

February 3, 2023

VIA HAND DELIVERY & ELECTRONIC MAIL

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

RE: Docket No. 22-42-NG – Issuance of Advisory Opinion to EFSB re RIE Application to Construct an LNG Vaporization Facility on Old Mill Lane, Portsmouth, RI Responses to CLF Data Requests – Set 1 (Full Set)

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company (the “Company”), I have enclosed the Company’s responses to the Conservation Law Foundation’s (“CLF”) First Set of Data Requests (Full Set) in the above-referenced docket. Please note that Attachments CLF 1-7, CLF 1-12 and CLF 1-14 are excel files that are being provided electronically.

Attachments CLF 1-9-15, CLF 1-9-16, CLF 1-9-17, CLF 1-9-18, CLF 1-9-19, CLF 1-9-20, CLF 1-9-21, CLF 1-9-22, CLF 1-9-23 and CLF 1-9-24 to the Company’s response to CLF’s Data Request 1-9 contain confidential information; and therefore, the Company has provided redacted public versions of the attachments and unredacted confidential versions subject to a motion for protective treatment.

Robinson+Cole

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Thank you for your attention to this matter. If you have any questions, please contact me at (401) 709-3351.

Sincerely,

A handwritten signature in blue ink, appearing to read "George W. Watson III", with a long horizontal flourish extending to the right.

George W. Watson III

Enclosures

cc: Docket 22-42-NG Service List

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate were electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



Heidi J. Seddon

February 3, 2023

Date

**Docket No. 22-42-NG – Needs Advisory Opinion to EFSB regarding Narragansett Electric LNG Vaporization Facility at Old Mill Lane, Portsmouth, RI
Service List update 1/27/23**

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**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

IN RE: THE ISSUANCE OF ADVISORY OPINION)
TO THE ENERGY FACILITY SITING BOARD)
REGARDING THE NARRAGANSETT ELECTRIC)
COMPANY APPLICATION TO CONSTRUCT)
AN LNG VAPORIZATION FACILITY ON)
OLD MILL LANE, PORTSMOUTH, RHODE ISLAND) DOCKET NO. 22-42-NG

**MOTION OF THE NARRAGANSETT ELECTRIC COMPANY
FOR PROTECTIVE TREATMENT OF CONFIDENTIAL INFORMATION**

The Narragansett Electric Company (the “Company”) hereby respectfully requests that the Public Utilities Commission (“Commission”) grant protection from public disclosure of certain confidential information submitted by the Company in response to Conservation Law Foundation (“CLF”) Data Request 1-9. The reasons for the protective treatment are set forth herein. The Company also requests that, pending entry of that finding, the Commission preliminarily grant the Company’s request for confidential treatment pursuant to 810-RICR-00-00-1.3(H)(2).

The documents that are the subject of this Motion and require protective treatment are Excel spreadsheets that contain commercially sensitive gas pricing information. These spreadsheets are provided as Attachment CLF 1-9-15, 1-9-16, 1-9-17, 1-9-18, 1-9-19, 1-9-20, 1-9-21, 1-9-22, 1-9-23, and 1-9-24 (collectively, the “Confidential Attachments”) to Company’s Response to CLF Data Request 1-9 from the CLF’s First Set of Data Requests, issued on January 13, 2023 (the “Confidential Response”).

I. LEGAL STANDARD

Rhode Island’s Access to Public Records Act (“APRA”), R.I.G.L. §38-2-1 *et. seq.*, sets forth the parameters for public access to documents in the possession of state and local government agencies. Under APRA, all documents and materials submitted in connection with the transaction

of official business by an agency are deemed to be a “public record,” unless the information contained in such documents and materials falls within one of the exceptions specifically identified in R.I.G.L. §38-2-2(4). Therefore, to the extent that information provided to the Commission falls within one of the designated exceptions to APRA, the Commission has the authority under the terms of APRA to deem such information to be 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 Company v. Convention Center Authority*, 774 A.2d 40 (R.I. 2001). The first prong of the test is satisfied when information is provided to the governmental agency and that information is of a kind that would customarily not be released to the public by the person from whom it was obtained. *Providence Journal*, 774 A.2d at 47.

The Rhode Island Supreme Court has also 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 Commission 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.”).

II. BASIS FOR CONFIDENTIALITY

The Confidential Attachments contain commercially sensitive gas pricing information that is confidential and privileged information of the type that the Company would not ordinarily make public. As such, the information should be protected from public disclosure. Public disclosure of such information could impair the Company’s ability to obtain advantageous pricing or other terms in the future, thereby causing substantial competitive harm to the Company and ultimately its customers. In addition, the information contained in the Confidential Attachments is not of a kind that would customarily be released to the public by the Company, therefore, the first prong of the *Providence Journal* test has been satisfied. *See Providence Journal*, 774 A.2d at 47. Accordingly, the Company respectfully requests that the PUC provide confidential treatment to the information.

III. CONCLUSION

For the foregoing reasons, the Company respectfully requests that the Commission grant this motion for protective treatment of the confidential information contained in the Confidential Attachments.

[SIGNATURE ON NEXT PAGE]

Respectfully submitted,

**THE NARRAGANSETT ELECTRIC
COMPANY**

By its attorneys,



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Dated: February 3, 2023

CERTIFICATE OF SERVICE

I hereby certify that on February 3, 2023, I delivered a true copy of the foregoing Motion via electronic mail to the parties on the Service List for Docket No. 22-42-NG.



The Narragansett Electric Company
RIPUC Docket No. 22-42-NG
In Re: The Issuance of Advisory Opinion to the
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CLF 1-1

Request:

Please provide the Company's peak hour demand forecast for the territory to be served by the proposed facility.

- a) Include the forecast Design Day and Design Hour demands underlying the forecast peak hour demand.
- b) Please explain how the Company has taken climate change into account when calculating the Design Day and Design Hour demands. If climate change was not considered, please explain why it was not considered.
- c) Please explain how the Company has taken any differences between the climate of Aquidneck Island and mainland Rhode Island into account when calculating the Design Day and Design Hour demands. If any such differences were not considered, please explain why they were not considered.

Response:

- a) Please see the Company's Gas Long-Range Resource and Requirements Plan for the Forecast Period 2021/22 to 2025/26 attached to the Siting Report as Appendix A and the Aquidneck Island specific forecast provided in response to Division 1-13.
- b) Climate change is considered in the retail and wholesale forecasts to the extent its effects are present in the historical data. Although average temperatures have risen in recent history, the Company is not aware of evidence that supports declining trends in the severity or frequency of extreme cold weather events. Therefore, Design Day standards are not subject to change based on warming temperatures.
- c) Aquidneck Island does not have sufficiently reliable historical weather data to create a demand forecast. Design Day and Design Hour demands are forecasted as a function of weather measured at the TF Green Airport weather station (PVD) in Providence, Rhode Island. Because the weather on Aquidneck Island is highly correlated with the weather in Providence, there is no need to consider weather differences between the two locations.

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CLF 1-2

Request:

Witness Porcaro's testimony on page 7, lines 19-20 indicates that the current supply demand-gap is approximately 145 Dth/hr.

Please provide:

- a) analysis supporting the estimate of the current supply-demand gap, and
- b) analysis supporting the forecast for the supply-demand gap in future years.

Response:

- a) The load forecast data provided by the forecasting team is used during the creation of the Synergy gas models each year. A customer load profile is created through this model development process and analyzed within the Synergy models to determine supply-demand data. The load profile for the anticipated winter 2023-2024 at the Portsmouth Gate Station can then be shown based on five-degree increments within a normal versus design winter. The Company's 68 HDD¹ (-3 degrees Fahrenheit average daily temperature) is the Company's design winter model to determine a five percent peak hour gas demand for the design day. The contracted Maximum Daily Quantity ("MDQ") with Algonquin Gas Transmission, LLC at Portsmouth Gate Station is calculated for an hourly rate, or 1,045 dekatherms per hour ("dth/hr"), and the model data for Winter 2022/2023 shows a demand of 1190 dth/hr. This would determine a shortfall of 145 dth/hr on the peak hour of a design day at the Old Mill Gate Station. This 145 dth/hr would be the recommended amount of gas supply from the portable LNG site to maintain the contractual MDQ at the Gate Station.
- b) Please refer to the Company's response to Division 1-13 and the attachments thereto for the supporting information to the Company's Aquidneck Island wholesale forecast, including its design hour.
- c) The Company uses the latest load forecast to look at the following years by a general growth percentage per year. The simple equation to determine the shortfall (Demand

¹ Heating degree day ("HDD").

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– MDQ = Shortfall) is used to determine the estimated amount of portable LNG required.

Growth Adjustment	Winter Year	Old Mill Lane Demand (dth/hr)	MDQ (dth/hr)	Shortfall (dth/hr)
1.01650	Winter 2023/2024	1210	1045	165
1.01130	Winter 2024/2025	1224	1045	179
1.00750	Winter 2025/2026	1233	1045	188
1.00620	Winter 2026/2027	1241	1045	196
1.00700	Winter 2027/2028	1253	1045	208

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CLF 1-3

Request:

Witness Porcaro's testimony on page 11, lines 6-7 indicates that all non-infrastructure options require continued reliance on portable LNG at Old Mill Lane at least for the next several years.

- a) How soon could non-infrastructure options eliminate the need for reliance on the Project?
- b) If it is the Company's position that non-infrastructure options could not eliminate the need for reliance on the Project, please explain why.
- c) Is the Project structured so that if and when the Project is no longer needed it can be discontinued?

Response:

- a) The Company's original analysis of non-infrastructure solutions, as presented in the Aquidneck Island Long-Term Gas Capacity Study Prepared by National Grid September 2020 and summarized in Section 4 of the April 2022 Siting Report,¹ indicated that the continued use of Old Mill Lane to address the capacity constraint would be required until 2035. By that time, there would be sufficient modeled contributions from the demand side management programs to fully resolve the capacity constraint and mitigate the capacity vulnerability; however, non-infrastructure solutions do not fully address capacity vulnerability and will not eliminate the need for the Project.

During the summer of 2021, the Company assessed two other non-infrastructure options that would focus on resolving the capacity constraint only in line with Order No. 150 in EFSB Docket SB-2021-04. With an assumed 20% of HVAC turn over to heat electrification under a moratorium scenario and assumed 40% of HVAC turn over to heat electrification under a non-moratorium scenario as well as energy efficiency and demand response demand reductions sized equivalent to assumed

¹ Energy Facility Siting Board Project Siting Report entitled "Aquidneck Island Gas Reliability Project Old Mill Lane Portsmouth, RI" prepared for The Narragansett Electric Company by VHB dated April 2022 (the "Siting Report"), which the Company filed with the Energy Facility Siting Board on April 1, 2022, in Docket No. SB-2021-04.

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- maximum potential, the Company could look to retire the current Old Mill Lane site by 2029/2030 if it was solely focused on resolving the capacity constraint.
- b) Non-infrastructure solutions provide relief from capacity constraint but not capacity vulnerability, so a project of some scale will be required indefinitely to address capacity vulnerability.
 - c) Yes, the Project consists of portable non-permanent equipment so that, if and when the Project is no longer needed to address the capacity vulnerability and the capacity constraint, it can be discontinued.

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CLF 1-4

Request:

In the Gas Long-Range Resource and Requirements Plan for the Forecast Period 2021/22 to 2025/26, attached to the Siting Report as Appendix A, the Company states at Section IV.C.3.c., page 25:

The Company has also mobilized temporary portable LNG vaporization equipment in Portsmouth to support its system on Aquidneck Island. This portable equipment provides critical pressure and supply support to Aquidneck Island should near-design day conditions arise. The Company's agreement for equipment rental continues through March 2022 with renewal rights through March 2023.

- a) Under the current mobilization is the Project a service (expense) that can be discontinued if need is not ongoing?
- b) As proposed, would the Project become a capital investment which will be recovered in rates over time? If so, over what time-period will the proposed capital investments will be recovered?
- c) Please compare the approximately \$15 million proposed capital expenditure to the annual costs incurred under the temporary mobilization.

Response:

- a) Yes, the Project can be discontinued if no longer needed.
- b) Yes, the Project as proposed would be a capital investment, the cost of which the Company proposes to recover through the Company's Gas Infrastructure, Safety, and Reliability ("ISR") Plan cost recovery mechanism once the Project is placed in service. The Company would continue to recover the cost of the Project through the ISR cost recovery mechanism until new base distribution rates for the Company are established at the conclusion of the Company's next general rate case, at which time the investment would be recovered in base distribution rates.
- c) The costs associated with the \$15 million proposed capital investment are for site work to move the equipment further into the property to address noise and visual

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impacts to the community as well as improve movement of trucks and equipment on the property and are not associated with annual costs incurred with the current temporary mobilization.

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CLF 1-5

Request:

In the winter season, under what conditions will the Project operate and provide vaporized LNG into the distribution system?

- a) Will the system operate only under extreme cold conditions when the forecast temperature and HDD exceed a certain threshold? If so, what is the projected low temperature and HDD? How many days and hours are estimated on an annual basis to meet this criteria?
- b) Is there a minimum level at which the system is expected to operate in all hours?
- c) Please provide the anticipated winter season load profile, indicating what percent of the proposed system's capacity (in terms of Dth/hr of vaporized gas supplied to the distribution system) is expected to be utilized by hour or day for a typical season.

Response:

- a) The equipment is scheduled to prepare to operate for days that are at or colder than 45 heating degree days ("HDD") (average 20 degrees Fahrenheit through the gas day) to address capacity vulnerability. The facility is further expected to be necessary to address capacity constraint when customer demand is forecasted to exceed contracted Maximum Daily Quantity ("MDQ") at the Portsmouth gate station, which occurs approximately at 62 HDD (average 3 degrees Fahrenheit). It is estimated that conditions will meet or exceed this threshold four or fewer times per winter season, each time for approximately six hours per day.
- b) The equipment is not expected to operate during all hours to address capacity constraint, only during peak hours of extremely cold days when customer demand exceeds hourly gate station limitations. The equipment may be necessary to run during all hours during a capacity vulnerability event.
- c) The design peak hour winter load profile is based on load forecasts. The anticipated peak hour on a design day for Aquidneck Island is 1190 dekatherms per hour ("dth/hr"). Approximately 12 percent of the gas supplied to the distribution system will be from vaporized LNG during the peak hour period. The Company's peak hour

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models are based off of a 68 HDD or -3 degree Fahrenheit average daily temperature. Please see the Company's response to CLF 1-2 for more information pertaining to the balance between supply and demand during design conditions.

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CLF 1-6

Request:

Witness Olney on page 7, lines 10-11 states that:

In the case of a moratorium, the otherwise projected growth in customer demand relative to 2023 levels was assumed to be met with fuel oil powered equipment.

- a) Please explain the basis for this assumption, and provide any calculations.
- b) Would this assumption still hold given anticipated incentives for electrification from the Inflation Reduction Act and state programs? If so, please provide analysis or rationale for this assumption.

Response:

The following sentence and associated footnotes found on page 7, lines 12 through 15, of Company Witness Tyler Olney's Pre-filed Direct Testimony describe the basis for the assumption that projected growth in customer demand for natural gas relative to 2023 levels would be met with fuel oil powered equipment:

This assumption was made at the time because absent substantial subsidies or mandates, electrification was not a cost-effective heating option,¹ and according to U.S. Census data more households in southeast Rhode Island currently use fuel oil than any other heating source.²

As noted in footnote 1, this analysis pre-dated the Inflation Reduction Act and associated state programs. The impact of these programs is uncertain at this time because they are in the early stage of implementation.

¹ See, e.g., Rhode Island Strategic Electrification Study accessible here: <https://ripuc.ri.gov/sites/g/files/xkgbur841/files/eventsactions/docket/5.-Rhode-Island-Strategic-ElectrificationStudy.pdf>. Note that this analysis was performed prior to the announcement of Rhode Island's High-Efficiency Heat Pump Program and the passing of the federal Inflation Reduction Act.

² US Census 2019 and 2021 American Community Survey Public Use Microdata, see: <https://data.census.gov/mdat/#/search?ds=ACSPUMS1Y2019&rv=ucgid,HFL&wt=WGTP&g=7950000US4400300>.

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CLF 1-7

Request:

Please provide the analyses supporting the cumulative GHG savings estimates presented in Graphic 4, page 45 of the Siting Report, and the updated estimates summarized in Table 1 on page 15 of witness Olney's testimony. Please include all supporting data in Excel format with all formulas and links intact.

Response:

The specific analysis (inputs, calculations, and outputs) used to make GHG savings estimates has been extracted from the broader modeling tool to respond to this request. See the *Summary* tab of the "22-42-NG_GHGValues.xlsx" Excel file provided with this response as Attachment CLF 1-7. Note that to view the different sensitivities you must operate the toggles in cells D2-D5 of the *Summary* tab. Generally, blue-colored cells are calculations and orange-colored cells are inputs.

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Attachment CLF 1-7

Please see the Excel Worksheet of Attachment CLF 1-7

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CLF 1-8

Request:

Please provide the analyses supporting the emissions estimates of the non-infrastructure alternatives presented in Table 4-1, page 38 of the Siting Report, and the cumulative savings estimates presented in Table 4-4, page 45 of the Siting Report.

Response:

The emission estimates for the non-infrastructure alternatives presented in Table 4-1 of the April 2022 Siting Report correspond with the values in cells C38-I39 of the *Summary* tab of the "22-42-NG_GHGValues.xlsx" provided at Attachment CLF 1-7. The cumulative savings estimates presented in Table 4-4 of the April 2022 Siting Report are listed in cells K33-O39 of the *Summary* tab of Attachment CLF 1-7.

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CLF 1-9

Request:

Please refer to Appendix A to the Siting Report and provide:

- a) all redacted pages of the Appendix.
- b) All supporting data underlying the tables in Appendix A in Excel format with all formulas and links intact.

Response:

- a) A complete unredacted copy of Appendix A to the Siting Report is on file with the Division and Commission and can be provided to the Conservation Law Foundation upon execution of a customary non-disclosure agreement as it contains competitively sensitive gas pricing information.
- b) Please see the following requested Excel workbooks which accompany this response:
 - i. Attachment CLF-1-9-1 (20220606-Exhibits-1-3-5).xlsx which contains the workpapers associated with Exhibits 1, 3 and 5 to the Company's Gas Long-Range Resource and Requirements Plan for the Forecast Period 2021/22 to 2025/26 (the "LRP");
 - ii. Attachment CLF-1-9-2 (20220606-Exhibits-4-6).xlsx which contains the workpapers associated with Exhibits 4 and 6 to the LRP;
 - iii. Attachment CLF-1-9-3 (20220607-Exhibit-09).xlsx which contains the workpapers associated with Exhibit 9 to the LRP;
 - iv. Attachment CLF-1-9-4 (20220607-Exhibit-10).xlsx which contains the workpapers associated with Exhibit 10 to the LRP;
 - v. Attachment CLF-1-9-5 (20220607-Exhibit-11).xlsx which contains the workpapers associated with Exhibit 11 to the LRP;
 - vi. Attachment CLF-1-9-6 (Exhibit 2 Design Hour Requirements V1).xlsx which contains the workpapers associated with Exhibit 2 Design Hour Requirements VI to the LRP;

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Attachment CLF 1-9, Page 2

- vii. Attachment CLF-1-9-7 (Exhibit 15).xlsx which contains the workpapers associated with Exhibit 15 to the LRP;
- viii. Attachment CLF 1-9-8 (Exhibit 16 – Pages 1-10).xlsx which contains the workpapers associated with Exhibit 16, Pages 1-10 to the LRP;
- ix. Attachment CLF 1-9-9 (Exhibit 16 – Pages 11-17).xlsx which contains the workpapers associated with Exhibit 16, Pages 11-17 to the LRP;
- x. Attachment CLF 1-9-10 (Exhibit 17 – RI LRP Load Duration Curve 2021-22).xlsx which contains the workpapers associated with Exhibit 17 – RI LRP Load Duration Curve 2021-22 to the LRP;
- xi. Attachment CLF 1-9-11 (Exhibit 17 – RI LRP Load Duration Curve 2022-23).xlsx which contains the workpapers associated with Exhibit 17 – RI LRP Load Duration Curve 2023-23 to the LRP;
- xii. Attachment CLF 1-9-12 (Exhibit 17 – RI LRP Load Duration Curve 2023-24).xlsx which contains the workpapers associated with Exhibit 17 – RI LRP Load Duration Curve 2023-24 to the LRP;
- xiii. Attachment CLF 1-9-13 (Exhibit 17 – RI LRP Load Duration Curve 2024-25).xlsx which contains the workpapers associated with Exhibit 17 – RI LRP Load Duration Curve 2024-25 to the LRP;
- xiv. Attachment CLF 1-9-14 (Exhibit 17 – RI LRP Load Duration Curve 2025-26).xlsx which contains the workpapers associated with Exhibit 17 – RI LRP Load Duration Curve 2025-26 to the LRP;
- xv. Attachment CLF 1-9-15 (Exhibit 18) (CONFIDENTIAL).xlsx which contains the confidential workpapers associated with Exhibit 18 to the LRP;
- xvi. Attachment CLF 1-9-16 (Exhibit 19) (CONFIDENTIAL).xlsx which contains the confidential workpapers associated with Exhibit 19 to the LRP;
- xvii. Attachment CLF 1-9-17 (Exhibit 20 – Pages 1, 5) (CONFIDENTIAL).xlsx which contains the confidential workpapers associated with Exhibit 20 - Pages 1 and 5 to the LRP;
- xviii. Attachment CLF 1-9-18 (Exhibit 20 – Pages 2, 6) (CONFIDENTIAL).xlsx which contains the confidential workpapers associated with Exhibit 20 – Pages 2 and 6 to the LRP;
- xix. Attachment CLF 1-9-19 (Exhibit 20 – Pages 3, 7) (CONFIDENTIAL).xlsx which contains the confidential workpapers associated with Exhibit 20 – Pages 3 and 7 to the LRP;

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Attachment CLF 1-9, Page 3

- xx. Attachment CLF 1-9-20 (Exhibit 20 – Pages 4, 8) (CONFIDENTIAL).xlsx which contains the confidential workpapers associated with Exhibit 20 – Pages 4 and 8 to the LRP;
- xxi. Attachment CLF 1-9-21 (Exhibit 21 – Pages 1,2,5,6) (CONFIDENTIAL).xlsx which contains the confidential workpapers associated with Exhibit 21 – Pages, 1, 2, 5, and 6 to the LRP;
- xxii. Attachment CLF 1-9-22 (Exhibit 21 – Pages 3,4,9,10) (CONFIDENTIAL).xlsx which contains the confidential workpapers associated with Exhibit 21 – Pages 3, 4, 9, and 10 to the LRP;
- xxiii. Attachment CLF 1-9-23 (Exhibit 21 – Pages 7, 8) (CONFIDENTIAL).xlsx which contains the confidential workpapers associated with Exhibit 21 – Pages 7 and 8 to the LRP; and
- xxiv. Attachment CLF 1-9-24 (Exhibit 21 – Pages 11, 12) (CONFIDENTIAL).xlsx which contains the confidential workpapers associated with Exhibit 21 – Pages 11 and 12 to the LRP.

Please note that Attachments CLF 1-9-1 through 1-9-24 were prepared by a variety of personnel employed by National Grid in a variety of departments. These materials were provided to the sponsor of this response upon request in order to provide a response to this data request, but were not prepared by the sponsor individually.

Please note that confidential Attachments CLF 1-9-15 through 1-9-24 contain commercially sensitive gas pricing information. Therefore, the Company has provided these Excel files subject to a motion for protective treatment. These confidential attachments can be provided to the Conservation Law Foundation upon execution of a customary non-disclosure agreement.

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Attachment CLF-1-9-1 (20220606-Exhibits-1-3-5)

Please see the Excel Worksheet of Attachment CLF-1-9-1 (20220606-Exhibits-1-3-5)

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Attachment CLF-1-9-2 (20220606-Exhibits-4-6)

Please see the Excel Worksheet of Attachment CLF-1-9-2 (20220606-Exhibits-4-6)

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Attachment CLF-1-9-3 (20220607-Exhibit-09)

Please see the Excel Worksheet of Attachment CLF-1-9-3 (20220607-Exhibit-09)

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Attachment CLF-1-9-4 (20220607-Exhibit-10)

Please see the Excel Worksheet of Attachment CLF-1-9-4 (20220607-Exhibit-10)

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Attachment CLF-1-9-5 (20220607-Exhibit-11)

Please see the Excel Worksheet of Attachment CLF-1-9-5 (20220607-Exhibit-11)

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Attachment CLF-1-9-6 (Exhibit 2 Design Hour Requirements V1)

Please see the Excel Worksheet of Attachment CLF-1-9-6 (Exhibit 2 Design Hour
Requirements V1)

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Attachment CLF-1-9-7 (Exhibit 15)

Please see the Excel Worksheet of Attachment CLF-1-9-7 (Exhibit 15)

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Attachment CLF 1-9-8 (Exhibit 16 – Pages 1-10)

Please see the Excel Worksheet of Attachment CLF 1-9-8 (Exhibit 16 – Pages 1-10)

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Attachment CLF 1-9-9 (Exhibit 16 – Pages 11-17)

Please see the Excel Worksheet of Attachment CLF 1-9-9 (Exhibit 16 – Pages 11-17)

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Attachment CLF 1-9-10 (Exhibit 17 – RI LRP Load Duration Curve 2021-22)

Please see the Excel Worksheet of Attachment CLF 1-9-10 (Exhibit 17 – RI LRP Load
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Attachment CLF 1-9-11 (Exhibit 17 – RI LRP Load Duration Curve 2022-23)

Please see the Excel Worksheet of Attachment CLF 1-9-11 (Exhibit 17 – RI LRP Load
Duration Curve 2022-23)

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Attachment CLF 1-9-12 (Exhibit 17 – RI LRP Load Duration Curve 2023-24)

Please see the Excel Worksheet of Attachment CLF 1-9-12 (Exhibit 17 – RI LRP Load
Duration Curve 2023-24)

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Attachment CLF 1-9-13 (Exhibit 17 – RI LRP Load Duration Curve 2024-25)

Please see the Excel Worksheet of Attachment CLF 1-9-13 (Exhibit 17 – RI LRP Load
Duration Curve 2024-25)

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Attachment CLF 1-9-14 (Exhibit 17 – RI LRP Load Duration Curve 2025-26)

Please see the Excel Worksheet of Attachment CLF 1-9-14 (Exhibit 17 – RI LRP Load
Duration Curve 2025-26)

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**CONTAINS PRIVILEGED AND CONFIDENTIAL INFORMATION –
DO NOT RELEASE**

Attachment CLF 1-9-15 (Exhibit 18) (CONFIDENTIAL)

Please see the Excel Worksheet of Attachment CLF 1-9-15 (Exhibit 18)

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Attachment CLF 1-9-16 (Exhibit 19) (CONFIDENTIAL)

Please see the Excel Worksheet of Attachment CLF 1-9-16 (Exhibit 19)

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Attachment CLF 1-9-17 (Exhibit 20 – Pages 1, 5) (CONFIDENTIAL)

Please see the Excel Worksheet of Attachment CLF 1-9-17 (Exhibit 20 – Pages 1, 5)

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Attachment CLF 1-9-18 (Exhibit 20 – Pages 2, 6) (CONFIDENTIAL)

Please see the Excel Worksheet of Attachment CLF 1-9-18 (Exhibit 20 – Pages 2, 6)

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Attachment CLF 1-9-19 (Exhibit 20 – Pages 3, 7) (CONFIDENTIAL)

Please see the Excel Worksheet of Attachment CLF 1-9-19 (Exhibit 20 – Pages 3, 7)

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Attachment CLF 1-9-20 (Exhibit 20 – Pages 4, 8) (CONFIDENTIAL)

Please see the Excel Worksheet of Attachment CLF 1-9-20 (Exhibit 20 – Pages 4, 8)

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Attachment CLF 1-9-21 (Exhibit 21 – Pages 1,2,5,6) (CONFIDENTIAL)

Please see the Excel Worksheet of Attachment CLF 1-9-21 (Exhibit 21 – Pages 1,2,5,6)

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Attachment CLF 1-9-22 (Exhibit 21 – Pages 3,4,9,10) (CONFIDENTIAL)

Please see the Excel Worksheet of Attachment CLF 1-9-22 (Exhibit 21 – Pages 3,4,9,10)

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Attachment CLF 1-9-23 (Exhibit 21 – Pages 7, 8) (CONFIDENTIAL)

Please see the Excel Worksheet of Attachment CLF 1-9-23 (Exhibit 21 – Pages 7, 8)

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**CONTAINS PRIVILEGED AND CONFIDENTIAL INFORMATION –
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Attachment CLF 1-9-24 (Exhibit 21 – Pages 11, 12) (CONFIDENTIAL)

Please see the Excel Worksheet of Attachment CLF 1-9-24 (Exhibit 21 – Pages 11, 12)

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CLF 1-10

Request:

Please refer to Exhibit 1 to Appendix A to the Siting Report and confirm whether any of the data in the charts therein are actual historic values. If not, please provide the Company's actual historic annual demand from 2011 through the most recently completed calendar year.

Response:

Please refer to pages 37 and 38 of Exhibit 1 to Appendix A of the Siting Report, which can be found as Attachment PUC 1-11, for a table and charts of annual retail gas demand for planning years 2011 – 2030. As this forecast was finalized in June of 2021, actual historic annual demand data would span planning year ("PY") 2011 through PY 2020.

A planning year spans from November of the year prior through October of the planning year. Annual gas demand is listed for Residential Non-Heating (RNH), Residential Heating (RH), CI_Sales (commercial/industrial sales), FT-1 commercial/industrial transportation, FT-2 commercial/industrial transportation, and Other customers.

PY 2021 would be partly actuals and partly forecast. PY 2022 through PY 2030 would be forecast data.

Because of billing lag, the annual demand for calendar year 2022 is not yet available. Please see the Company's response to CLF 1-12 for the most recent actual customer demand data for Aquidneck Island.

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CLF 1-11

Request:

Please refer to page 7, lines 12-14 of witness Kirkwood’s testimony where it is stated:

The Project at Old Mill Lane is intended to serve both purposes: a backup supply as a secondary source intended to address capacity vulnerability, and also peak shaving to address the capacity constraint to Aquidneck Island.

Please explain how the Company defines and distinguishes a “capacity vulnerability” from a “capacity constraint.”

Response:

The Company distinguishes between “capacity vulnerability” and “capacity constraint” (also referred to as “capacity shortfall”) on the first page of the Introduction section of the Siting Report¹ excerpted below:

The Project is needed to address capacity vulnerability and capacity constraints to the Distribution System. Capacity vulnerability has two aspects. First, the Company faces seasonal vulnerability from unexpected upstream disruptions that could limit the flow of natural gas from the interstate pipeline below levels needed to meet demand. Second, capacity vulnerability occurs when AGT disrupts capacity in order to inspect and maintain the upstream transmission pipeline. The Project would protect the Distribution System against these vulnerabilities. Finally, the Project also addresses the capacity shortfall that may occur during each winter season when there exists a gap between the natural gas demand and the available natural gas capacity to Aquidneck Island on extremely cold days.

For more information regarding capacity vulnerability and capacity constraint on Aquidneck Island, and how the Project addresses these concerns, please refer to Section 2 of the Siting Report.

¹ Energy Facility Siting Board Project Siting Report entitled “Aquidneck Island Gas Reliability Project Old Mill Lane Portsmouth, RI” prepared for The Narragansett Electric Company by VHB dated April 2022 (the “Siting Report”), which the Company filed with the Energy Facility Siting Board on April 1, 2022, in Docket No. SB-2021-04.

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CLF 1-12

Request:

Please refer to page 6 of witness Porcaro's testimony and provide the hourly demand/offtake for Aquidneck Island from 2015 through the most recently completed calendar year.

Response:

Please see Attachment CLF 1-12 for the requested information. Because of the size of this attachment, it is being provided in Excel format.

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Attachment CLF 1-12

Please see the Excel Worksheet of Attachment CLF 1-12

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CLF 1-13

Request:

On page 6 of her testimony, witness Porcaro refers to the supply loss that occurred on January 19, 2019. Witness Porcaro indicates on page 7 of her testimony that even though the Company will receive notice of transmission issues, the Company may have limited time to respond, "hours or minutes." Witness Porcaro also indicates on page 8 of her testimony that without the Project customers on Aquidneck Island are vulnerable to future episodes of loss of supply during critical winter months.

- a) Please provide the number of transmission supply issues affecting customers on Aquidneck Island since January 19, 2019, including the date and duration of any such event.
- b) Please provide the capacity provided to Aquidneck Island by the Project during these times.

Response:

- a) There have been no posted transmission supply issues affecting customers on Aquidneck Island since January 19, 2019.
- b) No transmission system events occurred, so the Project provided no capacity to Aquidneck Island to address gas transmission interruptions during the specified time period. On one occasion, gas day December 23, 2022, an extreme weather pattern was experienced, with unseasonably warm temperatures and rain followed by a flash of cold temperatures. The Company opted to utilize the equipment for a period of approximately four hours at a flow rate of approximately 150 dekatherms per hour.

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CLF 1-14

Request:

On pages 15-16 of Appendix A to the Siting Report the Company references a “cost-benefit analysis to evaluate the cost of maintaining the resources necessary to meet design day demand versus the cost to customers of experiencing service curtailments.” Please provide the cost-benefit analysis referenced therein, in Excel format with all formulas and links intact.

Response:

Please refer to Attachment CLF 1-14 for the referenced design day cost/benefit analysis, in Excel format, that the Company performed in conjunction with its 2018 Long Range Plan submission (Docket No. 4816, Gas Long-Range Resource and Requirements Plan for the Forecast Period 2017/18 to 2026/27).

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Attachment CLF 1-14

Please see the Excel Worksheet of Attachment CLF 1-14