.34            | 201.06141         | 1258.025912        |
|                               | Installation Started   | 200655.49            | 65.41849          | 476.1871074        |
|                               | Paid                   | 6487420.5            | 2231.42012        | 12071.59666        |
| <b>RISE ENGINEERING Total</b> |                        | <b>7169134.38</b>    | <b>2498.66083</b> | <b>13810.11753</b> |
| <b>Grand Total</b>            |                        | <b>7169134.38</b>    | <b>2498.66083</b> | <b>13810.11753</b> |

[REDACTED]  
National Grid  
939 Southbridge St  
Worcester, MA 01610



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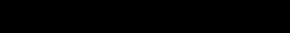

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**To:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Tue 12/20/2016 8:05:28 PM (UTC)  
**Subject:** FW: savings info as of today

FYI

---

**From:** [REDACTED]  
**Sent:** Tuesday, December 20, 2016 2:15 PM  
**To:** [REDACTED]  
**Subject:** savings info as of today

- RI MF elec - 3810 Annual MWh or 94%
- RI MF IE elec - 3161 Annual MWh or 112% (FINAL - I am holding numerous invoices)
- RI MF Gas - 115,444 Annual Therms or 67%
- RI MF IE Gas - 148,358 Annual Therms or 74%
- RI MF Comm Gas - 116,125 Annual Therms or 122% (FINAL - I am holding an invoice)

[REDACTED]  
[REDACTED]  
[nationalgrid | Waltham, MA](#)  
[REDACTED]

**To:** [REDACTED]  
**Cc:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Tue 1/3/2017 6:00:50 PM (UTC)  
**Subject:** RE: RI Upstream lighting invoice

Yes. We are presently at 105.4%.

Also, [REDACTED] we have 2 applications pending and set to be released tonight in the payment release queue.

Let's hold them and the ones you have been tracking on your shared drive not yet processed until the 16<sup>th</sup>.

Thank you,

---

**From:** [REDACTED]  
**Sent:** Tuesday, January 03, 2017 12:57 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RI Upstream lighting invoice

Hi [REDACTED] please don't pay the December RI Upstream Ecova Invoice until on or after January 16<sup>th</sup>. We are currently at 105% paid in RI Electric C&I. In addition, if there are Upstream HVAC invoices not yet paid, please don't pay those either. [REDACTED] please confirm we are officially at our sweet spot of 105% paid.

Thanks,

[REDACTED]

Please consider the environment before printing this email.

**To:** [Redacted]  
**From:** [Redacted]  
**Sent:** Fri 5/31/2019 7:41:11 AM (UTC)  
**Subject:** RE: RI Residential/low income year end results

Hi [Redacted]  
The yearend spending should be the same as forecasted or even little lower for New construction gas and electric programs. However for Cool smart , the spending will exceed the forecasts

---

**From:** [Redacted]  
**Sent:** Thursday, November 03, 2016 4:39 PM  
**To:** [Redacted]  
**Subject:** RI Residential/low income year end results

Hi team, just had call with [Redacted] and the RI policy team on our year end forecasts. I wanted to communicate that we can't go above the current forecasts in the Residential sector. According to [Redacted] our sweet spot to hit is 95% of spend and 105% of savings at year end. If we over achieve beyond this savings result, it will cause regulatory/ stakeholder issues for the Policy team and 2017-18 goals could significantly increase for us.  
So, last scorecard shows that EnergyWise and Lighting are driving the 109% of the resi sector forecast. (which by the way is an awesome problem to have!!!)

I think the first place I would like to focus on is with EnergyWise.  
[Redacted] we can discuss what we can do to lower your year end result and if that is possible. We may have to find out what invoices we can hold, or offer audits and not complete jobs in December.

For everyone else, I will follow up if we need further discussion. Again, I can't have anyone achieve higher than what you have said you would in the September scorecard. If you will, I need to k now that as soon as possible.

Low Income in good shape, no issues here.

Gas forecasts and spend are in great shape! If you are going to exceed last month's scorecard forecast, please let me know right away.

We are well on our way to closing out another great year everyone! Thanks in advance for your cooperation.

If you would like a call about this, please let me know.

[Redacted]

To: [Redacted]  
From: [Redacted]

Sent: Tue 12/20/2016 4:43:07 PM (UTC)  
Subject: RE: RI invoices

I believe it was in our forecast – but can hold them if need be as I know the budget is going over.

[Redacted]



---

From: [Redacted]  
Sent: Tuesday, December 20, 2016 10:13 AM  
To: [Redacted]  
Subject: RE: RI invoices

If this amount is not in your budget forecast, I can take a look at what paying these does to the overall budget for RI resi. I'll get back with you as soon as I can

---

From: [Redacted]  
Sent: Monday, December 19, 2016 2:39 PM  
To: [Redacted]  
Subject: RI invoices

Hi [Redacted]  
sorry to bother you – question for you.

Lockheed Martin invoice for Rhode Island program implementation costs - \$46,747.13 total  
Split \$31,320.58 – Lighting / \$15,426.55 – Product

Should I hold that until 2017 as well, or is that ok to pay? This is for November activities.  
Please advise, when you can.

Thank you

[Redacted]



**To:** [REDACTED]  
**Cc:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Fri 12/2/2016 2:44:14 PM (UTC)  
**Subject:** RE: NE EE Gas Portfolios - update 12/30/2016

Great, thanks!

---

**From:** [REDACTED]  
**Sent:** Friday, December 02, 2016 9:10 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: NE EE Gas Portfolios - update 12/30/2016

Yes, our plan will be to hold back any gas payments to be at the requested 105% savings for all sectors. I am comfortable with the rigor around monitoring the LCI pipeline. We have been meeting weekly on Electric and we will discuss gas at next meeting (held on Thursdays)

---

**From:** [REDACTED]  
**Sent:** Friday, December 02, 2016 9:00 AM  
**To:** [REDACTED]  
**Subject:** RE: NE EE Gas Portfolios - update 12/30/2016

It looks like C&I Gas is now looking to hit 119% of goal. Given our discussions on wanting to keep closer to 105% this year is there anything we can do to move some of these savings to 2017?

Thanks,  
[REDACTED]

---

**From:** [REDACTED]  
**Subject:** NE EE Gas Portfolios - update 12/30/2016

Good morning,  
Here's today's update on the MA and RI gas portfolios. If you would like to be removed from the distribution list, please let me know.

Below are the current dashboards for claimed savings and year-end forecasts. The change from 11/28/16 results in percentage points for both paid and forecasted is included in the  $\Delta$  columns.

Substantive changes to note:

- MA Claimed savings - Accrual Period - no change except for slight savings move from Prescriptive-No Rep to Sales.
- MA Forecasted savings - 2016 total forecasted savings remains at 115% with only slight fluctuations in sales pipelines.
- RI Claimed savings - Accrual Period - no change
- RI Forecasted savings - C&I total forecast increased by 12.8% to 119% due to a considerable increase in Strategic Sales' pipeline. Resi-LI and Resi have not changed their forecasts.

Quantity of C&I Custom Apps left to pay:

- MA Upper pipeline - 188 (-15 since Monday)
- RI Upper pipeline - 46 (+1 since Monday)

These numbers are derived from the best available information from vendors, contractors, and internal sales staff, and reflect the current understanding of our pipeline. As new information is received, year-end forecasts will fluctuate. If you believe something is in error, please contact your friendly program manager.

Thanks, [REDACTED]

12/30/16

| Massachusetts       | Savings to date and year-end forecast |             |       |       |            |            |             |        |       | Filed NLT Goal |
|---------------------|---------------------------------------|-------------|-------|-------|------------|------------|-------------|--------|-------|----------------|
|                     | NLT Goal                              | Paid        | P(%G) | Δ     | Pipeline   | Projection | Forecast    | F (%G) | Δ     |                |
| Sales               | 47,490,838                            | 45,514,479  | 96%   | 0.0%  | 37,204,956 | 859,146    | 83,578,581  | 176%   | 0.8%  |                |
| Strategic           | 40,000,000                            | 39,556,271  | 99%   | 0.0%  | 34,674,511 |            | 74,230,782  | 186%   | 0.8%  |                |
| North               | 22,000,000                            | 15,926,863  | 72%   | 0.0%  | 21,289,428 |            | 37,216,291  | 169%   | 1.2%  |                |
| South               | 18,000,000                            | 23,629,408  | 131%  | 0.0%  | 13,385,084 |            | 37,014,491  | 206%   | 0.4%  |                |
| Channel             | 7,490,838                             | 5,958,208   | 80%   | 0.3%  | 2,530,445  |            | 8,488,653   | 113%   | 0.4%  |                |
| Upstream            | 4,439,655                             | 10,259,791  | 231%  | 0.0%  |            | 2,050,161  | 12,309,952  | 277%   | 0.0%  |                |
| Prescriptive/no Rep | 11,000,000                            | 3,835,394   | 35%   | -0.2% |            | 195,935    | 4,031,329   | 37%    | -0.2% |                |
| LCI                 | 62,930,493                            | 59,609,663  | 95%   | 0.0%  | 37,204,956 | 3,105,242  | 99,919,861  | 159%   | 0.5%  |                |
| Multi Family HR     | 8,000,000                             | 482,943     | 6%    | 0.0%  |            | 4,635,382  | 5,118,325   | 64%    | 0.0%  |                |
| Multi Family Retro  | 3,234,567                             | 2,349,800   | 73%   | 0.0%  |            | 431,928    | 2,781,728   | 86%    | 0.0%  |                |
| SBS/DI              | 1,021,466                             | 373,226     | 37%   | 0.0%  |            | 137,507    | 510,733     | 50%    | 0.0%  |                |
| C&I                 | 75,186,526                            | 62,815,632  | 84%   | 0.0%  | 37,204,956 | 8,310,060  | 108,330,647 | 144%   | 0.4%  | 72,208,476     |
| Resi - LI           | 24,472,280                            | 13,046,449  | 53%   | 0.0%  |            | 8,186,351  | 21,232,800  | 87%    | 0.0%  | 24,472,280     |
| Resi                | 100,675,764                           | 83,098,777  | 83%   | 0.0%  |            | 15,113,081 | 98,211,858  | 98%    | 0.0%  | 100,675,764    |
| 2016 Total          | 200,334,570                           | 158,960,858 | 79%   | 0.0%  | 37,204,956 | 31,609,492 | 227,775,305 | 114%   | 0.2%  | 197,356,520    |
| 3-year total        | 605,706,542                           | 158,960,858 | 26%   | 0.0%  |            |            | 227,775,305 | 38%    | 0.1%  | 605,706,542    |

| Rhode Island        | Savings to date and year-end forecast |           |       |      |          |             |           |        |       |
|---------------------|---------------------------------------|-----------|-------|------|----------|-------------|-----------|--------|-------|
|                     | AnTh Goal                             | Paid      | P(%G) | Δ    | Pipeline | Projection* | Forecast  | F (%G) | Δ     |
| Sales               | 1,663,372                             | 1,020,683 | 61%   | 0.0% | 758,813  | 150,000     | 1,929,497 | 116%   | 14.5% |
| Strategic           | 1,571,372                             | 965,054   | 61%   | 0.0% | 746,907  | 150,000     | 1,861,961 | 118%   | 15.4% |
| Channel             | 92,000                                | 55,630    | 60%   | 0.0% | 11,906   |             | 67,536    | 73%    | -0.5% |
| Prescriptive/no Rep | 30,000                                | 32,110    | 107%  | 0.0% | -        | 1,905       | 34,016    | 113%   | -0.1% |
| Upstream            | 27,000                                | 48,305    | 179%  | 0.0% |          | 59,535      | 107,840   | 399%   | 0.0%  |
| Codes & BOC         | 50,000                                | -         | 0%    | 0.0% |          | 52,005      | 52,005    | 104%   | 4.0%  |
| LCI                 | 1,770,372                             | 1,101,099 | 62%   | 0.0% | 758,813  | 263,445     | 2,123,357 | 120%   | 13.7% |
| C&I Multi Family    | 94,897                                | 88,545    | 93%   | 0.0% |          | 9,199       | 97,744    | 103%   | 0.0%  |
| SBS/DI              | 36,672                                | 43,987    | 120%  | 0.0% |          | -           | 43,987    | 120%   | 0.0%  |
| C&I Total           | 1,901,941                             | 1,233,630 | 65%   | 0.0% | 758,813  | 272,644     | 2,265,088 | 119%   | 12.8% |
| Resi-LI             | 292,825                               | 224,015   | 77%   | 0.0% |          | 69,735      | 293,750   | 100%   | 0.0%  |
| Resi                | 1,762,839                             | 1,362,879 | 77%   | 0.0% |          | 422,421     | 1,785,300 | 101%   | 0.0%  |



**To:** [REDACTED]  
**Cc:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Mon 12/5/2016 4:02:51 PM (UTC)  
**Subject:** Upstream Gas for remainder of 2016

Hi [REDACTED] we've been asked to manage to 105% of the C&I Gas portfolio as well. I see you have January thru October uploaded to InDemand which accounts for your 48,305 paid savings. When do you think you will have November in? And, could you hold off on uploading December until 2017 (any time after January 13, 2016) if necessary?

We'll talk more on Thursday but I wanted to give you a heads up that this may be asked of you.

| Rhode Island         | Savings to date and year-end forecast |                  |            |             |                |                  |                  |             |               |
|----------------------|---------------------------------------|------------------|------------|-------------|----------------|------------------|------------------|-------------|---------------|
|                      | AnTh Goal                             | Paid             | P(%G)      | Δ           | Pipeline       | Projection*      | Forecast         | F (%G)      | Δ             |
| <b>Sales</b>         | <b>1,663,372</b>                      | <b>1,039,840</b> | <b>63%</b> | <b>1.2%</b> | <b>758,352</b> | <b>(136,744)</b> | <b>1,661,447</b> | <b>100%</b> | <b>-16.1%</b> |
| Strategic Channel    | 1,571,372                             | 983,153          | 63%        | 1.2%        | 747,502        |                  | 1,730,655        | 110%        | -8.4%         |
| Channel              | 92,000                                | 56,686           | 62%        | 1.1%        | 10,850         |                  | 67,536           | 73%         | 0.0%          |
| Prescriptive/no Rep  | 30,000                                | 32,110           | 107%       | 0.7%        | -              | 1,905            | 34,016           | 113%        | 0.0%          |
| Upstream             | 27,000                                | 48,305           | 179%       | 0.0%        |                | 59,535           | 107,840          | 399%        | 0.0%          |
| Codes & BOC          | 50,000                                | -                | 0%         | 0.0%        |                | 52,005           | 52,005           | 104%        | 0.0%          |
| <b>LCI</b>           | <b>1,770,372</b>                      | <b>1,120,255</b> | <b>63%</b> | <b>1.1%</b> | <b>758,352</b> | <b>(23,299)</b>  | <b>1,855,307</b> | <b>105%</b> | <b>-15.1%</b> |
| C&I Multi Family     | 94,897                                | 88,545           | 93%        | 0.0%        |                | 9,199            | 97,744           | 103%        | 0.0%          |
| SBS/DI               | 36,672                                | 43,987           | 120%       | 0.0%        |                | -                | 43,987           | 120%        | 0.0%          |
| <b>C&amp;I Total</b> | <b>1,901,941</b>                      | <b>1,252,786</b> | <b>66%</b> | <b>1.0%</b> | <b>758,352</b> | <b>(14,100)</b>  | <b>1,997,038</b> | <b>105%</b> | <b>-14.1%</b> |
| Resi-LI              | 292,825                               | 224,015          | 77%        | 0.0%        |                | 69,735           | 293,750          | 100%        | 0.0%          |
| Resi                 | 1,762,839                             | 1,368,143        | 78%        | 0.3%        |                | 417,157          | 1,785,300        | 101%        | 0.0%          |

[REDACTED]

To: [Redacted]  
From: [Redacted]

Sent: Fri 5/31/2019 7:46:48 AM (UTC)  
Subject: RE: RNC & HVAC savings forecast for RI

Hi [Redacted]  
The RNC Electric budget is already at 101% , unfortunately the scorecard doesn't reflect the savings for C&S , since there is no monthly tracking for it yet. The spending will be within budget at 100% as well .

**RNC Electric:**

|             |       |       |      |
|-------------|-------|-------|------|
| New Con     | 569   | 561   | 101% |
| C & S (54%) | 650   | 650   |      |
| Total       | 1,219 | 1,211 | 101% |

**RNC Gas:**

|             |        |         |     |
|-------------|--------|---------|-----|
| New Cons    | 34,632 | 47,419  | 73% |
| C & S (57%) | 61,648 | 61,648  |     |
| Total       | 96,280 | 109,067 | 88% |

The gas program spending would exceed 1-3% if allowed, but any event the savings are to exceed 100% when November invoice is paid.

**HVAC Electric:**

From: [Redacted]  
Sent: Tuesday, November 22, 2016 4:37 PM  
To: [Redacted]  
Subject: RNC & HVAC savings forecast for RI

Hi there, I'd like to sit with the two of you next week to discuss whether or not you will meet the RNC & HVAC forecasts between now and December. The paid savings in October for RNC are only at 43% of goal. Are we going to bring in over 700 units in Nov/Dec? HVAC at 86% Do we still expect to overachieve?

I'm trying to see ways to balance the overall residential sector to 105% of savings, per [Redacted] direction. The resi sector forecast is currently at 111%. So I'm looking at each program to see if there's any opportunity to hold back invoices or strategies to stay at around 100% instead of overachieving.

[Redacted] could you set up a meeting for the 3 of us Monday or Tuesday next week. I'm available after 2:30 on Tuesday.

RNC

|       |                   |               |          |                  |
|-------|-------------------|---------------|----------|------------------|
|       | <b>Savings</b>    |               |          |                  |
|       | <b>claimed to</b> |               |          | <b>% to goal</b> |
| Goal  | <b>date</b>       |               | Forecast | forecast         |
| 1,213 | <b>525</b>        | % to goal 43% | 1,315    | 108%             |

HVAC

|       |            |     |       |      |
|-------|------------|-----|-------|------|
| 1,011 | <b>867</b> | 86% | 1,163 | 115% |
|-------|------------|-----|-------|------|

[Redacted]



REDACTED

[REDACTED]

[REDACTED]

Please consider the environment before printing this email.

To: [Redacted]

From: [Redacted]

Sent: Thur 1/11/2018 3:37:11 PM (UTC)  
Subject: RE: NE EE Electric 2017 Portfolios - update 1/11/2018

Hi [Redacted]  
RNC & HVAC Electric invoices are pushed to fiscal year 2018.

Thanks,  
[Redacted]

From: [Redacted]  
Sent: Thursday, January 11, 2018 10:35 AM  
To: [Redacted]  
Subject: RE: NE EE Electric 2017 Portfolios - update 1/11/2018

Hi [Redacted]  
We are not processing any additional invoices for EW RI single family gas or electric for 2017. Anything remaining will be for 2018.

Thanks,  
[Redacted]

From: [Redacted]  
Sent: Thursday, January 11, 2018 10:32 AM  
To: [Redacted]  
Subject: RE: NE EE Electric 2017 Portfolios - update 1/11/2018

Hi All,  
Per [Redacted] email, is there anything with savings attached that you all are still planning to pay out in Electric standard income in RI? It was my understanding that we were final there for this year.  
[Redacted]

From: [Redacted]  
Sent: Thursday, January 11, 2018 10:15 AM  
To: [Redacted]  
Subject: NE EE Electric 2017 Portfolios - update 1/11/2018

Good Morning,  
Below are the current dashboards for claimed savings and year-end forecasts for filed and stretch goals. The change from 1/4/2018 results in percentage points for both paid and forecasted is included in the  $\Delta$  columns.

Substantive changes to note:

- **RI Claimed savings** - 2017 total C&I Portfolio claimed savings presently at **111%**
- **RI Claimed savings** - Resi 116% and Resi-LI at 108% of their **filed** goal.
- **RI Forecasted savings** - The total 2017 C&I forecast at 111% of the filed goal.
- **RI Forecasted savings** Resi forecast 119% and Resi-LI forecast to 108%

Quantity of C&I Custom Apps left to pay:

- RI 2017 pipeline -0

These numbers are derived from the best available information from vendors, contractors, and internal sales staff, and reflect the current understanding of our pipeline. As new information is received, year-end forecasts will fluctuate.

If you have any questions please let me know.

Thank you,



| Savings to date and year-end stretch forecast |         |       |      |          |            |          |         |       |         |
|-----------------------------------------------|---------|-------|------|----------|------------|----------|---------|-------|---------|
| RI (AnMWh)                                    | Paid    | P(%G) | Δ    | Pipeline | Projection | Forecast | FC (%G) | Δ     | Goal    |
| Sales                                         | 80,358  | 117%  | 1.8% | 2,858    | (2,857)    | 80,358   | 117%    | -2.8% | 68,485  |
| Comm                                          | 63,451  | 108%  | 2.1% | 2,726    |            | 66,177   | 113%    | 0.0%  | 58,549  |
| Strat                                         | 43,374  | 115%  | 3.3% | 2,726    |            | 46,100   | 122%    | 0.0%  | 37,795  |
| CHP                                           | 11,131  | 106%  | 0%   | -        |            | 11,131   | 106%    | 0.0%  | 10,549  |
| StL                                           | 8,945   | 88%   | 0.0% | -        |            | 8,945    | 88%     | 0.0%  | 10,205  |
| Channel                                       | 16,907  | 170%  | 0.0% | 132      |            | 17,038   | 171%    | -0.7% | 9,936   |
| MedC&I                                        | 1,820   | 27%   | 0.0% | -        |            | 1,820    | 27%     | 0.0%  | 6,780   |
| Nat'l                                         | 15,086  | 478%  | 0.0% | 132      |            | 15,218   | 482%    | -2.3% | 3,156   |
| Upstream (Includes Lgts & HVAC)(pilot)        | 17,288  | 55%   | 0.0% |          | 12         | 17,299   | 55%     | 0.0%  | 31,321  |
| Codes&BOC                                     | 4,769   | 100%  | 0.0% |          | 0          | 4,769    | 100%    | 0.0%  | 4,769   |
| LCI                                           | 102,414 | 98%   | 1.2% | 2,858    | (2,845)    | 102,426  | 98%     | -1.8% | 104,575 |
| SBS                                           | 12,955  | 102%  | 0.0% |          | -          | 12,955   | 102%    | 1.7%  | 12,743  |
| C&I                                           | 115,369 | 98%   | 1.1% | 2,858    | (2,845)    | 115,381  | 98%     | -1.5% | 117,318 |
| Resi                                          | 104,818 | 111%  | 0.3% |          | 2,649      | 107,467  | 113%    | 0.0%  | 94,767  |
| LI                                            | 7,640   | 103%  | 1.9% |          | -          | 7,640    | 103%    | 1.4%  | 7,430   |



Please consider the environment before printing this email.

**To:** [Redacted]  
**From:** [Redacted]  
**Sent:** Thur 1/11/2018 3:53:54 PM (UTC)  
**Subject:** RE: NE EE Electric 2017 Portfolios - update 1/11/2018

RI Resi gas heating will not be processing any additional workpackages for 2017. Vendor was advised to process invoices/workpackages on 1/16/18. Holiday on Monday!!

**From:** [Redacted]  
**Sent:** Thursday, January 11, 2018 10:38 AM  
**To:** [Redacted]

**Subject:** RE: NE EE Electric 2017 Portfolios - update 1/11/2018  
 I have one more MF Std elec invoice that I can pay or wait for 2018.  
 Net Annual MWh is 4.03.  
 Just let me know which is best...  
 Thanks!

**From:** [Redacted]  
**Sent:** Thursday, January 11, 2018 10:35 AM  
**To:** [Redacted]

**Subject:** RE: NE EE Electric 2017 Portfolios - update 1/11/2018  
 Hi [Redacted]  
 We are not processing any additional invoices for EW RI single family gas or electric for 2017. Anything remaining will be for 2018.  
 Thanks,

**From:** [Redacted]  
**Sent:** Thursday, January 11, 2018 10:32 AM  
**To:** [Redacted]

**Subject:** RE: NE EE Electric 2017 Portfolios - update 1/11/2018  
 Hi All,  
 Per [Redacted] email, is there anything with savings attached that you all are still planning to pay out in Electric standard income in RI?  
 It was my understanding that we were final there for this year.

**From:** [Redacted]  
**Sent:** Thursday, January 11, 2018 10:15 AM  
**To:** [Redacted]

**Subject:** NE EE Electric 2017 Portfolios - update 1/11/2018  
 Good Morning,  
 Below are the current dashboards for claimed savings and year-end forecasts for filed and stretch goals. The change from 1/4/2018 results in percentage points for both paid and forecasted is included in the  $\Delta$  columns.  
 Substantive changes to note:

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- **RI Forecasted savings** - The total 2017 C&I forecast at 111% of the filed goal.
- **RI Forecasted savings** Resi forecast 119% and Resi-LI forecast to 108%

Quantity of C&I Custom Apps left to pay:  
 • RI 2017 pipeline -0

These numbers are derived from the best available information from vendors, contractors, and internal sales staff, and reflect the current understanding of our pipeline. As new information is received, year-end forecasts will fluctuate.  
 If you have any questions please let me know.  
 Thank you,

Janine

| Savings to date and year-end stretch forecast |         |       |      |          |            |          |         |       |         |
|-----------------------------------------------|---------|-------|------|----------|------------|----------|---------|-------|---------|
| RI (AnMWh)                                    | Paid    | P(%G) | Δ    | Pipeline | Projection | Forecast | FC (%G) | Δ     | Goal    |
| Sales                                         | 80,358  | 117%  | 1.8% | 2,858    | (2,857)    | 80,358   | 117%    | -2.8% | 68,485  |
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| StL                                           | 8,945   | 88%   | 0.0% | -        |            | 8,945    | 88%     | 0.0%  | 10,205  |
| Channel                                       | 16,907  | 170%  | 0.0% | 132      |            | 17,038   | 171%    | -0.7% | 9,936   |
| MedC&I                                        | 1,820   | 27%   | 0.0% | -        |            | 1,820    | 27%     | 0.0%  | 6,780   |
| Nat'l                                         | 15,086  | 478%  | 0.0% | 132      |            | 15,218   | 482%    | -2.3% | 3,156   |
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| Codes&BOC                                     | 4,769   | 100%  | 0.0% |          | 0          | 4,769    | 100%    | 0.0%  | 4,769   |
| LCI                                           | 102,414 | 98%   | 1.2% | 2,858    | (2,845)    | 102,426  | 98%     | -1.8% | 104,575 |
| SBS                                           | 12,955  | 102%  | 0.0% |          | -          | 12,955   | 102%    | 1.7%  | 12,743  |
| C&I                                           | 115,369 | 98%   | 1.1% | 2,858    | (2,845)    | 115,381  | 98%     | -1.5% | 117,318 |
| Resi                                          | 104,818 | 111%  | 0.3% |          | 2,649      | 107,467  | 113%    | 0.0%  | 94,767  |
| LI                                            | 7,640   | 103%  | 1.9% |          | -          | 7,640    | 103%    | 1.4%  | 7,430   |

|            |              |
|------------|--------------|
| RI (AnMWh) | Filed An MWh |
| C&I        | 104,000      |
| Resi       | 90,000       |
| Resi - LI  | 7,000        |



Please consider the environment before printing this email.

To: [REDACTED]  
Cc: [REDACTED]  
From: [REDACTED]  
Sent: Thur 11/2/2017 5:13:53 PM (UTC)  
Subject: RE: EXT || FW: RI Invoicing

Not a problem thanks you too!

---

From: [REDACTED]  
Sent: Thursday, November 02, 2017 12:44 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: EXTERNAL: RE: EXT || FW: RI Invoicing

Hi [REDACTED]  
They can submit by then – rumor is the deadline is sooner than expected for 2017 year end.  
I can hold them in our system until the January release, so they process in 2018.  
Many thanks for helping us with our budget change.

Enjoy the day

---

From: [REDACTED]  
Sent: Thursday, November 02, 2017 11:42 AM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: EXT || FW: RI Invoicing

Hi [REDACTED]  
If Greenlite submits their RI invoices for October and November on December 20<sup>th</sup> will that work or do you want them submitted later?

Thanks,

---

From: [REDACTED]  
Sent: Wednesday, November 01, 2017 12:15 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: EXTERNAL: RE: RI Invoicing

Hi [REDACTED]  
Yes, we can hold off in submitting, to EFI, the NGRID RI invoices for October, November, and December sales.  
We plan to submit the October and November sales invoice by 12/20 and the December sales invoice by 1/20/17.

Thanks.

[REDACTED]



---

From: [REDACTED]  
Sent: Wednesday, November 01, 2017 7:22 AM

---

To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: RI Invoicing

Hi [REDACTED]

Can you please confirm you are able to accommodate the request below for RI?

Thanks,

[REDACTED]

---

From: [REDACTED]  
Sent: Thursday, October 19, 2017 10:13 AM  
To: [REDACTED]  
Subject: RI Invoicing  
Importance: High

Hi [REDACTED]

Thanks for the call this morning. As we discussed we're asking several lighting manufacturers who work with independents to hold off submitting their **National Grid RI invoices** (all programs) for the months of October, November and December until the end of this year (submit to EFI at the end of December, early January, submitting all months at once). This will allow National Grid to claim savings on these months towards next year's plan and reduce their spend in 2017. Please let me know if you are able to do this for all of your National Grid RI programs.

Thanks,

[REDACTED]

[REDACTED]

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To: [REDACTED]  
From: [REDACTED]  
Sent: Tue 11/7/2017 10:08:18 PM (UTC)  
Subject: Re: forecast update for today

Yes -the score card due today.  
Class tomorrow in the am  
We can catch up in the pm  
Thanks!

Sent from my iPhone

On Nov 7, 2017, at 4:53 PM, [REDACTED] wrote:

Thanks, [REDACTED] What do you mean about the data online today? The scorecard? Or some data from EFI also?

Let's chat tomorrow if necessary

---

From: [REDACTED]  
Sent: Tuesday, November 07, 2017 2:33 PM  
To: [REDACTED]  
Subject: forecast update for today

Hi [REDACTED]  
Just an FYI – here's what I put in for forecast updates today.

According to the data online today, RI is already at 100% of spend / with savings at 117%  
Depending on when the spend is through, we might be holding everything now in RI, if I'm not already over my budget. Trying to check with [REDACTED] now to verify what the spend date is through.

This is what I put in, but feel like RI savings will have to be adjusted to reflect reality of right now = 117%  
As we are out of funds allocated.  
I'll let you know, soon as I know.  
Thanks,  
[REDACTED]

| Massachusetts | Savings | Spend |
|---------------|---------|-------|
| Products      | 100%    | 104%  |
| Lighting      | 95%     | 95%   |

| Rhode Island | Savings | Spend |
|--------------|---------|-------|
| Products     | 96%     | 100%  |
| Lighting     | 132%    | 100%  |



[REDACTED]

**To:** [REDACTED]  
**Cc:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Thur 11/2/2017 7:55:53 PM (UTC)  
**Subject:** RE: EXT || RE: Hold all Custom Gas Payments in RI please

Hi [REDACTED]

Please push completed apps as far as you can without initiating the sales rep's "create payment" task. I think you can move to Post Inspection Complete status and then ask Phil not to complete his QA review task until we know we want to pay that app.

I'll set up some time for us to talk next week.  
Thanks so much!

---

**From:** [REDACTED]  
**Sent:** Thursday, November 02, 2017 12:58 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: EXT || RE: Hold all Custom Gas Payments in RI please

Does URI and Lifespan NEED their checks this year?

Fred sent a note to his sales team to find out what must be paid this year.

---

**From:** [REDACTED]  
**Sent:** Thursday, November 02, 2017 12:36 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** EXT || RE: Hold all Custom Gas Payments in RI please

FYI

We've been pushing on the URI and Lifespan PG 6 may have an EOY payout.

URI Pipe Insulation (#1 Child – 85,242 and #2 – 68565) and Lifespan PG 6 (14,897 Therms).

RISE will hold on closing anything else in RI until we hear back.

Thanks,

Ken

---

**From:** [REDACTED]  
**Sent:** Thursday, November 02, 2017 12:29 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Hold all Custom Gas Payments in RI please

We need to pay the Brown SEMP.... I will ask the team what if anything else

---

**From:** [REDACTED]  
**Sent:** Thursday, November 02, 2017 12:27 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Hold all Custom Gas Payments in RI please  
**Importance:** High

I am working on figuring out how to maximize the shareholder incentive. Please do not pay anymore custom apps (including radiator traps).

Here is what it looks like right now...

- We are targeting to reach 110% of the **C&I SECTOR** savings and 100% spend. That makes the SECTOR's target 2,744,799 and makes remaining to pay 1,286,219.
- That said, we have forecasts from other C&I programs (I need to make sure these are still current) that leaves them with 121,995 left to pay. Leaving a remaining balance of 1,164,224 to come from Custom.
- We have SOLD 1,159,146 in savings from these (prescriptive/custom hybrid) radiator traps and have another 139,688 UNSOLD, which totals to 1,298,834. Paying those will put us just a little over the 110% target. No biggie.

**[REDACTED]: What do we HAVE TO pay out to customers this year? Brown SEMP?**

If we pay all of the rad traps, all of the other C&I program forecasts, and Brown SEMP, we will hit **120%** and I am pretty sure we don't want to do that.

So please don't pay anything else until we can figure this out together.

Thanks, **[REDACTED]**

|                                                            |            | 11/2/2017                  |                              |
|------------------------------------------------------------|------------|----------------------------|------------------------------|
|                                                            | Filed Goal | Paid                       | %P                           |
| <b>C&amp;I Total</b>                                       | 2,495,272  | 1,458,580                  | 58%                          |
|                                                            |            |                            | Target 2,744,799             |
| <b>Row Labels</b>                                          |            | <b>Sum of Total Therms</b> | <b>forecasts</b>             |
| <b>lower</b>                                               |            | <b>261,400</b>             | Presc-no Rep                 |
| DHW flow reducer (aerator, showerhead, spray nozzle, etc.) |            | 5,380                      | Upstream/POS                 |
| Furnace - All                                              |            | 741                        | Codes & BOC                  |
| Heat recovery - Seasonal                                   |            | 1,533                      | C&I Multi Family             |
| Hood Controls                                              |            | 1,706                      | SBS/DI                       |
| HVAC Controls and EMS                                      |            | 19,863                     | <b>savings from others</b>   |
| HVAC Equipment                                             |            | 9,089                      |                              |
| Other                                                      |            | 39,855                     | <b>remaining</b>             |
| Pipe Insulation                                            |            | 2,556                      |                              |
| Process - Laundry                                          |            | 1,691                      |                              |
| Roof/Wall/Floor/Basement/building other Insulation         |            | 116                        | Rad Traps Upper              |
| StreamTrap_Pres                                            |            | 139,688                    | Rap Traps L                  |
| Verified Savings Project                                   |            | 39,181                     | <b>total Rap Traps</b>       |
| <b>Upper</b>                                               |            | <b>1,748,334</b>           | <b>remaining</b>             |
| Advanced Buildings                                         |            | 861                        |                              |
| Comprehensive Design                                       |            | 6,979                      |                              |
| Heat recovery - All                                        |            | 9,636                      |                              |
| Heat recovery - Seasonal                                   |            | 4,267                      | <b>what do we</b>            |
| HVAC Controls and EMS                                      |            | 42,474                     | Brown SEMP                   |
| HVAC Equipment                                             |            | 12,538                     | <b>remaining</b>             |
| Non-Condensing Boiler - All                                |            | 17,481                     |                              |
| Other                                                      |            | 127,282                    |                              |
| Pipe Insulation                                            |            | 19,840                     | <b>total if paid all abc</b> |
| Process - Laundry                                          |            | 8,331                      |                              |
| Process Equipment/Controls                                 |            | 20,921                     |                              |
| Retro-commissioning/Tune-up/Optimization                   |            | 64,257                     |                              |
| Roof/Wall/Floor/Basement/building other Insulation         |            | 117,730                    |                              |
| Steam Trap Repair or Replacement                           |            | 136,590                    |                              |
| StreamTrap_Pres                                            |            | 1,159,146                  |                              |

280 Melrose Street / Providence, RI 02907  
| Office 401.784.4317 | Cell 401.559.2251 |  
[rebecca.golding@nationalgrid.com](mailto:rebecca.golding@nationalgrid.com)

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**To:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Thur 1/4/2018 10:19:07 PM (UTC)  
**Subject:** RE: Happy New Year!

Hi [REDACTED]  
My programs both gas and electric cannot add any additional savings , since my invoices are all pushed to 2018.

In addition, the final results are less than what have been forecasted in the last scorecard.

RNC Electric: Forecasted/Results: 1,390/1,396

RNC Gas: Forecasted/Results 127,250/116,562

HVAC Electric: Forecasts/Results 1,403/1,396

Please let me know if you have any additional question.

Thanks,  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, January 04, 2018 1:07 PM  
**To:** [REDACTED]  
**Subject:** RE: Happy New Year!

Hi All,

Circling back on this. I have not heard from everyone on any anticipated changes to our forecasts.

This is particularly critical in RI standard income, where our most recent forecasts had us close to tipping the scales into a negative shareholder incentive. Gas was forecasted at 123% and Electric at 119%. As you know, we cannot go over 125% of savings goal or we get penalized.

[REDACTED] has already let me know she has come in slightly higher than anticipated, so for those with outstanding invoices that will go well over your previous forecasts, let's chat before paying out.

As of this morning, RI Gas standard income is at 111% to goal paid, while RI Electric standard income is at 116% paid. Please let me know where you anticipate coming in at this point.

Thanks  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Tuesday, January 02, 2018 9:39 AM  
**To:** [REDACTED]  
**Subject:** Happy New Year!

Hi All,

Welcome to 2018! I hope you all had a wonderful holiday and are back re-energized and refreshed for the new year.

REDACTED

Thanks for all your work bringing in the last of 2017's savings. Any updates we should be aware of as a team in terms of forecasts changing?



**To:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Wed 1/10/2018 4:13:47 PM (UTC)  
**Subject:** RE: Happy New Year!

My dear friend, please dismiss this email , blaming you for bringing in more savings.

Watch, as we are heading in the final year of 3 years plan, she will come back and thank you later around with invoices.

Nothing is wrong here. As everyone else we have time in 2018 to adjust collectively based on portfolio level rather than program level , which is typical in third year of plan.

In regard to forecasts you can do our best , but that is a difficult task . I don't receive a forecasts savings from my cooling equipment , but rather receive unit count and \$ value. It's ultimately a guessing game, I personally don't know how to make that better .

At am glad you are blamed for bringing in more savings rather missing savings .

Cheers, cheers & cheers

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, January 10, 2018 11:04 AM  
**To:** [REDACTED]  
**Subject:** FW: Happy New Year!

FYI

---

**From:** [REDACTED]  
**Sent:** Friday, January 05, 2018 5:14 PM  
**To:** [REDACTED]  
**Subject:** RE: Happy New Year!

Hi [REDACTED]

I am disappointed that you did not coordinate with me as I requested and reminded multiple times, before paying out above your forecast, especially a 13% increase. I am also disheartened that the forecast was so inaccurate in the very last days of the year. I'd like you to put some thought into how we can work to get a better handle on our forecasting and controls for 2018. We can discuss at our next one on one.

We are extremely lucky that EW SF savings are coming in slightly under, so the MF invoices will not have a detrimental effect. As of this evening, the gas portfolio is at 122%, so yes, please hold any additional invoices from RISE.

Thanks

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, January 05, 2018 5:04 PM  
**To:** [REDACTED]  
**Subject:** RE: Happy New Year!

Hi [REDACTED]

RISE has a few more invoices to submit, but the info from the Sum By Month below is probably pretty much where we will end up. If you'd like me to not pay any MF gas invoices (because we came in higher than forecast), just let me know.

Thanks!

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, January 04, 2018 5:17 PM  
**To:** [REDACTED]  
**Subject:** RE: Happy New Year!

Hi [REDACTED]

Thanks for getting back to me. I am unclear what you are telling me. I also understood your forecasts to be those you noted below. Are you telling me you will not be able deliver as forecasted below? What is your updated forecast?

Thanks

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, January 04, 2018 4:45 PM  
**To:** [REDACTED]  
**Subject:** RE: Happy New Year!

Hi [REDACTED]

My forecast for RI MF Elec was 90% (3167 NAMWh). Today the SBM shows 76% (2671).

My forecast for RI MF Gas was 80% (92,144 NAT). Today the SMB shows 93% (106,618).

RISE has a few more RI invoices that they will be submitting. If you'd like, I won't pay them until 1/16. Just let me know.

Thanks!

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, January 04, 2018 1:07 PM  
**To:** [REDACTED]  
**Subject:** RE: Happy New Year!

Hi All,

Circling back on this. I have not heard from everyone on any anticipated changes to our forecasts.



This is particularly critical in RI standard income, where our most recent forecasts had us close to tipping the scales into a negative shareholder incentive. Gas was forecasted at 123% and Electric at 119%. As you know, we cannot go over 125% of savings goal or we get penalized.

█ has already let me know she has come in slightly higher than anticipated, so for those with outstanding invoices that will go well over your previous forecasts, let's chat before paying out.

As of this morning, RI Gas standard income is at 111% to goal paid, while RI Electric standard income is at 116% paid. Please let me know where you anticipate coming in at this point.

Thanks

█

---

**From:** █  
**Sent:** Tuesday, January 02, 2018 9:39 AM  
**To:** █  
**Subject:** Happy New Year!

Hi All,

Welcome to 2018! I hope you all had a wonderful holiday and are back re-energized and refreshed for the new year.

Thanks for all your work bringing in the last of 2017's savings. Any updates we should be aware of as a team in terms of forecasts changing?

█

**To:** [REDACTED]  
**Cc:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Wed 12/26/2018 5:55:08 PM (UTC)  
**Subject:** RE: EXT || 2019 Data File Changes

Hi [REDACTED]

This is [REDACTED] I am sorry if I am causing confusion here, but I just wanted to try and keep things simple. I could always just have a different "start date" after you send me the final invoice for small business in January for the \$50 December incentives. You won't be sending me another invoice until early February for January's recycling anyway and I can just have the rates changed by then. Or if you want all new codes, I can have the \$50 ones with an end date of 1/31/19 and new ones for the \$75 incentives created and implemented with a 1/1/19 date. Thoughts?

Thanks,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, December 26, 2018 12:47 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: EXT || 2019 Data File Changes

Hi [REDACTED] – We will still need to be able to invoice RI Residential incentives at \$50 and RI Small Business incentives at \$25, as we are not submitting the November invoice until January. I will defer to [REDACTED] for the decision on the 2019 RI incentive amount.

Sincerely,

[REDACTED]  
 Business Analyst  
 ARCA Recycling, Inc.  
 175 Jackson Avenue North, Suite 102  
 Hopkins, MN 55343  
 Direct 952.930.1794

---

**From:** [REDACTED]  
**Sent:** Wednesday, December 26, 2018 11:31 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: EXT || 2019 Data File Changes

**WARNING:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi [REDACTED]

Sorry, I am now noticing that the rebates are going from \$50>\$75 for MA and \$25>\$50 for RI, but these are the RESIDENTIAL incentives and not Small Business. I am going to step away from residential and let Elizabeth deal with making the necessary changes for her program when she is back in the office.

My concern is Small Business and the current incentive levels are \$50 for BOTH MA and RI so I want to make sure I get my program

straightened out with the correct increased incentives. I will increase my levels to \$75 in BOTH states. I currently have an email to our IT asking if we can just simply change the current ARCA data files for my program that have the incentive of \$50 to \$75. This seems like it would be the easiest way to go about this, but I want to make sure that will not cause confusion or problems on your end and if your IT can handle that change.

- 331 – Mass Save Nantucket Small Business (331\_UnitLegend)
- 332 – Mass Save Small Business (332\_UnitLegend)
- 357-2 – Rhode Island Small Business (357-2\_UnitLegend)

Also, please note that Small Business is NOT included in the recycling of dehumidifiers and I confirmed this with the other utilities. This is apparently a Residential program only.

Please let me know what you think about the change for small business.

Thanks,

[Redacted signature block]

**From:** [Redacted]  
**Sent:** Wednesday, December 26, 2018 8:58 AM  
**To:** [Redacted]  
**Cc:** [Redacted]  
**Subject:** RE: EXT || 2019 Data File Changes

Hi [Redacted] – All Mass/RI Save programs will begin accepting Dehumidifiers effective 1/1/2019. The recycling cost will be \$35 per unit and the incentive amount will be \$30.00. Limit is 2 per account per calendar year.

I have attached samples of the current unit data files. Please advise of any and all changes we need to make for the files to be accepted into the National Grid invoicing system, both in terms of adding a new unit type (Dehumidifiers) and the incentive changes (\$50>\$75 for Mass; \$25>\$50 for RI Residential):

- 329 – Mass Save Nantucket Residential (329\_UnitLegend)
- 330 – Mass Save Residential (330\_UnitLegend)
- 331 – Mass Save Nantucket Small Business (331\_UnitLegend)
- 332 – Mass Save Small Business (332\_UnitLegend)
- 357-1 – Rhode Island Residential (357-1\_UnitLegend)
- 357-2 – Rhode Island Small Business (357-2\_UnitLegend)

Sincerely,

[Redacted signature block]

**From:** [Redacted]  
**Sent:** Wednesday, December 26, 2018 7:32 AM  
**To:** [Redacted]  
**Subject:** RE: EXT || 2019 Data File Changes

**WARNING:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good Morning [REDACTED]

I am not sure I understand what you mean by Dehumidifier unit types. Are you still referring to refrigerators and if so, what kind of additional cost, if any, are we looking for in processing of these?

Would you also please send the current codes and their values that you are using for the residential and small business programs for both MA and RI so that we are all on the same page as we make the determination of what changes need to be made to accommodate the new rebate rates.

Thank you,

---

**From:** [REDACTED]  
**Sent:** Wednesday, December 26, 2018 8:21 AM  
**To:** [REDACTED]  
**Subject:** EXT || 2019 Data File Changes

Good morning! We are working on adding Dehumidifier unit types for all Save programs and need to know what changes you require for the data files. Can you please advise what we should use for the Type or MeasureCode?

Also, for Mass – do we need to make any other changes to accommodate the incentive increase or will your system automatically recognize the new price for Refrigerator & Freezer pickups starting 1/1/2019?

Thank you and have a great day!

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To: [REDACTED]  
[REDACTED]  
From: [REDACTED]

Sent: Fri 12/7/2018 3:35:50 PM (UTC)  
Subject: RE: EXT || RE: RI Lighting and Products Year End Plans Discussion

Thanks so much, [REDACTED]

For RI Lighting, would it be possible to invoice us for approximately \$515,000? (up to a maximum of \$525,000)

We can pay that for 2018.

Then, can you invoice us for the balance later?

We will continue to monitor the portfolio and see if there is any more we can pay in 2018.

Please provide a Tableau update as soon as you can.

Thanks!

[REDACTED]

---

From: [REDACTED]  
Sent: Thursday, December 06, 2018 2:11 PM  
To: [REDACTED]  
Subject: EXT || RE: RI Lighting and Products Year End Plans Discussion

Hello,

Below are EFI's action items from yesterday's call as well as updates from today.

EFI to provide a pending dollar amount for RI lighting invoices

Update: \$1,232,528.91 pending as of this morning. Please let us know if it is OK for EFI to include this amount in the next closing scheduled for the week of 12/17

EFI to provide an update on Tableau data issues

Update: issue was escalated with our CIO and I can confirm that IT is actively working on it (i.e.: MOU name fields that were missing have already been corrected). I should have an update for you by COB tomorrow.

EFI to provide confirmation if NULL values in data file affect reporting to the PAs

Update: although we can confirm that EFI is up to date in releasing payment and that the NULL values in the check run field are a reporting issue, I cannot confirm that disregarding the field will provide accurate reporting. As mentioned above, IT is actively working on the NULL values and I should have an update for the group by COB tomorrow.

Thank you,

[REDACTED]  
[REDACTED]

---

From: [REDACTED]  
Sent: Wednesday, December 05, 2018 10:01 AM  
To: [REDACTED]  
Subject: RE: RI Lighting and Products Year End Plans Discussion

Hi all,

We have reviewed the portfolio.

We have determined that EFI should submit all lighting and products invoices. I will pay as many of them as I can. The rest will be accrued.

I look forward to discussing more at 11:00.

Thanks!

-----Original Appointment-----

**From:** [REDACTED]  
**Sent:** Wednesday, November 14, 2018 9:19 AM  
**To:** [REDACTED]  
**Subject:** RI Lighting and Products Year End Plans Discussion  
**When:** Wednesday, December 05, 2018 11:00 AM-11:30 AM (UTC-05:00) Eastern Time (US & Canada).  
**Where:** [REDACTED]

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**To:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Thur 11/8/2018 1:27:51 PM (UTC)  
**Subject:** EXT || RE: RNC Spending

[REDACTED]

Quick question, do you have the total gas and electric goals, and where we are to goal for both? You included that info for C&S below and I was curious about New Con too.

The 200 units is mostly made up of three big projects – two all electric 45 unit projects, and one 84 unit gas project. I will run some analysis on those to see what the savings are.

Thanks.

---

**From:** [REDACTED]  
**Sent:** Wednesday, November 7, 2018 8:27 AM  
**To:** [REDACTED]  
**Subject:** RE: RNC Spending

Hi [REDACTED]  
Trying to get some perspective for my acting manager on budget and savings....

If I recall on our previous communication Gas spend was projected to \$90K Electric at \$115K with a total of 200 units .

To digest the numbers, I would ask if you can give a breakdown

Gas/Elec in unit with associated savings to help determine how much to defer to next year

My own estimate is this

**Gas YTD Savings:** 21,794 Monthly average: 2,179.4 additional 2 months: 4,358.8

C&S: 9,558 total yearend: 37,890.2 which is 122% over goals of 31,170

Electric YTS: 415,430 Monthly average: 41,543 additional 2 months: 83,086

C&S: 167 total yearend: 706.629 which is 114% over goals of 619 MWH

Please give your perspective.

Thanks,  
[REDACTED]



To: [REDACTED]  
Cc: [REDACTED]  
From: [REDACTED]  
(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GOLDIR]  
Sent: Wed 1/9/2019 10:36:46 PM (UTC)  
Subject: RE: accruals understated and 2018 charges

Hi [REDACTED] as of today, RIGas C&I is at 97% paid.

We were projecting another 7,609 from C&I MF...  
There was a pleasant surprise from [REDACTED] last night - 12 RIGas participants completed the course and applied for reimbursement.

Prescriptive-No Rep & Upstream/POS Gas work packages were paid today and expected to be backdated for tomorrow's sum by month's - I have no idea what the savings are until then though...

So, using best available information, and excluding any more savings from C&I MF, we should hit 103% of the C&I 2018 filed goal.

I will go out on a limb and say we are ok without the RIGas C&I MF savings that weren't accrued.

| Rhode Island            | Filed Goal | Paid 1/9         | P(%G)       |
|-------------------------|------------|------------------|-------------|
| C&I Total               | 2,392,465  | 2,332,559        | 97%         |
| weighted sales pipeline |            | 74,000           |             |
| BOC projection          |            | 37,767           |             |
| Upstream forecast       |            | 8,900            |             |
| blackhawk               |            | 2,100            |             |
|                         |            | <b>2,455,325</b> | <b>103%</b> |

| Rhode Island      | 2018 Savings to date and year-end forecast (stretch targets) |           |       |      |          |             |           |        |       |
|-------------------|--------------------------------------------------------------|-----------|-------|------|----------|-------------|-----------|--------|-------|
|                   | Assigned Goal                                                | Paid      | P(%G) | Δ    | Pipeline | Projection* | Forecast  | F (%G) | Δ     |
| Sales             | 2,300,892                                                    | 1,924,561 | 84%   | 0.9% | 165,645  |             | 2,090,206 | 91%    | -1.9% |
| Strategic Channel | 2,231,665                                                    | 1,907,474 | 85%   | 0.9% | 163,211  |             | 2,070,686 | 93%    | -2.0% |
|                   | 69,226                                                       | 17,086    | 25%   | 0.7% | 2,434    |             | 19,520    | 28%    | 0.7%  |
| Presc-no Rep      | 28,875                                                       | 24,045    | 83%   | 0.0% | -        | 2,186       | 26,231    | 91%    | 0.0%  |
| Upstream/POS      | 70,560                                                       | 184,101   | 261%  | 0.0% |          | 8,967       | 193,068   | 274%   | 0.0%  |
| Codes & BOC       | 3,088                                                        | 3,089     | 100%  | 0.0% |          | -           | 3,089     | 100%   | 0.0%  |
| LCI               | 2,403,415                                                    | 2,135,796 | 89%   | 0.9% | 165,645  | 11,153      | 2,312,595 | 96%    | -1.8% |
| C&I Multi Family  | 69,752                                                       | 94,616    | 136%  | 0.0% |          | 7,609       | 102,225   | 147%   | 0.0%  |
| SBS/DI            | 33,649                                                       | 32,602    | 97%   | 0.0% |          | -           | 32,602    | 97%    | 0.0%  |
| C&I Total         | 2,506,815                                                    | 2,263,014 | 90%   | 0.9% | 165,645  | 18,762      | 2,447,422 | 98%    | -1.8% |
| Income Eligible   | 329,884                                                      | 353,121   | 107%  | 0.0% |          | 11,080      | 364,201   | 110%   | 0.0%  |
| Residential       | 1,764,482                                                    | 1,804,659 | 102%  | 0.0% |          | 245,156     | 2,049,815 | 116%   | 0.0%  |

From: [REDACTED]  
Sent: Wednesday, January 09, 2019 4:56 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: FW: accruals understated and 2018 charges  
Importance: High

One of the invoices not accrued for RI MF is for the commercial sector. Looks like 8,300 therms. Email below indicates it was included in the projection. Is there a preference for this to be paid/counted toward 2018 or not for the RI Gas C&I portfolio? Is RI C&I gas still over 100% w/o this and any other changes recently?

It may not be an option to count to 2018, anticipating more direction from [REDACTED] [REDACTED] [REDACTED] on that. If you prefer it paid, please let me know and I will respond all on the email chain and include you as well.

The other MF invoices are residential or income eligible.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, January 09, 2019 3:51 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** accruals understated and 2018 charges  
**Importance:** High

Hello everyone,  
It recently came to our attention that there was a large number of invoices that were not properly accrued via the manual process. It was one vendor in particular that underreported accruals and impacted multiple programs, Multifamily (MA and RI) and HES (MA). Due to MF it impacts both residential and commercial. The vendor has been made aware of the error and future training will be held.

The attached spreadsheet shows the figures. (Thanks to [REDACTED])  
***The request is that even though these charges were not manually accrued, due to a self-imposed National Grid deadline, they should be backdated to 2018.***

- For MA, this is the end of the 3 year term and therefore expenses should hit the 2018 budget.
- All work associated with these invoices was completed in 2018.
- These invoices/charges/savings were included in forecasts.
- It is not as critical for RI as we are in the middle of 3 year term so could be carried over to 2019.

Let me know if any questions. **Please let us know by Friday if these charges can be backdated.** Thanks.

<< File: 2018 Outstanding Invoices\_manual accruals\_[REDACTED].xlsx >>

[REDACTED]

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To: [Redacted]  
From: [Redacted]  
Sent: Wed 1/9/2019 8:02:55 PM (UTC)  
Subject: RE: details for Multifamily MA / RI

Nothing from [Redacted]

[Redacted]

Please consider the environment before printing this email.

---

From: [Redacted]  
Sent: Wednesday, January 09, 2019 3:02 PM  
To: [Redacted]  
Subject: RE: details for Multifamily MA / RI

Did you hear from [Redacted]

---

From: [Redacted]  
Sent: Wednesday, January 09, 2019 3:02 PM  
To: [Redacted]  
Subject: RE: details for Multifamily MA / RI

I didn't put in your invoices – hold please Let me redo w/ your info

[Redacted]

Please consider the environment before printing this email.

---

From: [Redacted]  
Sent: Wednesday, January 09, 2019 3:01 PM  
To: [Redacted]  
Subject: RE: details for Multifamily MA / RI

Are my invoices in here also?  
I don't see the pivot table.

---

**From:** [REDACTED]  
**Sent:** Wednesday, January 09, 2019 2:58 PM  
**To:** [REDACTED]  
**Subject:** details for Multifamily MA / RI

Hi [REDACTED]  
Here are the Multifamily details we spoke about. Pivot table shows the breakdown by State/fuel type  
The only invoices I was planning on holding are the RI ; Gas ; Low Income  
It's was going to push the numbers way over for savings & spend on that line item.  
Those two invoices are noted in the attached. Let me know if you need something else.  
Thanks,

[REDACTED]

Please consider the environment before printing this email.

[REDACTED]

**To:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Wed 12/23/2020 12:43:47 PM (UTC)  
**Subject:** FW: wrs 051032

Hi. Just an fyi, the small gas calculating issue I mentioned the other day is RI only and we look to have finally figured it out, a fix is in the making. [REDACTED] concern was that they will make their gas goal, (our stretch), but are hitting the stop button right at goal so as not to exceed budget and if we then make a correction concerning these units which drops them just below goal that would be wrong as he is holding back on other jobs. This should be corrected today so shouldn't be an issue but should that have happened and since it's our bad I would want to honor and pay out for that gas goal if your ok with that? It's small money. Then as a separate note RI electric is still as last reported, 90% of filed goal and 100% budget but Vin did mention he has more jobs done he could submit if needed but it would put them just over the 100%. I said no, to hold off but could change if you say to. Happy Wednesday.

---

**From:** [REDACTED]  
**Sent:** Wednesday, December 23, 2020 7:15 AM  
**To:** [REDACTED]  
**Subject:** Re: wrs 051032

Hi [REDACTED]  
 I am looking into it. Will be sharing the test case shortly.

Thanks,  
 [REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, December 23, 2020 5:33 PM  
**To:** [REDACTED]  
**Subject:** RE: wrs 051032

Hi [REDACTED]  
 Thanks for checking on Impact side.

LF\_SHWR\_HD\_1.75\_GPM\_DI has 52 therms which is correct. So we need to correct the deemed saving in other lookup table(sbs\_direct\_install\_gas\_measure : this is used to calculate the saving on screen : 19.5). SALON\_NOZZLE has 204 therms which is correct, so here also we need to correct the deemed saving in other lookup table that has value 114.

Hi [REDACTED]  
 Can you make the correct changes in sbs\_direct\_install\_gas\_measure tables and share the Test Case as well?

Regards,  
 [REDACTED]

---

**From:** [REDACTED]  
**Sent:** Tuesday, December 22, 2020 8:34 PM  
**To:** [REDACTED]

[REDACTED]

**Subject:** RE: wrs 051032

Hi [REDACTED]

Is the impact table something I am able to see? On the screen, I see 52 therms for LF\_SHWR\_HD\_1.75\_GPM\_DI and 204 therms for SALON\_NOZZLE, which are the correct values.

The values displayed on the facility detail show the incorrect gross savings, but the net savings seem to be calculated using the correct values.

Thanks,  
[REDACTED]

---

**From:** [REDACTED]

**Sent:** Wednesday, December 16, 2020 5:35 PM

**To:** [REDACTED]

**Subject:** RE: wrs 051032

Hi [REDACTED]

Impact Group (LF\_SHWR\_HD\_1.75\_GPM\_DI) Id : 350 has **GROSS\_ANNUAL\_THERMS\_DHW** value as **19.5 in impact tables. While adding the measure on screen the deemed saving set up in DSM look up table is 52. So either look up value is wrong or gross annual therms dhw factor is wrong on impact side.**

Similarly for Impact Group (SALON\_NOZZLE ) Id : 350 has **GROSS\_ANNUAL\_THERMS\_DHW** as **114 on impact side but in InDemand table the saving is stored a 204.**

So we need your help in checking these values as the value should be consistent in both tables (impact tables and InDemand look up table).

Regards,  
[REDACTED]

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**From:** [REDACTED]

**Sent:** Wednesday, December 16, 2020 5:07 PM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: wrs 051032

**Importance:** High

Thanks [REDACTED] Looping in [REDACTED] as this is RI C&I gas.

[REDACTED] – [REDACTED] has identified that savings are not calculating properly for RI small business gas measures. InDemand team is saying that the issue is with the impact factors. Attached the extract and details of codes below in yellow. I had a quick look at the WRS, it looks like the net savings > gross savings for below measures. I briefly looked at your factors, and the NTG formula cannot have caused the net > gross savings. It would be gross savings\*(1-0.014+0+0), so I am unsure. This is critical for year-end, so it will be great if you can provide your inputs.

[REDACTED] – Evaluation analysts manage the impact factors in InDemand and also oversee evaluation studies. I am fairly new to the team, but the impact factors have been in place for at least over a decade now, and using these factors gross savings get converted to net savings and benefits. Hope this answers your question about role of evaluation analysts. Feel free to reach out if you want to know more.

Thanks,

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Wednesday, December 16, 2020 2:50 PM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** Re: wrs 051032

Hi [REDACTED]

The issue is for RI applications. Please see below details for impact group and program.

Impact group: 350- LF\_SHWR\_HD\_1.75\_GPM\_DI (Measure:SHOWER\_HEAD)

Impact group: 351- FAUCET\_AERATOR\_0.5\_DI (Measure:AERATOR)

Impact group: 352 -SALON\_NOZZLE (measure:SALON\_NOZZLE)

Program Id-75 (C&I Direct Install)

Regards,

[REDACTED]

---



To: [Redacted]  
Cc: [Redacted]  
From: [Redacted]

Sent: Mon 1/4/2021 1:47:27 PM (UTC)  
Subject: RE: RE: No invoice should be paid until okayed

[Redacted] I have a meeting scheduled with you & [Redacted] on your return from vacation on 1/8/21 so we can discuss Retail invoices. Sounds like there was a slight misunderstanding on some of the gas invoices that I'm sure we can rectify when we chat on Friday. Enjoy your break!

---

From: [Redacted]  
Sent: Monday, January 4, 2021 8:14 AM  
To: [Redacted]  
Cc: [Redacted]  
Subject: RE: RE: No invoice should be paid until okayed

Okay. I will hold off.

There have been some that I have paid in the HVAC and RCD Energy Federation Inc that have caused issues for [Redacted] Not knowing who owns what Retail Invoice has caused her anxiety for which I am sorry. Maybe this year we can go over what I need to look for (so I know which PM owns what invoice), it will help me do my job better.

[Redacted]

[Redacted]

[Advance notice of vacation:](#)

[Redacted]

---

From: [Redacted]  
Sent: Monday, January 04, 2021 12:13 AM  
To: [Redacted]  
Subject: RE: No invoice should be paid until okayed

Hi [Redacted] I hope you had a good holiday season and a good beginning to fiscal year 2021. Please let me wish you a happy new year.

Just wanted, to give you a heads up , please stop processing invoices in the next 2 weeks of 2021 until you hear from myself and [Redacted]

In order to help aligning spending, payments and yearend accruals , only program managers can determine that efforts. For HVAC E Invoices and New construction , I would like a review prior to releasing and you can consult with Greg on how to handle his invoices .

Thank you ,

REDACTED



**To:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Wed 1/13/2021 8:12:37 PM (UTC)  
**Subject:** RE: EXT || RE: Energy Star Products Invoice #187200 for State :RI is now submitted

Hi [REDACTED]

Since it was not accrued, I will pay it next week and it will hit 2021.

Thanks!

[REDACTED]

-----Original Message-----

**From:** [REDACTED]  
**Sent:** Wednesday, January 13, 2021 3:11 PM  
**To:** [REDACTED]  
**Subject:** EXT || RE: Energy Star Products Invoice #187200 for State :RI is now submitted

This is a really large appliance invoice, definitely out of volume compared to what we expected, there was only 30K accrued for products in NECO so I'm not sure if we should include it for 2020. We can if you'd like, but ultimately your call!

[REDACTED]

-----Original Message-----

**From:** [REDACTED]  
**Sent:** Wednesday, January 13, 2021 3:04 PM  
**To:** [REDACTED]  
**Subject:** FW: Energy Star Products Invoice #187200 for State :RI is now submitted

Hi [REDACTED]

This is the only other one I have a question on. Should this be 2020 or 2021?

Was it accrued?

Thanks!

[REDACTED]


-----Original Message-----

**From:** [REDACTED]  
**Sent:** Wednesday, January 13, 2021 11:29 AM  
**To:** [REDACTED]  
**Cc:** mhansen@efi.org  
**Subject:** Energy Star Products Invoice #187200 for State :RI is now submitted

Hi,

The invoice #187200 for amount \$160901.0 of Energy Star Products program has been now submitted and is ready for your attention.

Thanks,



PS: This is an auto-generated email from the system and was sent for your information.  
Please do not reply to this mail, if needed please contact the sender directly.  
This Mailbox is not monitored.

This e-mail, and any attachments are strictly confidential and intended for the addressee(s) only. The content may also contain legal, professional or other privileged information. If you are not the intended recipient, please notify the sender immediately and then delete the e-mail and any attachments. You should not disclose, copy or take any action in reliance on this transmission.

You may report the matter by contacting us via our UK Contacts  
Page<<http://www2.nationalgrid.com/contact-us/>> or our US Contacts  
Page<<https://www1.nationalgridus.com/ContactUs>> (accessed by clicking on the appropriate link)

Please ensure you have adequate virus protection before you open or detach any documents from this transmission. National Grid plc and its affiliates do not accept any liability for viruses. An e-mail reply to this address may be subject to monitoring for operational reasons or lawful business practices.

For the registered information on the UK operating companies within the National Grid group please use the attached link: <https://www.nationalgrid.com/group/about-us/corporate-registrations>

Email Listing by Program\_Year

| Seq | Year | Utility  | Sector                     | Program                                  | Year/Utility/Program                                 | PUC Attachment |
|-----|------|----------|----------------------------|------------------------------------------|------------------------------------------------------|----------------|
| 1   | 2012 | Electric | Non-Low Income Residential | Residential New Construction             | 2012ElectricResidential New Construction             | PUC 3-4-1      |
| 2   | 2013 | Electric | Commercial & Industrial    | Large Commercial New Construction        | 2013ElectricLarge Commercial New Construction        | PUC 3-4-2      |
| 3   | 2013 | Electric | Commercial & Industrial    | Large Commercial Retrofit                | 2013ElectricLarge Commercial Retrofit                | PUC 3-4-2      |
| 4   | 2013 | Gas      | Non-Low Income Residential | Energy Star® HVAC                        | 2013GasEnergy Star® HVAC                             | PUC 3-4-3      |
| 5   | 2013 | Gas      | Non-Low Income Residential | EnergyWise                               | 2013GasEnergyWise                                    | PUC 3-4-3      |
| 6   | 2015 | Electric | Low Income Residential     | Single Family - Income Eligible Services | 2015ElectricSingle Family - Income Eligible Services | PUC 3-4-4      |
| 7   | 2015 | Electric | Low Income Residential     | Income Eligible Multifamily              | 2015ElectricIncome Eligible Multifamily              | PUC 3-4-4      |
| 8   | 2015 | Gas      | Commercial & Industrial    | Large Commercial New Construction        | 2015GasLarge Commercial New Construction             | PUC 3-4-5      |
| 9   | 2015 | Gas      | Commercial & Industrial    | Large Commercial Retrofit                | 2015GasLarge Commercial Retrofit                     | PUC 3-4-5      |
| 10  | 2016 | Electric | Commercial & Industrial    | Large Commercial New Construction        | 2016ElectricLarge Commercial New Construction        | PUC 3-4-6      |
| 11  | 2016 | Electric | Commercial & Industrial    | Large Commercial Retrofit                | 2016ElectricLarge Commercial Retrofit                | PUC 3-4-6      |
| 12  | 2016 | Electric | Commercial & Industrial    | Small Business Direct Install            | 2016ElectricSmall Business Direct Install            | PUC 3-4-7      |
| 13  | 2016 | Electric | Low Income Residential     | Income Eligible Multifamily              | 2016ElectricIncome Eligible Multifamily              | PUC 3-4-8      |
| 14  | 2016 | Electric | Non-Low Income Residential | Energy Star® HVAC                        | 2016ElectricEnergy Star® HVAC                        | PUC 3-4-9      |
| 15  | 2016 | Electric | Non-Low Income Residential | EnergyWise                               | 2016ElectricEnergyWise                               | PUC 3-4-10     |
| 16  | 2016 | Electric | Non-Low Income Residential | ENERGY STAR® Lighting                    | 2016ElectricENERGY STAR® Lighting                    | PUC 3-4-11     |
| 17  | 2016 | Electric | Non-Low Income Residential | Residential Consumer Products            | 2016ElectricResidential Consumer Products            | PUC 3-4-11     |
| 18  | 2016 | Gas      | Commercial & Industrial    | Large Commercial New Construction        | 2016GasLarge Commercial New Construction             | PUC 3-4-12     |
| 19  | 2016 | Gas      | Commercial & Industrial    | Large Commercial Retrofit                | 2016GasLarge Commercial Retrofit                     | PUC 3-4-12     |
| 20  | 2016 | Gas      | Commercial & Industrial    | Small Business Direct Install            | 2016GasSmall Business Direct Install                 | PUC 3-4-13     |
| 21  | 2016 | Gas      | Commercial & Industrial    | Commercial & Industrial Multifamily      | 2016GasCommercial & Industrial Multifamily           | PUC 3-4-8      |
| 22  | 2016 | Gas      | Non-Low Income Residential | Energy Star® HVAC                        | 2016GasEnergy Star® HVAC                             | PUC 3-4-14     |
| 23  | 2016 | Gas      | Non-Low Income Residential | Residential New Construction             | 2016GasResidential New Construction                  | PUC 3-4-14     |
| 24  | 2017 | Electric | Low Income Residential     | Single Family - Income Eligible Services | 2017ElectricSingle Family - Income Eligible Services | PUC 3-4-15     |
| 25  | 2017 | Electric | Non-Low Income Residential | Residential New Construction             | 2017ElectricResidential New Construction             | PUC 3-4-15     |
| 26  | 2017 | Electric | Non-Low Income Residential | Energy Star® HVAC                        | 2017ElectricEnergy Star® HVAC                        | PUC 3-4-15     |
| 27  | 2017 | Electric | Non-Low Income Residential | EnergyWise Multifamily                   | 2017ElectricEnergyWise Multifamily                   | PUC 3-4-16     |
| 28  | 2017 | Electric | Non-Low Income Residential | ENERGY STAR® Lighting                    | 2017ElectricENERGY STAR® Lighting                    | PUC 3-4-17     |
| 29  | 2017 | Electric | Non-Low Income Residential | Residential Consumer Products            | 2017ElectricResidential Consumer Products            | PUC 3-4-18     |
| 30  | 2017 | Gas      | Commercial & Industrial    | Large Commercial New Construction        | 2017GasLarge Commercial New Construction             | PUC 3-4-19     |
| 31  | 2017 | Gas      | Commercial & Industrial    | Large Commercial Retrofit                | 2017GasLarge Commercial Retrofit                     | PUC 3-4-19     |
| 32  | 2017 | Gas      | Commercial & Industrial    | Commercial & Industrial Multifamily      | 2017GasCommercial & Industrial Multifamily           | PUC 3-4-19     |
| 33  | 2017 | Gas      | Low Income Residential     | Single Family - Income Eligible Services | 2017GasSingle Family - Income Eligible Services      | PUC 3-4-15     |
| 34  | 2017 | Gas      | Non-Low Income Residential | Energy Star® HVAC                        | 2017GasEnergy Star® HVAC                             | PUC 3-4-20     |
| 35  | 2017 | Gas      | Non-Low Income Residential | EnergyWise Multifamily                   | 2017GasEnergyWise Multifamily                        | PUC 3-4-21     |
| 36  | 2017 | Gas      | Non-Low Income Residential | Residential New Construction             | 2017GasResidential New Construction                  | PUC 3-4-20     |
| 37  | 2018 | Electric | Commercial & Industrial    | Small Business Direct Install            | 2018ElectricSmall Business Direct Install            | PUC 3-4-22     |
| 38  | 2018 | Electric | Non-Low Income Residential | ENERGY STAR® Lighting                    | 2018ElectricENERGY STAR® Lighting                    | PUC 3-4-23     |
| 39  | 2018 | Electric | Non-Low Income Residential | Residential New Construction             | 2018ElectricResidential New Construction             | PUC 3-4-24     |
| 40  | 2018 | Gas      | Commercial & Industrial    | Small Business Direct Install            | 2018GasSmall Business Direct Install                 | PUC 3-4-22     |
| 41  | 2018 | Gas      | Commercial & Industrial    | Commercial & Industrial Multifamily      | 2018GasCommercial & Industrial Multifamily           | PUC 3-4-25     |
| 42  | 2018 | Gas      | Low Income Residential     | Single Family - Income Eligible Services | 2018GasSingle Family - Income Eligible Services      | PUC 3-4-26     |
| 43  | 2018 | Gas      | Low Income Residential     | Income Eligible Multifamily              | 2018GasIncome Eligible Multifamily                   | PUC 3-4-26     |
| 44  | 2018 | Gas      | Non-Low Income Residential | Residential New Construction             | 2018GasResidential New Construction                  | PUC 3-4-24     |
| 45  | 2020 | Electric | Commercial & Industrial    | Small Business Direct Install            | 2020ElectricSmall Business Direct Install            | PUC 3-4-27     |
| 46  | 2020 | Electric | Non-Low Income Residential | Residential New Construction             | 2020ElectricResidential New Construction             | PUC 3-4-28     |
| 47  | 2020 | Electric | Non-Low Income Residential | Energy Star® HVAC                        | 2020ElectricEnergy Star® HVAC                        | PUC 3-4-28     |
| 48  | 2020 | Electric | Non-Low Income Residential | Residential Consumer Products            | 2020ElectricResidential Consumer Products            | PUC 3-4-29     |

PUC Post-Decisional 3-5

Request:

Referencing page 11 of the Review, please provide a copy of each email “in which the holding of invoices was discussed, but the particular program could not be identified.”

Response:

On page 11 of the June 7, 2022, “Review of Invoices Within the Energy Efficiency Program” report, The Narragansett Electric Company indicated that it “also examined emails in which the holding of invoices was discussed, but the particular program could not be identified.” The set of emails to which that statement refers are attached as Attachment PUC 3-5-1 through 3-5-20 (Confidential).

To add context, the investigation collected approximately 5.2 million emails. After applying search terms, this resulted in approximately 162,000 responsive emails which were then reviewed by the forensic consultant.

REDACTED

To: [REDACTED]  
Cc: [REDACTED]  
From: [REDACTED]

Sent: Fri 12/7/2018 1:27:39 PM (UTC)  
Subject: RE: NE EE Gas 2018 Portfolios - update 12/06/2018

Hi [REDACTED]  
Sorry for delay in response. I was at MA statewide meeting most of yesterday.  
Yes, we have been monitoring. The overachievement of savings is due to Opower, which [REDACTED] has been addressing with external stakeholders all year. Hawk is not able to pay customers until we pay them so doing all possible, without impacting customer rebates. Happy to talk further.

---

From: [REDACTED]  
Sent: Thursday, December 06, 2018 12:30 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: FW: NE EE Gas 2018 Portfolios - update 12/06/2018

Hi [REDACTED] and [REDACTED]  
For RI Gas, does Residential want to consider holding back any invoices for this year, as the forecast is projecting 140%. Since we can't earn above 125%, it's wasted savings for 2018.

Thoughts?

---

From: [REDACTED]  
Sent: Thursday, December 06, 2018 12:27 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: NE EE Gas 2018 Portfolios - update 12/06/2018

Good afternoon,  
This is one of many emails that will be sent to you through year-end with important updates regarding the 2018 MA & RI EE Gas Portfolios. These emails will be distributed on Mondays and Thursdays through the end of the 2018 program year. If anyone was missed in the distribution, I apologize, but please forward and let me know to add them to future distributions. If you would like to be removed from the distribution list, please let me know. - [REDACTED]

Below are the current dashboards for claimed savings and year-end forecasts. The change from 12/04/2018 results in percentage points for both paid and forecasted is included in the  $\Delta$  columns.

- MA Claimed savings - 2018 total portfolio claimed savings increased 0.8% to 74% of 2018 filed goal.
  - C&I claimed savings saw no increase and remain at 65%, Resi-IE claimed savings increased 2.2% to 96%, and Resi claimed savings increased 1.1% to 75% of 2018 filed sector goals.
  - 16-18 3Y Plan Goal claimed to date increased 0.3% to 92%.
- MA Forecasted savings - C&I Program Operations & My Energy Solutions teams recently refined their programs' year-end forecasts.
  - 2018 total forecasted savings decreased 3.8% to 103% of the filed goal.
  - C&I forecast decreased 4% to 96%, Resi-LI is 106% and Resi is 111% of their filed 2018 goals-
    - Multi-Family New Construction decreased their forecast by 3.5% to 48% and Commercial Multi-Family Retrofit decreased by 2.7% to 104% of their assigned goals;
    - The savings forecast from LCI Sales' applications decreased 4.8% to 69% of their assigned goals;
      - LCI Sales' 2018 \*pipeline increased by ~712K Net Lifetime Therms
      - 2018 Custom Gas applications remaining to pay - upper pipeline - 129 (-2 since 12/04)
  - 16-18 3Y Plan forecast decreased 1.4% to 102% of goal.
- RI Claimed savings - 2018 total C&I Portfolio claimed savings increased 0.2% to 73% of the filed goal, Resi-IE Portfolio claimed savings increased 0.5% to 101% & Resi Portfolio claimed savings increased 1.2% to 115% of their filed goals.
- RI Forecasted savings - C&I Program Operations & My Energy Solutions teams recently refined their programs' year-end





REDACTED

[Redacted]

[Redacted]

[Redacted]

REDACTED

To: [REDACTED]  
From: [REDACTED]  
Sent: Wed 11/7/2018 1:51:14 PM (UTC)  
Subject: RE: follow up to staff re: year end

Thank you.

---

From: [REDACTED]  
Sent: Wednesday, November 07, 2018 8:50 AM  
To: [REDACTED]  
Subject: RE: follow up to staff re: year end

Hi [REDACTED]  
Please my notes in red below.

Holding invoices has been done almost every year , but it's a delicate exercise not to trigger any customer or contractor, Hers rater issues.

In the past when strategy was serious about over spending, they will give me a number in \$\$ to work with , then figure with CR who/ how to differ invoices.

Also, holding gas invoices will also impact the electric spending and savings for homes are both gas & electric.

Thanks,  
[REDACTED]

---

From: [REDACTED]  
Sent: Wednesday, November 07, 2018 7:29 AM  
To: [REDACTED]  
Subject: follow up to staff re: year end

Hi [REDACTED]  
As a follow up to yesterday's staff meeting where we discussed tactics for year end, a couple of questions:

1. How often do your gas vendors, specifically RI NC, invoice? Monthly, bi-weekly etc **Both MA & RI invoice once a month**
2. Are they able to invoice more frequently, through end of year, to give us better control over the amounts? So instead of getting one large invoice, perhaps we could get more smaller ones, say weekly? **MA Can't , but RI always invoice twice in December if needed, can invoice before yearend closing in January.**
3. Who is your contact at CLEAResult? **Rachel Pinnons** Are there other vendors that manage this program or mostly just CR? **No**  
Can you get an idea of how many therms/kwh they have in pipeline that have not been invoiced yet? Thanks. **With additional \$95,000 in spend & around 4,359 annual therms.**
- 4.

[REDACTED]

REDACTED

To: [REDACTED]  
Cc: [REDACTED]  
From: [REDACTED]

Sent: Wed 2/6/2019 4:12:05 AM (UTC)  
Subject: RE: Best Buy TV Overages and Extension approval

Thanks [REDACTED]

1. I will not pay for Nov. or Dec. Best Buy overages.
2. Yes, I will pay for RI December invoice to be counted toward 2013.
3. Yes, I approve

---

From: [REDACTED]  
Sent: Thursday, January 10, 2013 12:56 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: Best Buy TV Overages and Extension approval  
Importance: High

Hi [REDACTED]

National Grid's MA Best Buy program ended on 5/31 and RI's program ended on 11/30. You have a few options to consider.

1. For MA, if you would like to take credit for November and December sales, November's units are \$69,480 or 3,474 5.3 units and December's units are \$73,880 or 3,694 5.3 units. You can choose to reject these both of these overages, pay for November or pay for both November and December. November and December would count towards 2013's goals, 5.3 units only.
2. The RI program did not have any overages, however the program did end on 11/31. Would you like to accept the December invoice of \$14,400 which is 1,440 5.3 units?
3. Last question, do you approve of the attached 2013 extension for this program 1/1-2/28? I had funding of \$200k for MA and \$40k for RI. This includes 5.3 models and Top 10 models.

Hopefully this is not too confusing, I know I was confused at first, please let me know if you have any questions or would like to have a call to review.

Thanks,

[REDACTED]  
[REDACTED]  
[REDACTED]

---

From: [REDACTED]  
Sent: Thursday, January 10, 2013 11:57 AM  
To: [REDACTED]  
Subject: Re: FW: EXTERNAL: Best Buy November and December Pre-Processing (2010-652)

Here are replacement charts (monthly expected payments as well as overall budget). The only change is that they now include valid ESTAR amounts for NGRID MA for November and December.

| <b>Best Buy November</b> |                  |                           |                       |
|--------------------------|------------------|---------------------------|-----------------------|
| <b>Sponsor</b>           | <b>Requested</b> | <b>Valid (E-Star 5.3)</b> | <b>Invalid Models</b> |
| CLC                      | \$10,800         | \$6,720                   | \$4,080               |
| NSTAR                    | \$102,400        | \$64,740                  | \$37,660              |
| WMECO                    | \$12,460         | \$8,120                   | \$4,340               |
| UNITIL                   | \$2,000          | \$1,320                   | \$680                 |
| NGRID MA                 | \$107,660        | \$69,480                  | \$38,180              |
| NGRID RI                 | \$18,330         | \$11,820                  | \$6,510               |
| <b>Totals</b>            | <b>\$253,650</b> | <b>\$162,200</b>          | <b>\$91,450</b>       |
| %                        | 100%             | 63.9%                     | 36.1%                 |

| <b>Best Buy December</b> |                  |                           |                       |
|--------------------------|------------------|---------------------------|-----------------------|
| <b>Sponsor</b>           | <b>Requested</b> | <b>Valid (E-Star 5.3)</b> | <b>Invalid Models</b> |
| CLC                      | \$11,100         | \$7,920                   | \$3,180               |
| NSTAR                    | \$88,760         | \$66,860                  | \$21,900              |
| WMECO                    | \$13,000         | \$10,200                  | \$2,800               |
| UNITIL                   | \$1,400          | \$940                     | \$460                 |

|               |                  |                  |                 |
|---------------|------------------|------------------|-----------------|
| NGRID MA      | \$97,540         | \$73,880         | \$23,660        |
| NGRID RI      | \$19,170         | \$14,400         | \$4,770         |
| <b>Totals</b> | <b>\$230,970</b> | <b>\$174,200</b> | <b>\$56,770</b> |
| %             | 100%             | 75.4%            | 24.6%           |

REDACTED

| Totals   | Amen d. 24 Fundi ng | Jan \$ Grant ed | Feb \$ Grant ed | Marc h \$ Grant ed | April \$ Grant ed | May \$ Grant ed | June \$ Grant ed | July \$ Grant ed | Augus t \$ Grant ed | Septem ber \$ Granted | Octob er \$ Grant ed | Novem ber \$ to be Granted | Rema ing \$ (expi 11/30) |
|----------|---------------------|-----------------|-----------------|--------------------|-------------------|-----------------|------------------|------------------|---------------------|-----------------------|----------------------|----------------------------|--------------------------|
| NGRID RI | \$86,910            | \$8,840         | \$8,370         | \$8,000            | \$6,580           | \$5,120         | \$0              | \$0              | \$0                 | \$5,420               | \$6,970              | \$11,820                   | \$25,000                 |
| NGRID MA | \$158,440           | \$46,280        | \$40,840        | \$37,080           | \$34,240          | \$0             | \$0              | \$0              | \$0                 | \$0                   | \$0                  | \$69,480                   | (\$69,480)               |
| NSTAR    | \$235,800           | \$46,680        | \$43,580        | \$38,860           | \$36,560          | \$0             | \$0              | \$0              | \$0                 | \$32,560              | \$37,560             | \$64,740                   | (\$64,740)               |
| CLC      | \$30,160            | \$5,060         | \$4,620         | \$3,960            | \$4,500           | \$4,020         | \$0              | \$0              | \$0                 | \$3,680               | \$4,320              | \$6,720                    | (\$6,720)                |
| WMECO    | \$45,620            | \$6,260         | \$5,620         | \$6,120            | \$4,040           | \$3,580         | \$0              | \$0              | \$0                 | \$3,260               | \$3,940              | \$8,120                    | \$4,000                  |
| UNITIL   | \$8,000             | \$980           | \$920           | \$760              | \$860             | \$540           | \$680            | \$360            | \$560               | \$400                 | \$720                | \$1,320                    | (\$1,320)                |

Thanks,

[Redacted]

On 1/10/2013 8:43 AM, [Redacted] wrote:

What was the valid ESTAR for NGRID MA in November and December? Do you have this readily available?

Thanks,

[Redacted]

To: [REDACTED]

REDACTED

Subject: EXTERNAL: Best Buy November and December Pre-Processing (2010-652)

We have pre-processed Best Buy's November and December sales data, and here are the forecasted numbers (As NGRID MA is not actively participating in the program at this time, all NGRID MA transactions have been grouped in the Invalid column. If they change their mind, please let me know).

The pending payments for November alone will cause overages for NSTAR, CLC, and UNITIL. If the December amounts are issued as well, WMECO will go over too. If the sponsors want to increase funding to accommodate these payments please send an amendment, and if not please let me know.

| Best Buy November |                  |                    |                  |
|-------------------|------------------|--------------------|------------------|
| Sponsor           | Requested        | Valid (E-Star 5.3) | Invalid Models   |
| CLC               | \$10,800         | \$6,720            | \$4,080          |
| NSTAR             | \$102,400        | \$64,740           | \$37,660         |
| WMECO             | \$12,460         | \$8,120            | \$4,340          |
| UNITIL            | \$2,000          | \$1,320            | \$680            |
| NGRID MA          | \$107,660        | \$0                | \$107,660        |
| NGRID RI          | \$18,330         | \$11,820           | \$6,510          |
| <b>Totals</b>     | <b>\$253,650</b> | <b>\$92,720</b>    | <b>\$160,930</b> |
| %                 | 100%             | 36.6%              | 63.4%            |

| Best Buy December |           |                    |                |
|-------------------|-----------|--------------------|----------------|
| Sponsor           | Requested | Valid (E-Star 5.3) | Invalid Models |
| CLC               | \$11,100  | \$7,920            | \$3,180        |
| NSTAR             | \$88,760  | \$66,860           | \$21,900       |
| WMECO             | \$13,000  | \$10,200           | \$2,800        |

|               |                  |                  |                   |
|---------------|------------------|------------------|-------------------|
| UNITIL        | \$1,400          | \$940            | REDACTED<br>\$460 |
| NGRID MA      | \$97,540         | \$0              | \$97,540          |
| NGRID RI      | \$19,170         | \$14,400         | \$4,770           |
| <b>Totals</b> | <b>\$230,970</b> | <b>\$100,320</b> | <b>\$130,650</b>  |
| %             | 100%             | 43.4%            | 56.6%             |

| Totals   | Amend . 24 Funding | Jan \$ Grant ed | Feb \$ Grant ed | March \$ Grant ed | April \$ Grant ed | May \$ Grant ed | June \$ Grant ed | July \$ Grant ed | August \$ Grant ed | September \$ Granted | October \$ Grant ed | November \$ to be Granted | Remaining \$ (exp 11/3) |
|----------|--------------------|-----------------|-----------------|-------------------|-------------------|-----------------|------------------|------------------|--------------------|----------------------|---------------------|---------------------------|-------------------------|
| NGRID RI | \$86,910           | \$8,840         | \$8,370         | \$8,000           | \$6,580           | \$5,120         | \$0              | \$0              | \$0                | \$5,420              | \$6,970             | \$11,820                  | \$25,000                |
| NGRID MA | \$158,440          | \$46,280        | \$40,840        | \$37,080          | \$34,240          | \$0             | \$0              | \$0              | \$0                | \$0                  | \$0                 | \$0                       | \$0                     |
| NSTAR    | \$235,800          | \$46,680        | \$43,580        | \$38,860          | \$36,560          | \$0             | \$0              | \$0              | \$0                | \$32,560             | \$37,560            | \$64,740                  | (\$6,000)               |
| CLC      | \$30,160           | \$5,060         | \$4,620         | \$3,960           | \$4,500           | \$4,020         | \$0              | \$0              | \$0                | \$3,680              | \$4,320             | \$6,720                   | (\$6,720)               |
| WMECO    | \$45,620           | \$6,260         | \$5,620         | \$6,120           | \$4,040           | \$3,580         | \$0              | \$0              | \$0                | \$3,260              | \$3,940             | \$8,120                   | \$4,000                 |
| UNITIL   | \$8,000            | \$980           | \$920           | \$760             | \$860             | \$540           | \$680            | \$360            | \$560              | \$400                | \$720               | \$1,320                   | (\$1,320)               |

Thanks,



REDACTED

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REDACTED

To: [REDACTED]  
From: [REDACTED]  
Sent: Mon 11/18/2013 2:47:38 AM (UTC)  
Subject: RE: RIEC 2014 Proposal

I agree with [REDACTED] Plenty of money left for you to use [REDACTED]

---  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

From: [REDACTED]  
Sent: Friday, November 15, 2013 1:34 PM  
To: [REDACTED]  
Subject: RE: RIEC 2014 Proposal

That should be fine. We are still in negotiations with SmartPower over the proposed increase. I would prefer not to make a payment in 2013, so we'll be lobbying to push out to 2014.

---

From: [REDACTED]  
Sent: Friday, November 15, 2013 11:53 AM  
To: [REDACTED]  
Subject: RE: RIEC 2014 Proposal

Just checking to see if you do plan to use all/any of RI Community marketing budget towards SmartPower's December payment. A request just came up to develop some banners for community events and I'd like to charge this budget. Thanks.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

From: [REDACTED]  
Sent: Wednesday, November 06, 2013 2:42 PM  
To: [REDACTED]  
Subject: RE: RIEC 2014 Proposal

Hi All,

There is money left in RI Community (residential & commercial) marketing budgets totaling about \$100,000, if want to use that towards SmartPower's December payment.

\$320,000 sound like a ton of money for grassroots/community efforts in 2014! We used CET for community outreach for Efficient Neighborhoods Plus initiative in two towns in MA and it was very reasonable. Approx. \$10,000 for 3 months. Attached is a proposal that outlines their billing structure and specifically the services they provided for cost as a comparison.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Monday, November 04, 2013 5:38 PM  
**To:** [REDACTED]  
**Subject:** RE: RIEC 2014 Proposal

Hey All - The proposed 2014 budget of \$320,000 is \$120,000 increase (60%) over the 2013 cost of \$200,000. That's pretty significant, and more than a little unexpected. When we did the 2014 planning, I didn't approach SmartPower directly because they were still considered a subcontractor of Opower. At that time, I asked [REDACTED] if he thought their 2014 services were priced similar to 2013 and he assumed so. So I think [REDACTED] and I may have added 10% and used a figure of \$220,000.

I think SmartPower has done a great job so far and is poised to do more great work in 2014. If you guys feel we have the room in other budget areas to take the extra spend, we can consider the proposed increase. However, I think we're already leaning on other budgets (like Community) to help finance the 2014 Opower budget as it stands.

Also, I noted that SmartPower wants the first payment of \$106,667 by December 1, 2013. There are a couple of issues with that:

- 1) We don't even have a separate contract with them yet. And there is no PO set up in the InDemand or SAP. And I'm not sure we could get that set up in 3 weeks.
- 2) What would that do to the 2013 BCR? We still have two outstanding 2013 invoices from Opower totaling about \$372,000. I was sitting on these pending word from [REDACTED] as to whether we can pay these in 2013 without further destroying the BCR. But if we hold them until 2014, that might be even worse on the 2014 BCR.
- 3) Lastly, there is a fundamental question about the value of our community-driven efforts. I had assumed they would increase Opower savings, but both gas and electric are REALLY struggling. I'm wondering if SmartPower isn't actually helping with an uptick in Home Energy Audits and general community goodwill (customer satisfaction), rather than directly boosting Opower savings.

Let me know your thoughts. Thanks.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, October 31, 2013 1:51 PM  
**To:** [REDACTED]  
**Subject:** FW: RIEC 2014 Proposal

And here is their 2014 proposal. They want a raise of about \$100K to hire another Matt, so we'll need to talk about how this hits our budget. Asher is trying to schedule a call for us to chat with him and his analytics team at some point soon, at which point we can start nailing down 2014 gap closing strategies.

---  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

**From:** [Redacted]  
**Sent:** Thursday, October 31, 2013 11:52 AM  
**To:** [Redacted]  
**Cc:** [Redacted]  
**Subject:** RIEC 2014 Proposal

Hi [Redacted]

Here is SmartPower's proposal for our plans and budget for the Rhode Island Energy Challenge for 2014. We are super excited to continue this great campaign to promote energy efficiency with National Grid that we have started in Rhode Island.

Please let us know if you have any questions or any need additional information. We are looking forward to working with you and the entire National Grid team!

Thanks.  
[Redacted]

[Redacted]  
[Redacted]

-----  
**SmartPower**

[Redacted]  
[Redacted]  
[Redacted]

- <http://www.smartpower.org>
- <http://solarizect.com>
- <http://www.findyourfour.com>

REDACTED

To:

From:

Sent: Fri 1/16/2015 4:33:27 PM (UTC)  
Subject: RE: EE Reporting Year End Accruals Update as of Jan 9th

Hello,

I have created payment requests for admin and post inspection invoices so the work that was done in 2014 will be paid with 2014 dollars. These were not huge dollars.

I will not be paying accrued Gas Applications (custom or prescriptive) per budget constraints and the fact, the team reached the savings goal.

The accrued gas applications will be paid in 2015 as they move to QA status and I will review them.

We are focusing on 2015 savings now.

Thank you.

---

From: [REDACTED]  
Sent: Friday, January 16, 2015 11:26 AM  
To: [REDACTED]  
Subject: Fwd: EE Reporting Year End Accruals Update as of Jan 9th

Sent from my iPhone  
Begin forwarded message:

From: [REDACTED]  
Date: January 16, 2015 at 11:23:38 AM EST  
To: [REDACTED]  
Subject: RE: EE Reporting Year End Accruals Update as of Jan 9th

Update -- 16 apps remaining in New England. Several are now at payment authorized : ) Looking forward to 6 pm deadline

---

Friday, January 16, 2015 10:48 AM  
: RE: EE Reporting Year End Accruals Update as of Jan 9th

We have 28 apps remaining in New England that we had anticipated initially coming in with expected completion dates in 2014. Most should come in --- there are 4 [REDACTED] apps from RI that will not come in...discussed w/ Fred & EEA this morning. They were low units...

Will keep you posted.

Friday, January 16, 2015 10:40 AM

FW: EE Reporting Year End Accruals Update as of Jan 9th

How are things progressing? Are we in good shape to have everything paid for today?

[Redacted]

**From:** [Redacted]  
**Sent:** Monday, January 12, 2015 6:48 PM

**To:** [Redacted]

**Cc:** [Redacted]

**Subject:** RE: EE Reporting Year End Accruals Update as of Jan 9th

Thank you for the report.

EE team, we need to get the invoices in and processed. Too much not paid for these accruals and we have this week to settle. How can I help?

**From:** [Redacted]  
**Sent:** Monday, January 12, 2015 4:07 PM

**To:** [Redacted]

**Cc:** [Redacted]

**Subject:** EE Reporting Year End Accruals Update as of Jan 9th

<< OLE Object: Picture (Device Independent Bitmap) >>

Hello,  
Please see the table below for the second update of the Energy Efficiency Year End Accruals as of close of business, Friday, Jan 9<sup>th</sup>. The next update will be as of end of day Wednesday, Jan 14<sup>th</sup>, delivered to you on Thursday, Jan 15<sup>th</sup>. If you have any questions, concerns, or require details to any payments made, please contact [Redacted] or [Redacted]

Regards,  
[Redacted]

| SAP Co. | Co. Desc. | Total Accrued  | Paid (01/12/15 6:00AM) | Remainder To Pay |
|---------|-----------|----------------|------------------------|------------------|
| 5210    | NIMO-E    | \$3,776,663.79 | \$1,316,418.03         | \$2,460,245.76   |
|         | NIMO-G    | \$812,856.67   | \$11,118.57            | \$801,738.10     |

|                    |                   |                        |                 |                       |                        |
|--------------------|-------------------|------------------------|-----------------|-----------------------|------------------------|
| <b>5210 Total</b>  |                   | <b>\$4,589,520.46</b>  | <b>REDACTED</b> | <b>\$1,327,536.60</b> | <b>\$3,261,983.86</b>  |
|                    | <b>5220</b> KEDNY | \$146,616.10           |                 | \$6,162.04            | \$140,454.06           |
| <b>5220 Total</b>  |                   | <b>\$146,616.10</b>    |                 | <b>\$6,162.04</b>     | <b>\$140,454.06</b>    |
|                    | <b>5230</b> KEDLI | \$215,514.87           |                 | \$267.50              | \$215,247.37           |
| <b>5230 Total</b>  |                   | <b>\$215,514.87</b>    |                 | <b>\$267.50</b>       | <b>\$215,247.37</b>    |
|                    | <b>5310</b> MECO  | \$21,123,471.92        |                 | \$5,114,173.88        | \$16,009,298.04        |
| <b>5310 Total</b>  |                   | <b>\$21,123,471.92</b> |                 | <b>\$5,114,173.88</b> | <b>\$16,009,298.04</b> |
|                    | <b>5320</b> NAECO | \$43,265.11            |                 | \$4,640.80            | \$38,624.31            |
| <b>5320 Total</b>  |                   | <b>\$43,265.11</b>     |                 | <b>\$4,640.80</b>     | <b>\$38,624.31</b>     |
|                    | <b>5330</b> BOS-G | \$5,914,211.14         |                 | \$421,081.06          | \$5,493,130.08         |
| <b>5330 Total</b>  |                   | <b>\$5,914,211.14</b>  |                 | <b>\$421,081.06</b>   | <b>\$5,493,130.08</b>  |
|                    | <b>5340</b> COL-G | \$1,647,232.87         |                 | \$72,346.74           | \$1,574,886.13         |
| <b>5340 Total</b>  |                   | <b>\$1,647,232.87</b>  |                 | <b>\$72,346.74</b>    | <b>\$1,574,886.13</b>  |
|                    | <b>5360</b> NECO  | \$5,489,810.97         |                 | \$1,767,950.36        | \$3,721,860.61         |
|                    | RIGAS             | \$301,925.53           |                 | \$142,290.19          | \$159,635.34           |
| <b>5360 Total</b>  |                   | <b>\$5,791,736.50</b>  |                 | <b>\$1,910,240.55</b> | <b>\$3,881,495.95</b>  |
| <b>Grand Total</b> |                   | <b>\$39,471,568.96</b> |                 | <b>\$8,856,449.17</b> | <b>\$30,615,119.79</b> |

**To:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Fri 11/30/2018 12:39:29 PM (UTC)  
**Subject:** FW: 2018 RI Residential Sector

Can you let me know about RNC, see below. I am expected to go over budget and may need to stop workpackage uploads if there isn't \$\$ elsewhere.

---

**From:** [REDACTED]  
**Sent:** Wednesday, November 28, 2018 11:29 AM  
**To:** [REDACTED]  
**Subject:** RE: 2018 RI Residential Sector

For EW single family gas it is tough to say since it is mainly deemed savings and we are projection 100% spend and 105% savings. We may be able to hit the savings with slightly lower spend but we are currently as 94% savings and 85% spend.

Thanks,

---

**From:** [REDACTED]  
**Sent:** Wednesday, November 28, 2018 11:07 AM  
**To:** [REDACTED]  
**Subject:** RE: 2018 RI Residential Sector

Thanks [REDACTED]  
From latest scorecard it looks like most obvious areas where there might be some money is NC, EW or EW MF. Residential portfolio-wise it looks like there is room for the additional spend.

---

**From:** [REDACTED]  
**Sent:** Wednesday, November 28, 2018 9:58 AM  
**To:** [REDACTED]  
**Subject:** 2018 RI Residential Sector

Hi RI Gas team:

To reduce RI Resi Savings for 2018, my vendor will upload data workpackages after YE, so savings can count towards 2019.

Incentive invoices are being billed to my program as a Miscellaneous expense against incentive budget.

My RI Resi GAS Incentive budget is now projected to overspend. At the moment to pay existing RI customers for rebates I am hoping to secure \$90K.

Does anyone have \$90K to spare from 2018 budget?? If not, I will work with vendor to come up with Plan B.

If so, I will run by Courtney & Rachel.

[REDACTED]  
[REDACTED]  
[REDACTED]



**To:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Tue 1/17/2017 4:37:05 PM (UTC)  
**Subject:** RE: EXT || FW: 2016 Fall Cool Cash - Rebate Confirmation

Thank you!!!

---

**From:** [REDACTED]  
**Sent:** Tuesday, January 17, 2017 8:37 AM  
**To:** [REDACTED]  
**Subject:** RE: EXT || FW: 2016 Fall Cool Cash - Rebate Confirmation

Hi [REDACTED]  
For budgetary reasons, we decided to hold on to November/December invoices until 2017 . The first batch should be released for payment either this week or next week. I will double check the progress of the claim with my vendor and circle back to you.

Thanks,  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Monday, January 16, 2017 12:34 PM  
**To:** [REDACTED]  
**Subject:** EXT || FW: 2016 Fall Cool Cash - Rebate Confirmation

[REDACTED]  
When you get a chance, could you check on the NGrid rebate of my 4 ton AC unit? I got a rebate from [REDACTED] already and [REDACTED] said they completed all the NGrid forms in December.

[REDACTED]  
Thnx.

---

**From:** [REDACTED]  
**Sent:** Monday, January 16, 2017 10:05 AM  
**To:** [REDACTED]  
**Subject:** RE: 2016 Fall Cool Cash - Rebate Confirmation

Hi [REDACTED] We answered a request for additional information in early December. The rebate amount for the 4-ton unit was \$ 250.00 (higher on the 3-ton proposal). You should expect to see in soon.

---

**From:** [REDACTED]  
**Sent:** Friday, January 13, 2017 3:33 PM  
**To:** [REDACTED]  
**Subject:** RE: 2016 Fall Cool Cash - Rebate Confirmation

Ditto for info on my rebate???

---

**From:** [REDACTED]  
**Sent:** Tuesday, December 06, 2016 9:06 AM  
**To:** [REDACTED]  
**Subject:** RE: 2016 Fall Cool Cash - Rebate Confirmation

[REDACTED] Did you fill out the National Grid application for the \$500 rebate for me? I did get the Carrier rebate last week and now want



to make sure I get the National Grid rebate. [REDACTED] REDACTED

**From:** [REDACTED]  
**Sent:** Wednesday, November 09, 2016 12:02 PM  
**To:** [REDACTED]  
**Subject:** RE: 2016 Fall Cool Cash - Rebate Confirmation

Thank you and please send me a copy.

**From:** [REDACTED]  
**Sent:** Wednesday, November 09, 2016 11:46 AM  
**To:** [REDACTED]  
**Subject:** RE: 2016 Fall Cool Cash - Rebate Confirmation

Hi [REDACTED]  
If I didn't, I will next week and copy you on it. I'm working on the Carrier Rebates now because the expire on November 15<sup>th</sup>.

**From:** [REDACTED]  
**Sent:** Wednesday, November 09, 2016 11:50 AM  
**To:** [REDACTED]  
**Subject:** FW: 2016 Fall Cool Cash - Rebate Confirmation

[REDACTED]

I got this from Carrier, but did [REDACTED] fill out the forms for NGrid rebate - <https://www.smartenergy-zone.com/nationalgridri/pdf/GLT.pdf>? So I can get that \$500 too? I thought you guys handled that?

Thnx.

[REDACTED]

**From:** [REDACTED]  
**Sent:** Wednesday, November 09, 2016 10:49 AM  
**To:** [REDACTED]  
**Subject:** 2016 Fall Cool Cash - Rebate Confirmation

Thank you and congratulations on your Carrier purchase!

It is recommended that you print a copy of this confirmation page for your records. Upon final approval, you should receive your Carrier Cool Cash rebate within 4-6 weeks. **Rebates are paid with a prepaid card mailed to your address listed below.** Once the card is received, you may request a direct deposit or use the card where accepted. Additional details will be provided with the card, **PLEASE USE THE CARD RIGHT AWAY. Your CITI PREPAID SERVICES Card expires on the date embossed on the front of the card.** You may not use your CITI PREPAID SERVICES Card after the Expiration Date.

Thank you again for purchasing Carrier products. We hope you continue to *Turn to the Experts* for all of your future heating or cooling needs.

**2016 Fall Cool Cash**  
Your Claim Confirmation Number is **389274206914**. Your calculated rebate is **\$ 700**.

**Sale Information**  
**Sale Date:** 10/10/2016

**Install Date:** 10/10/2016  
**Total Sale:** 12450.00  
**Invoice # / Job Code:** 2016132

REDACTED

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 5189  
Attachment PUC 3-5-7 (Redacted)  
Page 3 of 3

**Dealer Information**

J K L Engineering (HVAC ID# 5027)  
Providence, RI

**Sales Representative:** Ken Adams (223326)

**Customer Information**



**Product Information**

AIR CONDITIONER - 24ANB1(1216E18712)  
FAN COIL - FE(1216A85921)  
CONTROLS - SYSTXCCITC01-A(1116W001833)

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**To:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Mon 11/16/2015 2:32:31 PM (UTC)  
**Subject:** RE: EXTRNL SENDR || Please Approve-ATP for RI Energy Modelling

Thanks Ishaga. I have communicated to ICF and noted that we need a separation between residential and commercial.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Monday, November 16, 2015 9:08 AM  
**To:** [REDACTED]  
**Subject:** RE: EXTRNL SENDR || Please Approve-ATP for RI Energy Modelling

Hi [REDACTED]  
This invoice can be processed and paid as part of this year's budget or next year. What I will need from you for each project is to identify and separate invoices between Residential and C&I, which are funded by 2 different budgets in term of Incentives and STAT.

Thanks,  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Monday, November 16, 2015 6:57 AM  
**To:** [REDACTED]  
**Subject:** FW: EXTRNL SENDR || Please Approve-ATP for RI Energy Modelling

Hello [REDACTED] and [REDACTED]

This is what I received back from ICF, a proposal for funding on this year's budget. Can you cover this amount this year or do you need it to go to next year? It's short money to just get the modeling completed so I can influence the project. Do we ask them to bill us after our deadlines and tell them they will get paid in early 2016?

Thanks,  
[REDACTED]

Thanks,  
[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, November 13, 2015 12:50 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** EXTRNL SENDR || Please Approve-ATP for RI Energy Modelling

[REDACTED] as a follow up to our call, could you please approve this Authorization to Proceed (ATP) email to have ICF assist in modeling the River House Graduate Apartments on behalf of National Grid Rhode Island (Customer).

This email is to confirm that National Grid authorizes ICF to provide energy modelling services and shall not exceed the agreed upon sum of \$2,000.00 (Two thousand dollars).

The period of performance authorized by this email is to end no later than December 31, 2015. In consideration of the Services provided, ICF shall send invoices to the Customer and Customer agrees to pay ICF per invoice terms. The Customer will be invoiced after receiving and approving the final energy model. ICF's services are provided on fixed price basis per building and shall not exceed the total contract value without Customer's further approval.

Please reply that you agree to the terms written above or if you have any questions or require any additional information.

REDACTED

Regards,

[Redacted]

[Redacted]

[Redacted]

---

REDACTED

To: [REDACTED]  
Cc: [REDACTED]  
From: [REDACTED]

Sent: Fri 5/31/2019 2:03:27 AM (UTC)  
Subject: RE: November Invoice

Hi [REDACTED]  
After review of the year to date spending , we realized that we are already above the program spending limit. It's unfortunate, but at this time we cannot accept any more payment between now and December.  
Please next year track gas and electric spending separately. Since you never mentioned the electric spending , I thought we have enough money and wasn't concerned at all , I would very much apologize

Thanks,  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Tuesday, November 25, 2014 8:39 AM  
**To:** [REDACTED]  
**Subject:** November Invoice

Hi [REDACTED]  
It was good to see you yesterday. We certainly covered a lot of topics! I did want to confirm whether we can submit a November invoice with the following amounts:

- Electric: \$81K
- Gas: \$34K
- Grace Church: \$15K

If there is the possibility of additional funding beyond the amounts listed above please let me know and I can put together an estimate for December.

Thank you.  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

To: [REDACTED]  
From: [REDACTED]  
Sent: Thur 11/9/2017 5:54:56 PM (UTC)  
Subject: EXT || RE: Gas Savings Goal

[REDACTED]  
Yes. We will ear mark all new opportunities for 2018.

In the numbers below, we had a project drop in that came off of a non-part follow up (so we did not have this in the pipeline reporting previously.) This was nearly 8,000 therms!

Regards,  
[REDACTED]

---

From: [REDACTED]  
Sent: Thursday, November 09, 2017 10:51 AM  
To: [REDACTED]  
Subject: Gas Savings Goal

Hi [REDACTED]

I was looking at the numbers today and see that RISE has exceeded the gas goal of 38,212 Net Annual Therms by quite a bit with what is in the pipeline. Where I only forecasted to meet the original goal and even requested a slight reduction in 2018 numbers, I'd like to ask that we start holding back or pulling back on doing any further gas measures for 2017? Maybe anything new that comes in can be installed in early 2018 and we can start the year with a nice cushion?

|                        |         |                        | Data                   |                                 |
|------------------------|---------|------------------------|------------------------|---------------------------------|
| Vendor                 | State   | Status                 | Sum of NG Contribution | Sum of Annual Net Therm Savings |
| RISE ENGINEERING       | RI      | Contract Signed        | 240.79                 | 444.06043                       |
|                        |         | Installation Scheduled | 1439.42                | 2085.819                        |
|                        |         | Installation Started   | 15760.67               | 18263.18817                     |
|                        |         | Invoiced               | 2567.12                | 4064.20948                      |
|                        |         | Paid                   | 23222.08               | 26689.68081                     |
|                        |         | RI Total               |                        | 43230.08                        |
| RISE ENGINEERING Total |         |                        | 43230.08               | 51546.95789                     |
| (blank)                | (blank) | (blank)                |                        |                                 |
| (blank) Total          |         |                        |                        |                                 |
| Grand Total            |         |                        | 43230.08               | 51546.95789                     |

Thanks,  
[REDACTED]

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REDACTED

To: [REDACTED]  
From: [REDACTED]

Sent: Mon 1/13/2020 8:39:11 PM (UTC)  
Subject: RE: EXT || RE: TRAVEL LEATHER ESR NO. 102484, GAS APP NO. 10463294

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 5189  
Attachment PUC 3-5-11 (Redacted)  
Page 1 of 3

Will do. Dan just replied to Shane that the incentive will stay the same. Have a good night.

[REDACTED]

---

From: [REDACTED]  
Sent: Monday, January 13, 2020 3:35 PM  
To: [REDACTED]  
Subject: RE: EXT || RE: TRAVEL LEATHER ESR NO. 102484, GAS APP NO. 10463294

Ok. Hold off on paying this one until 2019 is over.

[REDACTED]

---

From: [REDACTED]  
Sent: Monday, January 13, 2020 3:33 PM  
To: [REDACTED]  
Subject: FW: EXT || RE: TRAVEL LEATHER ESR NO. 102484, GAS APP NO. 10463294

Hi [REDACTED]

FYI

[REDACTED]

---

From: [REDACTED]  
Sent: Monday, January 13, 2020 3:20 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: EXT || RE: TRAVEL LEATHER ESR NO. 102484, GAS APP NO. 10463294

[REDACTED]

[REDACTED] and I conducted the child post (app# 10866434) associated with the pipe insulation that was installed at Travel Leather on January 10<sup>th</sup>. We found a couple small discrepancies during our visit and had to revise the savings. Please see updated project economics below:

Initial Project Savings: 17,822 therms (80% has been claimed in the parent app, or 14,258 therms)



Revised Project Savings: 15,893 therms

The reduction in therm savings can be attributed to some of the piping being located in conditioned space as well as some piping being replaced with smaller diameter piping.

Therefore about 1,635 therms may be claimed in the child app to complete the application.

Please confirm that the incentive should remain unchanged.

Thank you for your time; I look forward to hearing from you.

[Redacted]

---

**From:** [Redacted]  
**Sent:** Friday, December 27, 2019 10:34 AM  
**To:** [Redacted]  
**Cc:** [Redacted]  
**Subject:** RE: EXT || RE: TRAVEL LEATHER ESR NO. 102484, GAS APP NO. 10463294

Thank you very much.

[Redacted]

---

**From:** [Redacted]  
**Sent:** Monday, December 23, 2019 4:43 PM  
**To:** [Redacted]  
**Cc:** [Redacted]  
**Subject:** EXT || RE: TRAVEL LEATHER ESR NO. 102484, GAS APP NO. 10463294

Good Afternoon [Redacted]

Please be advised that the Post Inspection for this project is now complete. I have uploaded all post inspection documentation directly to gas app. no. **10463294**.

Please feel free to let us know if any additional information/clarification is needed.

Thank you,

[Redacted]

REDACTED

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RIPUC Docket No. 5189  
Attachment PUC 3-5-11 (Redacted)  
Page 3 of 3

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To: [REDACTED]  
Sent: Thur 1/11/2018 3:50:10 PM (UTC)  
Subject: RE: Please do not create RI Incentive Payments...

Thank you both!

---

From: [REDACTED]  
Sent: Thursday, January 11, 2018 10:49 AM  
To: [REDACTED]  
Subject: RE: Please do not create RI Incentive Payments...

Yes. We chatted yesterday & she is holding the payment.

Thank you,

[REDACTED]

---

From: [REDACTED]  
Sent: Thursday, January 11, 2018 10:48 AM  
To: [REDACTED]  
Subject: RE: Please do not create RI Incentive Payments...

Hi,

I would not process the payment until next week but let me confirm with [REDACTED]

[REDACTED] should [REDACTED] hold off on payment on the application she has outlined below?

Thank you,

[REDACTED]

---

From: [REDACTED]  
Sent: Thursday, January 11, 2018 10:47 AM  
To: [REDACTED]  
Subject: RE: Please do not create RI Incentive Payments...

Hi - I just want to confirm whether or not I should pay this open RI application – it was being watched closely. I wasn't sure if it was still being included in the forecast since it was posted by 12/31.

6911935 Ocean State Job Lot - Perf Ltg  
Gross Annual kWh Savings 1,666,525 kWh

---

From: [REDACTED]  
Sent: Wednesday, January 03, 2018 9:12 AM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: Please do not create RI Incentive Payments...

Hi,

[REDACTED] has asked that we hold off on creating any more RI Incentive payments for 2017 for now. She will let us know when we can begin again.

Thank you,

[REDACTED]

To: [REDACTED]  
Cc: [REDACTED]  
From: [REDACTED]  
Sent: Wed 1/15/2014 5:45:01 PM (UTC)  
Subject: RE: 2014 Oil and Propane Weatherization payments

Awesome thank you.

---

From: [REDACTED]  
Sent: Wednesday, January 15, 2014 12:43 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: 2014 Oil and Propane Weatherization payments

Ok...I am on it...**RequestID: 00006918**

---

From: [REDACTED]  
Sent: Wednesday, January 15, 2014 12:18 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: 2014 Oil and Propane Weatherization payments

Theoretically yes, but some setup would be required first. We would need to create a new upload group that pointed to the new accounting string. If you want Ankit to get started on this, please create a WRS ticket. Thanks.

- [REDACTED]

---

From: [REDACTED]  
Sent: Wednesday, January 15, 2014 12:13 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: 2014 Oil and Propane Weatherization payments

Hi [REDACTED]

I believe we have the accounting strings for the OIL/Propane/Wood for the RGGI funds but no funds yet. (correct me if I am wrong on the accounting strings). Can RISE issue and upload the work packages for these into indemand and we just wait to pay them?

Thanks,

[REDACTED]

---

From: [REDACTED]  
Sent: Wednesday, January 15, 2014 11:06 AM  
To: [REDACTED]  
Subject: 2014 Oil and Propane Weatherization payments

Hi [REDACTED] thank you for the meeting yesterday. Learning that we are at 215% of our electric goal and 170% of gas for 2013 was the highlight of my day.

Just following up on the request to hold off on billing oil and propane weatherization (similar to last year) in 2014. Can you please check to see if we would still be able to upload and process the payments through indemand but you would just hold off on approving those individual invoices tied to that accounting string. Or if we need to hold off uploading until the money from the State is made available.

Thanks

[REDACTED]



\*\*\*\*\*

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To: [REDACTED]  
From: [REDACTED]  
Sent: Fri 1/20/2017 1:37:50 PM (UTC)  
Subject: RE: EXT || Unpaid RISE Invoices

Ok no problem, thank you both!

[REDACTED]

---

From: [REDACTED]  
Sent: Friday, January 20, 2017 8:05 AM  
To: [REDACTED]  
Subject: RE: EXT || Unpaid RISE Invoices

Hi [REDACTED]

These should be all set. [REDACTED] is going to double check. Anytime you see payment pulled it means that we have paid it on our end and it is now processing in the financial system. The ones listed as payment complete should have already been received by you. We had to hold some invoices for year-end reasons but are back to the standard processing mode.

Thanks,

[REDACTED]

---

From: [REDACTED]  
Sent: Thursday, January 19, 2017 5:45 PM  
To: [REDACTED]  
Subject: EXT || Unpaid RISE Invoices

[REDACTED] & [REDACTED]

We have not been paid for the following invoices. Do you need any additional information from us in order to process?

In your system the invoice status's are listed as:

- 149986 payment completed 01/14/2017
- 149987 payment was pulled yesterday 01/18/2017
- 149988 payment was pulled yesterday 01/18/2017

What does Payment Pulled mean?

Thanks,

[REDACTED]

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REDACTED

To: [REDACTED]

Cc: [REDACTED]

From: [REDACTED]

Sent: Tue 11/22/2016 8:10:04 PM (UTC)

Subject: RE: EXT || RE: Email Blasts

Hi,

Yes, this is possible. How many customers should we e-mail the week of 11/28? How many customers should we e-mail the week of 12/5? Do we want to prioritize customers who we know have gas heating from us? Thanks so much for your help.

Happy Thanksgiving!

Sincerely,

[REDACTED]

---

From: [REDACTED]

Sent: Tuesday, November 22, 2016 2:42 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: EXT || RE: Email Blasts

Hi [REDACTED]

Is [REDACTED] request possible?

[REDACTED]

---

From: [REDACTED]

Sent: Tuesday, November 22, 2016 2:28 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: EXT || RE: Email Blasts

Hi [REDACTED]

We currently have a backlog of +/- 700 so we could use a little bump now. Do you think we could send out some emails the weeks of 11/28 and 12/5 to ensure full schedules then do the remainder after the new year? I feel like anything mailed out mid December is going to get trumped by holiday hustle and bustle.

[REDACTED]

[REDACTED]

---

From: [REDACTED]

Sent: Tuesday, November 22, 2016 2:09 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: Email Blasts

Hi [REDACTED] & [REDACTED]

RI Home Energy Assessment e-mails blasts were intended to go out in October and November, but there were issues with the data center and it took several weeks to get the e-mail list from the Data team. If we want to send them out, it would be the weeks of 11/28 and into December or we can save them and send in early 2017. I wanted to get an understanding of your current backlog and if it makes sense to wait since we may need to hold invoices. At the same time I want to make sure we have steady production lined up.

Thoughts?

[REDACTED]

[REDACTED]

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To: [REDACTED]  
From: [REDACTED]  
Sent: Sat 1/23/2021 12:08:24 AM (UTC)  
Subject: FW: RI Electric 2020 IMPORTANT KEEP

From: [REDACTED]  
Sent: Tuesday, September 8, 2020 4:50 PM

To: [REDACTED]  
Cc: [REDACTED]  
Subject: RI Electric 2020

Hi all, notes from the conversation today to reduce spending. [REDACTED] I've added you into the email thread.

Sales reps review the most recent pipeline report ([REDACTED] sent today)

1. Determine what projects need to stay in 2020 due to customer receiving tax break or they need the incentive to hit their 2020 books. Move ECD out to 2021 what doesn't have that requirement
2. Look at December projects - what can be moved to ECD of 2021. Push those.
3. Projects under a \$/kwh threshold stay in. Above the threshold need to be pushed out to 2021
  - a. Action: [REDACTED] please refresh our memories: What is the baseline/threshold \$/kwh they can offer. Please provide by Wednesday 9/9.
4. Move any uncommitted app to 2021, if it can be done.
5. Move any committed by us, but not committed by the customer (waiting for customer to sign offer letter) to 2021.
6. Action: Sales to complete this exercise by end of this week
7. Action: Pete to ask Jerry specifically about those projects in [REDACTED] queue.

Additional discussion with CEM to happen mid week.

Action: [REDACTED] to share range of forecasts with CEM this week for both Gas and Electric  
Electric  
spend forecast  
min = 94%, Max 106% - but goal is 100% spending  
savings forecast  
min =66%, Max 81%

[REDACTED]

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Please consider the environment before printing this email.

**Organizer:** [REDACTED]

**From:** [REDACTED]

**Attendees:** [REDACTED]

**Location:** 1-866-844-9417, 72882852 or W3.833 Freeport

**Importance:** Normal

**Subject:** Year End Accrual Follow Up -- How to track?

**Start Time:** Tue 12/17/2013 2:00:00 PM (UTC)

**End Time:** Tue 12/17/2013 3:00:00 PM (UTC)

**Required Attendees:** [REDACTED]

When: Tuesday, December 17, 2013 9:00 AM-10:00 AM (GMT-05:00) Eastern Time (US & Canada).  
 Where: 1-866-844-9417, 72882852 or W3.833 Freeport

\*~\*~\*~\*~\*~\*~\*~\*~\*~\*

This is to discuss how to track the jobs that are accrued as "install complete" or "construction complete" that then do not have a post-inspection completed by 12/31/14 because we don't want to count those to 2013 goal. We may not want them to become "payment authorized" by 1/31/14 (or have savings paid date reverted to 12/31/13). This is a follow up to today's meeting with RA group.

I am working from home, I will open the call-in from there. There is a room for those at Rez Woods if you'd prefer in person.

Please forward to anyone I may have missed.

[REDACTED] may not be able to join us, I will send notes after.

REDACTED

**To:** [REDACTED]  
**Cc:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Tue 1/16/2018 6:45:32 PM (UTC)  
**Subject:** RE: quick check of InDemand impacts? Is the 200% C&I Gas correct?

Thanks [REDACTED]

I am holding Rockcliff Farm Condominiums (invoice 132586) to pay in 2018.

For app # 7161380, Scenic View II Condos, I see this paid date: 10/04/2017. I can ask the InDemand team if they have any insights.

Thanks!

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Tuesday, January 16, 2018 1:38 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: quick check of InDemand impacts? Is the 200% C&I Gas correct?

Hi -

There are 2 resi MF projects that RISE has but NGrid SBM doesn't:  
Rockcliff Farm condos: 2,056 therms  
Scenic View condos: 586 therms

And NGrid has 28 therms more savings for Homestead Mills

Otherwise, there are small therm differences between RISE & SBM data, probably rounding errors, so essentially we're on the same page for the rest of the resi MF projects.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, January 11, 2018 4:56 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: quick check of InDemand impacts? Is the 200% C&I Gas correct?

Thanks, [REDACTED] Meaning, the Indemand Resi MF savings data is also correct?

---

**From:** [REDACTED]  
**Sent:** Thursday, January 11, 2018 4:30 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: quick check of InDemand impacts? Is the 200% C&I Gas correct?

The 2017 MF C&I gas savings are coming through correctly, as far as I can tell.

The discrepancy between RISE & InDemand savings values appear to be due to RISE entered savings updates made to InDemand that have not yet been made to the RISE summary information, where the main discrepancies are at Rolling Green Village (3,100 therms) and Sandy Lane Apartments (3,760 therms).

██████████

---

**From:** ██████████  
**Sent:** Thursday, January 11, 2018 2:39 PM  
**To:** ██████████  
**Cc:** ██████████  
**Subject:** RE: quick check of InDemand impacts? Is the 200% C&I Gas correct?

Yes - this program experienced a huge hockey stick this year.

It is a small program, and any one project can have a significant impact on savings and spend. In past years, some projects have not completed by year-end, so I went with a conservative forecast.

However, the fact that the sum-by-month and RISE data are very different is unexpected. I have asked RISE to provide a list of all projects, to help with doing a comparison.

---

**From:** ██████████  
**Sent:** Thursday, January 11, 2018 2:35 PM  
**To:** ██████████  
**Cc:** ██████████  
**Subject:** RE: quick check of InDemand impacts? Is the 200% C&I Gas correct?

██████████

The BO Report I pulled yesterday may be helpful. It shows that C&I Multifamily Gas achieved about 14,000 Therms of savings from Jan - Nov and then an additional 80,000 Therms in the month of December alone. Hope that helps.

Best,  
██████████

<< File: DSM EVAL %28011-G%29 Sum By Month Gas (4).xls >>

---

**From:** ██████████  
**Sent:** Thursday, January 11, 2018 2:30 PM  
**To:** ██████████  
**Cc:** ██████████  
**Subject:** RE: quick check of InDemand impacts? Is the 200% C&I Gas correct?

██████████

Thanks so much for tackling this quickly. Please let us know if you do find anything.

--██████████

---

**From:** ██████████  
**Sent:** Thursday, January 11, 2018 2:22 PM  
**To:** ██████████  
**Cc:** ██████████  
**Subject:** RE: quick check of InDemand impacts? Is the 200% C&I Gas correct?

[REDACTED] -

I don't see anything obviously strange in the impacts [REDACTED] sent to me 12/27/17, but I asked him to send me a query of supporting project information and impacts so I can review / hand calculate what the savings should be. [REDACTED] message yesterday was concerned with a smaller discrepancy, so my guess is most of the jump from 30% to 200% was based on projects completing, but I will let everyone know what I find.

[REDACTED]

From [REDACTED] yesterday afternoon:  
Hi [REDACTED]

The Sum By Month shows much higher numbers than RISE for RI MF Comm Gas and RI MF Gas.

The RISE info is attached.

Here is the SBM info.

RESI Gas - 106,618 net annual therms or 93% (RISE shows 94,129)

Comm Gas - 94,420 net annual therms or 213% (RISE shows 87,719)

While the Sum By Month often shows slightly higher numbers, these discrepancies seem too large. Can you please help me look into this?

---

**From:** [REDACTED]  
**Sent:** Thursday, January 11, 2018 2:09 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** quick check of InDemand impacts? Is the 200% C&I Gas correct?  
**Importance:** High

[REDACTED]

Have you had a chance to double check that the impacts are correct in MF C&I Gas? The jump from 30% in the projections to 200% on the scorecard surprised me yesterday and I did want to confirm it was not an InDemand error.

Just had a meeting with [REDACTED] & [REDACTED] and this is super high priority on the C&I sector and they want to ensure that the savings are correct. Fred did mention that Jeff pushed on C&I gas jobs as part of a gap closer, so the savings jump may be actual - just not forecasted.

Can you let all know on this chain because there's a lot of moving pieces on this.

Thanks,  
[REDACTED]

-----  
[REDACTED]  
[REDACTED]  
[REDACTED]



REDACTED

**To:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Mon 12/28/2015 7:20:10 PM (UTC)  
**Subject:** FW: RI incentive payments

I don't think this will affect you, just wanted to let you know 😊

---

**From:** [REDACTED]  
**Sent:** Monday, December 28, 2015 2:03 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** FW: RI incentive payments

Please see below,

Do not make any payments or request for payments for RI !!!

Until further notice.

Thanks

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Monday, December 28, 2015 1:58 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RI Incentive payments

Afternoon guys,  
Hope everyone had a good Christmas, or if you're not into Christmas, at least a good long weekend.

Until further notice, please don't pay/approve any incentive payments in RI. We're pretty good on goal, we're over on budget, and I'd like to take stock of where things stand before potentially pushing us into a bad place from a budget perspective. The accruals should give us plenty of latitude to make payments should we need to.

Thanks much,  
GB

[REDACTED]

[REDACTED]



REDACTED

To:

Cc:

From:

Sent: Sun 6/2/2019 7:39:09 AM (UTC)

Subject: RI ; Gas/LI

Good Morning Gentlemen,

There are some concerns with the numbers coming in for Gas in Rhode Island, at the overall portfolio level. Not our program, but how the line items for all roll up. Since we are so successful... 😊

With the addition of the Cozy project for [REDACTED] we really need to scrub the numbers as far as what we can/should pay through year end to keep us in check and not go over our stretch goals. Specifically in the Low Income sector. With the numbers you shared yesterday, we are going to be really close to going over those lines.

Things being discussed – holding some invoices for payment until January, to allow the invoices to accrue, but not physically be paid until 2019. Hand picking projects to be paid, to be held. This is all still under discussion, but wanted to provide a heads up to you so we can start to think about this, should we be asked to do so. Example ; if we have to have the Cozy project in, is there something we should shuffle out to next year? Etc..

Let me know if you have any questions, concerns, more to come as we move things along.  
Thank you!

[REDACTED]

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 22-05-EE  
In Re: 2022 Annual Energy Efficiency Plan  
Responses to the Commission's Third Set of Post-Decisional Data Requests  
Issued on June 8, 2022

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PUC Post-Decisional 3-6

Request:

Referencing page 6 of the Review, please produce a list of all of the “search terms and key words specific to Rhode Island energy efficiency as well as terms designed to identify potential misconduct or fraud” that were used to search the email collection set.

Response:

Please see Attachment PUC 3-6.

Search Term List

| Seq. | Search Term                          | Seq. | Search Term                                                          |
|------|--------------------------------------|------|----------------------------------------------------------------------|
| 1    | "Defer billing**"                    | 75   | Exceed* w/5 MOU                                                      |
| 2    | "Deferred billing**"                 | 76   | Invoice AND Stack                                                    |
| 3    | Defer w/5 billing*                   | 77   | Deceit                                                               |
| 4    | Deferred w/5 billing*                | 78   | Deceive                                                              |
| 5    | "Reduce expense**"                   | 79   | Fraud AND NOT ("WIRE FRAUD ALERT")                                   |
| 6    | Reduce w/5 expense*                  | 80   | Manipulate                                                           |
| 7    | ("Claim saving**") w/7 Year          | 81   | Auditor w/5 hide                                                     |
| 8    | ("Claim saving**") w/7 Rebate        | 82   | Auditor w/5 conceal                                                  |
| 9    | ("Claim saving**") w/5 Hold          | 83   | Auditor w/5 lie                                                      |
| 10   | ("Claim saving**") w/5 Defer         | 84   | Auditor w/5 "do not tell"                                            |
| 11   | "Urgent data"                        | 85   | Auditor w/5 ("don't tell")                                           |
| 12   | "Work together"                      | 86   | Auditor w/5 ("dont tell")                                            |
| 13   | "Push toward"                        | 87   | Deloitte                                                             |
| 14   | "Hard stop"                          | 88   | Move w/3 invoices                                                    |
| 15   | "Need to manage"                     | 89   | Scal* w/1 back                                                       |
| 16   | "Slowing invoice**"                  | 90   | Goal w/5 over                                                        |
| 17   | "Cheaper incentive**"                | 91   | Goal w/5 get                                                         |
| 18   | "Hold over"                          | 92   | Goal w/5 100                                                         |
| 19   | "Our favor"                          | 93   | Goal w/5 want                                                        |
| 20   | "Locked in"                          | 94   | Goal w/5 enough                                                      |
| 21   | 100 w/3 spend                        | 95   | Goal w/5 exceed*                                                     |
| 22   | (Invoice* w/5 pending) AND EFI       | 96   | Penalt* w/5 Over                                                     |
| 23   | "Hold them"                          | 97   | Penalt* w/5 Regulatory                                               |
| 24   | ("Claimed saving**") AND Goal        | 98   | Penalt* w/5 Cost                                                     |
| 25   | ("Forecasted saving**") AND Forecast | 99   | Penalt* w/5 Budget                                                   |
| 26   | "Not" w/5 Accrued                    | 100  | Penalt* w/5 Saving*                                                  |
| 27   | "Not" w/5 Posted                     | 101  | Penalt* w/5 Performance                                              |
| 28   | "Leave no"                           | 102  | "Accrual procedure" >>> <i>Time period contrained to 2017-onward</i> |
| 29   | "Leave no money"                     | 103  | Outstanding w/1 invoice                                              |
| 30   | "Maximizing saving**"                | 104  | Exceed* w/5 Over*                                                    |
| 31   | "Maximize saving**"                  | 105  | Exceed* w/5 Budget                                                   |
| 32   | "Close eye"                          | 106  | ("Next Year") AND Budget                                             |
| 33   | "Goal to be"                         | 107  | ("Next Year") AND Invoice                                            |
| 34   | Hold w/5 invoice*                    | 108  | ("Next Year") AND Exceed                                             |
| 35   | ("Don't allow") AND Invoice*         | 109  | ("Next Year") w/5 MOU                                                |
| 36   | "Do not allow" AND Invoice*          | 110  | Overspent                                                            |
| 37   | Billing* w/5 Delay                   | 111  | "running start"                                                      |
| 38   | Hold* w/5 invoice*                   | 112  | Decide w/5 invoices                                                  |
| 39   | Budget* AND ("Keep an eye")          | 113  | Decision w/5 invoices                                                |
| 40   | Goal* AND ("Keep an eye")            | 114  | Budget* w/5 Pay*                                                     |
| 41   | Saving* AND ("Keep an eye")          | 115  | Budget* w/5 *Accru*                                                  |
| 42   | Invoice* AND ("Keep an eye")         | 116  | Defer w/5 Invoice                                                    |
| 43   | Spend AND ("Keep an eye")            | 117  | Defer w/5 Pay*                                                       |
| 44   | Bill* AND ("Keep an eye")            | 118  | Exceed w/5 Forecast                                                  |
| 45   | Budget* AND ("Keep a close eye")     | 119  | Ding* w/5 Over                                                       |
| 46   | Goal* AND ("Keep a close eye")       | 120  | ("With hold") w/5 Invoice*                                           |
| 47   | Saving* AND ("Keep a close eye")     | 121  | Withhold w/5 Invoice*                                                |
| 48   | Invoice* AND ("Keep a close eye")    | 122  | Stop w/5 Processing                                                  |
| 49   | Spend AND ("Keep a close eye")       | 123  | Stretch                                                              |
| 50   | Bill* AND ("Keep a close eye")       | 124  | Improper w/5 Budget                                                  |
| 51   | "Maxing out"                         | 125  | Inappropriate w/5 Budget                                             |
| 52   | Stretch w/5 saving*                  | 126  | Pressure* w/5 Budget                                                 |
| 53   | ("Move them") AND January            | 127  | Pressuring w/5 Budget                                                |
| 54   | "Working thing"                      | 128  | Improper w/5 Accounting                                              |
| 55   | Dinged                               | 129  | Inappropriate w/5 Accounting                                         |
| 56   | Negative AND Shareholder             | 130  | Pressure* w/5 Accounting                                             |
| 57   | ("Hold off") w/5 Recommendation      | 131  | Pressuring w/5 Accounting                                            |
| 58   | ("Hold off") w/5 Invoice*            | 132  | Improper w/5 Saving*                                                 |

**Search Term List**

| <b>Seq.</b> | <b>Search Term</b>           | <b>Seq.</b> | <b>Search Term</b>         |
|-------------|------------------------------|-------------|----------------------------|
| 59          | ("Hold off") w/5 Accru*      | 133         | Inappropriate w/5 Saving*  |
| 60          | ("Hold off") w/5 Payment*    | 134         | Pressure* w/5 Saving*      |
| 61          | ("Hold off") w/5 Paying      | 135         | Pressuring w/5 Saving*     |
| 62          | ("Hold off") w/5 Uploading   | 136         | Improper w/5 Invoice       |
| 63          | "Monies out"                 | 137         | Inappropriate w/5 Invoice  |
| 64          | "Nice bump"                  | 138         | Pressure* w/5 Invoice      |
| 65          | "Moving back"                | 139         | Pressuring w/5 Invoice     |
| 66          | Adjust w/5 accrual*          | 140         | Improper w/5 Guidance      |
| 67          | "Not want counted"           | 141         | Inappropriate w/5 Guidance |
| 68          | "Choose to hold"             | 142         | Pressure* w/5 Guidance     |
| 69          | Compliance w/5 Appropriate   | 143         | Pressuring w/5 Guidance    |
| 70          | ("Carry over") OR Carry-over | 144         | Improper w/5 Decision      |
| 71          | Excess AND ("Next year")     | 145         | Inappropriate w/5 Decision |
| 72          | Overspend AND Lighting       | 146         | Pressure* w/5 Decision     |
| 73          | Exceed* w/5 Goal             | 147         | Pressuring w/5 Decision    |
| 74          | Exceed* w/5 Rebate           | 148         | "Gap Closer"               |

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 22-05-EE  
In Re: 2022 Annual Energy Efficiency Plan  
Responses to the Commission's Third Set of Post-Decisional Data Requests  
Issued on June 8, 2022

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PUC Post-Decisional 3-7

Request:

Please identify and produce any document retention policy that the Company had in place at any time during 2012-2022 that related to invoices or records of the energy efficiency program.

Response:

Please see Attachment PUC 3-7.

# NATIONAL GRID

06/10/2022  
4:38:32 PM  
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Page 1

**Department Name:** ENERGY EFFICIENCY - LI (Formerly EL138)(DO NOT L  
**Department ID:** 0016

| <i>Record Series ID</i> | <i>Record Series Title</i>                                          | <i>Department Retention</i> | <i>Inactive Retention</i> |
|-------------------------|---------------------------------------------------------------------|-----------------------------|---------------------------|
| 191 035 H.              | SMART START REBATE APPLICATIONS - DISCONTINUED (GC)                 | ACT+3                       | ACT+6                     |
| 191 013 H.              | RESIDENTIAL ACTUAL AUDITS                                           | ACT+7                       | ACT+7                     |
| 191 010 H.              | COMMERCIAL ENERGY AUDIT PROGRAM                                     | ACT+7                       | ACT+7                     |
| 191 048 H.              | COMMERCIAL CONSTRUCTION AND GEO-THERMAL REBATES                     | ACT                         | ACT+7                     |
| 086 151 H.              | GAS & ELECTRIC HISTORICAL STUDIES                                   | ACT+5                       | HLD                       |
| 191 053 H.              | REAL TIME PRICING (RTP) - Discontinued                              | ACT                         | ACT+6                     |
| 086 032 H.              | KEYSPAN / LIPA POPULATION SURVEYS                                   | ACT+1                       | ACT+50                    |
| 191 052 H.              | RESIDENTIAL ENERGY AFFORDABILITY PARTNERSHIP (REAP)                 | ACT                         | ACT+7                     |
| 191 051 H.              | INFO ED - RESIDENTIAL INFORMATION & EDUCATION PROGRAM               | ACT                         | ACT+7                     |
| 191 055 H.              | PEAK REDUCTION PROGRAM (PRP)                                        | ACT                         | ACT+6                     |
| 191 056 H.              | SOLAR VOLTAIC REBATES                                               | ACT                         | ACT+6                     |
| 191 054 H.              | CENSUS STATISTICS                                                   | ACT                         | ACT+12                    |
| 191 047 H.              | COMMERCIAL POWER FOR JOBS CONTRACTS AND BILLING DETERMINANTS - EXPI | ACT+1                       | ACT+10                    |
| 191 046 H.              | COMMERCIAL NIGHTLIGHT / DUSK TO DAWN / LIGHT SOLUTIONS - ACTIVE     | ACT                         | ACT                       |
| 191 044 H.              | COMMERCIAL PEAK REDUCTION PROGRAM - ACTIVE                          | ACT+1                       | IND                       |
| 191 042 H.              | WASHING MACHINE REBATE PROGRAM                                      | ACT+2                       | ACT+6                     |
| 191 041 H.              | RESIDENTIAL LIGHTING & APPLIANCE REBATE PROGRAMS (RLA)- INFORMATION | ACT+1                       | ACT+6                     |
| 191 018 H.              | MULTI-FAMILY DWELLINGS AUDITS                                       | ACT+7                       | ACT+7                     |
| 191 014 H.              | COMMERCIAL ENERGY AUDITS REQUESTS                                   | ACT+7                       | ACT+7                     |
| 191 011 H.              | CENTR AIR CONDITIONER AND GEO-THERMAL REBATE PROGRAMS               | ACT+2                       | ACT+6                     |
| 191 009 H.              | COMMERCIAL MANDATORY TIME-OF-USE PROGRAM                            | ACT+2                       | ACT+7                     |
| 191 007 H.              | COMMERCIAL VOLUNTARY TIME OF USE PROGRAM                            | ACT+2                       | ACT+7                     |
| 191 006 H.              | RESIDENTIAL VOLUNTARY TIME-OF-USE PROGRAM                           | ACT+2                       | ACT+7                     |

**Total Series In Department Code:** 23

**Note:** Retention Format is ACT+ #Yrs/#Mos

ACT+ = Retention based on contents of record to date.

IND = Permanent Retention

PUC Post-Decisional 3-8

Request:

Referencing page 6 of the Review, please identify the “outside professionals” that the Company used [t]o conduct the review and identify out-of-period invoices.

Response:

The outside professionals are PricewaterhouseCoopers (“PwC”).

PUC Post-Decisional 3-9

Request:

Referencing page 6 of the Review, please identify the “forensic consultant” that worked with the Company in reviewing emails.

Response:

The forensic consultant is PricewaterhouseCoopers (“PwC”).



PUC 3-10 (Supplemental)

Request:

Please provide a copy of any reports the Company produced, received, or has done related to the Review.

Original Response:

Please see Attachment PUC 3-10-1 and Attachment PUC 3-10-2.

The Company is asserting legal privilege for Attachment PUC 3-10-2. Please see Motion of The Narragansett Electric Company Objecting to data request PUC 3-10 from the Public Utilities Commission ("PUC").

Notwithstanding the Company's objection, in an effort to provide the PUC with the information contained in Attachment PUC 3-10-2 without providing legally privileged documents, the Company has attached a redacted version of Attachment PUC 3-10-2. Please note the redacted Attachment PUC 3-10-2 is confidential and the Company is seeking protective treatment from public disclosure.

Supplemental Response

Please see Attachment PUC 3-10-1 and Attachment PUC 3-10-2 (Confidential).

The Narragansett Electric Company ("Narragansett") is asserting legal privilege for Attachment PUC 3-10-2. Please see Motion of The Narragansett Electric Company Objecting to data request PUC 3-10 from the Public Utilities Commission ("PUC"), filed on June 16, 2022.

Notwithstanding Narragansett's objection, in an effort to provide the PUC with the information contained in Attachment PUC 3-10-2 without providing legally privileged documents, Narragansett has attached a redacted version of Attachment PUC 3-10-2. Please note the redacted information in Attachment PUC 3-10-2 is confidential and Narragansett is seeking protective treatment from public disclosure pursuant to the Motion of The Narragansett Electric Company d/b/a Rhode Island Energy for Protective Treatment of Confidential Information filed on June 16, 2022.

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 22-05-EE  
In Re: 2022 Annual Energy Efficiency Plan  
Responses to the Commission's Third Set of Post-Decisional Data Requests  
Issued on June 8, 2022

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Attachment 3-10-2

**REDACTED**

## Rhode Island Energy Efficiency Investigation

### EXECUTIVE SUMMARY:

This investigation focused on determining whether the “out-of-period invoice” strategy identified in the Rhode Island Residential Upstream Lighting program in program years 2017 and 2018 was widely accepted within the Rhode Island energy efficiency program; determining where the strategy was actually implemented (as opposed to simply being discussed as a potential year-end tactic); and determining whether an effect upon the Performance Incentive received by the Company could be estimated and calculated.

This investigation has established that the strategy of delaying the receipt of invoices in Rhode Island Energy Efficiency programs (“out-of-period invoices”) for purposes of staying within budget and/or savings targets was widely known and accepted within the Rhode Island Energy Efficiency program throughout the period of review (program years 2012-2020).

The strategy was known and discussed widely within the Program, and in many instances was used by program managers to delay receipt, recognition, and payment of invoices until the following program year in order to stay within certain budget and savings targets.

The investigation was able to document 48 instances where it was concluded that the strategy was implemented. These instances occurred in various programs across the review period. The investigation established additional instances where the strategy appeared to have been implemented but the program or programs in which it was implemented could not be established; or was discussed among Rhode Island Energy Efficiency personnel but it could not be established that the strategy was ever implemented.

Through interviews, extensive review and analysis of email of Rhode Island Energy Efficiency Program Managers; analysis and evaluation of the mechanisms for calculating Performance Incentives within the Rhode Island Energy Efficiency program years; and development of a Performance Incentive Model that allowed the application of “out-of-period percentages” (previously tested and calculated in the course of the preliminary investigation) to programs beyond the Residential Upstream Lighting program, the investigation has calculated a value for a net downward adjustment of Performance Incentive earned by the Rhode Island Energy Efficiency programs over the review period.

### **Purpose of Investigation:**

To determine the extent to which the “out-of-period invoice” strategy was known, accepted, and implemented within the Rhode Island Energy Efficiency program, and to estimate the potential impact, if any, on Performance Incentives received by the Company in program years 2012-2020.

### **Background: - TW Lighting**

In 2020 National Grid was made aware of an allegation that Program Managers in the Rhode Island Residential Upstream Lighting program had asked certain lighting manufacturers to withhold

submission of invoices in the 2017 and 2018 program years so that National Grid could reduce expenses and claim savings in the following years.

Internal investigation confirmed that the program managers in those years did, in fact, take steps to delay the recognition of manufacturer invoices in the Residential Upstream Lighting Program in program years 2017 and 2018.<sup>1</sup>

National Grid engaged a forensic consultant to undertake a review of out-of-period invoices in Rhode Island Residential Upstream for the program years 2016 – 2020 for purposes of quantifying the impact, if any, of these actions. The subsequent review obtained the underlying billing and documentation for the transactions involved and determined the annualized out-of-period percentages for the implicated years 2017 and 2018, as well as annualized out-of-period percentages for years 2016, 2019 and 2020. By identifying out-of-period invoice percentages, returning the associated spend and claimed savings back to the appropriate calendar year, and recalculating the Performance Incentives that would have been earned by National Grid had the invoices been received and counted in the correct year, the investigation applied the transaction-tested annualized “out-of-period percentages” for Rhode Island Residential Upstream Lighting for the years in this review, and calculated an aggregate net downward adjustment of the Performance Incentive in the amount of \$124,135.00.

The company has made a regulatory filing reporting this \$124,135.00 net downward adjustment and credit to ratepayers.<sup>2</sup>

The investigation was thereafter expanded to look at the activities of all Program Managers in Rhode Island Energy Efficiency in the program years 2012-2020.

### **Methodology:**

Through extensive review of emails, interviews of Program Managers and CEM team members, analysis of regulatory filings and filed annual program results, and application of transaction-tested “out-of-period percentages” developed in the initial investigation, the investigation was able to calculate a value of Performance Incentive received by National Grid as a result of the implementation of the “out-of-period invoice” strategy over the time period under review (2012-2020).

### **Summary of Findings:**

This investigation focused on determining whether this strategy was widely accepted within the Rhode Island energy efficiency program; determining where the strategy was actually implemented (as opposed to simply being discussed as a potential year-end tactic); and determining whether an effect upon the Performance Incentive received by the Company could be estimated and calculated. This calculation is reported as a **net downward adjustment of Performance Incentive** across the period of this review.

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<sup>1</sup> Direct contact with manufacturers was only confirmed for program year 2017

<sup>2</sup> For the purposes of this analysis and calculation, the previously reported Net Downward Adjustment has not been netted out of the calculations of the expanded investigation

This investigation has established that the strategy of delaying the receipt of invoices in Rhode Island Energy Efficiency programs was widely known and accepted within the Rhode Island Energy Efficiency program throughout the period of review (program years 2012-2020).

The strategy was known and discussed widely across all sectors, and in many instances was used by program managers to delay receipt, recognition, and payment of invoices until the following program year in order to stay within certain budget and savings targets.

The investigation was able to identify 29 email exchanges where it was concluded that the strategy was implemented. This identified 48 instances across a number of programs in a number of program years through the review period where the investigation concluded that the strategy was utilized.

The investigation identified a number of additional email exchanges where the strategy was discussed, but the specific program or programs in which it was implemented could not be established; or where the strategy was discussed among Rhode Island Energy Efficiency personnel, but it could not be established that the strategy was ever implemented.

Through interviews, extensive review and analysis of email of Rhode Island Energy Efficiency Program Managers; analysis and evaluation of the mechanism for calculating Performance Incentives within the Rhode Island Energy Efficiency program years; and development of a model that allows the application of previously tested and calculated “out-of-period percentages” to programs beyond the Residential Upstream Lighting program, the investigation has calculated a **net downward adjustment of Performance Incentive** received by the Company across the period of this review (2012-2020).

#### **Discussion:**

- **E-mail Review:**

Commencing in September of 2021, the investigation developed a roster of all National Grid employees who worked as program managers in New England Energy Efficiency programs. A list of the programs they managed in each year of the study was compiled. The available email for the program managers for every year of the review period (2012-2020) was collected. The collection set included approximate 500,000 emails.

In consultation and coordination with the forensic consultant, an extensive email review was commenced, using search terms and key words specific to Rhode Island Energy Efficiency as well as terms designed to identify potential misconduct and fraud. The search was designed and conducted to locate email that related to any improper or inappropriate activity including the out-of-period invoicing strategy. Over the remainder of 2021 and through January of 2022, email sets were reviewed and evaluated in order to determine responsiveness of the samples and to refine the continued analysis of the email collection.

By February of 2022 the investigation had developed a responsive set of email that showed Program Managers, across sectors, programs, measures and years, openly discussing the strategy of holding off on the receipt and payment of invoices at the end of program years.

Further analysis of the data set was performed to determine any patterns or concentrations of these strategies, ie: were they limited to residential programs, or to programs in the Electric sector, or to certain years, or to certain Program Managers, etc. No such limiting patterns could be identified other than the fact that more responsive email were found in the latter years of the review period than earlier – it could not be ruled out that this concentration was related to the greater availability of more recent email than email from 5-10 years ago.

The responsive emails were then analyzed by identifying the involved program managers to determine which program managers represented the greatest volume of responsive email across the broadest groups of sectors, programs and measures. The program manager sets were then evaluated for purposes of interviews to obtain the broadest view of the pervasiveness of the strategy and its use in the Rhode Island Energy Efficiency programs.

- **Program Manager Interviews:**

Beginning in February of 2022, interviews of program managers were commenced. Interviews included program managers in Residential and Commercial programs, with responsibilities in both Electric and Gas sectors. It was quickly confirmed that the out-of-period invoice strategy was widely known, frequently discussed, and many times was implemented and used by program managers to stay within budget and savings targets.

Program Managers were aware of what was described as a “sweet spot” - a combination of performance against budget targets and savings targets – which they understood represented the best influence on the Performance Incentives earned by the Company at the end of the program year.

Program managers also were aware that once “savings” reached the caps in a given program year, they no longer served to increase performance incentives. This was described by program managers as “wasting” savings.

In contrast to the initial investigation stemming from the TW Lighting matter, program managers were forthright in discussing the out-of-period invoicing strategy during the interviews, describing it as well accepted and openly discussed and considered. There was no hedging, prevaricating or obfuscation in these interviews. The Program Managers also emphasized, without prompting, that it has been made clear that this strategy is unacceptable and prohibited and that this has been made clear to Program Managers. “We wouldn’t send those emails now”, “We would not do that now”, and “It’s been made clear now that this is not acceptable” was a common refrain.

Based upon the emails in the interview sets, however, the interviewed program managers were not able to confirm for certain that invoices were delayed out of period in any given program or any given year. Often, the email discussions about the strategy did not result in actual implementation of the strategy, for instance where transactions “in the pipeline” did not ultimately exceed budget, or commercial installations could not be completed and final

inspected by year-end. Without a full set of data and documents – invoices, accruals, scorecards, etc. – certainty on a given set of transactions could not be obtained. It was determined, however, that in many instances, the responsive emails openly described the application of the strategy to specific programs, or to programs which could be identified.

- **Performance Incentive Model:**

Having established that the out-of-period invoice strategy was a widely known, widely accepted and widely discussed strategy, the investigation turned to developing a deeper understanding of how the Program Managers' performance against budget targets, savings caps and "sweet spot" calculations actually translated into and affected Performance Incentives earned by the Company after a program year given that there is no direct relationship between the two.

Interviews of analysts in CEM provided insight and understanding into the way in which the Performance Incentive Mechanism worked in the Rhode Island Energy Efficiency programs in the years included in the review period<sup>3</sup>. The interaction of budget targets, savings targets, thresholds and caps for savings, and the yield curve of performance incentive up to 100% of budget as opposed to the flatter curve above 100% of budget was explored. This examination bore out the statement made in an interview that "savings" targets and budget performance were not a direct predictor of Performance Incentive.

Further evaluation of the tables in the actual regulatory filings allowed the identification of "levers" in each program that linked budget dollars / units of savings to realized Performance Incentive dollars. This model made it possible to apply the as-tested out-of-period percentages to any individual program in any given year and to recalculate the performance incentive that would have been realized had invoices been recognized in the proper year.

Where a program was identified as having implemented the out-of-period invoice strategy in a given year, the applicable out-of-period percentage was taken from the following year and returned to the program year where the strategy was implemented. This intricate model made it possible to recalculate performance incentives for the entire review period once specific programs and specific program years were identified. The model follows the methodology used in the recalculation of the effect on Performance Incentive of the original Residential Upstream Lighting investigation, and expands the interrelationships of the programs, and their individual budget and savings results, to allow for calculation based upon implementation of the out-of-period invoice strategy in any program in any sector, Electric or Gas.

- **"Sweet Spot":**

The concept of a "sweet spot" sitting at something less than full budget with greater than 100% of savings targets was explored. The interaction of the performance of the various programs which made up a sector was also explored. The interviews suggested a potential "sweet spot"

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<sup>3</sup> The Performance Incentive mechanism has been changed for program year 2021

of 94% of budget and > 100% of savings which would maximize the yield curve of the budget spend and achieve the additional yield on savings.

The regulatory filings for Rhode Island Energy Efficiency for the years in the review period were also examined. By analyzing the tables for each year showing the budget and savings results for programs, the investigation sought to identify the programs where the out-of-period invoice strategy likely was employed, focusing on the programs that finished at or near a “sweet spot”

The investigation determined that “sweet spot” alone was not an accurate identifier of a program that may have implemented the out-of-period invoice strategy. Comparing the programs’ year end results to the programs that were identified in emails revealed that some identified programs were not programs which finished near a “sweet spot”. It was concluded that identification of suspect programs / program years simply by analysis of the final budget/savings numbers was not a reliable predictor.

- **Out-Of-Period Invoice Programs:**

The investigation turned back to the effort to identify programs where the out-of-period invoice strategy use could be confirmed.

Through additional detailed examination of email, the investigation was able to identify 29 email exchanges where it was concluded that the email explicitly demonstrated that the strategy was implemented. This implicated 48 instances across a number of programs across the review period where the investigation concluded that the strategy was utilized.

The investigation identified a number of additional email exchanges where the strategy was discussed; and focused on email exchanges where the strategy appeared to have been implemented, but the program or programs in which it was implemented could not be established; or where the strategy was discussed among Rhode Island Energy Efficiency personnel, but it could not be established that the strategy was ever implemented. Without explicit demonstration that the strategy was implemented in a specific program, the email suggested that any of the multiple programs managed by the program managers involved in the email discussions in a given year might be implicated. This encompassed an additional 33 instances.

- **Recalculation of Performance Incentives:**

The Performance Incentive Model was used to apply the as-tested out-of-period percentages to the programs identified above to calculate the effect upon Performance Incentives for the entire test period.

A number of different calculations were performed against the reported performance of the programs established to have implemented the strategy and programs suspected of having implemented the strategy. Where the results were too speculative, and tended to skew in favor of the company, the results were deemed unreliable.



The calculations made use of the transaction-tested out-of-period percentages developed in the initial investigation:

- For the programs which fell within the years where actual yearly out-of-period percentages were calculated (2016-2020), the actual as-calculated percentage for that year was applied (ranging from 13% in 2017 to 23.94% in 2018). For the programs which fell within years where the initial analysis did not have actual as-calculated percentages for that year, the average of the calculated out-of-period percentages (16.58%) was applied (the “actuals-average” method.)
- The calculations were also run with the straight average (16.58%) of the transaction-tested out-of-period percentages (the “straight average” method) applied to all instances.
- The calculations were also run with the combination of actual as-calculated percentages for the original investigation years, and a maximum calculated out-of-period percentage (23.94% from 2018) for all other years (the “actuals - highest percentage” method).

The calculation method also mirrored the method used to calculate the values in the initial investigation – for each program that was deemed to have implemented the out-of-period invoice strategy, the applicable percentage was applied and that amount of spend/savings was taken from the following year and returned to the previous year. Once each program had the applicable percentage applied and returned to the previous year, the Performance Incentive Model was run to recalculate the Performance Incentives that should have been earned had the spend/savings been counted in the correct year.

The investigation concluded that the most reliable indicator of the increased Performance Incentive received by the Company in the Rhode Island Energy Efficiency Program over the review period of 2012-2020 was the application of the “actuals-average” method, as this used the actual calculated percentages in the applicable years and minimized the effect of over counting or undercounting out-of-period invoices in the years where actual percentages were not available<sup>4</sup>.

- **Recalculation applied to specifically-identified programs:**  
As set forth above, the detailed email review identified 48 instances across the review period where the investigation concluded that the out-of-period invoice strategy was implemented. These instances occurred in a number of programs across the review period. The programs are listed in the chart at the conclusion of this report, and occurred in both Gas and Electric Portfolios, across all sectors, in multiple programs and throughout the review period.

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<sup>4</sup> For the purposes of this analysis and calculation, the previously reported Net Downward Adjustment has not been netted out of the calculations of the expanded investigation

- When the Performance Incentive Model was run using the “actuals-average” method, the effect upon Performance Incentive of these 48 instances was calculated at a **net downward adjustment of \$1,400,423.00**.
- When the Performance Incentive Model was run using the “straight average” method, the effect upon Performance Incentive of these 48 instances was calculated at a **net downward adjustment of Performance Incentive of \$1,569,887.00**. The investigation concluded that the “straight average” method was imprecise as it overstated the out-of-period percentages in 3 of the years where we had actual transaction-tested percentages (2016, 2017 and 2020) and understated the out-of-period percentages in 2 of the years where we had actual transaction-tested percentages (2018 and 2019). Because the Performance Incentive calculations include caps on savings and declining yield curves on performance against budget, inaccurate calculations can be obtained if programs were credited with more spending and savings than they had actually achieved, causing some programs to actually appear to do better, and pushing programs already close to their “caps” over those limits.
- When the Performance Incentive Model was run using the “actuals – highest percentage” method, the effect upon Performance Incentive of these 48 instances was calculated at a **net downward adjustment of Performance Incentive of \$2,194,339.00**. The “highest percentage” method was also determined to be imprecise as it was concluded that it was unlikely that all programs in the untested years were consistently delaying recognition of 23.94% of their budget, especially given the programs’ ability to set budgets on a yearly basis. As demonstrated by the transaction tested calculations, the “highest percentage” was an anomaly in the transaction testing.
- **Recalculation applied to additional non-specific programs:** As set forth above, the detailed email review identified additional emails where the holding of invoices was discussed, but the particular program could not be identified. The investigation attempted to include the additional programs in the calculations however, the inability to determine what program, if any, was actually subjected to the out-of-period invoice strategy, and the inability to confirm in a number of instances whether the strategy was actually implemented, rather than simply discussed, injected a significant amount of inaccuracy and lack of certainty into the calculations. Where a program manager was involved in these exchanges, but was managing multiple programs in that program year, it was not possible to determine which program or programs would have been affected. All told, the additional email exchanges could have impacted up to 33 additional program/instances and there was no evidence developed in the investigation to support a finding that a program manager ever implemented the out-of-period invoice strategy on every program he or she managed in a program year.

There was no way to calculate all the millions of permutations of combinations of these multiple programs. Different combinations were attempted (ie, programs a Program Manager was

known to have implemented from the 48 specific programs above; programs managed only by program managers involved in the 48 programs above; all programs managed by all program managers in these email exchanges) but in each case the calculation of net downward adjustment of Performance Incentive actually resulted in a lower value. The results supported the conclusion that programs which were not part of the out-of-period invoice strategy were actually being artificially enhanced by receiving an influx of invoices from the following year and were actually appearing to do better than they actually had done, and thus reducing the aggregate value of the downward adjustment of Performance Incentive. In light of the inaccuracies and uncertainty created by the inability to identify specific programs, and the fact that the calculations skewed in favor of the Company by lowering the resulting value, the investigation determined that these calculations were not accurate.

- **Allocations:**

The attached chart identifies the programs and program years in which the investigation has concluded the strategy of out-of-period invoicing was actually implemented. The programs have been identified by Program Year, Portfolio, Sector and Program. For purposes of any net downward adjustment credits, the pro-rata allocation to each sector was calculated on that program’s actual implementation expense and then grouped by Sector.

| <u>Portfolio</u> | <u>Sector</u>              | <u>Implementation Expense</u><br><u>(\$000)</u> | <u>Pro Rata %</u> |
|------------------|----------------------------|-------------------------------------------------|-------------------|
| Electric         | Commercial & Industrial    | \$62,101                                        | 34.38%            |
| Electric         | Non-Low Income Residential | \$54,816                                        | 30.35%            |
| Electric         | Low Income Residential     | \$19,666                                        | 10.89%            |
|                  |                            |                                                 |                   |
| Gas              | Commercial & Industrial    | \$19,632                                        | 10.87%            |
| Gas              | Non-Low Income Residential | \$13,838                                        | 7.66%             |
| Gas              | Low Income Residential     | <u>\$10,570</u>                                 | <u>5.85%</u>      |
|                  |                            | \$169,918                                       | 100.00%           |

- **Recommendations:**

- The calculation of Net Downward Adjustment of Performance Incentive applying the “actuals-average” method to the 48 specifically identified programs is the calculation that hews most closely to the facts developed in the investigation. It uses the actual calculated out-of-period percentages for the specific program years for which they were calculated and applies the average of these calculated percentages to years in which specific percentages have not been calculated. It avoids the uncertainty of including additional programs that cannot be proven to have applied the strategy and avoids the more favorable calculation that results from that uncertainty.
- The actual results for 2021 should take into consideration the finding that 4 programs applied the out-of-period invoice strategy in 2020. It should be confirmed that no

invoices from those programs that should have been recognized in 2020 are included in the final budget and savings results for 2021 when calculated for filing.

Rhode Island Energy Efficiency Investigation - Allocations

| Seq                                 | Year | Utility  | Sector                     | Program                                  | Actual Implementation Expenses (\$000) | Actual Implementation Expenses, % |
|-------------------------------------|------|----------|----------------------------|------------------------------------------|----------------------------------------|-----------------------------------|
| 1                                   | 2012 | Electric | Non-Low Income Residential | Residential New Construction             | \$1,259                                | 0.70%                             |
| 2                                   | 2013 | Electric | Commercial & Industrial    | Large Commercial New Construction        | \$8,625                                | 4.78%                             |
| 3                                   | 2013 | Electric | Commercial & Industrial    | Large Commercial Retrofit                | \$7,854                                | 4.35%                             |
| 4                                   | 2013 | Gas      | Non-Low Income Residential | Energy Star® HVAC                        | \$2,519                                | 1.52%                             |
| 5                                   | 2013 | Gas      | Non-Low Income Residential | EnergyWise                               | \$4,530                                | 2.51%                             |
| 6                                   | 2015 | Electric | Low Income Residential     | Single Family - Income Eligible Services | \$7,068                                | 3.91%                             |
| 7                                   | 2015 | Electric | Low Income Residential     | Income Eligible Multifamily              | \$2,320                                | 1.28%                             |
| 8                                   | 2015 | Gas      | Commercial & Industrial    | Large Commercial New Construction        | \$1,844                                | 1.02%                             |
| 9                                   | 2015 | Gas      | Commercial & Industrial    | Large Commercial Retrofit                | \$3,227                                | 1.79%                             |
| 10                                  | 2016 | Electric | Commercial & Industrial    | Large Commercial New Construction        | \$5,417                                | 3.00%                             |
| 11                                  | 2016 | Electric | Commercial & Industrial    | Large Commercial Retrofit                | \$19,719                               | 10.92%                            |
| 12                                  | 2016 | Electric | Commercial & Industrial    | Small Business Direct Install            | \$6,994                                | 3.87%                             |
| 13                                  | 2016 | Electric | Low Income Residential     | Income Eligible Multifamily              | \$2,067                                | 1.14%                             |
| 14                                  | 2016 | Electric | Non-Low Income Residential | Energy Star® HVAC                        | \$1,170                                | 0.65%                             |
| 15                                  | 2016 | Electric | Non-Low Income Residential | EnergyWise                               | \$6,906                                | 4.93%                             |
| 16                                  | 2016 | Electric | Non-Low Income Residential | ENERGY STAR® Lighting                    | \$7,706                                | 4.27%                             |
| 17                                  | 2016 | Electric | Non-Low Income Residential | Residential Consumer Products            | \$1,706                                | 0.94%                             |
| 18                                  | 2016 | Gas      | Commercial & Industrial    | Large Commercial New Construction        | \$1,664                                | 0.92%                             |
| 19                                  | 2016 | Gas      | Commercial & Industrial    | Large Commercial Retrofit                | \$3,740                                | 2.07%                             |
| 20                                  | 2016 | Gas      | Commercial & Industrial    | Small Business Direct Install            | \$134                                  | 0.07%                             |
| 21                                  | 2016 | Gas      | Commercial & Industrial    | Commercial & Industrial Multifamily      | \$580                                  | 0.32%                             |
| 22                                  | 2016 | Gas      | Non-Low Income Residential | Energy Star® HVAC                        | \$1,253                                | 0.69%                             |
| 23                                  | 2016 | Gas      | Non-Low Income Residential | Residential New Construction             | \$847                                  | 0.47%                             |
| 24                                  | 2017 | Electric | Low Income Residential     | Single Family - Income Eligible Services | \$8,211                                | 4.55%                             |
| 25                                  | 2017 | Electric | Non-Low Income Residential | Residential New Construction             | \$1,142                                | 0.63%                             |
| 26                                  | 2017 | Electric | Non-Low Income Residential | Energy Star® HVAC                        | \$1,587                                | 0.88%                             |
| 27                                  | 2017 | Electric | Non-Low Income Residential | EnergyWise Multifamily                   | \$2,039                                | 1.13%                             |
| 28                                  | 2017 | Electric | Non-Low Income Residential | ENERGY STAR® Lighting                    | \$6,966                                | 4.96%                             |
| 29                                  | 2017 | Electric | Non-Low Income Residential | Residential Consumer Products            | \$2,307                                | 1.28%                             |
| 30                                  | 2017 | Gas      | Commercial & Industrial    | Large Commercial New Construction        | \$2,082                                | 1.15%                             |
| 31                                  | 2017 | Gas      | Commercial & Industrial    | Large Commercial Retrofit                | \$4,608                                | 2.55%                             |
| 32                                  | 2017 | Gas      | Commercial & Industrial    | Commercial & Industrial Multifamily      | \$795                                  | 0.44%                             |
| 33                                  | 2017 | Gas      | Low Income Residential     | Single Family - Income Eligible Services | \$3,825                                | 2.17%                             |
| 34                                  | 2017 | Gas      | Non-Low Income Residential | Energy Star® HVAC                        | \$1,584                                | 0.88%                             |
| 35                                  | 2017 | Gas      | Non-Low Income Residential | EnergyWise Multifamily                   | \$1,145                                | 0.63%                             |
| 36                                  | 2017 | Gas      | Non-Low Income Residential | Residential New Construction             | \$920                                  | 0.51%                             |
| 37                                  | 2018 | Electric | Commercial & Industrial    | Small Business Direct Install            | \$5,982                                | 3.31%                             |
| 38                                  | 2018 | Electric | Non-Low Income Residential | ENERGY STAR® Lighting                    | \$10,705                               | 5.93%                             |
| 39                                  | 2018 | Electric | Non-Low Income Residential | Residential New Construction             | \$757                                  | 0.42%                             |
| 40                                  | 2018 | Gas      | Commercial & Industrial    | Small Business Direct Install            | \$143                                  | 0.08%                             |
| 41                                  | 2018 | Gas      | Commercial & Industrial    | Commercial & Industrial Multifamily      | \$915                                  | 0.45%                             |
| 42                                  | 2018 | Gas      | Low Income Residential     | Single Family - Income Eligible Services | \$4,225                                | 2.34%                             |
| 43                                  | 2018 | Gas      | Low Income Residential     | Income Eligible Multifamily              | \$2,420                                | 1.34%                             |
| 44                                  | 2018 | Gas      | Non-Low Income Residential | Residential New Construction             | \$640                                  | 0.35%                             |
| 45                                  | 2020 | Electric | Commercial & Industrial    | Small Business Direct Install            | \$7,508                                | 4.16%                             |
| 46                                  | 2020 | Electric | Non-Low Income Residential | Residential New Construction             | \$950                                  | 0.53%                             |
| 47                                  | 2020 | Electric | Non-Low Income Residential | Energy Star® HVAC                        | \$3,364                                | 1.86%                             |
| 48                                  | 2020 | Electric | Non-Low Income Residential | Residential Consumer Products            | \$2,241                                | 1.24%                             |
|                                     |      |          |                            |                                          | <b>\$180,823</b>                       | <b>100.00%</b>                    |
| Electric Commercial & Industrial    |      |          |                            |                                          | \$52,101                               | 34.38%                            |
| Electric Non-Low Income Residential |      |          |                            |                                          | \$54,816                               | 30.35%                            |
| Electric Low Income Residential     |      |          |                            |                                          | \$19,666                               | 10.89%                            |
| Gas Commercial & Industrial         |      |          |                            |                                          | \$19,632                               | 10.87%                            |
| Gas Non-Low Income Residential      |      |          |                            |                                          | \$13,838                               | 7.66%                             |
| Gas Low Income Residential          |      |          |                            |                                          | \$10,570                               | 5.85%                             |
|                                     |      |          |                            |                                          | <b>\$180,823</b>                       | <b>100.00%</b>                    |

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 22-05-EE  
In Re: 2022 Annual Energy Efficiency Plan  
Responses to the Commission's Third Set of Post-Decisional Data Requests  
Issued on June 8, 2022

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Attachment 3-10-2

**REDACTED**

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 5189  
In Re: 2022 Annual Energy Efficiency Plan  
Responses to the Commission’s Third Set of Post-Decisional Data Requests  
Issued on June 8, 2022

PUC Post-Decisional 3-11

Request:

Please provide a schedule showing the performance incentive earned in each year for the period 2012-2021. Please provide two columns, one for electric and one for gas, and sum the totals for each column.

Response:

Please see below table which does not include the proposed net downward adjustment of \$1,400,423.00 as identified in the Company’s review of invoices within the energy efficiency program that was filed on June 7, 2022.

| Year                | Electric<br>PI Earned | Gas<br>PI Earned | Electric + Gas<br>PI Earned |
|---------------------|-----------------------|------------------|-----------------------------|
| 2012                | \$ 2,469,411          | \$ 586,036       | \$ 3,055,447                |
| 2013                | \$ 2,997,681          | \$ 968,229       | \$ 3,965,910                |
| 2014                | \$ 4,223,321          | \$ 1,362,108     | \$ 5,585,429                |
| 2015                | \$ 4,533,360          | \$ 1,387,079     | \$ 5,920,439                |
| 2016                | \$ 4,128,034          | \$ 1,496,869     | \$ 5,624,903                |
| 2017                | \$ 4,829,847          | \$ 1,633,531     | \$ 6,463,378                |
| 2018                | \$ 4,940,402          | \$ 1,541,255     | \$ 6,481,657                |
| 2019                | \$ 3,290,237          | \$ 1,580,119     | \$ 4,870,356                |
| 2020                | \$ 3,242,675          | \$ 347,732       | \$ 3,590,407                |
| 2021 <sup>(1)</sup> | \$ 3,464,590          | \$ 333,123       | \$ 3,797,714                |
| Total 2012-2021     | \$ 38,119,558         | \$ 11,236,081    | \$ 49,355,639               |

<sup>(1)</sup> For 2021, the total performance incentive included above is a net of the performance incentive earned and the service quality adjustments.

Division 1-4

Request:

Please provide a copy of the contract executed between the Company and the “forensic consultant” referenced at page 6 of the report.

Response:

Please see Attachment DIV 1-4 Confidential, which is a copy of an engagement letter between National Grid USA Service Company, Inc. and its forensic consultant, with the consultant's associated rates redacted. Legal counsel for National Grid USA has reviewed this engagement letter prior to submitting this response and determined that it does not contain legally privileged information. However, certain terms are redacted because those terms are negotiated, competitively sensitive business terms of the consultant.

REDACTED



March 15, 2021

Ms. Laurice Arroyo  
Vice President and Deputy General Counsel  
National Grid  
One Metrotech Center  
Brooklyn, New York 11201

Dear Ms. Arroyo:

This engagement letter dated March 8, 2021 (the "Effective Date") confirms that National Grid Service Company, Inc. ("Client") has engaged PricewaterhouseCoopers Advisory Services LLC ("PwC") to perform the professional services described below. Client and PwC are sometimes referred to in this engagement letter as the "parties" and each, individually, as a "party."

**SCOPE OF PWC SERVICES, DELIVERABLES, AND TIMING.**

**(a) Services to be provided by PwC.** Client is engaging PwC to provide the following professional services (the "Services"):

Assistance with an internal investigation that may include, but is not limited to, transaction data analysis, interviews, and other investigative procedures as mutually agreed. The internal investigation is in response to reports related to Client's energy efficient programs.

PwC is not required to perform services that are inconsistent with the scope of Services or terms and conditions set forth in this engagement letter. Either party may request changes to the scope of Services. To be effective, such change(s) must be agreed in a writing and signed by the parties. PwC is not required to perform, and may cease performance of, any changes until and unless such changes are agreed to in writing and signed by the parties.

PwC acknowledge that Client intends to assert the attorney-client privilege and attorney work-product privilege in connection with the Services and Deliverables PwC is providing hereunder to Client and that the decision to assert or waive such privileges rests solely with Client. PwC shall use reasonable measures to protect Client's Confidential Information, as set forth herein. PwC understands that it will perform the Services and provide the Deliverables at Client's direction and under Client's supervision.

**Additional Terms for Certain Services.** The provisions of Exhibit (Data Protection Addendum) hereto shall apply to the extent that PwC processes Client Personal Information (as that term is defined in Exhibit) in connection with its performance of Services hereunder.

**(b) Deliverables.** PwC will provide the following Deliverables (as defined in the "Deliverables: Terms and Definitions" section below):

Our findings will be shared in a format agreed by Client.

**(c) Timing.** The timing of the Services is as follows:

The estimated engagement start date is: March 15, 2021.

**FEES, EXPENSES, AND PAYMENT.**

**(a) Professional Fees and Expenses**

PwC's fee is based on the time required by PwC professionals to complete the engagement and will be billed at the rates set forth in this engagement letter. Hourly rates may be revised from time to time, and the adjusted rates will be reflected in billings.



Division 1-22

Request:

Exhibit B attached to the Report is a 16 page Markdown MOU (2021-338) between National Grid's RI Energy Star Lighting Initiative and Maxlite with effective dates of 1/1/21 through 12/31/21.

- a) If this is a new form of MOU from prior years, please provide the prior MOU and highlight on the new MOU where the changes have occurred.
- b) Please explain why, pursuant to Section X (c) on page 7, this MOU "shall be governed by and construed in accordance with the laws of the Commonwealth of Massachusetts, without regard to conflict of laws principles."
- c) Please advise whether all other MOUs in the RI Energy Efficiency program were also executed with the laws of the "Commonwealth of Massachusetts" as being the governing law.
- d) Please explain why the MOU provided was signed only by the retailer and manufacturer.
- e) Please explain why the MOU was executed by the retailer on April 2021 and the manufacturer in March 2021, when the effective date was January 1, 2021.

Response:

- a) Attachment DIV 1-22-1 is the prior form of Memorandum of Understanding ("MOU"). Attachment DIV 1-22-2 is the new form of MOU with highlights showing where the changes occurred.
- b) Historically, Rhode Island energy efficiency programs were, in most areas, aligned with MASS Save energy efficiency programs. As such, the provision referencing the laws of the Commonwealth of Massachusetts was respective of the program product lists and general operating procedures and both the Rhode Island and Massachusetts programs used a consistent format for their MOUs. As shown in Attachment DIV 1-22-2, page 8, funding areas referenced within the MOU are under The Narragansett Electric Company ("Narragansett" or "Rhode Island Energy") and the MOU is signed accordingly as Narragansett. For any MOUs executed going forward, Rhode Island Energy will use the State of Rhode Island as its choice of law venue.
- c) Yes. As mentioned in subsection (b), above, the Rhode Island and Massachusetts programs used a consistent format for their MOUs. Rhode Island Energy will work with the parties to amend all active MOUs to update the applicable provision to the laws of State of Rhode Island.

Division 1-22, page 2

- d) All MOUs are signed by the retailer, manufacturer and program manager. In this case, Narragansett's program manager executed the agreement on March 30, 2021 (Attachment DIV 1-22-2, page 8). The signature page of Attachment DIV 1-22-2 differs from the signature page of Exhibit B attached to the Report. Exhibit B of the Report was included for illustrative purposes and did not contain the fully executed signature page. Attachment DIV 1-22-2 contains the fully executed signature page.
  
- e) Based on early recommendations stemming from the Residential Upstream Lighting program review, a new "unit cap by store type" rule was established for the Residential Upstream Lighting in early 2021, which set maximum market shares, based on store type. Although final signatures on MOUs were obtained in March and April 2021, the "unit cap by store type" rule was imposed on all Residential Upstream Lighting program participants, effective January 1, 2021, pursuant to the updated MOUs.

Division 1-29

Request:

Please identify the necessary training for an employee to be appointed as a Program Manager.

Response:

In the case where a program manager is brought in as a new hire for The Narragansett Electric Company, the program manager would need to have a track record of collaborating with internal and external stakeholders to improve customer satisfaction, increase program productivity, and enhance processes through best practices. Additionally, there would be evidence provided to show record of analyzing, managing, and delivering on program-based targets and budgets, while also demonstrating strong collaboration and communication skills. If an internal candidate was working on a career path progression to become a program manager delivering programs, they would shadow a seasoned program manager for a period of time until they have demonstrated a clear understanding of the accrual and claiming processes as well as an independent working knowledge of forecasting.

Division 1-30

Request:

Please indicate how the Program Managers are trained in their positions? Is there any “shadowing” of other Program Managers? Is there any specific, separate formal training for Program Managers within the energy efficiency programs?

Response:

For any new program manager, they would start with accrual, claiming and budget training with both the finance team and the internal compliance team. From the onboarding with finance and internal compliance they would shadow a seasoned program manager for a period of time until they have demonstrated a clear understanding of the accrual and claiming processes as well as an independent working knowledge of forecasting and managing program budgets.

REDACTED

**From:** [REDACTED]  
**Subject:** FW: EXT || FW: Calls Received - (TW Lighting) Third Party Proprietary Information  
**To:** [REDACTED]  
**Sent:** April 1, 2019 5:51 PM (UTC+00:00) REDACTED

FYI

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**From:** [REDACTED]  
**Sent:** Monday, April 01, 2019 12:08 PM  
**To:** [REDACTED]  
**Cc:** Codner, [REDACTED]  
**Subject:** EXT || FW: Calls Received - (TW Lighting) Third Party Proprietary Information

(TW Lighting) Third Party Proprietary Information  
Proprietary Information owned by an individual or entity other than Lockheed Martin such as a supplier, contractor, partner, customer, or competitor (Third Party). Refer to CRX-015D for more information.

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. .  
.  
Message Start:  
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FYI, TW Lighting has been receiving calls from a retailer in Illinois trying to purchase LED shop lights. It seems they are currently purchasing them through a retailer involved in the Mass Save program and are looking to receive the discounted price. We'll keep a look out for any retailers that are abusing the program but I wanted to make everyone aware incase anyone lodged a complaint.

Thanks,

-Dan

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Monday, April 1, 2019 10:52 AM  
**To:** [REDACTED]  
**Subject:** EXTERNAL: Calls Received

Hi Dan,

Per our conversation I wanted to send an e-mail recapping the call that we received this morning and our customer received on Saturday:

Tori received a call from "Jay" this morning at 847-497-8399. Jay said he owns retail stores in IL and asked to purchase shoplights by the truck load. When Tori quoted him a price in the \$18 range he became angry and told us he was buying another manufacturer's brand right now in the \$6.00+ range out of MA. Tori explained to him that this is above our cost and the only way he would qualify for

REDACTED

anything close to this price range was if he had a physical retail store in MA which qualified and was approved to be added to our MOU. He then mentioned one of our retailers and said if we didn't sell to him he would report TW Lighting as well as the retailer. I was very confused by this statement so I called the retailer.

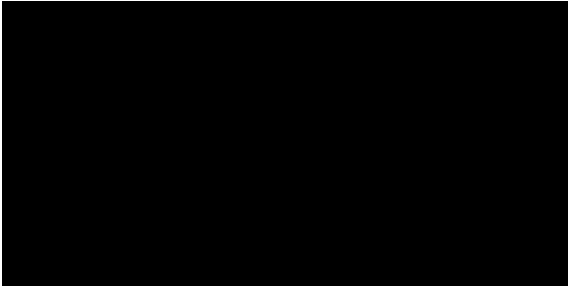
When I called the retailer they told me that on Saturday they received a similar call from "Jay" at 312-956-2669 asking to purchase shoplights by the "truckload" to be shipped to IL to be sold in his numerous retail stores. The retailer explained to "Jay" that he was more than welcome to purchase product in the store however he would be capped at 10-15 units. The caller became irate and told the customer that he would be "reporting them to the Mass Save program" and hung up the phone.

I have no idea who Jay is or what his directive is but just wanted to make you and the sponsors aware. Based on the phone numbers collected he does appear to be located in IL.

If you have questions or need additional info please do not hesitate to reach out.

Thanks,

Scott



The information contained in this email is intended only for the personal and confidential use of the recipient above. The message is a confidential communication and may be protected by various states and federal laws regarding privilege communication. If you receive this message in error, you are requested to immediately delete it and notify TW Lighting of the error. Any review, dissemination, or copying of this message without the consent of TW Lighting is strictly prohibited.

Division 1-37

Request:

What specifically has the Company done since June of 2020 to align the ethics, culture, and practices within the energy efficiency programs to be compatible with the Company's professed value of "Do the Right Thing"?

Response:

While The Narragansett Electric Company ("Narragansett") was under the control of National Grid USA, energy efficiency employees received three annual energy efficiency trainings during 2021, which included messaging on ethical values and "doing the right thing." Please refer to Attachment Division 1-17-1, pages 34, 48-53, 56 and 68.

As discussed in the responses to Division 1-16, Division 1-19, Division 1-21, and Division 2-10, energy efficiency policies and procedures used for and by employees and vendors were also updated during 2021. As described in the response to data request Division 2-4, National Grid USA Service Company, Inc. updated its "Code of Ethics" document in 2021 and sent it via U.S. mail to the home addresses of all employees. This document is also available on the National Grid website with a keyword search for "Code of Ethics."

Now that Narragansett is under the control of PPL Corporation, all Rhode Island Energy employees are required annually to complete the Standards of Integrity training within an online training application. For more details, please refer to Narragansett's response to data request Division 1-21.

REDACTED



| Individuals                  | Hourly Billing Rate |
|------------------------------|---------------------|
| Partner/Principal            | \$ [REDACTED]       |
| Managing Director / Director | \$ [REDACTED]       |
| Senior Manager               | \$ [REDACTED]       |
| Manager                      | \$ [REDACTED]       |
| Senior Associate             | \$ [REDACTED]       |
| Associate                    | \$ [REDACTED]       |

Subject to the notification requirements set forth under the Confidentiality section below, if PwC is requested or authorized by Client or required by government regulation, regulatory agency, subpoena, or other legal process to produce PwC's Deliverables, working papers, or personnel for testimony or interview with respect to services PwC performed for Client, Client will reimburse PwC for PwC's, the PwC Subcontractors' (as defined below), and their respective counsels' reasonable expenses and professional time incurred in responding to such a request.

**(b) Payment Terms.**

[REDACTED]

**DELIVERABLES: TERMS AND DEFINITIONS.**

**(a) Ownership and License.**

[REDACTED]

As used herein, "Materials" means information, know-how, data, and other technology, including works of authorship and other creations and ideas, databases, compilations, inventions, developments, software, firmware, and other computer programs (in source code, object code, or any other format), documentation, technical information, specifications, configuration information, designs, plans, drawings, writings, schematics, documents, reports, methods, procedures, concepts, techniques, protocols, systems, elements, components, subsystems, devices, equipment and other hardware.

**(b) Use and Disclosure.**



REDACTED



(i) PwC provides the Services and the Deliverables, Work Product, and PwC's Background Materials solely for Client's internal use and benefit and not for any other person's or entity's use, benefit, or reliance, and PwC disclaims any contractual or other responsibility, liability, or duty of care to any other person or entity based upon the Services, Deliverables, Work Product, or PwC's Background Materials. [REDACTED]

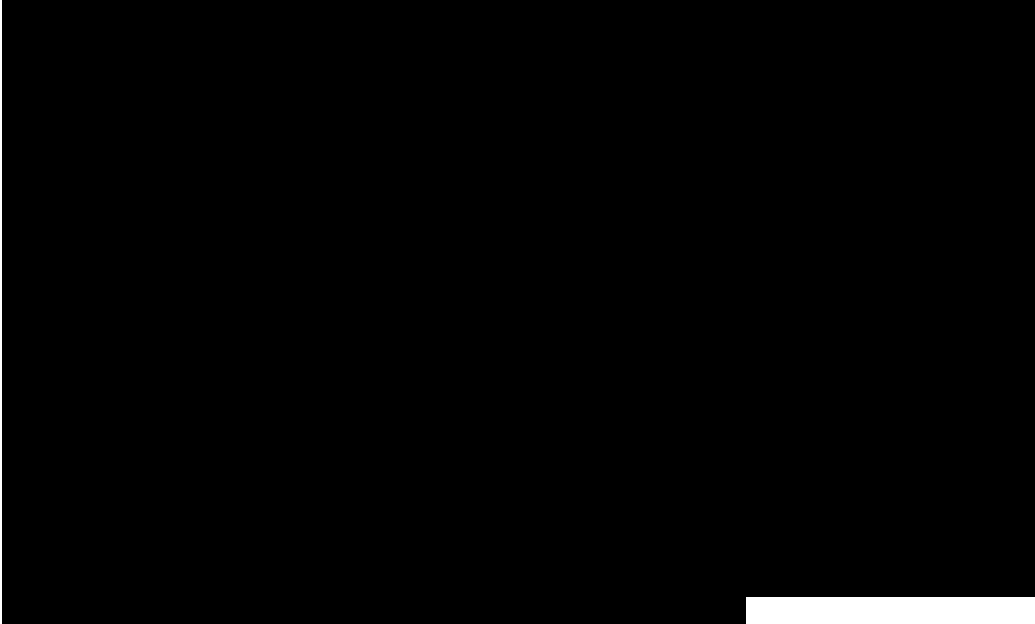
(ii) Except as described in this section, Client shall not discuss the Services with, or disclose the Deliverables, Work Product, or PwC's Background Materials to, any third party without PwC's prior written consent. Client may disclose Deliverables to, or discuss information relating to the Services with, Client's third-party professional advisors (including subcontractors, accountants, auditors, attorneys, financial, and other advisors) that are acting solely for Client's benefit and on Client's behalf and that have a need to know such information in order to provide advice or services to Client (collectively, "Third-Party Professional Advisors"), provided that such Third-Party Professional Advisors agree: (i) that PwC did not perform the Services or prepare Deliverables for such Third-Party Professional Advisors' use, benefit, or reliance and that PwC assumes no duty, liability, or responsibility to such Third-Party Professional Advisors; and (ii) not to disclose the Services or Deliverables to any other party without PwC's prior written consent. Notwithstanding the foregoing, PwC's prior written consent (which consent will include the requirement to enter into an access letter in PwC's standard form) shall be required if Client wishes to disclose the Deliverables or discuss the Services with any person or entity that is not a Third Party Professional Advisor. For the avoidance of doubt, Third-Party Professional Advisors do not include any parties that are providing or may provide insurance, financing, capital in any form, a fairness opinion, or selling or underwriting securities in connection with any transaction that is the subject of the Services or any parties that have or may obtain a financial interest in Client or an anticipated transaction.

(iii) Notwithstanding anything contained herein to the contrary, Client may disclose Deliverables to, or discuss information relating to the Services with, any governmental authority, agency or regulator ("Regulator") with jurisdiction over Client pursuant to a subpoena from such Regulator, and provided that Client provides PwC written notice of such request. Client may disclose any Deliverables that do not contain PwC's name or other information that could identify PwC as the source (either because PwC provided a Deliverable without identifying information or because Client subsequently removed it) to any third party if Client first accepts and represents them as its own and makes no reference to PwC in connection with such Deliverable.

**(c) Oral Advice and Draft Deliverables.** [REDACTED]

**(d) Other Materials.** To facilitate PwC's provision of Services and Deliverables, during the term of this engagement letter, PwC may provide or otherwise make available to Client certain of PwC's Background Materials, including (for example) spreadsheets and scripts, automations, visualization tools and other software (collectively, the "PwC Technology"), whether on a hosted basis or for installation on Client's systems. [REDACTED]

REDACTED



**PWC RESPONSIBILITIES.**

(a) PwC will perform the Services in accordance with the relevant standards promulgated by the American Institute of Certified Public Accountants ("AICPA") as set forth below: Consulting Services will be performed under the Standards for Consulting Services; tax Services will be performed under the Statements on Standards for Tax Services; Accounting Advisory Services for non-audit clients will be performed under the Standards for Reports on the Application of Accounting Principles; valuation Services that represent an estimate of value will be performed under the Statement on Standards for Valuation Services; and Forensic Services for litigation or investigation engagements will be performed under Statements on Standards for Forensic Services (SSFS).

(b) PwC's role is advisory only. PwC will not provide an audit, accounting, or attest opinion or other form of assurance. PwC will not verify or audit any information provided to it. Because PwC will provide the Services solely for Client's use and benefit and pursuant to a relationship exclusively with Client, PwC disclaims any contractual or other responsibility, liability, or duty of care to others based upon the Services or upon any Deliverables or advice PwC provides.

**CLIENT RESPONSIBILITIES.**

(a) Client is responsible for all management functions and decisions relating to the Services, including without limitation evaluation and acceptance of the adequacy of the scope of Services in addressing Client's needs. It is Client's responsibility to establish and maintain its internal controls. Client also is responsible for the results achieved from using the Services or Deliverables. Client will designate a competent member of Client's management to oversee the Services. Client will provide reasonable assistance and accurate and complete information on a timely basis. PwC will perform the Services on the basis of information provided, and PwC will have no responsibility or liability for such information, or for any third-part hardware, software, information or materials selected or supplied by Client. Client represents and warrants that it has and will maintain the requisite rights, licenses, consents, and permissions to collect, access, use and disclose, and to permit PwC and the PwC Subcontractors to access, use and disclose, all information, materials (including emails), software and hardware (including any third-party hardware, software, information or materials supplied by Client) provided or otherwise made available to PwC or the PwC Subcontractors in connection with the Services and/or this engagement letter.

REDACTED



(b) If PwC is requested or authorized by Client or required by government regulation, regulatory agency, subpoena, or other legal process to meet with a regulator with respect to services PwC performed for Client, PwC's role will be limited to providing a fact-based overview of the Services PwC performed as described in our Deliverable(s). Should the regulator have any questions regarding the Services, PwC will provide factual clarifications as needed. Client will field and address other questions from the regulator as required. Client will allow PwC to review the content of any materials to be used during the meetings that relate to the PwC Services in advance of the meetings. As per PwC protocol, PwC will have two PwC partners attend meetings with a regulator when PwC's attendance is requested.

Notwithstanding the foregoing, Client will be solely responsible for any and all communications required with Client's federal and state regulators and/or independent monitor(s) relating to these Services and Deliverables. PwC is not being engaged to interact or meet with third parties, including but not limited to Client's regulators and/or independent monitor(s)

**CONFIDENTIALITY.**

[REDACTED]

**LIMITATIONS OF LIABILITY.**

[REDACTED]

**OTHER PWC FIRMS; PWC SUBCONTRACTORS.**

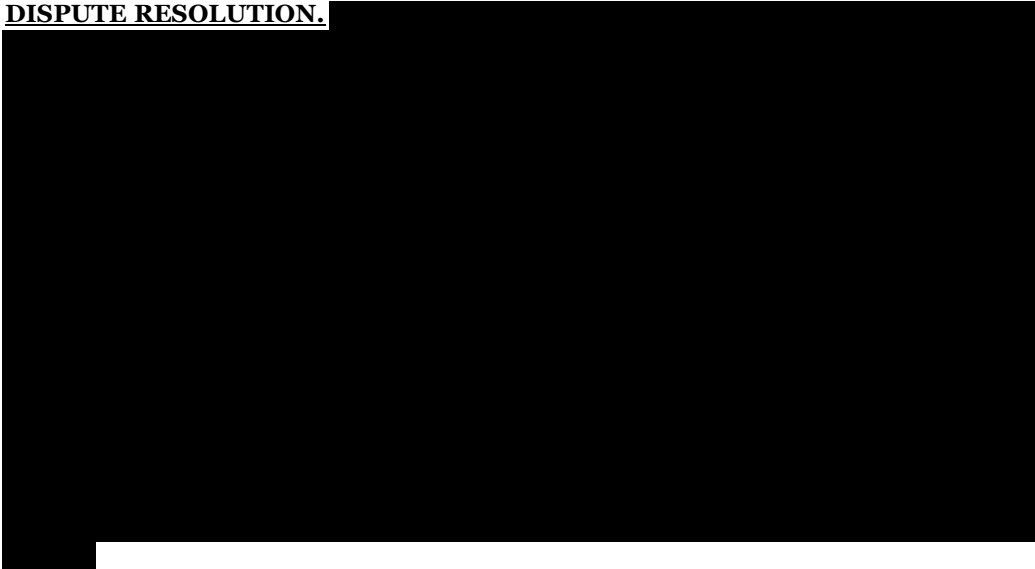
[REDACTED]

REDACTED

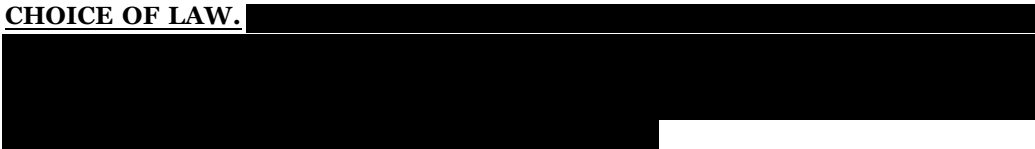


**TERMINATION.** Any party may terminate this engagement letter without penalty upon written notice to the other party. Any provisions of this engagement letter that expressly or by implication are intended to survive its termination will survive and continue to bind the parties.

**DISPUTE RESOLUTION.**



**CHOICE OF LAW.**



**CPA NOTICE.** PwC is owned by professionals who hold CPA licenses as well as by professionals who are not licensed CPAs. Depending on the nature of the Services, non-CPA owners may be involved in providing Services under this engagement letter.

**NO LEGAL ADVICE; CHANGES IN LAWS.** The Services do not include the provision of legal advice, and PwC makes no representations regarding questions of legal interpretation. Client should consult with its attorneys with respect to any legal matters or items that require legal interpretation under federal, state, or any other type of law or regulation. Changes in the

REDACTED



law and/or its interpretation may take place before PwC's advice is acted upon or may be retrospective in effect; PwC accepts no responsibility for changes in the law or its interpretation that may occur after the provision of the Services.

**COMPLIANCE WITH LAWS.** While performing its obligations under this engagement letter, each party will comply with all relevant United States federal or state laws and regulations that are directly applicable to such party's performance of the Services and/or its obligations under this engagement letter.

**MISCELLANEOUS.**

**(a) Non-Exclusive Agreement; Other Matters.**

This is a non-exclusive agreement, and subject to its confidentiality obligations, PwC and the PwC Subcontractors are not prevented or restricted from providing services to other clients. PwC is an independent contractor, not a fiduciary or agent of Client, and shall not perform any obligation of Client, whether regulatory or contractual, nor shall PwC negotiate on Client's behalf.



If PwC commenced Services prior to execution of this engagement letter, the terms of this engagement letter shall govern such Services.

**(b) Order of Precedence.** If there is a conflict between the terms contained in the main body of this engagement letter and any Attachment to this engagement letter, the following order of precedence shall apply: (i) the applicable Attachment and then (ii) the main body of this engagement letter.

**(c) Entire Agreement; Severability.** This engagement letter and its Attachments represent the entire agreement between the parties with regard to the subject matter hereof and supersede any prior understandings, proposals, or agreements concerning the Services. If any provision (or any part thereof) of this engagement letter is found to be unenforceable or invalid, the remainder of such provision shall remain enforceable to the maximum extent permitted by law.

**(d) Assignment.** No party to this engagement letter may assign or transfer this engagement letter or any rights, licenses, obligations, claims, or proceeds from claims arising out of or in any way relating to this engagement letter, any Services provided hereunder, or any fees for this engagement letter or such Services to anyone, by operation of law or otherwise, without the prior written consent of the other parties; and any assignment without such consent shall be void and invalid. This engagement letter shall be binding upon and inure to the benefit of the parties hereto and their permitted successors and assigns, and except as expressly provided herein, nothing in this engagement letter shall confer upon any other person or entity any legal or equitable right, benefit, or remedy of any nature whatsoever under or by reason of this engagement letter.

**(e) Force Majeure.** No party shall be liable for any delay or failure to perform any of the Services or obligations in this engagement letter due to causes beyond its reasonable control.

REDACTED



**(f) Counterparts; Headings.** This engagement letter may be executed in counterparts, each of which shall be deemed an original but all of which taken together shall constitute one single document between the parties. Counterparts may be exchanged by facsimile or attached as a pdf, jpeg, or similar file type to an email or by DocuSign, Adobe Acrobat, or other electronic signature. Headings in this engagement letter are for convenience only and shall not be used in interpreting this engagement letter or any provision of it.

\* \* \* \* \*

REDACTED



If Client has any questions about this engagement letter, please discuss them with Meera ADVS) at [REDACTED] Phone Number: [REDACTED] If the Services and terms outlined in this engagement letter are acceptable to Client, please sign one copy of this engagement letter in the space provided and return it to the undersigned.

Very truly yours,

PricewaterhouseCoopers Advisory Services LLC

\_\_\_\_\_  
Meera Banerjee

Partner

Date:

\_\_\_\_\_  
3/15/2021

**ACKNOWLEDGED AND AGREED:**

National Grid USA Service Company, Inc.

*Laurice Arroyo*

\_\_\_\_\_  
Laurice Arroyo

Vice President and Deputy General Counsel

Date:

\_\_\_\_\_  
3/15/2021

REDACTED



**Exhibit A**

**DATA PROTECTION ADDENDUM**

[REDACTED]

1. [REDACTED]

2. [REDACTED]

[REDACTED]

3. PwC shall process Client Personal Information in accordance with applicable data protection laws, rules, and regulations, including without limitation and to the extent applicable, the General Data Protection Regulation (EU) 2016/679 (the “**GDPR**”) and the California Consumer Privacy Act of 2018 (the “**CCPA**”) (collectively, “**Applicable Data Protection Laws**”) and only in accordance with Client’s instructions as established in this Addendum and/or the Agreement.

4. When Client is established in the European Economic Area (the “**EEA**”), Switzerland, or the United Kingdom (the “**UK**”), or when Client Personal Information relates to individuals in the EEA, Switzerland, or the UK, then the additional provisions set out in Schedule B to this Addendum shall apply to PwC’s processing of such Client Personal Information. When PwC processes such Client Personal Information as a controller (as such term is defined by the GDPR), PwC shall do so in accordance with the body of this Addendum and Section 1 of Schedule B. When PwC processes such Client Personal Information as a processor (as such term is defined by the GDPR), PwC shall do so in



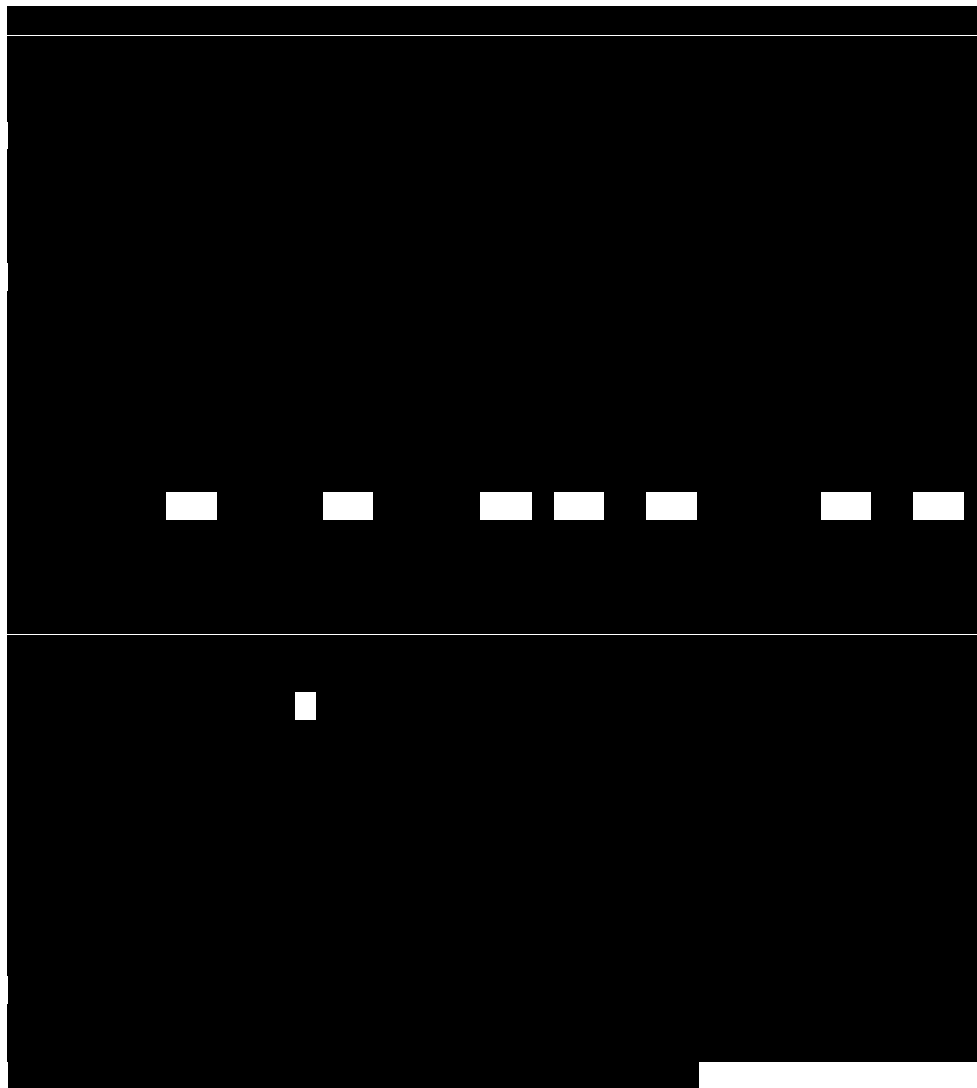


accordance with the body of this Addendum and PwC's obligations under Article 28 of the GDPR as set forth in Section 2 of Schedule B.

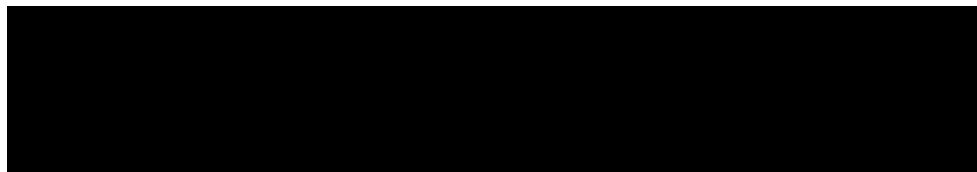
5.



6.



7.



REDACTED



8.

[Redacted]

9.

[Redacted]

10.

[Redacted]

11.

[Redacted]

12.

[Redacted]

13.

[Redacted]

REDACTED

Attac



14.

15.

16.

REDACTED



**Schedule A**  
**Client Personal Information**

Data subjects:

[Redacted]

- [Redacted]

Categories of data:

[Redacted]

- [Redacted]

REDACTED



### Schedule B: GDPR Specific Provisions

- [REDACTED]
- 1. [REDACTED]
- 2. [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
    - i. [REDACTED]
    - [REDACTED]
    - [REDACTED]
    - [REDACTED]
    - [REDACTED]
    - [REDACTED]
    - [REDACTED]
    - [REDACTED]
    - [REDACTED]
    - [REDACTED]

REDACTED



Division 1-11

Request:

At page 7, the Company states that “program managers were aware that once savings reached the caps in a given program year, they no longer served to increase performance incentives.”

- a) What negative impact would have occurred in the program or to the employees in the energy efficiency program had the savings caps been exceeded?
- b) What positive impact would have occurred in the program or to the employees in the energy efficiency program had the savings caps been exceeded?
- c) Other than overpaying for performance incentives, were there negative impacts imposed upon Rhode Island ratepayers by “deferring” savings? If so, what were they and can they be quantified? If not, why not?

Response:

- a) Given the interdependency of the savings goals, budgets, and performance incentives within the energy efficiency program, positive or negative impacts from changed variables are challenging to predict. Assuming that more incremental savings were cost-effective and achievement of those savings would have allowed The Narragansett Electric Company to stay within prudent spending parameters, customers participating in the program and funding the program would receive the benefit of all program savings, as captured. No negative impact for employees would arise from this outcome. If more incremental savings came at a higher cost, and budgets were exceeded, it would have been acceptable, but up to a point. Please see the response to the forthcoming data request Division 2-12 for more information.
- b) Please see the response to subpart (a), above.
- c) Under certain conditions, a deferral and a potential overstatement of savings could affect the achievement of the performance incentive in the next year. Please also refer to the response to the forthcoming data request Division 2-12.

Division 1-15

Request:

What was the earliest date that the Company became aware that there was a potential problem with employees and “out of period” invoices? When the Company became aware of this problem, what steps, if any, did it take to communicate this issue to the Division or the Commission?

Response:

On January 7, 2022, The Narragansett Electric Company (“Narragansett”) responded to PUC Data Request 5-4 in the 2022 Annual Energy Efficiency Program Plan, Docket No. 5189, wherein a detailed explanation of the genesis of the issues under investigation in this docket was provided.

As explained in the response to PUC Data Request 5-4, in early 2020, Narragansett and a group of Massachusetts energy efficiency program administrators initiated an investigation into conduct of a manufacturer participating in the Residential Upstream Lighting program. In March 2020, counsel for Narragansett notified Commission counsel and Division counsel that the manufacturer was being reviewed for non-compliance with certain program rules. In June 2020, in the course of the initial investigation, Narragansett received an unsubstantiated allegation from the manufacturer that an employee working on Narragansett’s program had asked a vendor participating in the Upstream Lighting Program to hold-off on submitting end-of-year invoice from that vendor, and to submit the invoice in the subsequent calendar year. The matter was referred internally to the legal, human resources, and ethics departments, and review by these departments ensued through early fall.

In the October 2020 timeframe, counsel for Narragansett informally notified counsel for the Commission and the Division that, during the course of the unrelated investigation of the manufacturer, a collateral claim was raised by a party under investigation and that Narragansett was taking the matter seriously and investigating the claim.<sup>1</sup>

Narragansett’s internal investigation into the employee conduct continued through the first and second quarter, 2021, ultimately confirming the manufacturer’s allegation. With confirmation of the veracity of the allegation, counsel for Narragansett followed up with Commission counsel and Division counsel by phone on August 6, 2021, to notify them that an allegation was made in

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<sup>1</sup> Counsel for Narragansett had previously notified Commission counsel and Division counsel of the investigation of the lighting manufacturer for noncompliance with certain program rules in March 2020.



Division 1-15, page 2

relation to employee conduct, prompting an internal investigation and that, based on the review completed thus far, it was determined that employee misconduct had occurred. Counsel for Narragansett conveyed that, because the investigation was ongoing, the full scope and impact was not known at that point.

On December 6, 2021, counsel for Narragansett notified Commission counsel of the follow-on investigation of the accounting practices relating to the out-of-period invoices, the estimated impact on customers, and the intent to remediate these impacts.

As noted above, on January 7, 2022, Narragansett responded to Data Request 5-4 in the 2022 Annual Energy Efficiency Program Plan, Docket No. 5189, providing a detailed explanation of the genesis of the initial investigation of the manufacturer, and the subsequent allegations of employee misconduct relating to the out-of-period invoices.

Finally, Narragansett communicated its conclusions about “out-of-period” invoicing to the Division and the Commission in its filing of the June 7, 2022, “Review of Invoices within the Energy Efficiency Program,” in Docket No. 5189.

Division 1-22

Request:

Exhibit B attached to the Report is a 16 page Markdown MOU (2021-338) between National Grid's RI Energy Star Lighting Initiative and Maxlite with effective dates of 1/1/21 through 12/31/21.

- a) If this is a new form of MOU from prior years, please provide the prior MOU and highlight on the new MOU where the changes have occurred.
- b) Please explain why, pursuant to Section X (c) on page 7, this MOU "shall be governed by and construed in accordance with the laws of the Commonwealth of Massachusetts, without regard to conflict of laws principles."
- c) Please advise whether all other MOUs in the RI Energy Efficiency program were also executed with the laws of the "Commonwealth of Massachusetts" as being the governing law.
- d) Please explain why the MOU provided was signed only by the retailer and manufacturer.
- e) Please explain why the MOU was executed by the retailer on April 2021 and the manufacturer in March 2021, when the effective date was January 1, 2021.

Response:

- a) Attachment DIV 1-22-1 is the prior form of Memorandum of Understanding ("MOU"). Attachment DIV 1-22-2 is the new form of MOU with highlights showing where the changes occurred.
- b) Historically, Rhode Island energy efficiency programs were, in most areas, aligned with MASS Save energy efficiency programs. As such, the provision referencing the laws of the Commonwealth of Massachusetts was respective of the program product lists and general operating procedures and both the Rhode Island and Massachusetts programs used a consistent format for their MOUs. As shown in Attachment DIV 1-22-2, page 8, funding areas referenced within the MOU are under The Narragansett Electric Company ("Narragansett" or "Rhode Island Energy") and the MOU is signed accordingly as Narragansett. For any MOUs executed going forward, Rhode Island Energy will use the State of Rhode Island as its choice of law venue.
- c) Yes. As mentioned in subsection (b), above, the Rhode Island and Massachusetts programs used a consistent format for their MOUs. Rhode Island Energy will work with the parties to amend all active MOUs to update the applicable provision to the laws of State of Rhode Island.

Division 1-22, page 2

- d) All MOUs are signed by the retailer, manufacturer and program manager. In this case, Narragansett's program manager executed the agreement on March 30, 2021 (Attachment DIV 1-22-2, page 8). The signature page of Attachment DIV 1-22-2 differs from the signature page of Exhibit B attached to the Report. Exhibit B of the Report was included for illustrative purposes and did not contain the fully executed signature page. Attachment DIV 1-22-2 contains the fully executed signature page.
  
- e) Based on early recommendations stemming from the Residential Upstream Lighting program review, a new "unit cap by store type" rule was established for the Residential Upstream Lighting in early 2021, which set maximum market shares, based on store type. Although final signatures on MOUs were obtained in March and April 2021, the "unit cap by store type" rule was imposed on all Residential Upstream Lighting program participants, effective January 1, 2021, pursuant to the updated MOUs.

Division 1-29

Request:

Please identify the necessary training for an employee to be appointed as a Program Manager.

Response:

In the case where a program manager is brought in as a new hire for The Narragansett Electric Company, the program manager would need to have a track record of collaborating with internal and external stakeholders to improve customer satisfaction, increase program productivity, and enhance processes through best practices. Additionally, there would be evidence provided to show record of analyzing, managing, and delivering on program-based targets and budgets, while also demonstrating strong collaboration and communication skills. If an internal candidate was working on a career path progression to become a program manager delivering programs, they would shadow a seasoned program manager for a period of time until they have demonstrated a clear understanding of the accrual and claiming processes as well as an independent working knowledge of forecasting.

Division 1-30

Request:

Please indicate how the Program Managers are trained in their positions? Is there any "shadowing" of other Program Managers? Is there any specific, separate formal training for Program Managers within the energy efficiency programs?

Response:

For any new program manager, they would start with accrual, claiming and budget training with both the finance team and the internal compliance team. From the onboarding with finance and internal compliance they would shadow a seasoned program manager for a period of time until they have demonstrated a clear understanding of the accrual and claiming processes as well as an independent working knowledge of forecasting and managing program budgets.

REDACTED

**From:** [REDACTED]  
**Subject:** FW: EXT || FW: Calls Received - (TW Lighting) Third Party Proprietary Information  
**To:** [REDACTED]  
**Sent:** April 1, 2019 5:51 PM (UTC+00:00) REDACTED

FYI

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**From:** [REDACTED]  
**Sent:** Monday, April 01, 2019 12:08 PM  
**To:** [REDACTED]  
**Cc:** Codner, [REDACTED]  
**Subject:** EXT || FW: Calls Received - (TW Lighting) Third Party Proprietary Information

(TW Lighting) Third Party Proprietary Information  
Proprietary Information owned by an individual or entity other than Lockheed Martin such as a supplier, contractor, partner, customer, or competitor (Third Party). Refer to CRX-015D for more information.

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. .  
.  
Message Start:  
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FYI, TW Lighting has been receiving calls from a retailer in Illinois trying to purchase LED shop lights. It seems they are currently purchasing them through a retailer involved in the Mass Save program and are looking to receive the discounted price. We'll keep a look out for any retailers that are abusing the program but I wanted to make everyone aware incase anyone lodged a complaint.

Thanks,

-Dan

---

**From:** [REDACTED]  
**Sent:** Monday, April 1, 2019 10:52 AM  
**To:** [REDACTED]  
**Subject:** EXTERNAL: Calls Received

Hi Dan,

Per our conversation I wanted to send an e-mail recapping the call that we received this morning and our customer received on Saturday:

Tori received a call from "Jay" this morning at 847-497-8399. Jay said he owns retail stores in IL and asked to purchase shoplights by the truck load. When Tori quoted him a price in the \$18 range he became angry and told us he was buying another manufacturer's brand right now in the \$6.00+ range out of MA. Tori explained to him that this is above our cost and the only way he would qualify for

REDACTED

anything close to this price range was if he had a physical retail store in MA which qualified and was approved to be added to our MOU. He then mentioned one of our retailers and said if we didn't sell to him he would report TW Lighting as well as the retailer. I was very confused by this statement so I called the retailer.

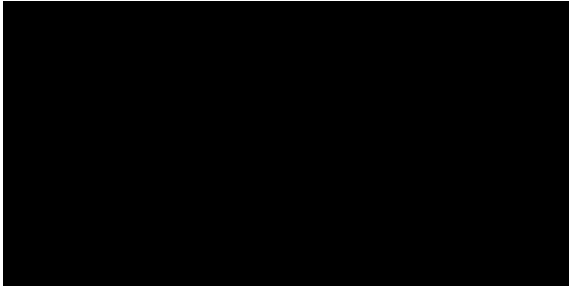
When I called the retailer they told me that on Saturday they received a similar call from "Jay" at 312-956-2669 asking to purchase shoplights by the "truckload" to be shipped to IL to be sold in his numerous retail stores. The retailer explained to "Jay" that he was more than welcome to purchase product in the store however he would be capped at 10-15 units. The caller became irate and told the customer that he would be "reporting them to the Mass Save program" and hung up the phone.

I have no idea who Jay is or what his directive is but just wanted to make you and the sponsors aware. Based on the phone numbers collected he does appear to be located in IL.

If you have questions or need additional info please do not hesitate to reach out.

Thanks,

Scott



The information contained in this email is intended only for the personal and confidential use of the recipient above. The message is a confidential communication and may be protected by various states and federal laws regarding privilege communication. If you receive this message in error, you are requested to immediately delete it and notify TW Lighting of the error. Any review, dissemination, or copying of this message without the consent of TW Lighting is strictly prohibited.

Division 1-37

Request:

What specifically has the Company done since June of 2020 to align the ethics, culture, and practices within the energy efficiency programs to be compatible with the Company's professed value of "Do the Right Thing"?

Response:

While The Narragansett Electric Company ("Narragansett") was under the control of National Grid USA, energy efficiency employees received three annual energy efficiency trainings during 2021, which included messaging on ethical values and "doing the right thing." Please refer to Attachment Division 1-17-1, pages 34, 48-53, 56 and 68.

As discussed in the responses to Division 1-16, Division 1-19, Division 1-21, and Division 2-10, energy efficiency policies and procedures used for and by employees and vendors were also updated during 2021. As described in the response to data request Division 2-4, National Grid USA Service Company, Inc. updated its "Code of Ethics" document in 2021 and sent it via U.S. mail to the home addresses of all employees. This document is also available on the National Grid website with a keyword search for "Code of Ethics."

Now that Narragansett is under the control of PPL Corporation, all Rhode Island Energy employees are required annually to complete the Standards of Integrity training within an online training application. For more details, please refer to Narragansett's response to data request Division 1-21.



Division 2-4

Request:

Does the Company have an internal definition of “fraud”? If so, what is it? If so, is this known to all employees? If the answer is yes, please explain how the employees know about the Company’s definition of fraud?

Response:

Currently, The Narragansett Electric Company, operating as Rhode Island Energy (“Rhode Island Energy” or “Narragansett”), does not have an internal definition of fraud. However, all employees are forbidden to engage in illegal conduct or other conduct that would violate Rhode Island Energy policies. This effectively prohibited any commission of fraud by employees. The Rhode Island Energy policy that establishes these expectations and values is the “Standards of Integrity” (see Attachment DIV 1-21-1). The Standards of Integrity prohibit fraud in a broad but thorough way. For example, there is a section entitled “Commitment to Compliance,” which calls for compliance with all applicable laws, regulations, and policies, including those contained within the Standards of Integrity. Almost any fraud should be illegal or against policy in some fashion. In addition, there is also a section entitled “Fair Dealing” which describes the expectation that employees deal “honestly and fairly” with third parties such as regulators and customers. This also should capture almost any fraud, as fraud would require some form of intentional misrepresentation or omission of facts.

All Rhode Island Energy employees are required annually to complete the Standards of Integrity training within an online training application. Please see Rhode Island Energy’s response to data request Division 1-21 for additional details.

In the past, Narragansett, under ownership of National Grid USA, defined fraud in its “Code of Ethics” at page 34, provided as Attachment DIV 2-4. National Grid Service Company updated its “Code of Ethics” document in 2018 and 2021 and sent it via U.S. mail to the home addresses of all employees. This document is also available on the National Grid website with a keyword search for “Code of Ethics.” National Grid also published its “Always Doing the Right Thing – A Guide to Ethical Business Conduct” document in 2015, which was the predecessor document to the “Code of Ethics,” and mailed it to the home addresses of all employees. National Grid also delivers an electronic anti-fraud training that management employees must complete every three years, and it is assigned to new employees as a part of their onboarding.

nationalgrid

# Our Code of Ethics

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Bring Energy to Life





## Our Code of Ethics

Welcome



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



Information and communication



Useful contact numbers



How to use this interactive document



# Welcome



# Acting responsibly



# People and behaviour



# Conflicts of interest



# Anti-corruption and transparency



# Information and communication



## Our Code of Ethics

### Welcome

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### Acting responsibly

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### People and behaviour

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### Conflicts of interest

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### Anti-corruption and transparency

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### Information and communication

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### Useful contact numbers

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# Welcome

## How to use this document

### The Code of Ethics is a publication delivered by the National Grid Group.

To help you find the information you need quickly and easily we have published this Code of Ethics as an interactive document.

#### How to utilise the interactive document:



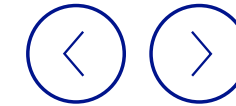
#### Home

This will take you to the contents page.

WWW.

#### Hyperlinks

Hyperlinks are highlighted in light blue throughout. You can click on them to access further information.



#### Arrows

Click on the arrows to move backwards or forwards a page.



#### Additional navigation

You can also navigate the document by clicking on the sections in the sidebar.



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# Welcome to our Code of Ethics

**We have policies and guidelines to help us make sure that we all do the right thing.**

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# Welcome to our Code of Ethics

**Our Purpose, 'We Bring Energy to Life', combined with our Vision and Values, guide us to serve our customers and look after the communities in which we operate.**

Our Vision is to be at the heart of a clean, fair and affordable energy future. This Vision demonstrates our belief that we need to stand for something beyond profit. It also emphasises the importance of trust, which we earn not just by meeting our commitments, but by making sure we do so in the right way. That is why how we work is as important as what we do.

Our Code of Ethics for all National Grid employees outlines how we behave and is shaped by our three Values; Do the Right Thing, Find a Better Way and Make it Happen.

The code applies to everyone, from the Board and the Group Executive to all colleagues across the organisation. It is intended to help protect our reputation as an ethical business and so maintain the trust of everyone that we do business with. The choices and decisions we make every day really matter and we should all feel confident in voicing our opinions and in challenging behaviour which doesn't feel right.

We have policies and guidelines to help us make sure that we all do the right thing. You will also find information about where to get further advice or how to raise a concern. If you see something that isn't right, you should speak up. No matter who is at fault, or the mistake that was made, we should all be prepared to learn from each other.

So, take the time to read and reflect on this guide, and apply its principles to how you do things every day.



*J. Pettigrew.*  
**John Pettigrew**  
Chief Executive

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**Our code is supported by an Ethics Business Management Standard.**

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# Our Code of Ethics

**Our Values – Do the Right Thing, Find a Better Way and Make it Happen – are fundamental to how we do business. And how we work is equally as important as what we do. Our code supports all of us in making informed and ethical decisions that align with these Values. It gives background information, advice and outlines how to raise a concern or get further guidance. (See page 7 for more information on our Values.)**

Our code also reinforces the importance of speaking up, so we can learn from our mistakes and address unethical behaviour. That means being open and honest and speaking up if we see something unsafe, unethical or potentially harmful. We do not tolerate victimisation or retaliation against anyone who raises a concern and consider such acts to be misconduct. Any such acts will be subject to local disciplinary procedures.

The code contains guidance sections that highlight key principles, ethical dilemmas and frequently asked questions (FAQs) to support our understanding, as well as details of what the guidance means to us.

#### The following areas are covered in our code:

- Acting responsibly
- People and behaviours
- Conflicts of interest
- Anti-corruption and transparency
- Information and communication.

Our code is supported by robust processes for investigating any concerns raised and responding to any related queries. Please refer to the contact information on page 10 for details of the avenues available to you for reporting any ethical concerns or for any further guidance you may need to answer any related questions or queries.

The code applies to all National Grid employees, including those of our subsidiaries. Failure to comply with the code and any associated company policies and procedures will be taken seriously and may result in disciplinary actions up to and including dismissal, in line with local disciplinary procedures.

This document is written in British English, following the common practice for multinational companies to use the language of their corporate base.



**Our code also reinforces the importance of speaking up, so we can learn from our mistakes and address unethical behaviour.**



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# Our Purpose, Vision and Values

Our Purpose is simple: to Bring Energy to Life

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**Our Vision is what we aim to achieve. To be at the heart of a clean, fair and affordable energy future.**

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# Our Values

## To Do the Right Thing, Find a Better Way and Make it Happen

### We'll achieve our Vision and deliver our strategy by living our Values – to Do the Right Thing, Find a Better Way and Make it Happen.

Taken together, they will guide our actions and behaviours as a responsible business and help us create the culture we need to tackle the world's greatest energy challenges with passion and purpose.

A culture that is purpose-driven and results-orientated, where our people are empowered to take the lead and make decisions that ensure we deliver efficiently for our customers, communities and stakeholders.

To put our Values into action, we need to look at how we live our behaviours in the work we do every day, in ways that mean something for colleagues across the business. Our code supports this by outlining the behaviours that are expected of us all. Ethical business behaviour depends on all of us accepting our responsibility for living the Values and upholding the principles within this code.

### Do the Right Thing

- Act safely, inclusively and with integrity
- Support and care for each other
- Speak up, challenge and act.

### Find a Better Way

- Work as one team to find solutions
- Embrace learning and new ideas
- Simplify to what really matters.

### Make it Happen

- Be bold and act with passion and purpose
- Take ownership to deliver for customers
- Focus on progress over perfection.



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# Responsibilities

## As a National Grid employee

I will comply with the laws, regulations and company requirements that apply to my job

I will follow the guidelines set out in this code and demonstrate the National Grid Values

I will not tolerate poor ethical standards in others and will speak up promptly about possible misconduct

I will treat employees and third parties with respect

I will cooperate fully with internal and external auditors, lawyers, HR, the Ethics and Business Conduct team and any other people involved in investigations

I will speak up and promptly report any Ethical or Business Conduct issues that I become aware of



## As a National Grid leader

I will model compliance with this code and other relevant National Grid policies

I will lead by example, doing the right thing and demonstrating National Grid's leadership skills and Values

I will listen to and follow up with employees who raise concerns

I will build trust and create an environment that makes it comfortable and safe for employees to speak up to share ideas and concerns

I will make ethics and business conduct an essential part of leadership accountability

I will cooperate fully with internal and external auditors, lawyers, HR, the Ethics and Business Conduct team and any other people involved in investigations

I will speak up and promptly report any Ethical or Business Conduct issues that I become aware of



## As a National Grid company

We will conduct our business in line with our Values

We will promote an environment where everyone can do the right thing and feel comfortable raising any concerns about actions or decisions that they think are unethical

We will investigate the facts thoroughly and fairly where concerns are raised in good faith and ensure appropriate actions are taken

We will not tolerate retaliation or victimization of any kind and we will take action against any employee who is found to have victimised a person for raising a concern



## Making the right choices

We have policies and guidelines to help us make sure we all do the right thing. However, they cannot cover every situation we may face. Always take time to think: Do our behaviours reflect our Values? Are we acting in line with our policies?

When we're not certain, we should stop, get advice, involve others where appropriate and be accountable. To help us test any decision we may reach, there are some questions we can ask ourselves to navigate grey areas. See the following page for more details.





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## Quick test

---

### Is it fair and honest?

(no intention to deceive or mislead)

---

### Is it within the spirit of our Values, policies or Code of Ethics?

---

### Is it in the best interests of the Company?

---

### Does it avoid creating a sense of obligation?

---

### Can I justify it to my manager, co-workers, friends and my family?

---

### Would I feel comfortable reading about it in the press?

---

### Is it lawful?

---

If we can answer 'yes' to all these questions, we are on the right track. However, if we answer 'no' to any of these questions, we should all seek advice using the avenues available and described in the 'Who should I contact?' section.



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## Who should I contact?

We all have a responsibility to speak up if we have an ethical query or concern, or if we are made aware of any ethical concerns that we haven't witnessed ourselves. You don't have to have all the facts or evidence available to report a concern, the key requirement is to ensure it is reported. The following options are available to all of us to support the process of raising ethical queries or concerns and includes access to confidential helplines.

Please be aware that if you choose to remain anonymous, the action taken will be limited by the information provided at the time, it is therefore important that as much information as possible is provided at the time of reporting an ethical issue or concern.



Are you comfortable speaking to your line manager?

Yes

Discuss your query or raise your concern with your line manager

No

Are you comfortable approaching another manager in your team/area?

Yes

Discuss your query or raise your concern with your manager

No

Do you feel comfortable speaking to someone in a supporting function?

Yes

Discuss your query or raise your concern with

- HR
- Ethics and Business Conduct team

For the US,  
Telephone  
1-888-867-6759  
Email  
businessconduct@nationalgrid.com

The central Ethics and Business Conduct teams can be contacted either directly or via the following:

In addition to the above, the central Ethics and Business Conduct teams are supported by a network of Ethics Champions/Liaisons who can help answer your related questions or queries.

For the UK,  
Telephone  
0800 328 7212  
Email  
business.conducthelp@nationalgrid.com

Contact the external helpline where you have an option to remain anonymous (this service is provided by an external third party).

For the UK, Telephone  
0800 298 6231

Email [report@seehearspeakup.co.uk](mailto:report@seehearspeakup.co.uk)

For the US, Telephone  
1-800-465-0121

Website  
<http://nationalgrid.ethicspoint.com>

\*This service is available 24/7 all year round.

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# Doing the right thing



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## Safety

**Our activities and those of our contractors can involve risks. We must assess those risks and remove or minimise them by putting in place preventative and protective measures to keep ourselves and the public safe.**



### Principles

- We all take responsibility for achieving our safety ambition which is to always do the right thing regarding safety and consider the safety impacts in everything we do.
- We take ownership and act safely.
- We commit to openly discussing safety issues and constructively challenging unsafe behaviours.
- We learn from sharing with our colleagues what goes well and what doesn't go well.
- We report all incidents, near misses and good catches.

### Dilemma

**1** I've worked with the same team for a few years. Recently, one of them has cut corners in following safety procedures. I feel that this has put them and the rest of the team at risk. Other team members have noticed it too, but they haven't told our manager. They say I shouldn't worry about this and that our colleague is just going through a tough time. I don't want an incident to happen, but I also don't want to distance myself from the other team members or get this employee into trouble.

### What should I do?

It's good to be loyal to your team, but that loyalty should prompt you to take action. You should constructively challenge the unsafe behaviour and raise your concerns. This could be by having a safety conversation with the individual or discussing it collectively as a team in an appropriate forum/meeting. You should also report your concerns to your manager. There could be many reasons for your colleague's unsafe behaviour, but whatever the reason, it can't continue. Remember that cutting corners and not following safety procedures could lead to an incident and someone could get hurt. Raising concerns enables us to learn from our mistakes and keep ourselves and each other safe.

### FAQs

**Do I really have to report a minor accident if nobody had to take time off work?**

**Yes.** You must report all incidents, no matter how minor. We look at all incidents – however trivial they may seem – to identify any hazards and trends, so that action can be taken to prevent injuries from occurring.

### What this guidance means to you

We strive to be world-class when it comes to safety. It's important that we always work safely and comply with health and safety rules and regulations. You should constructively challenge unsafe behaviours, and you must report all incidents and near misses, so we can investigate them and take appropriate action.

### Where you can find more information

Safety BMS Standard  
Grid:home

### Policy section owner

Safety



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# Environmental protection

**As a responsible business we aim to go beyond legal compliance and seek opportunities to operate in an environmentally sustainable way. We do this by not only avoiding negative environmental impacts, but by leaving the natural environment in an improved state as a result of our actions. We're all responsible for protecting and enhancing the environment.**



## Principles

- We identify our environmental risks, including climate change, and develop plans to mitigate them.
- We comply with all relevant regulations and requirements, follow our environmental procedures, use permits, plans and other documents when necessary, and seek specialist advice to inform our decisions.
- We protect the environment by ensuring prevention of pollution is a key consideration in the design of all our assets.
- We use resources more efficiently by using sustainable materials and reducing waste.
- We identify opportunities to use alternatives to hazardous materials.
- We seek ways to enhance the natural value of the areas in which we work for the benefit of local communities and the environment.
- We ensure all our employees have the training, skills, knowledge and resources necessary to achieve the requirements of our internal standards.
- We use our environmental management systems, tools, expertise and innovation to measure and improve our performance.
- We report all environmental incidents and near misses, however minor they may seem. We treat environmental incidents as we do safety incidents.
- We seek opportunities to deliver improvements and enhancements as a result of our work.

## Dilemma

**1** During a recent site visit I found that on-site controls and monitoring records hadn't been inspected, which need to be done as part of our regulatory and environmental permit commitments.

### What should I do?

Tell your manager straight away. You may also need to contact your local Environmental team, the Environment Operations team or the Legal department to inform them of the matter. They'll discuss it with you and give advice.

**2** When reviewing reports, I routinely print out paper copies.

### What should I do?

Consider whether it is necessary to print the reports instead of reviewing the reports on your computer.

## FAQs

**Do I still have to report an environmental incident if no pollution was caused?**

**Yes.** You must report all environmental incidents, no matter how minor. We investigate all incidents that are reported – however trivial they may seem – to identify hazards, capture any learning and prevent them from happening again.

## What this guidance means to you

This guidance helps you understand how environmental policies, procedures and processes apply to your job. Remember that to meet our environmental commitments we must all support the environmental policy in all areas of our work.

## Where you can find more information

Environmental Sustainability BMS Standard  
Grid:home

## Policy section owner

**Safety, Health and Environment**

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# Insider threats

**If an employee or contractor misuses National Grid information or accesses it to harm our company, this is referred to as an 'Insider Act'. Insider acts can include criminal activities such as theft, fraud, sabotage, terrorism and commercial or state-sponsored espionage. A person from outside National Grid could also pose a threat by exploiting a relationship they have with one of our employees or contractors.**



## Principles

- We ensure that prior to their start date, background checks for all new employees and contractors are completed to ensure they do not pose an unacceptable risk.
- We remain vigilant at all times in the workplace and adopt the approach of always speaking up: **If you see something, say something.**
- We are mindful of changes in colleagues' attitudes, mindsets and loyalties. These changes can sometimes result in people becoming more likely to use their access to our systems and other assets in ways that could cause us harm. We will report any suspicious or unusual behaviour and deal with security concerns when they arise.
- We look out for our colleagues and offer support as appropriate. We will not jump to conclusions or assume that a change in a colleague's behaviour means that they are doing something wrong. Just talking to them and showing our concern may help.
- Where we have any security concerns, such as those related to changes in behaviour, we raise these with our line manager or contact the Security team by emailing [security@nationalgrid.com](mailto:security@nationalgrid.com). You can phone UK Security on 01926 653773 and US Security on 844-290-0722. You can also phone the Business Conduct Helpline (UK 0800 328 7212, US 1-888-867-6759).

## Dilemma

- 1 A usually lively outgoing team member has become withdrawn and seems anxious.

They have changed their working pattern and have frequently been observed working unusual hours and are reluctant to take any holiday. I have noticed they have started to regularly take files home with them. Some of the files appear to contain sensitive information about our infrastructure and security measures.

### What should I do?

The problem could be they have a heavy workload and are struggling to complete assigned work. Talk to them and find out if they're ok. If you still have concerns after this, or don't feel comfortable with this approach, discuss the situation with your line manager or contact the relevant UK/US Security team.

- 2 I routinely work on new property acquisitions and new National Grid building projects. These projects are generally off-site and remote and there are often new faces coming and going. I noticed there seems to be very few interactions between these individuals and the National Grid personnel on-site. Sometimes they show up, walk around and take notes, and depart without any interaction with National Grid.

### What should I do?

These types of projects occur every day at National Grid. In addition to the aggressive pace to acquire, construct, and complete new sites, National Grid employees must work routinely with a wide range of contractors and vendors to ensure projects are completed in a timely manner. Project Managers are aware they must maintain proper security protocols while supervising

these remote projects and must ensure all personnel working on National Grid properties are authorised to be there. Should you ever feel that unauthorised personnel are on your job site, please contact the relevant on-site National Grid employee or the Security team.

## FAQs

### What should I do if I don't feel comfortable raising an insider threat concern with the person or my line manager?

You can raise it with the Security team or the Ethics and Business Conduct team or contact the helpline.

### What this guidance means to you

The security of our people, and our other assets and information, is vital to us and the national infrastructure. Taking appropriate security measures is an important way in which we can help protect both ourselves and National Grid against people who may cause us harm.

### Where you can find more information

Security BMS Standard  
Global People Security Policy  
Grid:home

### Policy section owner

Security

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# Physical security

**Having effective and visible security in place helps keep our people and assets safe and secure. Visible security and ALL employee participation in security fundamentals help us guard against criminal activity, such as theft, vandalism, sabotage and terrorism. We are the owner and operator of infrastructure that's critical to the countries we work in and we must ensure all necessary steps are taken to protect it.**

**The security measures we employ, both people and physical security measures, are proportionate to the level of risk to the Company. We use best practices in each country we work in and comply with all relevant laws and regulations.**

**Members of our Security team will work with you and, where appropriate, help liaise with other entities/bodies to include local law enforcement.**



## Principles

Safety of our employees, contractors, visitors and members of the public is our number one priority. To achieve this, we will all:

- challenge anyone who isn't wearing an employee security pass/badge or visitor badge
- report any loss or theft from National Grid to the police and the Security team
- report suspicious activity – if you see something, say something
- use the security arrangements and controls we have in place (for example, locking gates and doors) or report them if they're not working correctly
- report all security incidents – they may indicate a trend or persistent problem
- protect our sites and people by not revealing any security arrangements or sensitive information to people outside our company, or to those who don't need to know these details as part of their job
- only take photographs or use cameras or recording equipment in secure areas where there is a clear business reason
- ensure that we never follow closely behind someone to avoid security barriers or allow others to do so.

We report any security concerns to: [Security@nationalgrid.com](mailto:Security@nationalgrid.com) or by dialling 01926 653773 (UK) or 844-290-0722 (US).

## Dilemma

**1** An individual has tailgated through the door or gate behind me without presenting their pass/badge to the card reader.

### What should I do?

Ask the individual to see their pass/badge. If they cannot produce one, escort them to the reception desk. If there isn't a reception and it's an employee, take them to their manager to verify the employee belongs in the building. If it's a visitor, ask who they're there to see and contact the individual to escort their visitor.

**2** I'm part of a team making an official National Grid business presentation today in front of numerous people in a public space. I've been noticing increased activist activity in the media from a wide variety of protestors who appear to be focused on energy sector businesses.

### How can I ensure my safety while giving this presentation?

National Grid's Security team routinely monitors social media and open sources (print, radio, TV, etc) for indicators and messaging from protestors and activists who might display an unusual or increased interest in National Grid and our employees. Contact the Security team (through contact information listed above) for updates and advice on National Grid locations and events in other locations if you are concerned about you or your colleagues' safety.

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## Physical security



### FAQs

#### Why should I challenge an unescorted visitor? Isn't that Security's job?

Security is everyone's responsibility. By having every employee look for and challenge unescorted visitors, National Grid becomes a much safer environment for everyone. Good security behaviours deter those who wish to do the organisation harm. In every instance, know that safety is of primary importance. Allowing an unauthorised person to remain in our facilities could result in harm to you, others, or the Company. Contact the Security team immediately if you see suspicious activity.

#### If you see something, say something.

#### I have noticed some activity that may compromise our physical security at a location. How do I report it?

If you are at a facility/site with a local security office or an onsite security guard, notify the office or the person as soon as possible. Otherwise, you can contact Security at the numbers on the previous page.

#### What's the reason for keeping security doors closed, especially to limited access areas? If we're all National Grid employees, why are the extra security measures needed?

Security doors and secure areas are kept closed and secure for various reasons. Leaving the door open increases risk to National Grid and your colleagues. In certain areas, there are regulations in place that designate certain areas as secure areas. Violations of these regulations can result in serious fines and reputational damage to the Company.

#### What this guidance means to you

Security is everyone's responsibility. Everyone can help keep our people and assets safe. Challenge behaviour that could threaten our security and report any concerns you have to the Security team.

### Where you can find more information

Security BMS Standard  
Global Physical Security Policy  
Global People Security Policy  
Regional Access Control Policies  
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# Community volunteering, investment and sponsorship

**We play a vital role in connecting people to the energy we all use, and we recognise the effect our work can have on people and communities. We're at the heart of communities, so investing in and connecting with them is the way we do business. We also support charitable, civic and community organisations at global, national and local levels because we want to see the communities in which we operate thrive. Our comprehensive volunteering programmes give employees the opportunity to work with a variety of different organisations in the UK and US, and to take part in a range of activities.**



## Principles

Employees who donate money or raise funds for a registered charity may be able to apply for Matched Giving (UK) or Matching Gift Program (US).

- **UK:** National Grid will match up to £400 per financial year (1 April – 31 March) for funds raised or donated to a registered charity. There's no minimum donation amount or limit on the number of donations you can make per year, as long as the overall total is within the annual allowance you can receive a match of up to £400.
- **US:** the Matching Gift Program matches personal donations of up to \$500 each fiscal year, as long as you donate \$20 or more as a lump sum.

All requests to contribute to community projects are handled in line with our policy on charitable donations and must meet the "delegations of authority" requirements. No commitments will be made without the appropriate process and authorisation (UK approval through the UK Citizenship team and US approval through the Economic Development and US Giving team).

- **UK:** All requests from community groups, charities and not-for-profit organisations for community investment/donations must go through the National Grid Community Grant Programme website – [www.nationalgrid.com/responsibility/community/community-grant-programme](http://www.nationalgrid.com/responsibility/community/community-grant-programme). Applications must come from charities and community organisations and not from employees.
- **US:** Charitable donations are governed by a policy that sets out the process for making, reviewing or approving funding requests.

## Dilemma

- 1 Carrying out work in a small community has caused lots of disruption. Representatives from the community have asked us to make a donation towards a new recreational area in the local park. As the overall project has come in under budget, I'm keen to help.

## What can I do?

**UK** – You cannot donate money from the project. You must ask the community to apply for a community grant through our Community Grant Programme. The community can apply online at [www.nationalgrid.com/responsibility/community/community-grant-programme](http://www.nationalgrid.com/responsibility/community/community-grant-programme).

**US** – You can agree to the donation only if you have the proper approval to do so. All requests for donations to charities must go through the Economic Development and US Giving team. Community contributions such as this should also be reviewed by local Jurisdiction leadership to make sure they meet our community strategy and priorities.



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# Community volunteering, investment and sponsorship



## FAQs

### Can I ask for donations from our suppliers, vendors or customers?

Speak to the Ethics and Business Conduct team or the Community Investment team before asking for any donations. In most cases we would advise against this.

### How can I find out more?

In the UK, if you have any questions about employee volunteering, community investment, sponsorship or donations you can call our Community Helpline on 01285 841 912. For more information you can search on Grid:home.

In the US, you can find out more by reading the US Fundraising section of the Workplace Guidelines, which are available on Grid:home. You can also find guidance on the types of fundraising we allow, as well as how you may advertise a fundraiser and get any approvals you may need. Company policies relating to charitable donations and sponsorships are available on the US Finance SharePoint hub. You can also contact the Corporate Citizenship team on 315 428 6891.

## What this guidance means to you

Getting involved with communities is the way we do business at National Grid. There are lots of ways in which you can make a difference – from volunteering your time and skills to fundraising.

## Where you can find more information

Responsible Business Policy  
Grid:home

## Policy section owner

Corporate Affairs

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# Human rights

**Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status as defined by the United Nations. Respect for human rights is incorporated into our employment practices and our Values.**



## Principles

- All employees are treated fairly and in a way that safeguards their human rights.
- We believe all employees should be able to work freely and receive fair pay in return.
- We adopt the 'Employer Pays' approach, where no one should have to pay to obtain a job at National Grid or within the supply chain.
- Our supply chains are required to, and we expect them to, adopt the same principles communicated via the Global Supplier Code of Conduct.
- We work with our supply chains to ensure adherence to the principles of the United Nations Global Compact, the Ethical Trading Initiative Base Code, the US Trafficking Victims Protection Act, the UK Modern Slavery Act 2015 and, in the UK, the requirements of the Living Wage Foundation.
- We take responsibility to report and monitor human rights violations and mitigate against any risk in our supply chain.

## Dilemma

- 1 I'm working on a National Grid site with a contractor. Some of the contractor's employees seem unseasonably dressed, have incorrect or no safety equipment and appear to be restricted in the way that they are allowed to engage with me.

## What should I do?

These three observations may be indicators of forced labour practices. In these situations, we would want you to report this immediately to your manager and the Ethics and Business Conduct team.

## FAQs

**I travel to the Far East as part of my role where working conditions are very different. Do these rules apply?**

**Yes.** They apply to anyone we employ, and anyone engaged through our supply chain.

**What steps does National Grid take to safeguard against modern slavery and human trafficking?**

We believe the risk of modern slavery or human trafficking in our business and first tier supply chain is low. We produce an annual statement which sets out the steps taken to monitor and manage any potential risk of modern slavery in our supply chain and have recruitment policies in place to mitigate the risk in our direct employee workforce. Furthermore, our Global Supplier Code of Conduct sets out our expectations and fundamental principles that we expect our suppliers will perform with the highest ethical standards and to comply with all relevant laws, regulations and licences when working for National Grid.

## What this guidance means to you

We are committed to maintaining a work environment and supply chain that recognises and upholds the importance of human rights. We are committed to the communities we serve, and support programmes designed to help improve the way people live and work.

## Where you can find more information

Modern Slavery Statement  
Procurement BMS Standard  
HR BMS Standard  
Global Supplier Code of Conduct  
Global Supplier Diversity Policy  
Grid:home

## Policy section owner

**Procurement and Human Resources**

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# Drugs and alcohol

**We are committed to having a workplace free from alcohol and drugs (including psychoactive substances) and any other substance that may affect your ability to safely perform all aspects of your job.**

**We understand that there will be circumstances where you may be taking controlled and prescribed drugs. In such instances you need to consider whether they could negatively affect your performance at work. To protect your safety and that of your colleagues you should seek advice from your doctor about any potential effects that could impact your ability to perform effectively and/or safely at work. You must tell your supervisor/manager or Occupational Health (UK)/Health and Wellbeing (US) and your HR department.**



## Principles

- We understand that help and support is available to anyone who voluntarily reports a drug or alcohol dependency and that anybody needing support should contact Occupational Health (UK) or Health and Wellbeing (US) and our Human Resources department.
- We take responsibility and accountability for ensuring we are not under the influence of alcohol or illegal drugs whilst working for the Company.
- We understand that while the controlled use of prescription drugs is allowed, if we feel that at any time they may impact our ability to carry out our role safely then we will inform our supervisor/manager or a member of the Occupational Health (UK)/Health and Wellbeing team (US) to decide if we can do our work safely and effectively.
- We are aware that drug and alcohol tests can be carried out if required by law; before a job offer; after an incident or if there is a good reason to believe that a person's work is affected by their use of alcohol or drugs.
- We are aware that in the UK, random drug and alcohol testing is carried out on a continual basis.

## Dilemma

**1** I'm taking prescription medication that could affect my ability to work, but I don't want to tell my supervisor because I don't want to reveal my medical condition.

### What should I do?

You don't have to tell your supervisor/manager the type of medication you're taking or why you're taking it. If you think that the medication you are taking could affect your performance, you must let your supervisor/manager know. You or your supervisor/manager can then get advice from the Occupational Health (UK) or Health and Wellbeing team (US) to decide if you can do your work safely and efficiently.

## FAQs

### If I have a drug or alcohol problem, how can National Grid help?

We will support you if you have a genuine problem and want help. Our Employee Assistance Programme (EAP) can also give employees and managers confidential support and advice on a wide range of issues at any time of the day or night, every day of the year.

## What this guidance means to you

We aim to maintain a safe, healthy and productive working environment for all employees, customers, contractors and visitors who are involved with our work. We have a duty to ensure our work environment is free from alcohol and drugs and that you never work if you are under the influence of alcohol or drugs.

## Where you can find more information

UK/US Drug and Alcohol Policy  
Grid:home

## Policy section owner

**Human Resource (UK)  
Human Resources and Health  
and Wellbeing team (US)**

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# Discrimination, harassment and bullying

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**We believe in treating everyone fairly and respectfully. We can all contribute to ensuring our workplaces are free from discrimination, harassment and bullying by promoting an environment where we all treat each other as we want to be treated ourselves and in line with our company Values.**



## Principles

- We will treat others fairly and equally.
- We will not tolerate any type of discrimination, harassment or bullying.
- If we are subjected to discrimination, bullying or harassment, we will report it promptly.
- We will report any behaviours that we witness that could be considered to be discriminatory, harassing or bullying.

## Dilemma

**1** My colleagues came to me and showed me an inappropriate text message that had been sent to them by another employee and that made them feel uncomfortable and they don't know what to do.

### What should I do?

If your colleague is able to, they should raise their concerns with their supervisor/manager. If they don't feel comfortable doing that they should contact Human Resources or the Ethics and Business Conduct team, or call the internal or external helpline. Alternatively, you could offer to raise this on behalf of your colleague.

**2** At our team meetings, one of my colleagues will continuously shout at me and dismiss any of my suggestions which makes me feel intimidated and humiliated.

## What should I do?

These actions could be considered bullying, you should raise this concern to your supervisor/manager and if you are not comfortable with that, you should contact Human Resources or the Ethics and Business Conduct team or call the internal or external helpline.

## FAQs

### If my supervisor/manager is pushing me to meet my objectives, is this considered bullying?

If your supervisor/manager is demonstrating the National Grid leadership values whilst pushing you to meet your performance objectives, then this would not be considered bullying.

### What is discrimination?

Discrimination can take many forms including, but not limited to, race, religion, gender, sexual orientation, age, physical and mental disability, marriage and civil partnership, pregnancy and maternity.

### What is harassment?

Harassment can include anything that creates an intimidating, offensive or hostile work environment which can be physical action, spoken or written remarks, and videos or pictures.

## What is sexual harassment?

Sexual harassment includes unwelcome sexual advances, requests for sexual favours and all other verbal or physical conduct of a sexual nature.

## What is bullying?

Bullying is any health-harming verbal or physical abuse or mistreatment that threatens, humiliates or intimidates an individual.

Bullying or harassment can be between two individuals or it may involve groups of people, it may be persistent or an isolated incident and can occur in written communications, by phone or through email, not just face to face.

## What this guidance means to you

We are committed to maintaining a work environment that respects people's differences. None of us should tolerate harassment, bullying or discrimination of any kind.

## Where you can find more information

UK/US Regional Policies  
Grid:home

## Policy section owner

Human Resources

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# Workplace violence

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**We believe in providing a safe work environment for our employees. Anything that threatens the safety of the workplace or any person is not allowed. This includes threats or violence against other employees, customers or property. It also includes any other type of behaviour that puts, or could put, the safety of anyone at risk. We have a zero tolerance for any form of workplace violence, threats of violence, intimidation or attempts to instill fear in employees, consultants, vendors, customers or contractors.**



## Principles

- If we witness or are subjected to any acts of violence or threatening behaviour in the workplace we will report it.
- We understand that we are not allowed to carry weapons or other dangerous objects and substances while working for or representing National Grid.

## Dilemma

- 1 I witnessed an altercation between two employees in which one employee pushed the other employee.

### What should I do?

You should immediately notify your supervisor/manager and Security.

## FAQs

### What is workplace violence?

Workplace violence is any verbal or physical conduct that is violent, threatens violence, intimidates, attempts to instil fear, degrades or shows hostility towards an individual.

## What this guidance means to you

We are committed to maintaining a work environment that is free from violence.

## Where you can find more information

US Workplace Violence Policy  
Grid:home

## Policy section owner

**Human Resources**



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# Conflicts of interest

**We will avoid situations where our personal interests could conflict or may be perceived to conflict with those of National Grid. A conflict of interest arises when our personal relationships, interests or activities affect or could potentially affect our ability to perform our work or make unbiased decisions on behalf of National Grid. Involvement in public duties outside of work is encouraged, but only if there is no conflict of interest, or the appearance of one.**



## Principles

We will inform our manager, Human Resources or the Ethics team:

- as soon as we become aware of any potential conflicts of interest that may occur
- if we or a family member holds a financial interest in a company that does business with us
- of any personal relationships in the workplace
- we understand that we cannot directly manage anyone with whom we have a personal relationship
- we understand that we should not take on more than one external directorship in a major publicly limited company or other significant appointment.

We will ensure that our financial, employment or other interests, or those of our family or friends, will not affect (or appear to affect) the decisions we make.

## Outside directorships, second jobs and other outside activities

- We will obtain prior written approval from our manager or supervisor before committing to an outside directorship, second job or other outside activities and understand that approval will only be given if the work or directorship doesn't:
  - cause a real or apparent conflict of interest
  - affect our obligations under any relevant laws
  - affect our ability to do our job, or conflict with our responsibilities as a National Grid employee

- involve our use of company time, equipment or other resources
- negatively affect our ability to meet the terms and conditions set out in our contract of employment (UK only).

Outside activities include voluntary or paid public office or community positions such as school governorships or parish council work.

## Personal relationships

- A “personal relationship” is defined as any relationship between employees that could be considered a consensual “romantic” relationship, any relationship in which employees cohabit, and/or any relationship with a relative. A relative is any person who is related by blood or marriage, or whose relationship with an employee is similar to that of a person who is related by blood or marriage.
- We will promptly inform our HR business partner if we are involved in a personal relationship in the workplace. In addition, any employee who is the manager of others and who becomes aware of any such personal relationship must immediately report it to Human Resources.

We understand that the Company reserves the right to take remedial action in any situations involving individuals in a personal relationship including transfer decisions, or any other remedial action it believes is appropriate to address any actual or perceived issue or conflict.

## Certificate of Compliance and Disclosure

- If we are management employees (in the US) or managers (in the UK), we will disclose any potential conflicts of interest and all personal relationships when first joining the Company and then annually, by completing our annual Certificate of Compliance and Disclosure. When completing our certificate, we will err on the side of disclosure and amend it whenever something changes during the year. When declaring any external directorships, you will be asked to provide details of time commitment and monetary benefit.

## Dilemma

- 1 My brother-in-law is a part owner of a business that is bidding on a contract to provide pipe to National Grid. I have been asked to get involved in the bid evaluation process.

## What should I do?

This situation could be perceived as an actual conflict of interest and should be disclosed to your manager immediately. It's likely that you will not be permitted to get involved (now or in the future) in any decisions related to your brother-in-law's business. This relationship should also be disclosed on your Certificate of Compliance and Disclosure.

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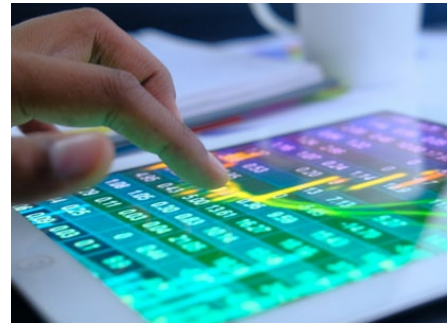
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# Conflicts of interest



**2** I have a seat on the local planning board for the area where I live. National Grid has a construction project and will be applying for a variation from the local planning board.

### What should I do?

Since the variation will need to be approved by the authority board, you need to remove yourself from all involvement in the National Grid matter to avoid a conflict of interest.

**3** Earlier this year I become romantically involved with my co-worker which I declared via the Certificate of Compliance and Disclosure process. At the time we were both at the same management grade. Due to the success of my projects, I was recently promoted to a higher grade with my partner reporting up to me.

### What should I do?

You should immediately contact Human Resources or Ethics and Business Conduct who will take steps to ensure that your companion is not in your reporting line, avoiding any conflicts of interest.

## FAQs

### What if one of my relatives or a close friend works for one of National Grid's suppliers?

You should disclose this to your manager and report it via the routine Certificate of Compliance and Disclosure process.

### I was recently elected to public office. Will this create any conflicts of interest with my job at National Grid?

As per the guidance, you should have already gained approval from your manager before standing for election. If this hasn't happened, you should tell your manager about the commitment and make sure that:

- it doesn't conflict with your working hours at National Grid;
- you don't use company resources for your duties in public office; and
- you don't use your position to look for favours for National Grid or to grant any favours.

When carrying out your public office role, if any discussions arise pertaining to National Grid, you must remove yourself and not provide any opinions as they could be construed as the opinion of National Grid, the Company, rather than your own opinion.

## What this guidance means to you

As an employee you will report any personal, financial, employment or other instances that could create a possible conflict of interest between you and National Grid and our personal relationships.

## Where you can find more information

US Personal Relationships Policy  
Certificate of Compliance and Disclosure Process  
Grid:home

## Policy section owner

**CRO (Chief Risk Officer) Office / Human Resources**



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# Relationships with third parties

**Our relationships with vendors/suppliers are particularly vulnerable to real and apparent conflicts of interest, so we all need to be extra vigilant and exercise caution in our day to day business with them. Suppliers, contractors and business partners of National Grid are held to the same standards of conduct as National Grid employees. This is described in the National Grid Global Supplier Code of Conduct.**



## Principles

- When we are managing supplier contracts or overseeing contractors, we will ensure we understand the terms of the contracts and the obligations of our role in contractor oversight where appropriate.
- We will not purchase goods or use the services of any contractor or supplier retained by National Grid for private purposes, except under the normal terms and conditions of that contractor or supplier (or under special arrangements negotiated by National Grid for the benefit of all employees).
- When we buy goods or services on behalf of National Grid, we will disclose in writing to our manager, any personal interests or associations that might appear to impair or conflict with our ability to make objective procurement decisions.
- We will comply with the Procurement BMS Standard and procurement policies that relate to identifying potential suppliers, bids, negotiations, contracts or sole source justifications, managing orders and contractors, and payment of invoices. If we are involved in procurement tender events, we will keep all bidding information confidential.
- When asked to provide references for third parties we will ensure any information provided complies with our Third-party supplier reference policy, and does not create any actual or perceived conflicts of interest.

## Dilemma

- 1 A close friend owns a business that is bidding on a contract to provide services

to National Grid. If they win the bid they would be providing services to my department and I would be able to work with them each day. I would like to work with my friend and I also want them to succeed in their business. They asked me if I could obtain copies of bids submitted by other businesses bidding on the same contract.

## What should I do?

You should tell your manager about your relationship and the request your friend has made. Do not provide your friend, or any outside party, with information that would give them an unfair advantage when bidding on a contract.

- 2 A contractor that I work with has confided in me that they feel they are being harassed and bullied by a National Grid employee.

## What should I do?

Let them know that they can get in touch through any of the means National Grid has in place, including the confidential 'speak up' line, to report concerns or offer to report this on their behalf. Their concern will be investigated thoroughly and promptly. The Company takes all concerns brought to its attention seriously.

## FAQs

**I have been made aware that one of our contractors is undertaking an activity that is potentially unlawful.**

## What should I do?

You should immediately notify your manager and the Ethics and Business Conduct team about the contractor's activity. Our vendors and contractors are important business partners who must be held to the same standards of conduct, because our reputation is at stake.

## What this guidance means to you

We need to hold all third parties including our vendors/suppliers and contractors to the same ethical standards as our employees. If you are responsible for third party oversight you should recognise the additional responsibilities that are expected of you. You should realise the importance of our relationships with suppliers, customers and other third parties, as well as how these relationships are areas where real or perceived conflicts could arise. You need to be extra vigilant and make sure you adhere to the relevant procurement policies.

## Where you can find more information

Procurement BMS Standard  
Supplier Code of Conduct  
Grid:home  
Third party supplier reference policy

## Policy section owner

Procurement

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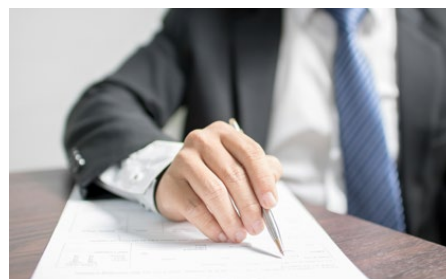
# Price-sensitive information, insider trading and material non-public information

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Information is 'price-sensitive' when it's precise; not yet public knowledge; relates directly or indirectly to National Grid or its shares and securities; and, if it's disclosed, might lead to a significant movement (up or down) in the price of shares or other securities such as National Grid retail bonds. It includes information that would have a substantial likelihood of affecting a reasonable investor's decision to buy, sell or hold National Grid's shares or other securities.

We have a policy in place to manage the disclosure of price-sensitive information. Also, it's a legal requirement that if you have access to price-sensitive information you must be named on a specific list that National Grid is required to maintain. This is called an Insider List and means you will be considered to be an insider.



### Principles

- We understand that it is **illegal** to unlawfully disclose price-sensitive information; this means if we require access to price-sensitive information in order to carry out our job, we will keep that information confidential. Also, we will not share the information with anyone else except where we are required to do so by law or as part of our employment.
- We understand that if we have access to price-sensitive information, we will be considered an insider and therefore must not deal in National Grid shares and securities without obtaining prior clearance in accordance with the company's Share Dealing Rules.
- We understand that if we are granted clearance to deal and use price-sensitive information to influence our share dealing, this is called 'insider dealing', **which is illegal**. Insider dealing isn't limited to financial information and can apply to information about the activities and future prospects of any other company listed on the stock market. This applies whether we are doing this in person or through an intermediary. We may also be responsible if we pass price-sensitive information on to a third party, who then uses it to buy or sell shares.

- We understand that we cannot use price-sensitive information to influence our share dealing and we must not recommend or induce anybody else to engage in insider dealing, as this is also **illegal**.
- We will only share price-sensitive information where required to do so by law or as part of our employment.
- Where we think we may have access to price-sensitive information and have not been informed that we are classified as an insider or where we require more information on the company's Share Dealing Rules, we will contact **insiders@nationalgrid.com** immediately.

### Dilemma

- 1 Recently I overheard two employees talking about the possibility of National Grid buying another company. I checked the market listings and found out the other company's share price is down because they haven't been performing well. If National Grid announces its plans to buy this company, the value of that company's stock will increase. I realise I can't invest in this company because I work for National Grid. However, my parents just sold their home and have a large sum of money they are looking to invest.

**Can I tell them that National Grid is thinking about buying this company and/or recommend that they make an investment?**

**No.** It's illegal to pass on price-sensitive information to others, even if you don't make any investments yourself. The laws on insider dealing contain severe civil and criminal penalties. You should never use price-sensitive information to make, or encourage others to make, investments in National Grid shares or other securities. This also applies to investments in other companies National Grid might be planning to buy or merge with.



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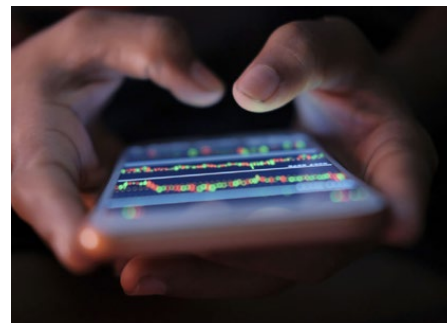
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# Price-sensitive information, insider trading and material non-public information

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#### What is 'price-sensitive information'?

Price-sensitive information is positive or negative information that is precise, not available to the general public, relates directly or indirectly to specific shares or other securities of a company and could influence a reasonable investor to buy, sell or hold shares or other securities.

The term 'price-sensitive' applies to information about securities of any company listed on the stock market. In the UK it's also known as 'inside information' and in the US it's referred to as 'material non-public information'.

#### What are examples of potentially price-sensitive information?

- Exceptional events or facts in the annual or half-yearly financial results.
- Major business developments (such as substantial projects or regulatory developments).
- Dividend announcements.
- Major deals to buy or sell a business.
- Significant changes in our financial condition or business performance.
- Significant changes in expectations of our performance.
- People being appointed to, or leaving, our Board of Directors.
- Significant share dealings by directors.
- Major contracts awarded.
- Significant potential legal action.

### What this guidance means to you

Never deal using price-sensitive information because that's insider dealing, **which is illegal**.

Be aware at all times – never disclose price-sensitive information to a third party because this could lead to insider dealing.

### Where you can find more information

Company Share Dealing Rules  
Grid:home

### Policy section owner

Legal

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# Fraud, bribery and corruption

**We are committed to preventing, deterring and detecting fraud, bribery and all other corrupt business practices. To protect our organisation, we have a compliance programme to detect and prevent fraud, bribery, financial crimes, money laundering or other corrupt business practices that can seriously damage our reputation, as well as cost us money.**



## Principles

- We are all responsible for controlling the risks of fraud, bribery, financial crimes, money laundering and corruption.
- We all take individual responsibility for ensuring that we never participate or engage in fraudulent activity, offer/accept bribes or engage in other corrupt business practices.
- We expect employees, suppliers and agents to comply with the laws that prohibit bribery and corruption, wherever we work in the world.
- We understand that theft is a fraudulent activity and will not participate in theft of any kind, including theft of time, money and company resources.
- We will never falsify company records or misreport company information.

## Dilemma

- 1 Following completion of a restoration by National Grid after a storm, a customer approaches me with a gift with a value of £50/\$100 to thank me for my work.

### What should I do?

In the first instance, we would recommend that you thank the customer for the kind offer but refuse the gift and advise your manager of this situation. If you wish, you could advise the customer that National Grid has in place recognition schemes for our employees and, if they wish, these details can be shared. If you feel that your personal safety may be compromised, you should take the gift and report it immediately to

your manager and the Ethics and Business Conduct team.

## FAQs

### What is fraud?

Fraud is a crime. It's a deception that's designed to benefit someone or cause a loss to someone else.

### What is bribery?

Bribery is when anything of value is given in return for influencing the way someone performs their duty. It could include a duty to carry out a public office (such as a policeman or official who approves permits), a commercial duty (such as an employee who should act in the best interest of their employer) or some other legal duty.

Bribery doesn't have to involve an actual payment changing hands. In fact, it can take many forms, including: a gift; lavish treatment during a business trip; property; an offer of employment; or tickets to an event.

### Examples include:

Bribing an agent acting for a landowner in order to get permission to build on the land; bribing a foreign official to make sure goods get through customs; and bribing a health and safety inspector so they turn a blind eye to problems.

### Other corrupt business practices

Money laundering is transforming the proceeds of crime into legitimate money or assets.

**Criminal facilitation of tax evasion** is when someone providing a service for or on behalf of National Grid criminally facilitates tax evasion and National Grid did not have procedures in place to prevent it.

## What this guidance means to you

You must keep to the highest standards of honesty, integrity and ethics at all times when working for us.

Every employee is responsible for controlling the risks of fraud, bribery and corruption.

If you know about, or suspect, any illegal activity, you must report it to the Ethics and Business Conduct team, regardless of who is responsible. You should never look the other way.

## Where you can find more information

Anti-Financial Crimes Policy  
Grid:home

## Policy section owner

**CRO (Chief Risk Officer) Office**

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# Gifts and hospitality

**We do business and have relationships with many people, such as suppliers, vendors and customers. Sometimes they (or we) might offer meals, hospitality and business entertainment. There may also be certain circumstances where we receive gifts from, or offer them to, people outside National Grid. All of this may seem harmless, but it can create a real or perceived obligation, potentially leaving us vulnerable to accusations of unfairness, bias, deceit or even bribery. Our personal or business reputation may be put at risk. Therefore, we have this guidance and controls in place to protect ourselves as employees and the interests of our company.**



## Principles

- We will not let our decisions be influenced – or appear to be influenced – by gifts or hospitality that our suppliers, vendors, customers or others may offer.
- We will not try to influence – or appear to be trying to influence – others by offering gifts or hospitality.
- We will consider the following important question before offering or accepting gifts or hospitality – is it serving a legitimate business purpose?
- We will not offer or accept gifts or hospitality from a vendor or supplier that is involved in a current tender/request for proposal (RFP) event in which we are taking part, and we will let our manager know if we do receive an invitation or gift.
- For transparency purposes, we will record all gifts and hospitality that we have accepted or offered, regardless of value, in the Gifts and Hospitality system (currently hosted via a SharePoint site). We understand that the guidance on gifts and hospitality also extends to our family members and to hospitality that is accepted and attended in our own time, outside of normal working hours.

## Gifts

- We understand that gifts are discouraged, although we may, in certain circumstances, accept or give gifts as part of a business relationship.
- Gifts with a value of less than £30/\$40 can be offered and accepted. However, prior supervisor/manager approval is needed, and we must log a record of the gift in the Gifts and Hospitality system.

- We will not offer or accept gifts worth more than £30/\$40.
- Irrespective of the value, we will not accept gifts of cash or cash value, such as gift cards, or gift certificates, of any value.
- If we receive a gift that does not meet these rules, we will tell our supervisor or manager, make every effort to return it and keep a record of the actions taken.

In exceptional circumstances (for example, when visiting a country where gift-giving may be customary and expected), we may offer a gift worth more than £30/\$40. However, in these circumstances we will need prior written approval from the Group General Counsel and Company Secretary.

## Meals, entertainment and hospitality

If the entertainment or hospitality we are offering or receiving serves a legitimate business purpose, then we need to follow this guidance:

- We will obtain prior permission from our supervisor/manager for hospitality with a value up to £100/\$100 per person.
- We will obtain prior permission from our supervisor/manager and a Band A leader or SVP within our directorate or jurisdiction for hospitality with a value over £100/\$100 and less than £500/\$1000 per person.
- We understand that hospitality with a value over £500/\$1000 per person is generally considered to be extravagant and is discouraged. However, in some circumstances it may be allowed, but will require prior written permission from a member of the Executive Committee as well as the approvals listed above.

- We will be mindful if hospitality, entertainment or gifts are being offered regularly by one person or organisation. At a minimum this could be viewed as an attempt to influence business decisions, or perhaps it is an actual attempt to influence our decision making. In such situations we understand that we need to decline the offer and raise this issue with our supervisor/manager.
- We will not accept or offer benefits in return for influence or a specific decision.
- We will not accept or offer an invitation to offensive or inappropriate entertainment.
- In the US, we will not provide gifts, hospitality, meals or entertainment of any value to any public official or public employee, such activities could be viewed as bribes.
- A 'public official' means anyone carrying out a public function, including but not limited to customs official, police officer, council inspector, state employee, fire department official or judge.
- We understand that our role or the business area that we work in may have greater restrictions around gifts and hospitality.

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# Gifts and hospitality

## Dilemma – Gifts

1 Recently I attended a conference where there were more than 2,000 attendees. My name was drawn from a raffle and I won an iPad.

### Can I keep it?

**Yes.** It was a widely attended event and everyone had an equal chance to win the prize, so you can keep it. However, you should notify your supervisor/manager for transparency.

## Dilemma – Hospitality

2 One of our suppliers has invited me to a major tennis tournament (such as the US Open or Wimbledon).

### Can I accept the invitation?

If you and your supervisor/manager are satisfied that by attending you're serving a legitimate business purpose, you'll need to consider the value of the entertainment offered. If it's more than £100/\$100 – which is likely for a major tennis tournament – you'll need approval in advance from your manager and your Band A leader or SVP. If it's the final of the tournament, the value of the hospitality may well be more than £500/\$1,000. So, you would need prior written approval from a member of the Executive Committee.

## Dilemma – Meals

3 After an association conference, a group of us go out to dinner together. One person in our party offers to pay the tab for everyone. I'm not sure who he is or what company he represents, but I know some of our suppliers were attending the event.

### What should I do?

Whenever you are in doubt, or you do not have time to obtain prior approval, you should politely decline the offer and pay for your own meal.

## FAQs

### Gifts – I received a gift that is worth more than £30/\$40, could I donate it to charity?

If you've done everything reasonably possible to return the gift, but are not successful, you can donate the gift to charity.

You should get approval for the donation and record the details on the Gifts and Hospitality system.

If you are worried that giving the gift back might cause offence, you should tell your manager and contact the Ethics and Business Conduct team for guidance.

### A large holiday gift basket of fruit and other perishables was shipped to me from a vendor, what should I do?

Since it's a perishable item and difficult to return, you can share the basket with the rest of the department. This reduces the per person value below our nominal gift value. Be sure to record it in the Gift and Hospitality system.

### A colleague gave me a gift during the holiday season. Is it okay to keep it?

**Yes.** Our gift policies only apply to vendors, suppliers and customers.

### Can I accept alcohol as a gift?

**Yes.** As long as it keeps to the rules described above and you do not drink it during working hours while working for or on behalf of us, or while on National Grid premises.

### Hospitality – My partner and children have been invited to an event. Can they go?

Partners and children may attend events, but the event must serve a legitimate business purpose. If you're not attending the event yourself, or your host will not be there, it's unlikely that there will be any legitimate business purpose and therefore your partner and children should decline.

## What this guidance means to you

You should not allow gifts or hospitality to influence your business decisions or personal judgement, or appear to do so.

You should keep an accurate log, using the Gifts and Hospitality system, of all gifts and hospitality you provide and receive, demonstrating transparency around your business relationships.

If you have any concerns or need more guidance, speak to your manager or contact the Ethics and Business Conduct team.

## Where you can find more information

Grid:home

## Policy section owner

CRO (Chief Risk Officer) Office



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# Business travel and expenses

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**We have policies and guidelines for incurring reimbursable business-related expenses on behalf of the Company. Our policies are designed to enable adequate controls to minimise costs ensuring accuracy of cost allocations and legitimacy of all business expenses claimed. The Company will reimburse ordinary, allowable and reasonable expenses you incur on behalf of the Company when you: properly submit claims for these expenses, comply with prudent business practice and exercise prudent business judgement.**



## Principles

- We all take responsibility for the legitimacy of expenses that we claim, and the adequacy and authenticity of supporting documents that we submit, including but not limited to any required receipts.
- We will submit expenses in a timely manner.
- We will familiarise ourselves with the regional expenses and business travel policies, relevant cost allocation guidelines, supporting systems and reimbursement procedures.
- If we are an approving manager, we will apply due diligence by making sure all claims are accurate, prudent and reasonable business expenses that have been incurred wholly and exclusively for legitimate business purposes and have proper back-up documentation.
- We will obtain management approval for all categories of business travel and expenses before incurring them, where practical.
- We will book all travel via the company appointed service provider.
- We understand that where expenses incurred are for more than one individual, e.g. a team event, the most senior person present will submit the expense.

## Dilemma

**I** I'm a manager and have taken my team out for a group dinner in recognition of a recently completed project.

### Who should pay and claim reimbursement?

If you are the most senior employee in attendance you should be the one paying and claiming reimbursement. Additionally, you should include the names of all employees in attendance on the receipt.

## FAQs

**If I'm travelling and staying with friends or family instead of using a hotel, am I entitled to any additional compensation?**

**No.** We only reimburse employees for costs they incur on behalf of the business.

**Tipping and gratuities are customary and, in some cases, required when dining or in other circumstances. Can I claim gratuities as a reimbursable expense?**

**Yes.** You should include gratuities as part of the total cost of service you're requesting reimbursement for. You do not need to claim them separately. We just ask that you please be prudent when providing gratuities.

## What this guidance means to you

National Grid is committed to giving you clear and consistent guidelines for incurring reimbursable business-related expenses on behalf of the Company.

Be familiar with policies, guidelines and processes related to reimbursable business and travel expenses as well as the different types of acceptable expense categories.

## Where you can find more information

UK Business Travel and Expense Policy  
US Business Travel and Expense Policy  
Grid:home

## Policy section owner

Human Resources

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# Use of company resources

**The company assets you rely on for your work (for example, computers and phones) are intended to be used for our business. Where appropriate, we have provided you with the things you need to do your job, such as a computer/laptop or a mobile device such as a phone/tablet.**



## Principles

- We understand that we can use our mobile device for limited occasional personal use, but this must not interfere with our work or the work of others, breach IT policies, break any laws, or incur significant cost to the Company.
- We understand that using company vehicles (cars, vans and aircraft) for personal use is not allowed unless it's specifically authorised (for example, company cars that are provided for private and company use).
- We understand that company property and resources such as facilities, equipment and information are provided for business purposes only and therefore not allowed for personal use.
- We take responsibility for the security of the company equipment we use.
- We will comply with National Grid's security controls when traveling with company equipment.
- We understand that we cannot use National Grid equipment or property for any gambling activities.

## Dilemma

- 1 A couple of my colleagues have been using a company excavator or backhoe to do some work on their personal property.

### What should I do?

Using company resources for personal purposes is not allowed. You should raise your concern to your line manager or speak to the Ethics and Business Conduct team.

The unauthorised use of company equipment is considered theft which is fraud.

- 2 One of my colleagues is using their company computer to run an accounting side business.

### Is this acceptable?

**No.** Company computers/laptops cannot be used to conduct a personal side business.

## FAQs

### Can I connect my personal mobile device to the company WiFi during my working day?

**Yes.** As long as it doesn't interfere with your work or use excessive bandwidth.

### Can I use mailing supplies to post some important personal papers?

**No.** Use of postage stamps, franking and postal supplies such as envelopes is not allowed. You may place personal mail in the outgoing mail tray as long as you use your own postal supplies and have already paid the postage.

### Is gambling allowed on company property and/or using company resources?

**No.** Gambling or gambling activities are not allowed on National Grid property.

## What this guidance means to you

We're all responsible for protecting our resources and making sure they're used appropriately.

## Where you can find more information

Security BMS Standard  
Acceptable Use of Devices Policy  
Grid:home  
Global working from abroad policy

## Policy section owner

CRO (Chief Risk Officer) Office / IT

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# Political interactions and lobbying

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**With so much of our work in the public eye, it's only natural that we'll come into contact with politicians and government officials. While it's important for us to build and develop good relationships, it's even more important that we manage them appropriately. Lobbying laws are very complex and carry severe penalties if you break them, they can vary across states and local governments.**



## Principles

- We will always be open and transparent in our dealings with government officials.
- We will not offer or accept money or gifts to or from politicians, government officials or regulators.
- We will comply with the regional laws and regulations that apply to interactions with elected/public officials and regulators.

## US guidance

A public official or public employee is anyone who is on the payroll of a municipality, city, state, town, county or federal government.

Interactions with public officials are not limited to the Corporate Affairs team. If whilst working for National Grid, you find yourself in a situation where you're working with a public official or public employee, you must not provide gifts or entertainment to that person. This policy applies to any interactions with public officials or public employees in any setting, on or off National Grid property and applies in all jurisdictions we work in. Always let the US Governmental Affairs team know of any interactions you have with government officials.

## UK guidance

Always let the UK and EU Public Affairs team know at [publicaffairs&policy@nationalgrid.com](mailto:publicaffairs&policy@nationalgrid.com) when you're meeting or working with any of the following on our behalf:

- a politician;

- a member of a Westminster government department (such as the Department for Business, Energy and Industrial Strategy or Her Majesty's Treasury) or devolved government department (see below guidance on Scottish Government);
- a non-governmental organisation (such as the Committee on Climate Change); or
- an interest group (such as Greenpeace or Green Alliance).

When you're working with politicians, government officials or regulators, it's important that you keep your own political interests or activities separate from your role as a National Grid employee.

You should also comply with the Association of Professional Political Consultants (APPC) code, the Bribery Act and the Political Parties, Elections and Referendum Act.

## Scottish Lobbying Act 2016

Introduced a new public register for "Regulated Lobbying" in Scotland. From March 2018, all employees of National Grid are required to record any face to face engagement in lobbying conversations with Members of the Scottish Government and Parliament (a Member of the Scottish Parliament (MSP); a Member of the Scottish Government (Cabinet Secretary, Junior Minister or Law Officer); the Scottish Government's Permanent Secretary and a Scottish Government Special Adviser) and when discussing Scottish Government or Parliamentary functions. There are financial penalties for failure to comply with the Act.

## EU guidance

We're registered on the EU Transparency Register, which regulates relationships between stakeholders and EU officials. You must respect the related code of conduct when dealing with EU officials and follow our rules on gifts and hospitality.

Ask the UK Corporate Affairs team for advice on national regulations that may apply in the EU.

## Dilemma

**1** In the UK, I've invited two well-known Members of Parliament (MPs) to speak at an event that my team is hosting in the UK. They've accepted the invitation but have asked for a small payment in return for attending. We think their contribution will be really useful for us.

### What should I do?

While the MPs' contribution may be valuable, you must not give them money under any circumstances. As an alternative, your team could make a token donation to an independent registered charity as a gesture of thanks for them attending.

**2** I'm a US engineer, specialising in gas pipeline safety. Two minor changes to an outdated pipeline regulation would improve customer safety and simplify our compliance process. I would like to invite a regulator to lunch to propose these changes.



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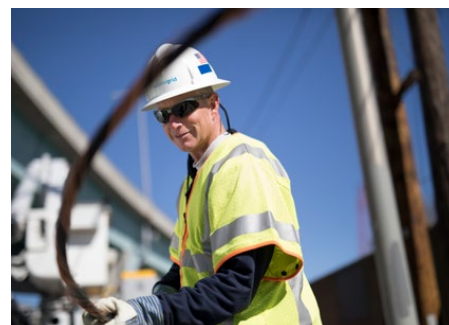
Useful contact numbers



# Political interactions and lobbying

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### What should I do?

You should contact the Corporate Affairs team to obtain guidance on acceptable protocols before the meeting takes place. Providing gifts, hospitality or anything of value to regulators is not permitted in the US.

### FAQs

**In the US, I'm holding an all-day meeting with the Public Service Commission to review our proposed new rate plan. Am I allowed to provide food and drinks for those attending?**

You must not offer any gifts or hospitality to a public official in the US. This includes food and drink.

**What should I do if a Member of Parliament (MP) in the UK only agrees to attend a meeting or function if we pay for their travel and accommodation?**

You can offer expenses, but only if they're reasonable. This would include situations where MPs have to travel from their usual location to attend a meeting, or where they would have to stay overnight to attend a meeting or function.

### What this guidance means to you

Working with politicians and government officials is an important part of the work we do. You will be open and honest in any dealings with politicians and public and government officials. You will follow all regional requirements related to interactions with government/public officials and seek guidance from Corporate Affairs or Legal in advance.

### Where you can find more information

Grid:home

### Policy section owner

Corporate Affairs

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# Competition

**Competition is generally recognised as a good thing for consumers as it helps keep prices for goods and services down. Competition may naturally occur, for example between supermarkets. Where it doesn't, regulation may be needed to ensure businesses that have limited, or no, competitors still behave in a fair manner.**



## Principles

- We will always seek legal advice before entering into arrangements that might be viewed as anti-competitive (including sharing confidential or commercially sensitive information).
- We will always act fairly and not place anyone at an unfair commercial advantage or disadvantage, including affiliated entities.
- We will be objective, fair and non-discriminatory in all our dealings with potential customers and suppliers.
- We will keep relevant documented evidence of our decisions and interactions with customers, suppliers and competitors and ensure all communications are written clearly, professionally and responsibly.
- We are all responsible for ensuring resources are not cross subsidised.
- We understand that an informal understanding or agreement that may affect competition will be treated by the competition authorities in the same way as a formal legal agreement.

## Dilemma

- 1 I am bidding to win work through a competitive tender process. I haven't had explicit discussions with any competitors or other sources, but I am generally aware of the types of prices our competitors may bid for such work.

## What should I do?

Make sure you consider your prices on a standalone basis, rather than based solely on what your competitors may bid. As a minimum, you should aim to recover all your costs, and ideally make a reasonable profit.

General market intelligence can be useful, but it cannot be obtained through inappropriate means such as:

- directly from competitors;
- discussing competitors' prices with customers; or
- from other parts of the National Grid business that may use a competitor as a supplier.

If you have any queries or concerns about discussions relating to competitors or how you price your bids, please contact the Legal team.

## FAQs

### What should I do if I'm worried that I might have broken, or be about to break, competition law?

Contact the Legal team, who will be able to advise you.

### What takes priority, competition law or the licences?

Neither – both apply where relevant, although Ofgem is required to consider using its competition powers, where appropriate, before using its regulatory powers. Competition law applies to all our activities, not just our regulated businesses.

## What this guidance means to you

This guidance will help you make sure we act fairly and don't give anyone an unfair commercial advantage or disadvantage. You should never agree to 'fix' any market and you must be seen to be acting in a non-discriminatory way at all times. Always record the reasons behind your decisions. This will help you demonstrate that what you are doing isn't breaking the rules.

## Where you can find more information

Grid:home

## Policy section owner

Group Legal

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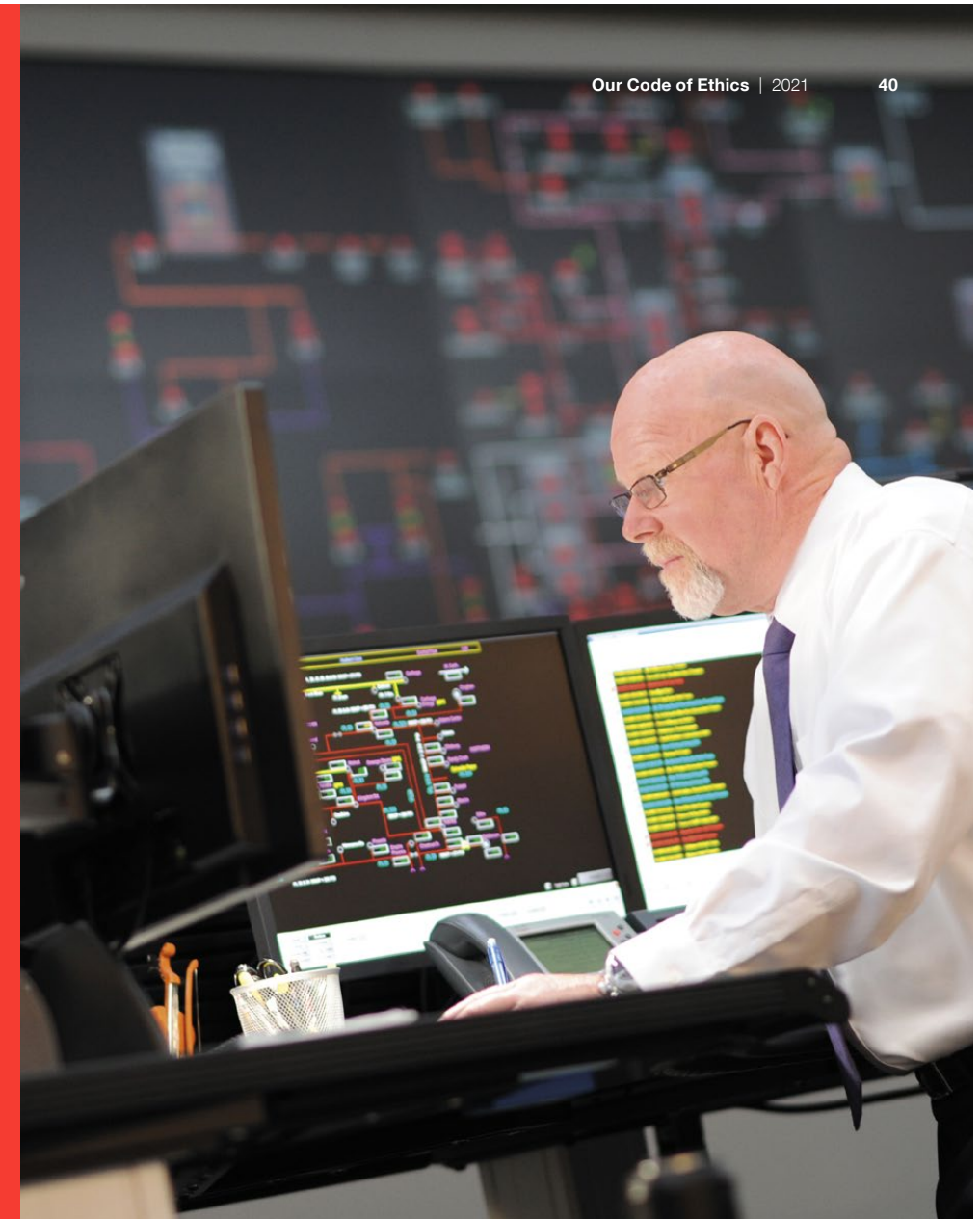


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# Data privacy

**We're committed to protecting people's privacy rights by making sure we handle their personal information responsibly.**

**We must make sure personal information is protected and processed fairly and in line with the law to maintain the confidence and trust of our employees, customers, vendors, suppliers and regulators.**

**Each country we work in has its own privacy and data protection laws. These laws focus on the importance of handling personal information in a responsible way. This also includes making sure that there are adequate controls in place to continue to protect the information when it's transferred across borders or to third parties.**

**As a responsible organisation, we're fully committed to adhering to these laws. We're all responsible for taking great care to deal with personal information in a safe and secure way, and to reduce the risk of it being lost, misused, inappropriately accessed, released, altered or destroyed.**

## Principles

- We will ensure we understand the data privacy policies and procedures.
- We will be clear on the purpose for which the personal information is being used.
- We will ensure we understand what consent is required before we collect, use or disclose any personal information.
- We will only collect personal information in accordance with National Grid's Data Privacy Policy and relevant data privacy legislation.
- We will only retain personal information for as long as required by law or regulations and thereafter appropriately dispose of such information.
- Where we have personal information, we will provide individuals with access to their personal information in accordance with established regulations.
- We will only disclose personal information to third parties in accordance with National Grid's Data Privacy Policy and relevant regulations.
- We will protect personal information against unauthorised access.
- We will maintain accurate, complete and relevant personal information for the purposes identified.
- We will comply with privacy policies and procedures and follow procedures to address privacy related incidents, complaints and disputes.

## Dilemma

**1** I realise that I have sent personal information inadvertently to an individual or individuals who do not have a business reason to see the information.

### What should I do?

If you have inadvertently sent personal information to someone who has no business reason to receive it, you must report it immediately to your line manager and the cyber response helpline.

Privacy and data protection laws are designed to protect private information and how it is collected, stored, accessed, used and passed on.

## FAQs

### What is 'personal data'?

Personal data is any information that relates to an identifiable 'natural person', or 'data subject', who can be identified directly from the data itself, or indirectly when that data is combined with other data available to the business. Examples of personal data would be the name of the person, a photograph, an email address, bank details, posts on a social media website or a computer IP address.

### What counts as 'personal information' and 'sensitive personal information'?

Personal information relates to living people who could be identified from that information, either by itself or when combined with other information available to the organisation. It can be factual, such as a person's name, address, contact details, or date of birth. It can also be an opinion, such as how a manager thinks you performed at an interview or an appraisal.

There are certain categories of information which need to be treated more carefully due to the harm that could result from their loss or unauthorised disclosure. For example – a person's social security or medical insurance number, details from their driver's licence or passport, employment details such as sickness, absence and disciplinary action, financial details such as debit or credit card details, racial or ethnic background, political opinions, religious beliefs, trade union membership, health, sexuality, alleged crimes and court proceedings.

### Who can I share personal identifiable information ('PII') with?

PII must be processed lawfully, fairly and in a transparent manner. On that basis it can be shared with others if to do so would meet the lawful basis for processing. It is important to note PII must only be shared with others if it is relevant and necessary to do so in order to meet the purposes for processing, for example a manager or team members.

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## Data privacy



### Can I use personal data for other purposes if I anonymise it?

Yes, if the data is appropriately anonymised. However, you must ensure the data is rendered anonymous in such a way that the data subject is no longer identifiable. Since the process of anonymisation is a form of processing of that personal data, you should also consider your legitimate interest for doing so in the first place (for example, is this personal data for statistical or research purposes) and whether this use should be included in the relevant privacy notice.

### Can I share individual performance metrics on team performance (Pex) hubs?

Managers have a legitimate reason to produce reports for improving individual and team performance; however, individual performance metrics are classified confidential and are only available to the individual and any managers involved in the performance and employee reward processes. Any team performance data used should be aggregated.

Team capability matrixes may be used to demonstrate which skills team members possess but should not be benchmarked against an employee's expected objectives or aspirations.

We do appreciate that there are multiple variations of performance reports used around National Grid where, with deeper analysis, individual performance may be inferred. If there is any reasonable doubt about a specific report, please contact a member of Global Information Records Management team (GIRM) for advice.

### What this guidance means to you

This guidance is to help you make sure that we all process personal information in a safe, secure, fair and lawful way.

### Where you can find more information

Data Privacy Policy  
Grid:home

### Policy section owner

**Global Information Records Management**



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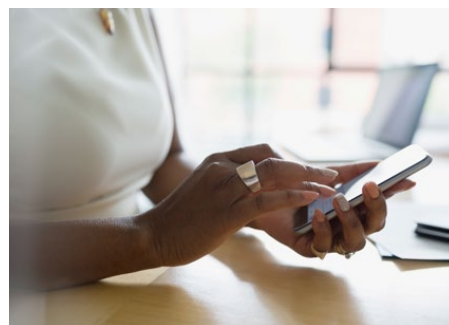


# Electronic communications

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**Electronic communication, which includes email, Internet and apps, brings many benefits to businesses. It can reach many people, over great distances, almost instantly. However, it also brings a number of risks and potential problems. When it comes to electronic communications, be cautious. You should always be aware that they have the potential to damage our company or people. For example, they may carry computer viruses that can infect our systems, be from an untrustworthy source, or they may be misinterpreted and cause offence. They could also affect our reputation and electronic messages may need to be disclosed in court proceedings or investigations.**



## Principles

- We will take responsibility for how we use our company email, Internet access and applications and will do so in line with National Grid policies and procedures.
- We will not use company equipment to:
  - download or pass on material that is dangerous, offensive or illegal
  - conduct any illegal activities
  - send or solicit messages that are political, religious or activist
  - violate any licence agreement, copyright or trademark law
  - impersonate anyone online or maliciously change any messages
  - produce, introduce or forward chain letters or personal video clips
  - send unsolicited junk messages
  - send inappropriate/libellous content.
- We will comply with National Grid's security controls when accessing our communication systems or internet facilities, or when traveling with company equipment.

## Personal use

We understand that limited personal use is allowed, but that use must not:

- interfere or create conflict with our work;
- take priority over our work;
- give rise to any risk, liability, potential loss or expense for the Company; or
- have any negative effect on the Company (refer to Social Media section for further details).

## Dilemma

**1** I have received an email that I wasn't expecting that includes an attachment.

### What should I do?

If in any doubt about the validity of the email you have received, you must not open any links contained within the email and should report these to Security via [cyberresponse@nationalgrid.com](mailto:cyberresponse@nationalgrid.com).

## FAQs

### Can I use the Internet for personal use during my breaks?

**Yes.** As long as it is limited and used in line with the requirements detailed above under personal use.

### Can I use my work email to enter a non-work related competition?

**No.** It could make you or our system vulnerable to a security incident.

## What this guidance means to you

We allow you to use your email and the Internet for limited personal reasons, and within the law, as long as it doesn't affect your work or expose you or the network to risk.

Be aware of social engineers. These are people who pretend to be someone they are not so they can gain information about yourself or National Grid.

## Where you can find more information

Global Acceptable Use of Devices Policy  
IT BMS Standard  
Security BMS Standard  
Grid:home

## Policy section owner

IT

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# Information security

**We're all responsible for protecting information from deliberate, accidental or unauthorised access, and from being altered, destroyed or disclosed. This applies to information held electronically (soft copy), on paper (hard copy), or in our minds (have knowledge of).**

**Sharing information and ideas within National Grid is great for our business and allows us to make the most of information technology. But there are risks.**

**If our confidential information falls into the wrong hands, it could be used to damage our (and our partners') reputation and business operations. The same applies to confidential information we have about our business partners or suppliers.**



## Principles

- We understand the data classifications and classify information we create and handle.
- We will only share information with those that are entitled to receive it.
- We store and dispose of information in line with our relevant policies.
- We will protect our access to information by having strong passwords/passphrases, being careful where we have confidential conversations, and keeping our workspace clean.
- We will keep passwords/passphrases confidential and will not share details of these with anyone.
- We will only access data/information that we are entitled to use to fulfil our role.

## Dilemma

**1** I know I'm not supposed to share my log-in ID and password/passphrase, but we really need to get this work done while I'm on holiday.

### What should I do?

You cannot share your log-in ID or password/passphrase. The reason you must never share your log-in ID and password/passphrase is simple – if you do this, you're effectively allowing someone else to 'be you' on our systems, and that's not acceptable under any circumstances.

You are expected to act responsibly whenever you log on to our systems. If you reveal your log-in details to someone else, you're breaking that trust.

If you know there is going to be a problem, contact the IT help desk as soon as possible and explain the situation. They will then start working on a secure solution for you. You can also utilise the new O365 collaboration tools to share documents securely.

## FAQs

### What do we mean by 'information'?

Information covers all forms of written, printed, verbal and electronic material. It includes information that:

- you talk about or hear in meetings;
- originates from informal discussions or conversations;
- is saved on storage media (for example, disk, memory stick or hard drive);
- is held on a computer/mobile device;
- is being sent over communications lines including Instant messages, Skype chat, Teams chat, WhatsApp, iPhone texts, Yammer etc;
- is held in digital, graphic, text, voice or image format; and
- is held in an electronic form on your personal devices.

### Am I allowed to access O365 (including MS Teams and Outlook) on my personal device?

Yes, as long as you are connected to a secure network.

### What is multifactor authentication?

Multifactor authentication (MFA) is necessary to keep us safe and secure from malicious individuals and is something we should do even if we do not remotely access our Office

365 account. MFA verification will put an extra step in for individuals to complete before they can gain access. For more information please go to the IT Portal or call the IT helpdesk.

## What this guidance means to you

We're all responsible for protecting information.

You should always be on your guard because the content of some emails, faxes (some fax machines and printers have a memory store), text messages, voicemail messages and other recorded conversations could cause significant problems if they're not protected and an unauthorised person has access to them.

## Where you can find more information

IT BMS Standard  
Security BMS Standard  
Data Privacy Policy  
Information Records Retention Policy  
Data Management BMS Standard  
Grid:home

## Policy section owner

Information Technology

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# Managing records

**Our business, regulators, auditors and shareholders rely on accurate company accounts and other records. We have to create and maintain complete, accurate and timely records.**

**We must keep our information and records safe, and make sure no-one has unauthorised access to them. They need to be kept in line with our policies on document storage.**

**We're all responsible for protecting National Grid's assets, including information and records in all media (hard copy, digital, video, audio, etc.). Records must be stored safely while being accessible to those who need them throughout their lifecycle.**



## Principles

We are all responsible for:

- entering complete and accurate information in any company account, expense statement, purchase order or other record
- ensuring all records are sufficient in content, context and structure to reconstruct the relevant activities and transactions they document, complete and unaltered
- securely maintaining records (both electronic and hard copy) for their appropriate record retention and disposing of them in accordance with our Records Management Policies
- providing true and accurate records when legitimately requested
- keeping all related company information when we become aware of impending legal action or where we have been issued a 'legal hold' order because of legal action
- saving whatever is required under a legal or contractual obligation, internal control or best practices. If you're not sure what to save, ask the legal department.

## Dilemma

- 1 I have records both in electronic and hard copy format, and I am not sure how I should proceed?

### What should I do?

Don't dispose/delete them unless you've verified that there are no legal, regulatory or business reasons to retain the records. Refer to the Global Information and Records Management (GIRM) Policy and the appropriate US or UK Retention Schedule.

Digitising records is recommended to save space and make it easy to access documents regularly referenced, provided required standards for classification, indexing and secure record storage are followed. Depending on the record category, records may be destroyed or sent to Global Information and Records Management for vital records protection/business continuity purposes. Record Centre storage services are available as follows:  
**UK** – Warrington Record Centre  
**US** – Iron Mountain (for upstate New York and New England) and Hicksville, New York Record Center (for downstate New York).

## FAQs

### What is a record?

A record is information created, received and maintained as evidence and information by an organisation or person, in relation to legal obligations or in the transaction of business.

### What is a legal hold?

An order issued by an organisation's legal counsel that prohibits destruction of specified records, because such records are or may be relevant to litigation or government investigation.

### Who is the Records Coordinator for my department?

Please refer to the Grid:home where you can find information relating to the Records Coordinators by department.

### How do I know what records need to be kept, how long to keep the records and in what format?

Retention schedules are available on the Grid:home.

### What this guidance means to you

Accurate records are critical, so you should make sure that all company records, information and communications are complete, fair, accurate, easy to understand and produced in a timely manner. You should make sure they're stored securely and that they can be retrieved when they're needed.

### Where you can find more information

Data Management BMS Standard  
IT Content and Collaboration Services  
Guideline  
Grid:home

**For guidance on converting hard copy records to digital format, please contact Global Information Records Management.**

### Policy section owner

Global Information Records Management



## Our Code of Ethics

Welcome



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



Information and communication



Useful contact numbers



# Social media

**People are talking about us through social media services and sites – such as Twitter, Facebook, YouTube, Instagram and LinkedIn – and it's important that we listen to what they say and respond in a timely manner. Through these channels we can join online conversations about National Grid. This will help us to understand the needs of our customers and the communities we serve.**

**A conversation that takes place online can be just as important as a letter or email. Remember that conversations on social media may need to be disclosed in court proceedings or investigations. There is also a risk that we may be hacked or targeted as individuals, or as a company, by those wishing to do us harm.**

## Principles

- We will only comment on behalf of National Grid on social media posts and contribute to social media conversations when they relate to both our role and expertise and we are authorised to do so.
  - We only speak on behalf of National Grid, respond to customer queries or company crises on social media where we are authorised to do so.
  - When using social media, we will do so in a manner consistent with National Grid's Values and policies.
  - We will not impersonate another person or organisation or use a social media handle/username we are not authorised to use, including mentions of National Grid, use of the National Grid logo, energy lines or other brand elements.
  - We will not post major Company news, such as information in a press release, before it is released and posted on National Grid's official social media channels.
  - We never disclose confidential corporate information, proprietary information or intellectual property (of National Grid or of a third party) when using social media or post discriminatory, harassing, offensive, bullying, abusive, threatening or defamatory comments regarding National Grid employees or any person.
  - We only use the National Grid brand in any social media handles/usernames/profile images where we are authorised to do so.
- We will report any social media concerns to the Group Social Media and Content team via **box.UK.socialmedia@nationalgrid.com**. We will report US-only issues to the US Social Media Team via **socialmedia@nationalgrid.com**. Where appropriate, we will report issues directly to Security, the Business Conduct helplines or Ethics and Business Conduct.
  - We will not use our official National Grid email address or any other National Grid details when participating in social media or online (with the exception of LinkedIn) unless we are official brand ambassadors.
  - We are careful if we are in a role that makes us an attractive target for a social engineer/criminal, for example, in one of our control rooms, at a critical site, or in Procurement, Finance, HR or Security, although any role may become a target to an innovative adversary. If we hold UK National Security Vetting or US Government Security Clearance, we don't mention it online.
  - We are careful about sharing details of business (or any) travel and we do not post photos of colleagues without obtaining permission. We do not share photos/videos of security controls such as security passes, security cameras at site or IT equipment.

## Dilemma

**1** Some of my colleagues are using Facebook to make derogatory comments about people on their team, both inside and outside working hours.

### What should I do?

This is unacceptable. You should tell your line manager, Human Resources or a member of the Ethics and Business Conduct team.

## FAQs

**A couple of journalists contacted me after I placed a post on Twitter. Can I talk to them?**

**No.** You must not talk to journalists on the Company's behalf, if they phone you or approach you on a social media site. Comments you make could be used to damage our reputation. Take the journalists' details and pass them on to the Media Relations team.

**What if a National Grid customer asks me a question via social media?**

You should seek advice from the Social Media team before responding via social media unless your role permits you to do so.

## Our Code of Ethics

Welcome



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



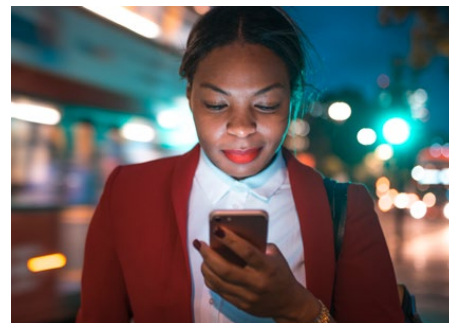
**Information and communication**



Useful contact numbers



# Social media



### What this guidance means to you

Remember that anything posted on the Internet is likely to be permanent, even if you delete it – the information could have been copied and reposted.

You're accountable for anything that you post on social media platforms.

### Where you can find more information

Social Media Policy  
Security BMS Standard  
Global Acceptable use of Devices Policy  
Grid:home

### Policy section owner

**Corporate Affairs**

## Our Code of Ethics

Welcome



Acting responsibly



People and behaviour



Conflicts of interest



Anti-corruption and transparency



Information and communication



**Useful contact numbers**



## Useful contact numbers

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### UK

#### Internal/Business Conduct Helpline

Freephone: **0800 328 7212**

Email: [business.conducthelp@nationalgrid.com](mailto:business.conducthelp@nationalgrid.com)

#### External/Focus Helpline

(24 hours a day, seven days a week)

Freephone: **0800 298 6231**

Email: [report@seehearspeakup.co.uk](mailto:report@seehearspeakup.co.uk)

#### Employee Assistance Helpline

Freephone: **0800 279 6155**

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### US

#### Internal/Toll-Free Helpline

**1-888-867-6759**

Email: [businessconduct@nationalgrid.com](mailto:businessconduct@nationalgrid.com)

#### External/Alertline

(24 hours a day, seven days a week)

Toll-Free: **1-800-465-0121**

Web: <http://nationalgrid.ethicspoint.com>

#### Employee Assistance Helpline

Toll-Free: **1-800 833 8707**

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 22-05-EE  
In Re: 2022 Annual Energy Efficiency Plan  
Responses to the Division's Second Set of Post-Decisional Data Requests  
Issued on June 22, 2022

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Division 2-9

Request:

The following email was included in Responses to the PUC's data request:

Thursday, December 01, 2016 11:35 AM

**To:** ''

**Cc:**

**Subject:** RE: EXT || RE: 2016 Final Savings for Rhode Island SBS

Hi

Looks like there is a strategy meeting going on in RI today and they are now telling me that they do not want me to exceed the 100% of goal and if possible to underspend doing it.

To whom is the writer referring when stating "they are now telling me that they do not want me to exceed the 100% of goal and if possible to underspend doing it"? What employees would have been involved in a "strategy meeting going on in RI."

Response:

The writer is no longer employed by National Grid USA Service Company, Inc. Therefore, it is not known to whom the writer is referring.

Division 2-10

Request:

Does the Company maintain any documents or undertake any training efforts to prevent collusion with vendors within its programs? If so, please describe and provide copies of any relevant documents.

Response:

As described in the responses to data requests DIV 1-21 and DIV 2-4, several documents have been used that were intended to educate employees working for The Narragansett Electric Company about applicable standards and govern their behavior.

In addition, as described in the response to data request DIV 1-19, processes for the Rhode Island energy efficiency programs governing vendor participation were updated in late 2021.

National Grid USA maintains a collection of business practice standards. The standards on Ethics and Procurement are provided as Attachment DIV 2-10-1. Refer to Section 1.0 for employee responsibilities. The "Supplier Code of Conduct" is provided as Attachment 2-10-2. Refer to page 10 for a description of governance mechanisms.



# Ethics

## Why is this important?

At National Grid, our values ‘Do the Right Thing’, ‘Find a Better Way’ and ‘Make It Happen’ are fundamental to how we do business. Doing the right thing inherently requires National Grid, its employees, and contractors to behave ethically.

This standard sets out the global minimum requirements and framework to help ensure our emphasis on ethics is embedded through all levels of the business. It protects our reputation as an ethical business, maintaining the trust of our stakeholders and protecting value.

Each business area is responsible for ensuring that employees know what is expected of them so that they can do the right thing.

## Scope

This standard applies to everyone at National Grid, from the Board and the Group Executive to all colleagues, contracted and contingent workers who carry out work on behalf of National Grid and its unincorporated Joint Venture (JV) partner(s). For incorporated JVs, we will work with our partners to promote the adoption of the principles and requirements set out within this standard.

## How we will measure success

The Chief Risk Officer (CRO) assesses adherence to the standard as part of the operation of National Grid’s Ethics and Business Conduct Framework. Details of the measures that will be used to track the effective use of the Framework by the business can be found [here](#).

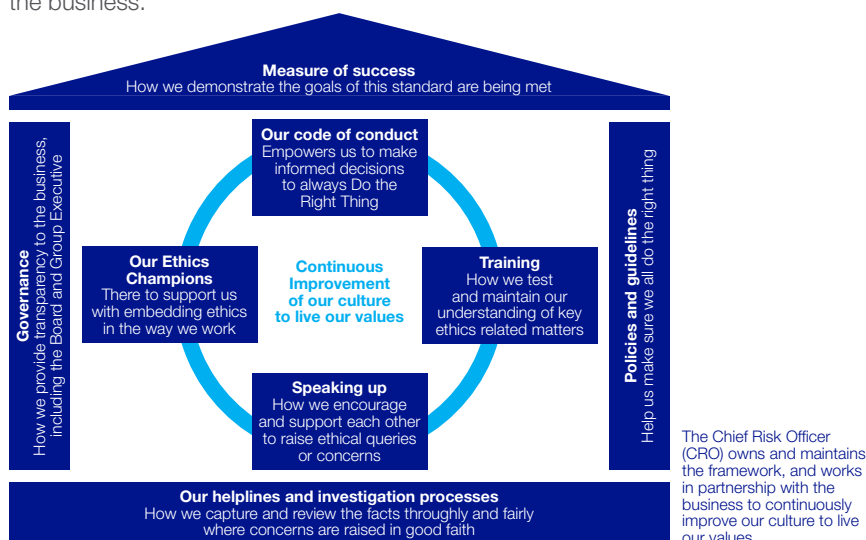
As we continue to embed ethics into our organisation and improve our culture, we will periodically review these measures to give additional insights on how we are meeting our goals.

## We commit to...

- providing employees and third parties with knowledge of expected behaviours through our Code of Ethics and online training.
- clearly communicating the personal responsibility for complying with policies, standards and procedures in relation to ethics.
- promoting an environment where everyone can do the right thing and feel comfortable raising any ethical concerns about actions or decisions that we think are unethical without fear of retaliation.
- providing different avenues for employees and third parties to report ethical concerns.
- investigating ethical concerns raised thoroughly, fairly and promptly.
- promoting a culture of integrity by integrating ethics-related practices into business activities.
- providing the Group Executive Committee and other senior leaders, boards and associated committees with timely and accurate information to monitor ethics as part of the culture of our company.

## Our framework

Our Ethics and Business Conduct Framework enables the commitments and minimum requirements set out within this standard to be consistently met by the business.



The Chief Risk Officer owns and maintains the framework, and will ensure.

- the Code of Ethics and supporting ethics training is updated at least every three years.
- opportunities to continuously improve our approach to ethics are identified and implemented by reviewing internal resources such as the Employee Engagement Survey, training metrics and external benchmarks.
- when an ethical concern is raised, it is investigated thoroughly, fairly, promptly, and independently.
- individuals are sufficiently supported, and mechanisms are in place to monitor and respond to any detrimental consequences that may occur when raising an ethical concern.
- when an allegation is substantiated, root cause analysis is conducted to identify why the misconduct occurred, what steps can be taken to prevent it from happening again and that disciplinary procedures are followed where required.
- anonymised lessons learned are shared more widely across the business through various communication channels.

## Our performance requirements

This section sets out the minimum requirements for Ethics. It highlights the responsibilities of all employees and managers with direct reports. Where applicable, links to helpful guidance have also been provided.

### 1. Responsibilities of all employees

The Code of Ethics applies to everyone and is intended to help protect our reputation as an ethical business and to maintain the trust of our stakeholders. We do not tolerate unethical behaviour and we support and encourage our colleagues to speak up. Therefore, as an employee, contracted or contingent worker at National Grid, you shall...

#### Ref Performance requirement

- |     |                                                                                                                                                                          |
|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.1 | Read and ensure you understand the <a href="#">Code of Ethics</a> with an awareness of where to go for further support.                                                  |
| 1.2 | Complete all required ethics training <sup>1</sup> and abide by policies, rules, laws and regulations.                                                                   |
| 1.3 | Promptly <a href="#">report</a> any unethical behaviour involving employees, contractors or suppliers.                                                                   |
| 1.4 | Cooperate fully with any internal or external investigations.                                                                                                            |
| 1.5 | Ensure ethics training, the annual Conflicts of Interest Disclosure and the Fraud and Bribery risk assessment are completed in their area of responsibility as required. |

### 2. Responsibilities of leaders with direct reports

It is critical we promote a “speak up” environment where everyone can do the right thing and feel comfortable and supported raising any concerns about actions or decisions that they think are unethical without fear of retaliation. Therefore, National Grid business leaders with direct reports shall...

#### Ref Performance requirement

- |     |                                                                                                                                                                         |
|-----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2.1 | Report ethical concerns that are raised with them by following the process as set out in the Code of Ethics.                                                            |
| 2.2 | Periodically discuss the information in the Code and clearly communicate responsibilities for complying with internal and external obligations.                         |
| 2.3 | Appoint an Ethics Champion(s) commensurate with the size and nature of their business area and empower them to promote and drive ethical behaviour.                     |
| 2.4 | Ensure ethics training, the annual Conflicts of Interest Disclosure and the Fraud and Bribery Risk Assessment are completed in their area of responsibility as required |
| 2.5 | Promote a positive ethical culture through the sharing of case studies, ethics messages and communications.                                                             |
| 2.6 | Use our values, including “do the right thing”, as part of performance discussions for all employees throughout all levels of the business.                             |
| 2.7 | Consider ethical behaviour, National Grid values, and completion of required ethics training in P4G discussions and performance management.                             |

## Appendix A Measure of success

The success of this standard shall initially be assessed by tracking completion of the CRO’s key ethics measures that have been established for the business. Progress against these measures will be reported to the appropriate governance bodies on a quarterly basis.

<sup>1</sup> Contractors and contingent workers are not required to complete the ethics training.

**CRO measures  
for the business**

Attendance rates of Ethics Champions at ethics meetings (e.g., Community of Practice)

Training completion rates

Employee survey ethics-related question scores

**What the measure  
demonstrates**

- Our commitment to embedding ethics across all business areas by having local points of contact to both promote and provide support on ethics-related matters
- Raising of the profile of ethics within our business and awareness of our Code of Ethics, supporting and encouraging a culture where employees are comfortable speaking up.
- Ongoing understanding and application of the Code of Ethics by all employees.
- Our employees feel safe to speak up and raise ethical issues using National Grid's confidential helplines.

**Speaking up**

We are all encouraged to speak up if we have an ethical query or concern; concerns can be raised through your line manager, HR representatives, directly to the Internal Ethics and Business Conduct Team (part of CRO) or using our confidential helplines. Contact details for the Internal Ethics and Business Conduct Team and the 24-hour confidential external helplines are on the following page:

**Internal UK Ethics & Business Conduct Team**

Phone: [0800 328 7212](tel:08003287212)  
Email: [business.conducthelp@nationalgrid.com](mailto:business.conducthelp@nationalgrid.com)

**Confidential UK External Whistleblowing helpline**

Phone: [0800 298 6231](tel:08002986231)  
Website: [Report@seehearspeakup.co.uk](mailto:Report@seehearspeakup.co.uk)

**Internal US Ethics & Business Conduct Team**

Phone: [1-888-867-6759](tel:18888676759)  
Email: [businessconduct@nationalgrid.com](mailto:businessconduct@nationalgrid.com)

**Confidential US External Whistleblowing helpline**

Phone: [1-800-465-0121](tel:18004650121)  
Website: <http://nationalgrid.ethicspoint.com>


  
Owner

---

Chief Risk Officer





# Procurement

## Why is this important?

National Grid spends over \$£4 billion each year with thousands of suppliers spanning the globe. With 80% of the company's expenditure directed through our supply chain, it's essential money is spent wisely to drive value for our customers. Commercially focused procurement and contract management create strong foundations by establishing and monitoring contracts for goods, services and works. The purchasing routes identified in these agreements must be used by colleagues to ensure that value is not eroded through non-contract spending.

The requirements set out in the standard help all colleagues who make purchases – from low-value transactions through to multi-million dollar/pound frameworks with strategic suppliers. It provides the basis for taking a consistent approach, adopting best practice, and monitoring compliance.

## Scope

Our Procurement BMS standard applies to everyone at National Grid who purchases goods, services or works, is involved in strategic procurement activity to create agreements, or conducts contract management.

This includes any National Grid business that purchases goods, services, or works from a source outside the company, and includes Procurement colleagues and contract managers. It also applies to colleagues interacting with suppliers in a supervisory or managerial capacity.

## We commit to...

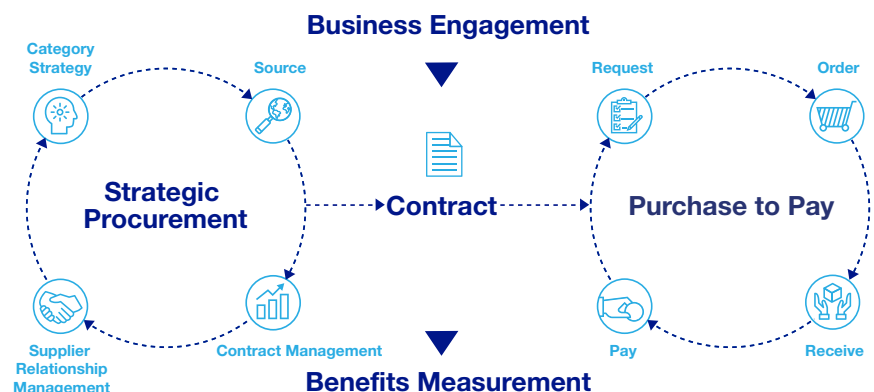
- developing a partnership between Procurement and business units to maximise value from the supply chain
- creating strategies for categories of goods, services and works that identify new value opportunities
- establishing agreements with new suppliers using the approach designated by Global Procurement and Purchase to Pay
- managing major contracts and frameworks to deliver the forecast business benefits
- using the preferred buying channel when requesting goods, services and works
- establishing a purchase request before committing spend to a supplier
- completing a system receipt when the order has been completed
- paying all invoices to the agreed payment terms when approvals have been received
- tracking delivery of benefits for identified contracts.

## BMS performance requirements

This standard establishes minimum requirements based on leading practice for strategic and operational procurement to ensure that:

- the business is engaged to develop the optimal approach to market
- sourcing events identify best value suppliers, selected through compliant procurement events
- robust contracts are put in place
- suppliers are held to account for delivery of the forecast benefits
- colleagues requiring the goods, services and works purchase from these contracts using the correct approach.

The procurement lifecycle is set out below aligned with our commitments:



**1. Business Engagement**

Developing a partnership between Procurement and the business to ensure alignment is essential to delivering joint objectives and maximising value through the supply chain. Therefore, each National Grid business and Procurement shall...

**Ref Performance requirement**

**1.1** Agree and deliver joint strategic procurement objectives.

**2. Category Strategy**

Category strategies set out a medium- to long-term plan on how National Grid seeks to optimise its supplier expenditure for defined groups of goods, services and works. This is achieved by identifying new opportunities through assessment of supply-side and demand-side value levers. Therefore, each National Grid business and Procurement shall...

**Ref Performance requirement**

**2.1** Develop category strategies aligned with joint objectives prior to developing sourcing plans.

**3. Source**

Sourcing plan execution maximises value by leveraging purchasing power, contract negotiation and risk mitigation. Therefore, each National Grid business shall...

**Ref Performance requirement**

**3.1** Source using the approach designated by Procurement.

**3.2** Demonstrate why a non-competitive sourcing approach is proposed by the business for single source requests prior to purchase.

**3.3** Agree the sourcing event strategy ahead of market engagement for strategic sourcing events.

**3.4** Agree the technical and commercial evaluation criteria for strategic sourcing events.

**3.5** Only award contracts to suppliers agreed upon by Procurement and the business.

**4. Contract Management**

Effective management of major contracts and frameworks is necessary to deliver forecast business benefits by monitoring performance. These agreements have allocated contract management resource to ensure rigorous contract governance and prevent value loss through off-contract spend. Therefore, at National Grid our contract managers shall...

**Ref Performance requirement**

**4.1** Mobilise and demobilise the contract in accordance with agreed plans, taking into account legacy contracts and associated buying channels.

**4.2** Maintain contract documentation and key contract information in the designated repositories.

**4.3** Demonstrate that contract assurance and performance are being achieved throughout its lifecycle.

**4.4** Ensure contracts allocated from frameworks/master service agreements have defined performance measures and governance.

**4.5** Establish governance for contract change management, including benefits forecast and business plan forecast impact analysis.

**5. Supplier Relationship Management**

Supplier relationship management is an approach to seek value opportunities with key suppliers identified as having the potential to deliver National Grid's strategic vision. This ensures long-term value is achieved, stimulates innovation, and facilitates transformative alliances to improve our commercial and operational standing. Therefore, each National Grid business shall...

**Ref Performance requirement**

**5.1** Evaluate suppliers for inclusion in the Supplier Relationship Management (SRM) programme.

**6. Request**

When requesting goods, services and works, utilising the preferred buying channel will ensure maximum value is achieved, and will avoid risks to the organisation. Therefore, each National Grid business shall...

**Ref Performance requirement**

- | Ref | Performance requirement                                                                                               |
|-----|-----------------------------------------------------------------------------------------------------------------------|
| 6.1 | Ensure supplier onboarding is conducted by Procurement at the outset of the relationship before committing any spend. |
| 6.2 | Procure goods, services and works using the designated buying channels.                                               |

**7. Order**

Procurement is responsible for authorising the conversion of purchase requests to purchase orders following controlled procedures to maximise efficiency and avoid risk. Therefore, each National Grid business shall...

**Ref Performance requirement**

- | Ref | Performance requirement                                                               |
|-----|---------------------------------------------------------------------------------------|
| 7.1 | Establish a purchase request where required, before committing spend to the supplier. |

**8. Receive**

Receipting is the process of confirming you have accepted the goods, services or works to be invoiced by the supplier. Timely receipts unlock discount opportunities, prevent late payments and unnecessary accruals, and improve operational efficiency. Therefore, each National Grid business shall...

**Ref Performance requirement**

- | Ref | Performance requirement                                                                                                                             |
|-----|-----------------------------------------------------------------------------------------------------------------------------------------------------|
| 8.1 | Complete a system receipt when goods/services/works are delivered in accordance with the contractual standard, when required by the buying channel. |

**9. Pay**

Accounts Payable operates efficient financial controls to ensure payment is only made for what was ordered and delivered to acceptable standards. Therefore, at National Grid we shall...

**Ref Performance requirement**

- | Ref | Performance requirement                                                                                                               |
|-----|---------------------------------------------------------------------------------------------------------------------------------------|
| 9.1 | Ensure Accounts Payable pays all invoices to the agreed payment terms when required approvals have been received.                     |
| 9.2 | Ensure suppliers are directed to send all invoices to the address stipulated by Accounts Payable.                                     |
| 9.3 | Ensure non-purchase-order payment requests are only used in circumstances permitted by Procurement.                                   |
| 9.4 | Ensure corporate credit card/purchasing card reconciliation and approval are completed within the timeframe specified by Procurement. |

**10. Benefits Measurement**

Generation of business benefits is the intended outcome of procurement activities. From a financial perspective, establishing an accurate cost baseline ensures benefits are tangible and measurable. Delivery must be tracked throughout the contract lifecycle. Therefore, each National Grid business shall...

**Ref Performance requirement**

- | Ref  | Performance requirement                                                                                                  |
|------|--------------------------------------------------------------------------------------------------------------------------|
| 10.1 | Confirm to Procurement the available budget or sanction cost for the sourcing event, agreeing the future spend baseline. |
| 10.2 | Calculate the benefits forecast at contract award in conjunction with Procurement.                                       |
| 10.3 | Reflect agreed forecast hard cost benefits in the business plan forecast.                                                |
| 10.4 | Ensure benefits delivery is measured for identified leverage contracts throughout the contract duration.                 |


  
**Owner**

Chief Procurement Officer.



# Supplier Code of Conduct

December 2021

**nationalgrid**

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# Section one

## Supplier Code of Conduct

**National Grid lies at the heart of a transforming energy system spanning the UK and US and is committed to being a responsible business in everything we do.**

**We are at the heart of one of the greatest challenges facing our society – delivering clean energy to support our world long into the future.**

We value our relationship with you, as you play an essential part in helping create a more socially, economically, and environmentally responsible supply chain.

Our Code of Conduct sets out our expectations, values, and fundamental principles which we expect you to extend into your business and your own supply chain. We play a vital role in delivering electricity and gas to millions of people and we will always do this safely, reliably and in a fair and affordable way for all.

At National Grid, we are a purpose led organisation and how we work is as important as what we do. Responsible business is how we do business and we expect our suppliers to ensure compliance with this Code.

We expect you to carry out your business in line with the values and aspirations outlined in this document, to act in accordance with the highest ethical standards and comply with all relevant laws, regulations and licenses when working for National Grid.

Our Responsible Business Charter outlines our commitments and ambitions to lead the clean energy transition in areas where we can have the most impact on society. Working with all our stakeholders, including our supply chain, we follow principles of sustainability, equality, and accountability in all our actions.



**Vivienne Bracken**  
**Chief Procurement Officer**  
**National Grid**

# Section two

## Our Values and Ethics

**We're committed to being a responsible business in everything we do. It's enshrined in our purpose – to Bring Energy to Life.**

Our values describe what we stand for and guide our behaviour. They set the tone and shape the culture of our organisation. Every day we:

- Do the Right Thing**
  - Act safely, inclusively and with integrity.
  - Support and care for each other.
  - Speak up, challenge and act.
- Find a Better Way**
  - Work as one team to find solutions.
  - Embrace learning and new ideas.
  - Simplify to what really matters.
- Make it Happen**
  - Be bold and act with passion and purpose.
  - Take ownership to deliver to customers.
  - Focus on progress over perfection.

We take pride in our reputation for working responsibly with our customers colleagues and consumers and we require the same standards from our suppliers.

At National Grid, we are committed to promoting an environment where everyone can feel comfortable raising concerns about actions or decisions, they think are unethical. We strongly believe in openness and transparency and encourage our employees and those working on our behalf to raise any concerns.

Examples of unethical behaviour may include, but are not limited to bullying, harassment, discrimination, fraud, bribery, corrupt business practices, human rights violations and any other unfair practices committed at a personal or corporate level. If you believe that an employee, contractor, or anybody else doing business with us has acted unethically or unlawfully, you must quickly bring this to our attention using the confidential helpline available on the front page.

In return, we will investigate the facts thoroughly, fairly and promptly when you raise a concern. This will be undertaken in the strictest confidence and we will not tolerate any form of retaliation or victimisation, where a concern is raised in good faith.



# Section three

## People

### We will develop the skills to enable and accelerate the energy transition and strive to build a diverse workforce and inclusive culture.

#### Health and safety

In line with our key values, ensuring the health and safety of our employees, contractors and members of the public is our number one priority at National Grid. We want to be a recognised leader in the development and operation of safe, reliable, and sustainable energy infrastructure to meet the needs of our customers and communities.

We believe that everyone in National Grid and everyone we contract with, collectively and individually, has a part to play to achieve this.

We recognise our operations give rise to risk; however, we believe through commitment, robust management, and compliance with legislation/industry best practice, we can eliminate or minimise these risks to a safe level. We expect the same commitment from our suppliers.

To work with National Grid, you must understand your health and safety responsibilities and be committed to creating an environment that is safe, healthy, and secure for all your employees, and anyone who may be affected by your undertaking. The safety of employees, contractors and members of the public is a mutual priority.

#### Wellbeing

Managing the wellbeing of our employees, contractors and supply chain is also one of our priorities. We know that where our people are engaged and healthy our work is more efficient, and our culture is more positive. We focus on the physical aspects of health, understanding the impact this may have on the psychological aspects of health too and we encourage you to do the same with your employees. We ensure we understand our fatigue risk, our stress risk, and that we design our workplaces and tasks around wellbeing needs, to ensure healthy and engaged employees and expect you to take the same approach to ensure wellbeing is a priority for your workforce.

#### Respecting human rights

National Grid requires all businesses in our supply chain to share our commitment to respecting, protecting, and promoting human rights. This includes alignment to the United Nations Guiding Principles on Business and Human Rights, The United National Global Compact Ten Principles, the core labour standards of the International Labour Organisation (ILO), the US Trafficking and Violence Protection Act 2000. The Department of State Principles of Combating Human Trafficking and the Ethical Trade Initiative (ETI) Base Code as a reference standard.

As a minimum, we expect:

- employment is freely chosen
- the right of collective bargaining
- safe and hygienic working conditions
- no use of child labour
- payment of the Real Living Wage
- no excessive working hours
- no discrimination
- regular employment
- no harsh or inhumane treatment



In meeting these expectations, you should have a full understanding of your business operations and wider supply chain, and ensure that any potential human rights risks are assessed, managed, and mitigated. You must comply with the requirements of the Modern Slavery Act 2015, and we encourage you to publish a statement on modern slavery regardless of whether this is a legal obligation to do so. [See the Modern Slavery Statement Registry here.](#)

On request, we may require further information detailing your approach to risk assessment and evidence of how you might mitigate any identified risks in your own business and supply chain.

### The real living wage

In the UK, National Grid has demonstrated its commitment to fair pay via accreditation with the Living Wage Foundation. This commits both National Grid and contractors working on its behalf to pay, as a minimum, the real living wage as promoted by the Living Wage Foundation.

This is defined as contractors aged over 18 who work on our sites for two or more hours a week or eight or more consecutive weeks.

This is an important principle for us, not just because it is the right thing to do, but because as a responsible business, we believe that everyone should be appropriately rewarded for the vital work we do to safely and reliably connect people to the energy they use.

The requirements of the Living Wage Foundation are mandated for all new contracts and embedded into our contract terms and conditions. We are asking for voluntary participation from suppliers within existing contracts. On request, we may require verification that the real living wage is being paid where contractually stipulated.

We expect employment agency partners to uphold the same standards of employment that we offer our direct employees and adopt the “employer pays” principle. This means that no employee of National Grid should ever have to pay to obtain access to temporary or permanent work within our organisation or supply chain.

### The Prompt Payment Code

National Grid has demonstrated its commitment to the fair treatment of our suppliers by signing up to the Prompt Payment Code. We encourage our suppliers to adopt the principles of this code throughout their own supply chains.

[For further information please visit the government website.](#)

### Conflict minerals

National Grid is committed to complying with Section 1502 of the Dodd-Frank Act (“Conflict Minerals Rule”), a US federal law that requires us to publicly disclose the use of conflict minerals. The term ‘conflict minerals’ generally refers to cassiterite (tin), coltan (tantalum), wolframite (tungsten), and gold, or derivatives of these minerals from the Democratic Republic of Congo (DRC).

Our policy is not to use products containing conflict minerals. We expect you, as a business in our supply chain, to have a policy and controls in place to monitor and prevent the use of minerals sourced illegally or unethically.

If you know, or have reason to believe, that conflict minerals may be contained within the product that you are supplying to us and these are not from recycled or scrap sources, you must exercise due diligence to determine the source and chain of custody of the conflict minerals or derivatives. You must document your efforts and make your due diligence measures available to us on request and provide us with evidence of the origin of the conflict minerals in products supplied by you to us.



## Section four Communities

**We will deliver sustainable energy safely, reliably, and affordably, ensuring no one gets left behind.**

### **Supplier diversity, equity, and inclusion**

We recognise that the markets in which we operate are multicultural and diverse. In turn, we need to support and develop diverse business enterprises within our communities.

It is National Grid's corporate policy to support supplier diversity. Expanding the diversity of suppliers in our supply chain is an important part of our procurement strategy. We understand the value of an inclusive supply chain that is richly diverse with ethnic, minority, women, LGBTQ, disabled, small and medium enterprises and other diverse businesses reflective of the communities we serve across the globe.

The Procurement department will develop, administer, and implement processes to address social inequalities and provide opportunities to diverse suppliers to ensure these businesses have an equal opportunity to participate in the procurement process at National Grid.

Our Global Supplier Diversity Policy outlines our commitments, and this should be understood and applied into the supply chain ensuring there is an established approach to diversity, equity, inclusion, and respect in all aspects of business.



# Section five

## Economy

**We will power and heat society, and partner with regulators, our business partners, suppliers, and other key stakeholders.**

### Community and workforce resilience

Our approach to responsibility in our communities goes beyond safely maintaining the resilient energy system society expects. It is also about making sure our economic and social role in the community has the greatest possible positive impact.

We recognise the role the supply chain can play in supporting this approach and National Grid expects suppliers to understand how their activities impact their local area and wider community. We encourage them to make positive contributions and investments where appropriate, for example by providing local employment opportunities, skills, development, and workforce volunteering. We expect our suppliers to build positive relationships and minimise disruption to communities.

National Grid is committed to skills development within our own business and that of our supply chain to meet the skills gap challenges recognised as an issue in our industry. We strive for affordability and fairness, and we will develop skills for the future, with a focus on lower income communities to meet workforce resilience demands.

We expect our suppliers to support our approach to developing the workforce of the future to meet our net zero commitments and focus on formal training programs targeted in areas considered to be in short supply. This includes the use of apprentices, graduate schemes, and other development/ training programmes.

### Resilience and business continuity

National Grid expects all businesses in our supply chain to have aligned resilience and business continuity arrangements with Crisis Management and Pandemic Plans in place. These should be tested annually to ensure that you can continue to provide your services to National Grid in the event of any disruption to your operations.

As a minimum, these resilience arrangements should consider:

- people
- premises
- process (information and technology)
- providers.

These arrangements should be reviewed and exercised on a regular basis. More detail will be provided through the procurement process and contained within individual contracts, where business continuity arrangements may be subject to review as part of the ongoing management of the contract.





# Section six

## Environment

### We will enable a fair and affordable transition to a clean energy economy and reduce our own emissions.

#### Protecting the environment

At National Grid we are committed to being a responsible business, we recognise the value of the natural environment and we ensure that environmental sustainability considerations are included in our investment, procurement, and operational decisions.

We expect all our suppliers to support us in this approach and actively work towards making a positive impact on environmental factors linked to our operations. We are all responsible for protecting the environment.

As a minimum we require you to:

- comply with all legal requirements and obligations and have in place an environmental management system that is aligned to the requirements set out in standards such as ISO14001.
- act to prevent pollution which may result from your activities
- ensure that any activities that have an impact on natural habitats are conducted in a manner to protect biodiversity
- assess ways to reduce the impact of climate change on your activities by implementing mitigation and adaptation measures
- implement an environmental strategy and establish relevant metrics and targets, including, but not limited to:
  - the reduction of GHG emissions, helping us on our journey to net zero (and supporting the CDP supply chain program if requested)
  - a waste management process, aiming for zero waste sent to landfill (and if requested, report how much waste you produce)

- tracking of energy usage, using renewable sources where feasible and increasing energy efficiency where possible. Provide energy efficiency strategies upon request.
- ensuring resources are used efficiently, through good design, the use of sustainable materials, using less packaging, re-use, recovery, and recycling of materials
- seeing ways to enhance the natural value of the area for the benefit of communities and/ or the environment
- a water management process to manage related risks including current and future water stress.

Our aim is to be a leading global utility, demonstrating technical and commercial solutions to help achieve net zero for the energy sector. We have targets to reduce our own greenhouse gas emissions and continue to explore making them more ambitious. We encourage all our suppliers to align to targets that are aimed at limiting the global temperature rise to 1.5C (above pre-industrial levels).



# Section seven

## Governance

**We will make sure our governance mechanisms reflect our commitments, and that the principles of responsibility guide us in everything we do.**

### **Business Ethics Standards, fraud, bribery, and corruption**

At National Grid, we are committed to our business in a fair, honest, and open way, and we expect you to be honest and fair as you conduct your business. We have a zero-tolerance approach to any type of bribery, fraud, or corrupt business practices. We expect you to have a programme in place to prevent these activities. We expect you to have procedures in place in accordance with all applicable local, state, federal or national laws or regulations.

This includes without limitation, the UK Bribery Act 2010, UK Finance Act 2017 (Criminal facilitation of Tax Evasion) and the US Foreign Corrupt Practices Act 1977.

We require you to have processes in place to protect employees who provide information related to any unfair or inappropriate business activities (whistleblowing), ensuring that you do not reveal their identity. In return, we ask that you communicate with us any business activities that could be deemed inappropriate so we can proactively work together to find resolution. In the event that we need to investigate any concerns, we expect you to fully cooperate and support/ facilitate any required investigative activity.

National Grid reserves the right to review your control procedures associated with the prevention and detection of fraud, bribery, and corrupt business practices. If we have serious concerns, whether they relate to our business or not, we will review our relationship with you.

### **Entertainment, hospitality, gifts, and cash rewards**

We require you to help enforce our rules on business rewards, such as gifts, meals, hospitality, and entertainment.

We may accept hospitality and entertainment as long as it is appropriate, has a genuine business purpose and is within the guidelines as set out in our Code of Ethics. The best way to avoid a potential conflict of interest is to avoid offering gifts, rewards, hospitality, or entertainment to our employees altogether.

We do not expect our employees to take part in any activity that would affect their judgement when dealing with you. We do not allow our staff to accept cash or cash equivalents, such as gift certificates.

Employees who directly buy goods, works or services for our business are not allowed to give or receive any gifts, hospitality or entertainment.

### **Testimonials and endorsements**

We will not give testimonials or individual company endorsements including customer feedback surveys, and you should not request them. We may provide factual references on requests for work that has been completed on our behalf.

### **Social media**

Social media is now an integral part of our society. It enables us to convey messages and opinions to a wide audience instantaneously. The messages you convey become permanent public statements reflecting upon you, your business, your clients, and customers – we must be able to recognise the perception of these actions and behaviours. We expect you to use social media in a responsible, reasonable, and respectful manner and any comments you make to align with the ethical values of National Grid.

If your social media activity is linked in any way – or could be deemed to be related to National Grid – by our customers, key stakeholders or others, the company has a legitimate interest in what is in the content being published, whether this is posted through a business or personal account. In particular, the posting of confidential National Grid proprietary information or business secrets, discriminatory, harassing, offensive, bullying, abusive, threatening, false or misleading comments are unacceptable. No new social media channels should be created using National Grid's brand without permission from the Group Social Media Team. Don't share embargoed company announcements prior to the time and date specified, or discuss sensitive business-related topics, such as our performance, or anything to jeopardise our trade secrets, confidential company information or intellectual property.

Any breach of the above may result in action and could involve us requesting that you cease providing services to National Grid. Anyone suspected of committing a breach of this policy will be required to cooperate with our investigation.

Remember that, when you give recommendations about working with certain people you are doing this in your personal capacity, and this must be clear in the wording you use. You must not suggest that National Grid is recommending or endorsing. You cannot refer to other National Grid colleagues by name without their express consent. Your recommendation must also not refer to any National Grid proprietary information or anything else that is confidential or involves our customers.

Contractors working as contracted employees should ensure to adhere to the Group Social Media Policy on [Grid:home](#).

## Security

National Grid is committed to ensuring effective controls are in place to protect employees and company assets, including physical and intangible assets such as information.

Any significant compromise of personnel, physical, information, or IT security could result in disruption, with potentially serious economic, delivery, safety, and social consequences.

We expect all our supply chain partners to demonstrate a similar commitment to security and have at a minimum the:

- appropriate internal policies and procedures covering people (e.g. background checks), process and technology
- security controls proportionate to the risk, which support the policies and procedures
- independent accreditation and assurance that security controls are in place
- necessary controls in place to detect security anomalies
- plans defining the appropriate activities to perform to respond to security incidents and events and recover from them.

In addition, any suppliers with access to National Grid data, equipment, people or information assets will also be required to review and understand National Grid's Security Policies and align with the requirements of, or equivalent to National Grid's IT Control Set.

Any violations to National Grid's Security Policies will be investigated and appropriate action will be taken.

## Operational security

To ensure our commitment to delivering operational excellence, including excellent levels of security we will be relying on the cooperation of suppliers.

If you have been identified as a supplier who supplies us with a product or service which supports a National Grid operational system, service, or asset, we expect you to:

- agree and implement enhanced organisational and technical policies, procedures, and controls where relevant.
- work with us to provide any information requested by the pertinent authorities to ensure we are compliant with the relevant laws and regulations.

## Data protection

Personal data should be protected fully in compliance with all relevant data protection legislation including the General Data Protection Regulations or equivalent provisions.

Data protection and privacy laws regulate the collection, storage, use, disclosure, and disposal of personal information, which can identify a living person.

We risk assess and carry out due diligence on our suppliers to ensure they meet our required standards. This may involve the collection of supplier personnel personal data, including, but not limited to the results of any background checks, names, and email addresses.

We expect you to have obtained the necessary consents from your personnel for us to receive and process this personal data.

We expect you to:

- process personal information in a fair, lawful, and transparent manner
- only collect the personal information required to fulfil the service you are providing and to not further process this information in a manner incompatible with this service
- take steps to ensure personal information remains accurate and up to date
- have a retention schedule to ensure personal information is not retained longer than is necessary
- implement organisational and technical measures to ensure the integrity and confidentiality of personal information and provide independent accreditation and assurance over the controls related to the services (i.e. ISO 27001/ SOC 1 and/ or SOC 2, or equivalent standards)
- reasonably co-operate with and assist on data protection impact assessments or compliance matters which relate to the processing activities being carried out by you on behalf of National Grid.

There is an expectation to report any breaches of National Grid data or information as a matter of urgency.

## Subcontracting and supply chain

Where allowed under the terms of the contract with National Grid to subcontract work or services to third parties, we require the following:

- prior written approval for contractors with transparent support locations
- subcontractors and third parties are informed, agree, and adhere to the provisions of this Supplier Code of Conduct and relevant agreements.
- risk assessments with proper due diligence performed
- agreement that you are responsible for all acts of any subcontractor or third parties
- provide evidence upon request that the above is taking place.

## Tax Compliance

National Grid expects its suppliers to ensure that they remain compliant with changes to UK tax law, and we will not work with suppliers who engage in any practices which may constitute tax evasion or involve workers not being taxed appropriately. For example, we expect you to have procedures in place to prevent the facilitation of tax evasion and other offences as set out in the Criminal Finances Act 2017.

We would also like to remind you of the importance of the changes to the off payroll working rules (IR35) effective from April 2021. We expect individuals involved in providing services to National Grid to be paid subject to deduction of PAYE tax. It is only permitted for individuals to provide their services via a personal service company (PSC), Sole Trader or other type of intermediary within our supply chain in exceptional circumstances.

If, in exceptional circumstances, you are providing services to National Grid which include a supply of labour through an intermediary (such as a PSC or Sole Trader), you must inform your National Grid Hiring Manager before services commence, so that compliance checks can be undertaken. If you are in any doubt as to whether a staffing arrangement you are using is affected by the off payroll working rules you should discuss this with your National Grid Hiring Manager. Failure to do so could place your organisation and National Grid at risk of being in breach of tax law, and National Grid reserves the right to require the immediate removal of any individuals found to be providing services via a PSC without approval within the supply chain.



### Monitoring and reporting

National Grid requires you to evaluate your activities to make sure you are keeping to this Supplier Code of Conduct and adhering to its provisions throughout your work. We expect you to be able to demonstrate compliance to the principles set out in this document whilst working on behalf of National Grid.

You must have a process in place to remedy any instances of non-compliance, breaches or problems identified through audits, reviews, or inspections. You should bring to our attention immediately any significant issue, non-compliance or potential breach of legislation or regulation.

We also expect you to investigate and report any concerns or complaints you have about issues to do with breaking the law or standards which relate to our business, sub-suppliers or sub-contractors. We can then investigate and deal with these issues. We expect you to fully co-operate with us during any investigation we carry out and we do not accept any type of retaliation against any person or business who raises any concerns.

You should have suitable training in place for key personnel working with National Grid, introducing this Supplier Code of Conduct and its provisions along with your relevant policies and procedures. We may request, periodically, a letter of assurance certifying that you have complied or have brought issues to National Grid's attention in a timely manner. We may conduct an audit or ask for further information relating to any of the areas mentioned above.





If you have any questions relating to the content of this policy, you should contact your Contract Manager where relevant. If you want to raise a concern or breach, please contact national Grid's Global Assurance Team using the details below:

## UK

**Focus helpline:** 0800 298 6231\*  
**Email:** [report@seehearspeakup.co.uk](mailto:report@seehearspeakup.co.uk)

## In-house

**Business conduct helpline:** 0800 328 7212  
**Email:** [business.conducthelp@nationalgrid.com](mailto:business.conducthelp@nationalgrid.com)

## US

**Alert line:** 1-800-465-0121\*  
Ethics Point - National Grid USA

## In-house

**Toll-free helpline:** 1-888-867-6759  
**Email:** [businessconduct@nationalgrid.com](mailto:businessconduct@nationalgrid.com)

\* (lines are open 24 hours a day, seven days a week)

National Grid plc  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick CV34 6DA  
United Kingdom

[nationalgrid.com](http://nationalgrid.com)

Division 3-2

Request:

At Attachment 3-4-10 (Redacted) the Company replied with an email that provided:

Sent: Thursday, November 03, 2016 4:39 PM To: Subject: RI Residential/low income year end results

“Hi team, just had call with XXX and the RI policy team on our year end forecasts. I wanted to communicate that we can't go above the current forecasts in the Residential sector. According to our sweet spot to hit is 95% of spend and 105% of savings at year end. If we over achieve beyond this savings result, it will cause regulatory/ stakeholder issues for the Policy team and 2017-18 goals could significantly increase for us.”

- a) Please identify all job titles that form a part of the RI Policy Team.
- b) Did the RI policy team direct the EE program to not “go above the current forecasts in the residential sector?
- c) Was the RI Policy Team directed by a higher authority in the Company to direct the EE program to not “go above the current forecasts in the residential sector? If so, identify the title of the person(s) giving such direction.
- d) What are the “regulatory/ stakeholder issues for the Policy team” referenced in the email?
- e) What were the goals for this program in 2016-2017?
- f) What were the goals for this program in 2016-2017?

Response:

- (a) The author's reference to the “RI Policy Team” in the above-mentioned email was referring to National Grid USA's internal RI Strategic Business, Policy and Evaluation team. In November 2016, job titles on this team included:
  - Director of RI Strategic Business, Policy and Evaluation
  - Six Analysts on the RI Strategic Business team
  - Manager of RI Policy and Evaluation
  - Five Analysts on the RI Policy and Evaluation Team
- (b) Yes.

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 22-05-EE  
In Re: 2022 Annual Energy Efficiency Plan  
Responses to the Division's Third Set of Post-Decisional Data Requests  
Issued on July 1, 2022

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- (c) Neither The Narragansett Electric Company (“Narragansett”) nor National Grid USA are aware of the RI Strategic Business, Policy and Evaluation team being directed by a “higher authority” at Narragansett, or that National Grid USA directed the Energy Efficiency program to not “go above the current forecasts in the residential sector.”
- (d) “Regulatory / stakeholder issues” could have referred to the required written statements justifying certain spending increases; the requirement to seek formal stakeholder approvals in advance for other spending increases; and/or the regulatory risk for Narragansett if the budget were exceeded without advance notice to stakeholders. This framework is explained in Narragansett’s 2016 energy efficiency plan.<sup>1</sup>

With regard to future goals, it appears from the message that some employees expected “overachieving” to generate external pressure to reach larger savings goals in the future. However, in 2016, the effect of establishing larger savings goals would have been ambiguous because performance incentive earnings opportunities were formulaically linked to proposed budgets. If savings goals were increased, then budgets and target performance incentive opportunities would have also grown. Achieving 100 percent of savings targets would have been more challenging, in such a context. Therefore, lower savings goals would have reduced the risk associated with achieving target-level savings, but would have also reduced nominal performance incentive earning opportunity.

- (e) and (f) 2016 and 2017 annual MWh and therm goals for all gas and electric programs in the residential sector are provided below:

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<sup>1</sup> Please see Docket No. 4580, “The Narragansett Electric Company, d/b/a National Grid 2016 Energy Efficiency Program Plan -- Settlement of the Parties,” (October 15, 2015) at 19-22, for the agreed upon handling of these various scenarios.

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
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| <b>Electric Residential Program</b> | <b>2016 Annual MWh Goal</b>    | <b>2017 Annual MWh Goal</b>    |
|-------------------------------------|--------------------------------|--------------------------------|
| ENERGY STAR® HVAC                   | 1,011                          | 1,376                          |
| ENERGY STAR® Lighting               | 43,098                         | 46,856                         |
| EnergyWise                          | 11,729                         | 6,545                          |
| EnergyWise Multifamily              | 4,061                          | 3,519                          |
| Home Energy Reports                 | 32,186                         | 26,184                         |
| Residential New Construction        | 1,213                          | 1,065                          |
| Residential Consumer Products       | 4,647                          | 4,708                          |
|                                     |                                |                                |
| <b>Gas Residential Program</b>      | <b>2016 Annual Therms Goal</b> | <b>2017 Annual Therms Goal</b> |
| ENERGY STAR® HVAC                   | 260,639                        | 273,995                        |
| EnergyWise                          | 681,171                        | 285,938                        |
| EnergyWise Multifamily              | 172,075                        | 115,208                        |
| Home Energy Reports                 | 539,887                        | 591,781                        |
| Residential New Construction        | 109,067                        | 115,778                        |

Division 3-3

Request:

At Attachment 3-4-3 (Redacted) the Company replied with an email that provided:

“Fri 12/20/2013 5:00:21 PM (UTC) Subject: RI Gas Overspending -- Year End Accruals and Game Plan Everyone, Happy Holidays!

I wanted to inform everyone that our team is projecting an overspend in RI Gas that is very close to 10%. It is in our best interest to avoid overspending by 10% of our budget. This email lays out a plan for year-end and January to avoid that. We got some advice from the RA group regarding a year end process we can use to manage the situation. First, please accrue anything that the Company has an obligation to pay in 2013. Second, it's the program managers discretion when to authorize payment on those accruals. Therefore we're asking that you not authorize payment on anything above 100% of budget until mid-January. In mid-January, when we have the year-end spend files from the RA group, we will sit down to look at our overall portfolio level spend and then coordinate which payments should be authorized in order to maximize savings and avoid overspending.”

- a) What is the RA Group?
- b) What job titles were in the RA Group?
- c) From where or from whom did the Program Managers derive “discretion when to authorize payments on accruals”? If the authorized discretion is in writing, please provide a copy of the same.
- d) What does the writer mean when he/she states: “it will cause regulatory/ stakeholder issues for the Policy team”?
- e) What would have happened if the Company overspent its budget? Include in your answer the impact to the Company's incentive, the establishment of a goal for the following year, and any impacts to employee compensation.

Response:

- a) Based on other data reviewed from 2013, “RA” appears to be an acronym for a “Reporting and Analysis” group.
- b) Director; Manager; Senior Accountant; Lead Analyst; Senior Analyst; and Analyst.

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 22-05-EE  
In Re: 2022 Annual Energy Efficiency Plan  
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Issued on July 1, 2022

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- c) It is unclear why the author of the email message believed that Program Managers had “discretion when to authorize payments on accruals.” Specific guidance on timing of payments has not been identified in any policies or training guides, but as shown in Attachment 1-17-1 at Slide 42, Program Managers were encouraged in their training “to be certain of timely payment. Invoices should not be held due to budgetary concerns. Work performed and considered a National Grid liability need to be paid in a timely manner.”
- d) The phrase specified in the request for subpart (d) of the request does not appear in the quoted email message.
- e) In 2013, when this message was written, employees of National Grid USA Service Company, Inc. working for The Narragansett Electric Company’s (“Narragansett”) energy efficiency program were expected to pursue all savings that were “optimally cost-effective, reliable, prudent, and environmentally responsible,” consistent with R.I. Gen. Laws § 39-1-27.7. Energy efficiency programs operated within the parameters of pre-authorized budgets, with the potential for “trading” savings and spending within a sector, and with additional tolerance for overspending, within limits.<sup>1</sup> If overspending at this time led to increased savings, then it would have increased the performance incentive, up to savings caps of 125 percent of savings targets. For a discussion of the effect of overachieving savings on future goals, please refer to the response to Division 3-2. For a discussion of the potential effect on the variable portion of an employee’s compensation, please refer to the response to data request Division 1-7, at subpart (d).

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<sup>1</sup> See, e.g., Docket No. 4366, “The Narragansett Electric Company, d/b/a National Grid 2013 Energy Efficiency Program Plan,” Section IV, “Funding, Budgets, Goals, and Cost-effectiveness,” which states that the budget may be overspent by up to 10 percent with a written explanation, and can be overspent by more than 10 percent if advance notice is provided to the Rhode Island Energy Efficiency and Resource Management Council and Narragansett and a vote is taken, or by more than 10 percent without advance notice or a vote, but Narragansett will bear the burden of proving reasonableness and providing an explanation.

DIV 3-4

Request:

At Attachment 3-4-13 (Redacted) the Company replied with an email that stated:

“Mon 12/5/2016 4:02:51 PM (UTC) Subject: Upstream Gas for remainder of 2016

Hi we've been asked to manage to 105% of the C&I Gas portfolio as well. I see you have January thru October uploaded to InDemand which accounts for your 48,305 paid savings. When do you think you will have November in? And, could you hold off on uploading December until 2017 (any time after January 13, 2016) if necessary?

- a) To whom, by title, is the writer referring to in the first sentence; who asked that the C&I Gas Portfolio be managed to 105%?

Response:

The title of the individual the writer is referring to is the Director of RI Strategic Business, Policy and Evaluation.

Division 3-5

Request:

At Attachment 3-4-21 (Page 3 of 3) (Redacted) the Company replied with an email that stated:

This is particularly critical in RI standard income, where our most recent forecasts had us close to tipping the scales into a negative shareholder incentive. Gas was forecasted at 123% and Electric at 119%. As you know, we cannot go over 125% of savings goal or we get penalized.

- a) Please describe what is meant by negative shareholder incentive.
- b) Please describe what is meant by the statement: "we cannot go over 125% of savings goal or we get penalized." Please describe the penalty in detail including the entities or employees who get penalized and the type of penalty, quantified.

Response:

The writer of the email is no longer employed by National Grid USA Service Company, Inc. Therefore, it is not known what the writer meant by the statements in parts (a) and (b) of this request. However, please note the following:

- a) At the time this email message was written, regarding program year 2017, The Narragansett Electric Company had no "negative shareholder incentive."
- b) Although there was no incremental earnings opportunity in 2017 associated with the performance incentive once 125 percent of savings was exceeded,<sup>1</sup> there was no penalty and no entities or employees were "penalized."

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<sup>1</sup> Docket No. 4654, "The Narragansett Electric Company, d/b/a National Grid Energy Efficiency Program Plan for 2017," Section IX, "Incentive," (October 17, 2016) at 31, states that: "[t]he cap for the target incentive amount of energy savings will remain at 125%."



The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 5189  
In Re: Review of 2022 Energy Efficiency Plan  
Responses to the Division's Fourth Set of Data Requests  
Issued on July 1, 2022

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DIV 3-6

Request:

At Attachment 3-4-25 (Page 1 of 2) (Redacted) the Company replied with an email that contained a chart. Please identify what is meant by the term “Blackhawk” in that chart.

Response:

Blackhawk refers to the rebate processing vendor of “prescriptive measures.”

Division 3-7

Request:

At Attachment 3-4-29 (Page 1 of 2) (Redacted) the Company replied with an email that stated:

“Subject: EXT || RE: Energy Star Products Invoice #187200 for State: RI is now submitted

This is a really large appliance invoice, definitely out of volume compared to what we expected, there was only 30K accrued for products in NECO so I'm not sure if we should include it for 2020. We can if you'd like, but ultimately your call!”

Please provide a copy of the appliance invoice (#187200) referenced above.

Response:

Please see Attachment DIV 3-7-1 for a copy of the invoice number 187200 cover sheet from the InDemand tracking system. Please see Attachment DIV 3-7-2 for a copy of the corresponding vendor invoice.



# Demand Side Management

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## View Invoice No. 187200 - ENERGY FEDERATION INC

Invoice Summary | [Invoice Line Items](#) | [Miscellaneous Line Item](#) | [Adjustments/Credits](#) | [Documents](#)

| Invoice Header Information   |                                        |                              |                           |
|------------------------------|----------------------------------------|------------------------------|---------------------------|
| <b>Invoice Number</b>        | 187200                                 | <b>Invoice Status</b>        | Paid                      |
| <b>Vendor Number</b>         | 1000013729                             | <b>Invoice Status Date</b>   | 02/05/2021                |
| <b>Vendor Name</b>           | ENERGY FEDERATION INC                  | <b>State</b>                 | RI                        |
| <b>Vendor Contract</b>       | 14590                                  | <b>Company ID</b>            | NECO                      |
| <b>Vendor Invoice Number</b> | 2567651                                | <b>Payment Terms</b>         | No Discount - No Days     |
| <b>Vendor Invoice Date</b>   | 01/13/2021                             | <b>Service Category</b>      | Uploaded ECM Installation |
| <b>Program</b>               | Energy Star Products                   | <b>Purchase Order Number</b> | 3200409498                |
| <b>SAP Program</b>           | Residential Consumer Products          |                              |                           |
| <b>Invoice Association</b>   | <a href="#">Workpackage No. 114330</a> |                              |                           |
| <b>Override Comment</b>      |                                        |                              |                           |

| Invoice Detail (86 Applications) |                   |               |                      |
|----------------------------------|-------------------|---------------|----------------------|
| Item                             | Description       | Amount Due    | Sub Total            |
| 1                                | Uploaded Ecm Cost | \$ 160,703.00 |                      |
| <b>NARRAGANSETT ELECTRIC</b>     |                   |               | <b>\$ 160,703.00</b> |

| Charges Summary                                                      |               |
|----------------------------------------------------------------------|---------------|
| <b>Total Invoice Charges (Excluding Additional Invoice Expenses)</b> | \$ 160,703.00 |
| <b>Additional Invoice Expenses</b>                                   | \$ 198.00     |
| <b>Total Invoice Amount</b>                                          | \$ 160,901.00 |
| <b>Discount</b>                                                      | \$ 0.00       |
| <b>Total Amount Due</b>                                              | \$ 160,901.00 |
| <b>Total Adjustments/Credit Amount</b>                               | \$ 0.00       |

|                                           |               |
|-------------------------------------------|---------------|
| <b>Total Amount Due after Adjustments</b> | \$ 160,901.00 |
|-------------------------------------------|---------------|

| Saving Summary              |              |
|-----------------------------|--------------|
| <b>Net Annual Summer kW</b> | 0.00         |
| <b>Net Annual kWh</b>       | 669,684.41   |
| <b>Net Annual MWh</b>       | 669.68       |
| <b>Net lifetime kWh</b>     | 3,348,422.06 |
| <b>Net lifetime MWh</b>     | 3,348.42     |

| Payment Summary        |                             |                       |               |                  |             |                      |
|------------------------|-----------------------------|-----------------------|---------------|------------------|-------------|----------------------|
| Payment Request Number | Description                 | Payee                 | Amount        | Status           | Status Date |                      |
| 330297                 | NECO, EFI invoice # 2567651 | ENERGY FEDERATION INC | \$ 160,901.00 | Payment Complete | 02/05/2021  | <a href="#">View</a> |

# INVOICE



CUSTOMER P.O: 3200409498

INVOICE NUMBER: 2567651-IN

CUSTOMER NAME: National Grid

INVOICE DATE: 1/13/2021

CUSTOMER NO: 10-NARR

PAYMENT TERMS: Due Upon Receipt

SHIP VIA:

WHSE

SALES ORDER NUMBER:

F.O.B: MH/AM

ORDER DATE:

**BILL TO :**

National Grid  
40 Sylvan Rd. E1-501  
Attn: Elizabeth Terry  
Waltham, MA 02451

**SHIP TO:**

National Grid  
40 Sylvan Rd. E1-501  
Attn: Elizabeth Terry  
Waltham, MA 02451

Page 1 of 1

| ITEM NO   | DESCRIPTION              | ORDERED | SHIPPED | BACK ORD | PRICE | AMOUNT     |
|-----------|--------------------------|---------|---------|----------|-------|------------|
| /UPSTREAM | Upstream Incentives      |         |         |          |       | 160,703.00 |
| 8928      |                          |         |         |          |       |            |
| /PFUP     | Upstream Processing Fees | 5       | 5       | 0        | 36.00 | 180.00     |
| /PFUP     | Upstream Processing Fees | 1       | 1       | 0        | 18.00 | 18.00      |
|           | Appliance Markdown       |         |         |          |       |            |

COMMENTS: RIMRK Jan 2021, LGT & APLS

|                       |                   |
|-----------------------|-------------------|
| Net Invoice:          | 160,901.00        |
| Less Discount:        | 0.00              |
| Freight:              | 0.00              |
| Sales Tax:            | 0.00              |
| <b>Invoice Total:</b> | <b>160,901.00</b> |

Please remit to:

Energy Federation Inc. | 1 Willow Street, Suite 2000 | Southborough, MA 01745 | 508.870.2277 | f 508.366.5462

DIV 3-8

Request:

At Attachment 3-4-25 (Page 2 of 2) (Redacted) the Company replied with an email that stated:

“Hello everyone, It recently came to our attention that there was a large number of invoices that were not properly accrued via the manual process. It was one vendor in particular that underreported accruals and impacted multiple programs, Multifamily (MA and RI) and HES (MA). Due to MF it impacts both residential and commercial. The vendor has been made aware of the error and future training will be held.”

- a) Please describe what is meant by “there was a large number of invoices that were not properly accrued via the manual process.”
- b) Please explain what the error was.
- c) Please describe the training provided to the vendors for accruing via the manual process.

Response:

- a) There is automation in place for accruing expenses that are in “automatically accrued” status. If applications are not in an “automatically accrued” status, then the expenses must be manually accrued using the Manual Accrual Template form. The procedure for manual accruals is outlined in section III.B.4. of the Energy Efficiency Accrued Liability Policy provided as Attachment DIV 1-16-1.
- b) The statement indicates that a particular vendor’s applications were not in an “automatically accrued” status, nor did the vendor correctly fill out the manual accrual form and submit it the Finance department.
- c) Existing and new vendors receive an annual year-end accrual process training.

Division 3-9

Request:

At Attachment 3-4-27 (Page 1 of 3) (Redacted) the Company replied with an email that stated:

“Hi. Just an fyi, the small gas calculating issue I mentioned the other day is RI only and we look to have finally figured it out, a fix is in the making. XXX concern was that they will make their gas goal, (our stretch), but are hitting the stop button right at goal so as not to exceed budget and if we then make a correction concerning these units which drops them just below goal that would be wrong as he is holding back on other jobs. This should be corrected today so shouldn't be an issue but should that have happened and since it's our bad I would want to honor and pay out for that gas goal if your ok with that? It's small money. Then as a separate note RI electric is still as last reported, 90% of filed goal and 100% budget but Vin did mention he has more jobs done he could submit if needed but it would put them just over the 100%. I said no, to hold off but could change if you say to. Happy Wednesday.”

- a) What is meant by “the small gas calculating issue I mentioned the other day is RI only.”
- b) What is meant by “a fix is in the making”?
- c) What is meant by “This should be corrected today so shouldn't be an issue but should that have happened and since it's our bad I would want to honor and pay out for that gas goal if your (sic) ok with that?”

Response:

- a) A vendor had alerted a National Grid USA Service Company, Inc. employee that reports from its tracking system showed energy efficiency projects were incorrectly calculating net savings higher than gross savings.
- b) The correction of the system calculations were in progress.
- c) The employee was proposing that if National Grid USA was unable to correct the energy efficiency project savings in the system, it would honor the vendor for achieving its annual target because the system showed incorrect savings and there were few days left in the calendar year to complete additional projects. This turned out to not be an issue because, when the system calculations corrections were complete, the vendor achieved its annual target.

Division 3-10

Request:

At Attachment 3-4-39 (Redacted) the Company replied with an email that stated:

“Subject: RE: EXT || RE: Energy Star Products Invoice #187200 for State :RI is now submitted  
Hi Since it was not accrued, I will pay it next week and it will hit 2021. Thanks! -----

Original Message----- From: Sent: Wednesday, January 13, 2021 3:11 PM

To: Subject: EXT || RE: Energy Star Products Invoice #187200 for State :RI is now submitted

This is a really large appliance invoice, definitely out of volume compared to what we expected, there was only 30K accrued for products in NECO so I'm not sure if we should include it for 2020. We can if you'd like, but ultimately your call!”

- a) Please provide a complete copy of Invoice # 187200
- b) Please identify whether this is one of the Invoices which has been recalculated for 2020.
- c) Please explain what is meant by “accrued.”

Response:

- (a) Please refer to Attachments DIV 3-7-1 and DIV 3-7-2.
- (b) Please see the response to data request Division 3-1 for a detailed discussion of the model that was developed within this review of The Narragansett Electric Company's (“Narragansett”) energy efficiency program. When a program was identified in the review of email messages as having “out-of-period” invoicing, other than invoices for the Residential Upstream Lighting program for 2017 and 2018, specific project invoices were not recalculated and reallocated to the prior year. Instead, the model was developed to assume a level of “out-of-period” expenses and energy savings for the program and the year, and a corresponding percentage of expenses and savings were reallocated to the prior program year. Then, Narragansett's performance incentives were recalculated for the period 2012 to 2020.
- (c) The writer is no longer employed by National Grid USA Service Company Inc., but at the time the email message was written, “Accrued Liabilities” were defined for the energy efficiency program as “[a]mounts computed by an entity as owed to third parties for goods



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or services received, but not paid for and not recorded as trade accounts payable.” Please see Attachment DIV 1-16-2, at 2.

Division 3-11

Request:

At Attachment 3-5-4 (Page 2 of 3) (Redacted) the Company replied with an email that stated:

“2) What would that do to the 2013 BCR? We still have two outstanding 2013 invoices from Opower totaling about \$372,000. I was sitting on these pending word from as to whether we can pay these in 2013 without further destroying the BCR. But if we hold them until 2014, that might be even worse on the 2014 BCR.”

What is the 2013 BCR?

Response:

The “2013 BCR” referred to the benefit cost ratio for 2013. The 2013 BCR was 2.24 for electric programs and 1.73 for gas programs.

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Division 3-12

Request:

At Attachment 3-5-5 (Page 3 of 3) (Redacted) the Company replied with an email dated January 12, 2015 that contained a chart. Referencing that chart:

- a) Does this chart indicate that there was \$30,615,119.70 in invoices from 2014 that was going to be paid in 2015?
- b) Please explain the meaning of the numbers in the left-hand column of the chart (5210,5220, etc.)
- c) Please provide the meaning of the abbreviations in the second column (NIMO-E, NIMO-G, etc.)

Response:

- (a) Yes. The chart presented information comparing the total amount accrued for 2014; the total amount actually paid as of January 9, 2015; and the remainder to pay, by operating company. The chart indicated that a combined total of \$30,615,119.70 was accrued in 2014 for all operating companies. The process of accrual assures that invoices are recorded in the appropriate time period.
- (b) and (c) Each “company number” and “company description” is from National Grid USA’s financial tracking system. They are matched with the operating companies, here.

| <b>Company Number</b> | <b>Company Description</b> | <b>Operating Company</b>          |
|-----------------------|----------------------------|-----------------------------------|
| 5210                  | NIMO-E                     | Niagara Mohawk Power Corporation  |
|                       | NIMO-G                     | Niagara Mohawk Power Corporation  |
| 5220                  | KEDNY                      | Brooklyn Union Gas-KEDNY          |
| 5230                  | KEDLI                      | KS Gas East Corp.-KEDLI           |
| 5310                  | MECO                       | Massachusetts Electric Company    |
| 5320                  | NAECO                      | Nantucket Electric Company        |
| 5330                  | BOS-G                      | Boston Gas Company                |
| 5340                  | COL-G                      | Colonial Gas Company              |
| 5360                  | NECO                       | The Narragansett Electric Company |
|                       | RIGAS                      | The Narragansett Electric Company |

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Division 3-14

Request:

At Attachment 3-5-13 (Page 1 of 2) (Redacted) the Company replied with an email dated January 15, 2014. Referencing said email, what is meant by an "RWS" ticket?

Response:

Attachment PUC 3-5-13 referenced a "WRS ticket," which is a work request ticket. WRS tickets allow users to create support or development requests related to the InDemand system.

Division 3-16

Request:

At Attachment 3-5-17 (Page 1 of 1) (Redacted) the Company replied with an email dated December 17, 2013 which said:

"This is to discuss how to track the jobs that are accrued as "install complete" or "construction complete" that then do not have a post inspection completed by 12/31/14 because we don't want to count those to 2013 goal. We may not want them to become "payment authorized" by 1/31/14 (or have savings paid date reverted to 12/31/13). This is a follow up to today's meeting with RA group.

- a) Please describe the difference between "install complete" and "construction complete."
- b) How are the jobs tracked?
- c) What is the significance of a post inspection?
- d) When does a job become "payment authorized"?
- e) Within how many days is a job that is "payment authorized" supposed to be paid?
- f) In each EE program, how are vendors instructed in the difference between "install complete" and "payment authorized"?

Response:

- (a) National Grid USA's tracking system uses both "installation completed" and "construction completed" to indicate projects that have completed installation of energy efficiency measures.
- (b) National Grid USA uses the following system generated reports to track the status of energy efficiency projects.
  - i. L36 an L37 reports
  - ii. COMM queries
  - iii. Sum By Month reports
- (c) A "post inspection" verifies the quantities and locations of the installation of energy efficiency measures for customer projects by:
  1. Ensuring that a site inspection of the customer's facility was conducted;
  2. Ensuring that test counts of installed measures were performed;

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3. Verifying that the process was adequately documented and reflects the quantities and locations of items counted;
  4. Providing assurance that the measures reported on the application are installed and operational; and
  5. When a project is complex and has multiple items, reviewing the sequence of operations of the new equipment and the removal of the old equipment.
- (d) A project becomes “payment authorized” after the installation is complete, documentation is finalized, installation is verified, payment has been created, and delegation of authority system approvals are complete.
- (e) When a payment is created and system approvals are complete, the payment request goes from In Demand to SAP and is typically paid within one to three business days.
- (f) National Grid USA provided a training to its vendors in December 2021 which mapped the In Demand statuses for each energy efficiency program to accruable statuses. This included “installation completed” and “payment authorized.”

Division 3-17

Request:

At Attachment 3-5-18 (Page 1 of 3) (Redacted) the Company replied with an email dated January 16, 2018 which said:

"I am holding Rockcliff Farm Condominiums (invoice 132586) to pay in 2018."

- a) Please provide a copy of invoice #132586
- b) Has this project been reallocated back to 2017 in the Company's June 2022 report?

Response:

- a) Please see Attachment DIV 3-17-1 for a copy of the invoice number 132586 cover sheet from the InDemand tracking system. Please see Attachment DIV 3-17-2 for a copy of the corresponding vendor invoice.
- b) Upon review of the email message, it seems to refer to an energy efficiency project within the gas sector (savings expressed in therms), which means that the year for this program was adjusted by the model. Please see the response to data request Division 3-1 for a detailed discussion of the model that was developed within this review of The Narragansett Electric Company's ("Narragansett") energy efficiency program. When a program was identified in the review of email messages as having "out-of-period" invoicing, other than invoices for the Residential Upstream Lighting program for 2017 and 2018, specific project invoices were not reallocated to the prior year. Instead, the model was developed to assume a level of "out-of-period" expenses and energy savings for the program and the year, and a corresponding percentage of expenses and savings were reallocated to the prior program year. Then, Narragansett's performance incentives were recalculated for the period 2012 to 2020.



# Demand Side Management

- [Home](#)
- [DSM Delivery](#)
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- [Search](#)

## View Invoice No. 132586 - RISE ENGINEERING

Invoice Summary | [Invoice Line Items](#) | [Miscellaneous Line Item](#) | [Adjustments/Credits](#) | [Documents](#)

| Invoice Header Information   |                  |                              |                           |
|------------------------------|------------------|------------------------------|---------------------------|
| <b>Invoice Number</b>        | 132586           | <b>Invoice Status</b>        | Paid                      |
| <b>Vendor Number</b>         | 1000002603       | <b>Invoice Status Date</b>   | 02/07/2018                |
| <b>Vendor Name</b>           | RISE ENGINEERING | <b>State</b>                 | RI                        |
| <b>Vendor Contract</b>       | 10444            | <b>Company ID</b>            | RIGAS                     |
| <b>Vendor Invoice Number</b> | 167577           | <b>Payment Terms</b>         | No Discount - No Days     |
| <b>Vendor Invoice Date</b>   | 12/29/2017       | <b>Service Category</b>      | Gas ECM Installation      |
| <b>Program</b>               | Energy Wise      | <b>Purchase Order Number</b> | 3200242755                |
| <b>SAP Program</b>           |                  |                              |                           |
| <b>Business Sector</b>       | Residential      | <b>Facility Type</b>         | MultiFamily over 20 units |

| Invoice Detail (1 Applications) |                                          |           |          |              |
|---------------------------------|------------------------------------------|-----------|----------|--------------|
| Item                            | Description                              | Item Cost | Quantity | Amount Due   |
| 1                               | Gas Installed Measures - Standard Income | --        | --       | \$ 27,990.00 |
| 2                               | Gas Installed Measures - Low Income      | --        | --       | \$ 0.00      |
| 3                               | Gas Miscellaneous - Standard Income      | --        | --       | \$ 3,638.70  |
| 4                               | Gas Miscellaneous - Low Income           | --        | --       | \$ 0.00      |

| Charges Summary                                                      |              |
|----------------------------------------------------------------------|--------------|
| <b>Total Invoice Charges (Excluding Additional Invoice Expenses)</b> | \$ 31,628.70 |
| <b>Additional Invoice Expenses</b>                                   | \$ 0.00      |
| <b>Total Invoice Amount</b>                                          | \$ 31,628.70 |
| <b>Discount</b>                                                      | \$ 0.00      |
| <b>Total Amount Due</b>                                              | \$ 31,628.70 |
| <b>Total Adjustments/Credit Amount</b>                               | \$ 0.00      |
| <b>Total Amount Due after Adjustments</b>                            | \$ 31,628.70 |

| Saving Summary |
|----------------|
|                |



|                            |           |
|----------------------------|-----------|
| <b>Net Annual Therms</b>   | 2,055.85  |
| <b>Net Lifetime Therms</b> | 30,837.77 |

| Payment Summary        |                                                            |                  |              |                  |             |                      |
|------------------------|------------------------------------------------------------|------------------|--------------|------------------|-------------|----------------------|
| Payment Request Number | Description                                                | Payee            | Amount       | Status           | Status Date |                      |
| 258904                 | Gas Application No. 7384316 -- Rockcliff Farm Condominiums | RISE ENGINEERING | \$ 31,628.70 | Payment Complete | 02/07/2018  | <a href="#">View</a> |

# Invoice Detail

Application #

7384316

AC

## Residential Multifamily Program Rhode Island

**Customer Name:**

Rockcliff Farm Condos  
40 Old Louisquisset Pike  
North Smithfield, RI 02896

RIS-81-17-0833  
Gas Residential

| Item                | Quantity | Cost / Item | Contractor | Cost   |
|---------------------|----------|-------------|------------|--------|
| Site Assessment Fee | 64 units |             |            | \$0.00 |

|                                   |                          |  |  |            |
|-----------------------------------|--------------------------|--|--|------------|
| Project Mgt. Fee-non refrigerator | 13% of measure cost      |  |  | \$3,638.70 |
| Project Mgt. Fee-refrigerators    | \$35.00 per refrigerator |  |  | \$0.00     |

Measures

|             |           |         |                  |             |
|-------------|-----------|---------|------------------|-------------|
| Air Sealing | 311 Hours | \$90.00 | RISE Engineering | \$27,990.00 |
|-------------|-----------|---------|------------------|-------------|

|               |             |
|---------------|-------------|
| Measure Cost  | \$27,990.00 |
| Permit fee    | \$0.00      |
| Recycling fee | \$0.00      |

|                                               |        |
|-----------------------------------------------|--------|
| Less Customer Contribution: non- refrigerator | \$0.00 |
| Less Customer Contribution: refrigerators     | \$0.00 |

**Total Due**

**\$31,628.70**

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Division 3-18

Request:

At Attachment 3-5-20 (Page 1 of 3) (Redacted) the Company replied with an email dated June 2, 2019 which said:

"With the addition of the Cozy project for XXX, we really need to scrub the numbers as far as what we can/should pay through year end to keep us in check and not go over our stretch goals. Specifically in the Low Income sector. With the numbers you shared yesterday, we are going to be really close to going over those lines. Things being discussed – holding some invoices for payment until January, to allow the invoices to accrue, but not physically be paid until 2019. Hand picking projects to be paid, to be held. This is all still under discussion, but wanted to provide a heads up to you so we can start to think about this, should we be asked to do so. Example ; if we have to have the Cozy project in, is there something we should shuffle out to next year? Etc."

- a) What does "scrub the numbers" mean?
- b) What were the "stretch goals" for 2019 for the referenced program?
- c) What were the "stretch goals" for 2020 for the referenced program?
- d) What were the "stretch goals" for 2018 for the referenced program?
- e) What is meant by "shuffle out"?

Response:

The writer of the email is no longer employed by National Grid USA Service Company, Inc. Therefore, it is not known what the writer meant by the quoted terms in parts (a) through (e) of this request.

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Division 4-4

Request:

To whom, by title, did the outside forensic consultant report both during and upon the conclusion of the investigation?

Response:

Upon being engaged for The Narragansett Electric Company's energy efficiency review, the forensic consultant reported to a Director / Assistant General Counsel for National Grid USA and a Vice Present / Deputy General Counsel.

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Division 4-7

Request:

Please provide a copy of the Company's engagement letter/contract, together with any supporting appendices or exhibits, with its outside forensic consultant.

Response:

Please refer to the response to data request Division 1-4 for the contract between the forensic consultant and National Grid USA Service Company, Inc.

Division 4-8

Request:

Have National Grid and Rhode Island Energy entered into any form of indemnification or a written agreement for a joint defense of the results of the outside forensic consultant's examination of the EE programs? If so, please provide a copy of these documents.

Response:

National Grid and Rhode Island Energy anticipate executing a Joint Defense Agreement ("JDA"). Following execution of the anticipated JDA, Rhode Island Energy will supplement this response and provide a copy of the JDA.