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April 5, 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 DIV Data Requests – Set 3 (Full Set)

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company (the “Company”), I have enclosed the Company’s responses to the Division of Public Utilities and Carriers’ Third Set of Data Requests (Full Set) in the above-referenced docket.

Attachment DIV 3-1 to the Company’s response to Division’s Data Request 3-1 contains confidential information; and therefore, the company has provided redacted public versions of the attachment and unredacted versions subject to a motion for protective treatment.

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

Sincerely,



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

April 5, 2023

Date

**Docket No. 22-42-NG – Needs Advisory Opinion to EFSB regarding Narragansett Electric LNG Vaporization Facility at Old Mill, Portsmouth, RI
Service List update 2/13/2023**

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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) DOCKET NO. 22-42-NG
AN LNG VAPORIZATION FACILITY ON)
OLD MILL LANE, PORTSMOUTH, RHODE ISLAND)

**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 Division Data Request 3-1. 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 Company’s response to Division Data Request 3-1 includes an attachment, Attachment DIV 3-1, setting forth the Company’s equipment rental and contracted services costs for deployment and operation of portable LNG vaporization and injection equipment at its facility at Old Mill Lane. These costs are negotiated by the Company with its equipment lessor and service provider, and disclosure of these terms could hamper the Company’s ability to negotiate advantageous pricing in the future.

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*, 577 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 information contained in Attachment DIV 3-1 is sensitive pricing information that the Company would not ordinarily make public, and the contracts through which such prices were set contain confidentiality provisions. The disclosure of these negotiated pricing terms could hamper the Company’s ability to negotiate favorable pricing terms for similar equipment rentals and contracted services in the future. For that reason, the Company has consistently sought and obtained protective treatment of the identified costs and does not publicly disclose the information. Because the confidential information contained in Attachment DIV 3-1 is not of a kind that would customarily be released to the public by the Company, the first prong of the *Providence Journal* test has been satisfied. *See Providence Journal, 774 A.2d at 47.*

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 Attachment DIV 3-1. The Company has submitted a redacted version of Attachment DIV 3-1 in its responses to the Company’s Third Set of Data Requests, and a confidential version subject to this motion for protective treatment.

[SIGNATURES ON NEXT PAGE]

Respectfully submitted,

**THE NARRAGANSETT ELECTRIC
COMPANY**

By its attorneys,



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Dated: April 5, 2023

CERTIFICATE OF SERVICE

I hereby certify that on April 5, 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.



Heidi J. Seddon

The Narragansett Electric Company
RIPUC Docket No. 22-42-NG
In Re: The Issuance of Advisory Opinion to the
Energy Facility Siting Board Regarding
The Narragansett Electric Company
Application to Construct and LNG Vaporization Facility on
Old Mill Lane, Portsmouth, Rhode Island
Responses to the Division's Third Set of Data Requests
Issued on March 17, 2023

Division 3-1
(REDACTED)

Request:

Re: Witness Brigg's Direct Testimony at page 4, lines 2-4. Please provide a detailed comparison of the annual operating expenses currently included in the Company's GCR for the operation of portable LNG vaporization at Old Mill Lane and the expected operating costs for the Project when completed. The response to this request should show costs separately for:

- a. equipment rental,
- b. LNG trucking,
- c. electricity and/or other fuel to operate the facility,
- d. security costs, including costs for security personnel,
- e. cost for TNEC personnel to maintain and operate the facility
- f. costs for contract personnel used in the operation and/or maintenance of the facility.

Response:

Presently, only the costs of equipment rental, LNG trucking, and costs for contract personnel are included in the Gas Cost Recovery factor. Other expenses associated with the Company's operations at Old Mill Lane are considered operating expenses (OPEX) and are not included within the Gas Cost Recovery factor.

Please see Attachment DIV 3-1 for a detailed breakdown of the annual current and future operating expenses at Old Mill Lane. Attachment DIV 3-1 contains confidential commercial information; therefore, the Company has provided a redacted version of the attachment and a confidential version subject to a motion for protective treatment.

GCR								
2021-2022			2022-2023			2024-2025		
2022-2023	Stabilis 2021-2022 Contract Pricing	Comments		Stabilis 2022-2023 Contract Pricing	Comments	2024-2025	RI Energy Operated Equipment	Comments
Equipment		4-month cost	Equipment		4-month cost	Equipment	\$ -	Purchased Equipment
Labor		4-month cost	Labor		4-month cost	Labor	\$ -	
Mobilization		Maximum Fee	Mobilization		Maximum Fee	Mobilization	\$ -	
Commissioning		One Time Fee	Commissioning		One Time Fee	Commissioning	\$ -	
Demobilization		Maximum Fee	Demobilization		Maximum Fee	Demobilization	\$ -	
Decommissioning		No fee	Decommissioning		One Time Fee	Decommissioning	\$ -	
Total			Total			Total	\$ -	
LNG Trucking		27 trucks total: intial fill (7), boil-off replacement (3), 1 day design conditions (17)	LNG Trucking		27 trucks total: intial fill (7), boil-off replacement (3), 1 day design conditions (17)	LNG Trucking	\$54,000	27 trucks total: intial fill (7), boil-off replacement (3), 1 day design conditions (17)
GCR Total			GCR Total			GCR Total	\$54,000	
OPEX								
Electricity	~5,000 kWh	Estimation over 4-month period, no other fuel used. Emergency Generator is diesel, but has not been needed.	Electricity	~5,000 kWh	Estimation over 4-month period, no other fuel used. Emergency Generator is diesel, but has not been needed.	Electricity	~5,000 kWh	Estimation over 4-month period, no other fuel used. Emergency Generator is diesel, but has not been needed.
Security	\$ 141,100	5-month cost	Security	\$ 141,100	5-month cost	Security	\$ 141,100	5-month cost
TNEC Personnel	\$ 200,000	4-month cost	TNEC Personnel	\$ 200,000	4-month cost	TNEC Personnel	\$ 431,250	5-month cost
Mat Rental & Misc Cost	\$ 150,000		Misc Cost	\$30,000		Mobilization, Demobilization, Misc Cost	\$ 80,000	Setup & breakdown cost
COMBINED COST		GCR & OPEX	COMBINED COST		GCR & OPEX	COMBINED COST	\$ 706,350	GCR & OPEX

The Narragansett Electric Company
RIPUC Docket No. 22-42-NG
In Re: The Issuance of Advisory Opinion to the
Energy Facility Siting Board Regarding
The Narragansett Electric Company
Application to Construct and LNG Vaporization Facility on
Old Mill Lane, Portsmouth, Rhode Island
Responses to the Division's Third Set of Data Requests
Issued on March 17, 2023

Division 3-2

Request:

Re: Witness Brigg's Direct Testimony at page 5, lines 4-6. Please indicate the calendar month within FY 2025 that the Company presently anticipates the Project would be placed in service if it obtains all necessary approvals. The amount of supply for Aquidneck Island received through the Algonquin transmission lateral service Aquidneck Island;

Response:

It is anticipated that if the Company obtains all necessary approvals for the project within calendar year 2023, that site work would begin in April 2024 and be completed by November 2024, with an in-service date of November 2024. This timeline does not account for construction delays that could be caused by deployment of portable LNG equipment to provide back-up supply during any inspection work that might be performed by Enbridge. The in-service date is for the site work only, if purchased, the LNG equipment would likely not be available until 2025.

The second sentence of this data request appears to have resulted from a typographical error and, therefore, has not been addressed in this response.

The Narragansett Electric Company
RIPUC Docket No. 22-42-NG
In Re: The Issuance of Advisory Opinion to the
Energy Facility Siting Board Regarding
The Narragansett Electric Company
Application to Construct and LNG Vaporization Facility on
Old Mill Lane, Portsmouth, Rhode Island
Responses to the Division's Third Set of Data Requests
Issued on March 17, 2023

Division 3-3

Request:

Re: Witness Brigg's Direct Testimony at page 5, lines 14-15. Please identify the estimated useful life for the Aquidneck Island LNG Project that was used in computing bill impacts and identify the projected salvage value of LNG vaporization equipment at the end of the period that the LNG vaporization equipment is expected to be operated on Aquidneck Island.

Response:

The revenue requirement and associated bill impacts presented in Witness Briggs' testimony is for the Old Mill Lane site work project and for calculation of the revenue requirement and bill impacts, it was assumed to be recovered through the Gas ISR plan until the next base distribution rate case. The revenue requirement in the annual Gas ISR plan uses a Composite Book Depreciation Rate approved in the Company's last base distribution rate case (RIPUC Docket No. 4770, which was effective September 1, 2018) based on the depreciation study in that case, which included a projection of net salvage value. If the Old Mill Lane site work is placed in service prior to the next base distribution rate case, the assets will be included in rate base and the depreciation expense will be based on the approved depreciation rates (including net salvage value) in that filing for the applicable plant accounts.

The Narragansett Electric Company
RIPUC Docket No. 22-42-NG
In Re: The Issuance of Advisory Opinion to the
Energy Facility Siting Board Regarding
The Narragansett Electric Company
Application to Construct and LNG Vaporization Facility on
Old Mill Lane, Portsmouth, Rhode Island
Responses to the Division's Third Set of Data Requests
Issued on March 17, 2023

Division 3-4

Request:

Re: Witness Brigg's Direct Testimony at page 7, lines 7-9. Please:

- a. Provide the workpapers (including electronic spreadsheet files), data, analyses, and assumptions relied upon to compute the referenced \$1.4 million annual revenue requirement for the first full year after the project is placed in service;
- b. Provide workpapers (including electronic spreadsheet files), data, analyses, and assumptions the Company has relied upon to compute the annual revenue requirement for each year after the first full year the project is placed in service.

Response:

- a. Please see Attachment DIV 3-4 for the workpapers to compute the referenced \$1.4 million annual revenue requirement for the first full year after the Old Mill Lane Site Work project is placed into service. Page 1 of Attachment DIV 3-4 compares the illustrative Gas ISR revenue requirements with and without the incremental \$15 million of capital investment for Old Mill Lane site work to determine the annual impact to the revenue requirement as shown on Line 32. For purposes of the calculation to determine an approximate annual requirement associated with the capital site work, the Company assumed that the investment was placed into service in FY 2024 and the first full year after placed in service would be FY 2025 (column d). The actual in-service costs would be reflected in the appropriate year in the ISR plan once the project was placed in service, however, the FY 2025 amount is indicative of an annual revenue requirement impact.
- b. Please see Attachment DIV 3-4, Page 1, Column f, Line 32 for the illustrative incremental annual revenue requirement associated with the Old Mill Lane site work project for FY 2026, which using the assumptions described in Part a, is the second full year of revenue requirement. The Company has not calculated additional years, however, the Company expects the revenue requirement to decrease in each subsequent year.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-42-NG
In Re: The Issuance of Advisory Opinion to the
Energy Facility Siting Board Regarding
Application to Construct and LNG Vaporization Facility on Old Mill Lane, Portsmouth, Rhode Island
Attachment DIV 3-4
Page 1 of 3

**The Narragansett Electric Company
d/b/a Rhode Island Energy
Comparison of Revenue Requirement with Old Mill Lane Capital Investment
FY 2024 - FY 2026**

Line No.	Plan Year FY 2024		Plan Year FY 2025		Plan Year FY 2026		
	ISR without Old Mill Lane Site Costs	ISR with Old Mill Lane Site Costs	ISR without Old Mill Lane Site Costs	ISR with Old Mill Lane Site Costs	ISR without Old Mill Lane Site Costs	ISR with Old Mill Lane Site Costs	
	(a)	(b)	(c)	(d)	(e)	(f)	
<u>Depreciable Net Capital Included in ISR Rate Base</u>							
1	Total Allowed Capital Included in ISR Rate Base in Current Year	\$177,325,000	\$192,325,000	\$177,325,000	\$192,325,000	\$177,325,000	\$192,325,000
2	Retirements	\$8,903,481	\$9,656,630	\$8,903,481	\$9,656,630	\$8,903,481	\$9,656,630
3	Net Depreciable Capital Included in ISR Rate Base	\$168,421,519	\$182,668,370	\$168,421,519	\$182,668,370	\$168,421,519	\$182,668,370
<u>Change in Net Capital Included in ISR Rate Base</u>							
4	Capital Included in ISR Rate Base	\$177,325,000	\$192,325,000	\$177,325,000	\$192,325,000	\$177,325,000	\$192,325,000
5	Depreciation Expense	\$40,954,246	\$40,954,246	\$40,954,246	\$40,954,246	\$40,954,246	\$40,954,246
6	Incremental Capital Amount	\$136,370,754	\$151,370,754	\$136,370,754	\$151,370,754	\$136,370,754	\$151,370,754
7	Cost of Removal	\$9,231,000	\$9,231,000	\$9,231,000	\$9,231,000	\$9,231,000	\$9,231,000
8	Net Plant Amount	\$145,601,754	\$160,601,754	\$145,601,754	\$160,601,754	\$145,601,754	\$160,601,754
<u>Deferred Tax Calculation:</u>							
9	Composite Book Depreciation Rate	1/ 2.99%	2.99%	2.99%	2.99%	2.99%	2.99%
10	Proration Percentage						
11	Tax Depreciation and Year 1 Basis Adjustments	\$155,464,079	\$167,833,999	\$2,331,975	\$2,339,343	\$2,339,343	\$2,339,343
12	Cumulative Tax Depreciation-PPL	\$155,464,079	\$167,833,999	\$157,796,054	\$170,363,237	\$160,135,397	\$172,702,580
13	Book Depreciation	\$2,517,902	\$2,730,892	\$5,035,803	\$5,461,784	\$5,035,803	\$5,461,784
14	Cumulative Book Depreciation	\$2,517,902	\$2,730,892	\$7,553,705	\$8,192,676	\$12,589,509	\$13,654,461
15	Cumulative Book / Tax Timer	\$152,946,177	\$165,103,107	\$150,242,349	\$162,170,560	\$147,545,889	\$159,048,119
16	Effective Tax Rate	21.00%	21.00%	21.00%	21.00%	21.00%	21.00%
17	Deferred Tax Reserve	\$32,118,697	\$34,671,652	\$31,550,893	\$34,055,818	\$30,984,637	\$33,400,105
18	Add: CY 2023 Federal NOL utilization	\$0	\$0	\$0	\$0	\$0	\$0
19	Net Deferred Tax Reserve before Proration Adjustment	\$32,118,697	\$34,671,652	\$31,550,893	\$34,055,818	\$30,984,637	\$33,400,105
<u>ISR Rate Base Calculation:</u>							
20	Cumulative Incremental Capital Included in ISR Rate Base	\$145,601,754	\$160,601,754	\$145,601,754	\$160,601,754	\$145,601,754	\$160,601,754
21	Accumulated Depreciation	(\$2,517,902)	(\$2,730,892)	(\$7,553,705)	(\$8,192,676)	(\$12,589,509)	(\$13,654,461)
22	Deferred Tax Reserve	(\$32,118,697)	(\$34,671,652)	(\$31,550,893)	(\$34,055,818)	(\$30,984,637)	(\$33,400,105)
23	Year End Rate Base before Deferred Tax Proration	\$110,965,155	\$123,199,209	\$106,497,155	\$118,353,259	\$102,027,608	\$113,547,188
<u>Revenue Requirement Calculation:</u>							
24	Average Rate Base before Deferred Tax Proration Adjustment	\$55,482,577	\$61,599,604	\$108,731,155	\$120,776,234	\$104,262,382	\$115,950,224
25	Proration Adjustment	(\$11,777)	(\$12,773)	\$0			
26	Average ISR Rate Base after Deferred Tax Proration	\$55,470,801	\$61,586,832	\$108,731,155	\$120,776,234	\$104,262,382	\$115,950,224
27	Pre-Tax ROR	8.41%	8.41%	8.41%	8.41%	8.41%	8.41%
28	Proration Percentage						
29	Return and Taxes	\$4,665,094	\$5,179,453	\$9,144,290	\$10,157,281	\$8,768,466	\$9,751,414
30	Book Depreciation	\$2,517,902	\$2,730,892	\$5,035,803	\$5,461,784	\$5,035,803	\$5,461,784
31	Annual Revenue Requirement	\$7,182,996	\$7,910,345	\$14,180,094	\$15,619,066	\$13,804,270	\$15,213,198
32	Incremental Revenue Requirement for Old Mill Lane Site Costs		\$727,349		\$1,438,972		\$1,408,928

1/ 2.99%, Composite Book Depreciation Rate approved per RIPUC Docket No. 4770, effective on Sep 1, 2018

**The Narragansett Electric Company
d/b/a Rhode Island Energy
ISR Revenue Requirement without Old Mill Lane
FY 2024 - FY 2026**

Line No.	PPL Plan Year 4/1/23 - 3/31/24 2024 (a)	Plan Year Mar-2025 (b)	Plan Year Mar-2026 (c)
<u>Depreciable Net Capital Included in ISR Rate Base</u>			
1	Total Allowed Capital Included in ISR Rate Base in Current Year	\$177,325,000	
2	Retirements	\$8,903,481	
3	Net Depreciable Capital Included in ISR Rate Base	\$168,421,519	\$168,421,519
<u>Change in Net Capital Included in ISR Rate Base</u>			
4	Capital Included in ISR Rate Base	\$177,325,000	\$0
5	Depreciation Expense	\$40,954,246	\$0
6	Incremental Capital Amount	\$136,370,754	\$136,370,754
7	Cost of Removal	\$9,231,000	\$9,231,000
8	Net Plant Amount	\$145,601,754	\$145,601,754
<u>Deferred Tax Calculation:</u>			
9	Composite Book Depreciation Rate	1/ 2.99%	2.99%
10	Proration Percentage		2.99%
11	Tax Depreciation and Year 1 Basis Adjustments	\$155,464,079	\$2,331,975
12	Cumulative Tax Depreciation-PPL	\$155,464,079	\$157,796,054
13	Book Depreciation	\$2,517,902	\$5,035,803
14	Cumulative Book Depreciation	\$2,517,902	\$7,553,705
15	Cumulative Book / Tax Timer	\$152,946,177	\$150,242,349
16	Effective Tax Rate	21.00%	21.00%
17	Deferred Tax Reserve	\$32,118,697	\$31,550,893
18	Add: CY 2023 Federal NOL utilization	\$0	\$0
19	Net Deferred Tax Reserve before Proration Adjustment	\$32,118,697	\$30,946,322
<u>ISR Rate Base Calculation:</u>			
20	Cumulative Incremental Capital Included in ISR Rate Base	\$145,601,754	\$145,601,754
21	Accumulated Depreciation	(\$2,517,902)	(\$7,553,705)
22	Deferred Tax Reserve	(\$32,118,697)	(\$31,550,893)
23	Year End Rate Base before Deferred Tax Proration	\$110,965,155	\$102,065,923
<u>Revenue Requirement Calculation:</u>			
24	Average Rate Base before Deferred Tax Proration Adjustment	\$55,482,577	\$108,731,155
25	Proration Adjustment	(\$11,777)	
26	Average ISR Rate Base after Deferred Tax Proration	\$55,470,801	\$108,731,155
27	Pre-Tax ROR	8.41%	8.41%
28	Proration Percentage		8.41%
29	Return and Taxes	\$4,665,094	\$9,144,290
30	Book Depreciation	\$2,517,902	\$5,035,803
31	Annual Revenue Requirement	\$7,182,996	\$13,805,881

1/ 2.99%, Composite Book Depreciation Rate approved per RIPUC Docket No. 4770, effective on Sep 1, 2018

Note: Forecasted FY 2024 ISR Revenue Requirement without Old Mill Lane site work capital costs

**The Narragansett Electric Company
d/b/a Rhode Island Energy
ISR Revenue Requirement with Old Mill Lane
FY 2024 - FY 2026**

Line No.	PPL Plan Year 4/1/23 - 3/31/24 <u>2024</u> (a)	Plan Year <u>Mar-2025</u> (b)	Plan Year <u>Mar-2026</u> (c)
<u>Depreciable Net Capital Included in ISR Rate Base</u>			
1	Total Allowed Capital Included in ISR Rate Base in Current Year	\$192,325,000	
2	Retirements	\$9,656,630	
3	Net Depreciable Capital Included in ISR Rate Base	<u>\$182,668,370</u>	<u>\$182,668,370</u>
<u>Change in Net Capital Included in ISR Rate Base</u>			
4	Capital Included in ISR Rate Base	\$192,325,000	\$0
5	Depreciation Expense	\$40,954,246	\$0
6	Incremental Capital Amount	<u>\$151,370,754</u>	<u>\$151,370,754</u>
7	Cost of Removal	\$9,231,000	\$9,231,000
8	Net Plant Amount	\$160,601,754	\$160,601,754
<u>Deferred Tax Calculation:</u>			
9	Composite Book Depreciation Rate	1/ 2.99%	2.99%
10	Proration Percentage		
11	Tax Depreciation and Year 1 Basis Adjustments	\$167,833,999	\$2,529,238
12	Cumulative Tax Depreciation-PPL	\$167,833,999	\$170,363,237
13	Book Depreciation	\$2,730,892	\$5,461,784
14	Cumulative Book Depreciation	\$2,730,892	\$8,192,676
15	Cumulative Book / Tax Timer	\$165,103,107	\$162,170,560
16	Effective Tax Rate	21.00%	21.00%
17	Deferred Tax Reserve	\$34,671,652	\$34,055,818
18	Add: CY 2023 Federal NOL utilization	\$0	\$0
19	Net Deferred Tax Reserve before Proration Adjustment	<u>\$34,671,652</u>	<u>\$34,055,818</u>
<u>ISR Rate Base Calculation:</u>			
20	Cumulative Incremental Capital Included in ISR Rate Base	\$160,601,754	\$160,601,754
21	Accumulated Depreciation	(\$2,730,892)	(\$8,192,676)
22	Deferred Tax Reserve	(\$34,671,652)	(\$34,055,818)
23	Year End Rate Base before Deferred Tax Proration	<u>\$123,199,209</u>	<u>\$118,353,259</u>
<u>Revenue Requirement Calculation:</u>			
24	Average Rate Base before Deferred Tax Proration Adjustment	\$61,599,604	\$120,776,234
25	Proration Adjustment	(\$12,773)	
26	Average ISR Rate Base after Deferred Tax Proration	<u>\$61,586,832</u>	<u>\$120,776,234</u>
27	Pre-Tax ROR	8.41%	8.41%
28	Proration Percentage		
29	Return and Taxes	\$5,179,453	\$10,157,281
30	Book Depreciation	\$2,730,892	\$5,461,784
31	Annual Revenue Requirement	\$7,910,345	\$15,619,066

1/ 2.99%, Composite Book Depreciation Rate approved per RIPUC Docket No. 4770, effective on Sep 1, 2018

Notes: Net Capital on Line 1 includes \$15 million for Old Mill Lane Site Work in service in FY 2024 for model purposes

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Division 3-5

Request:

Re: Witness Brigg's Direct Testimony at page 7, lines 7-9. Please provide the Company's projections of average annual residential therm use per customer for each year of the period for which the Aquidneck LNG Project is expected to be operated.

Response:

The Company has not calculated the projected average annual residential therm use per customer for each year that the Project is expected to be operated. The revenue requirement presented in Attachment DIV 3-4 was for the Old Mill Lane site work project capital costs that the Company assumed would be recovered through the annual Gas ISR plan. As shown on Attachment DIV 3-6, the Company used the forecasted FY 2024 throughput per rate class to determine a forecasted factor by rate class to recover the forecasted revenue requirement. The Company then applied the average annual therms per rate class to the factor to determine the annual bill impact. For an average residential heating customer, the Company typically uses 845 annual therms in its bill impact analysis.

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Division 3-6

Request:

Re: Witness Brigg's Direct Testimony at page 7, lines 7-9. Please provide the workpapers (including electronic spreadsheet files), data, analyses, and assumptions relied upon to compute bill impacts by rate class.

Response:

Please see Attachment DIV 3-6 for the workpapers for the bill impacts by rate class. In preparing this response, the Company realized that the annual bill impact in the Direct Testimony of Witness Briggs, Page 7, lines 7-9 was inadvertently shown as the bill impact for the year the project was placed in service as well as the first full year after placed in service. As shown on Attachment DIV 3-6, Page 1, Columns m and n, Line 2, the annual bill impact on an average residential heating customer using 845 therms per year, is \$5.14 or 0.3%.

FY 25 Revenue Requirement Old Mill Lane Site Work	Rate Class	Rate Base Allocator (%)	Allocation to Rate Class (\$)	Throughput (dth)	ISR Factor - Only Old Mill Lane Site Work (dth)	ISR Factor - Only Old Mill Lane Site Work (therm)	Uncollectible %	ISR Factor (therm)	Average Annual Therms	Annual \$ impact	GET	Annual \$ impact w/ GET	% Increase from current rates
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)
\$1,814,662	Residential Total	66.59%	\$1,208,383	20,669,404	\$0.0584	\$0.0058	1.91%	\$0.0059	845	\$4.99	3%	\$5.14	0.3%
	Small	8.04%	\$145,899	2,527,337	\$0.0577	\$0.0057	1.91%	\$0.0058	1,277	\$7.41	3%	\$7.63	0.3%
	Medium	12.23%	\$221,933	5,855,957	\$0.0378	\$0.0037	1.91%	\$0.0037	10,623	\$39.31	3%	\$40.48	0.2%
	Large LL	5.57%	\$101,077	2,925,154	\$0.0345	\$0.0034	1.91%	\$0.0034	57,825	\$196.61	3%	\$202.50	0.2%
	Large HL	2.25%	\$40,830	1,382,567	\$0.0295	\$0.0029	1.91%	\$0.0029	64,545	\$187.18	3%	\$192.80	0.2%
	XL-LL	0.97%	\$17,602	1,292,083	\$0.0136	\$0.0013	1.91%	\$0.0013	359,745	\$467.67	3%	\$481.70	0.1%
	XL-HL	4.35%	\$78,938	5,860,658	\$0.0134	\$0.0013	1.91%	\$0.0013	748,506	\$973.06	3%	\$1,002.25	0.1%
	Total	100.00%	\$1,814,662	40,513,161									

- (a) Incremental Annual Revenue Requirement from DIV 3-4, FY 25, Column D, Line \$ 1,438,972
Incremental Property tax adjustment related to Old Mill Lane \$ 375,690
\$ 1,814,662 Total Incremental Capital Component of Revenue Requirement
- (c) Docket 4770, RI 2017 Rate Case, Compliance Attachment 14 (August 16, 2018), Schedule 2, Page 1 & 2, Line 15 (Rate Class divided by Total Company)
- (d) Column (a) Line 1 * Column (c)
- (e) Page 2, Column (m)
- (f) Column (d) / Column (e), truncated to 4 decimal places
- (g) Column (d) / (Column (e)*10), truncated to 4 decimal places
- (h) Docket 4770, RI 2017 Rate Case, Compliance Attachment 2 (August 16, 2018), Schedule 22, Page 7, Line 15
- (i) Column (g) / (1- Column (h)), truncated to 4 decimal places

Forecasted Throughput April 2023 - March 2024

		Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Total
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
(1)	Res-NH	32,722	17,627	14,729	12,134	11,633	11,842	14,932	23,404	34,731	43,448	47,295	38,266	302,762
(2)	Res-H	2,317,355	851,793	573,936	453,690	433,319	446,697	598,069	1,470,815	2,633,843	3,549,689	3,971,935	3,065,501	20,366,642
(3)	Small	285,844	124,997	64,421	54,187	43,242	41,803	54,616	147,547	313,165	449,257	540,931	407,327	2,527,337
(4)	Medium	667,083	324,894	238,769	169,312	160,551	164,298	206,272	436,093	711,633	913,591	1,030,866	832,596	5,855,957
(5)	Large LL	341,713	146,391	78,951	43,570	40,707	44,919	84,532	243,208	400,299	512,504	555,075	433,286	2,925,154
(6)	Large HL	130,842	106,321	90,157	86,340	80,386	86,450	87,945	108,040	131,565	154,028	167,116	153,378	1,382,567
(7)	X-Large LL	132,000	52,699	28,048	23,460	24,151	28,280	68,293	150,950	184,851	222,248	205,311	171,792	1,292,083
(8)	X-Large HL	506,318	459,948	423,059	419,512	430,465	433,813	445,403	494,428	545,481	577,956	579,793	544,481	5,860,658
(9)		<u>4,413,877</u>	<u>2,084,669</u>	<u>1,512,071</u>	<u>1,262,205</u>	<u>1,224,455</u>	<u>1,258,101</u>	<u>1,560,062</u>	<u>3,074,485</u>	<u>4,955,567</u>	<u>6,422,720</u>	<u>7,098,322</u>	<u>5,646,626</u>	<u>40,513,161</u>

Source: Company Forecast

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Division 3-7

Request:

Re: TNEC's response to Division Data Request 2-1. Please document and explain the extent to which LNG vaporization on Aquidneck Island has been used to facilitate greater pipeline deliveries for other parts of the TNEC system in Rhode Island:

- a. On the three coldest days of the winter of 2022-2023;
- b. On the three coldest days of each of the five preceding winter heating seasons (i.e., the winters of 2017-2018, 2018-2019, 2019-2020, 2020-2021, and 2021-2022).

Response:

At no time was the Aquidneck Island LNG facility used to facilitate greater pipeline deliveries for other parts of the TNEC system in Rhode Island. In general, the LNG equipment on Aquidneck Island has been used solely for making up for the actual or anticipated supply shortfall specific to the Portsmouth Gate station, which is contractually limited to 1045 Dth/hr at peak hours.

Gas Day	Supply From Aquid. Isl LNG Above 1045 Dth Hourly Limit to Portsmouth Gate Station
12/24/2022	663.7 Dth
2/3/2023	400.4 Dth
2/4/2023	397.1 Dth

- a. During the winter of 2022-23, on gas day 2-3-2023, Portsmouth gate station exceeded maximum hourly contractual limit of 1045 dth/hr for eight hours, between the hours of 2am and 10am. During that time, the LNG facility supplied approximately 400.4 Dth more than was required to offset the supply shortfall. The equipment continued to run, per direction from Gas Control, into the new gas day 2-4-2023, for approximately four hours from 10am until 1pm for a total of approximately 397.1 Dth. This decision was based on temperature and to ensure that pipeline pressures were stabilized.
- b. The facility was not in place for winter 2017-18 or 2018-19. The facility was not used for winter 2019-20, 2020-21, or 2021-22.

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Division 3-8

Request:

Re: TNEC's response to Division Data Request 2-1. Please provide AGT deliveries to Aquidneck Island for:

- a. Each hour of the February 3, 2023 and February 4, 2023 gas days;
- b. The annual peak hour for Aquidneck Island in each of the preceding five winter heating seasons.

Response:

- a. Please see the table below for the requested information.

Date and Time	Portsmouth Gate Station DTH	Portsmouth LNG DTH
02/03/23 10:00	665.5613	0.0000
02/03/23 11:00	679.9418	0.0000
02/03/23 12:00	674.9324	0.0000
02/03/23 13:00	689.2896	0.0000
02/03/23 14:00	710.8137	0.0000
02/03/23 15:00	747.1743	0.0000
02/03/23 16:00	815.1040	0.0000
02/03/23 17:00	891.9888	0.0000
02/03/23 18:00	937.7549	0.0000
02/03/23 19:00	957.3267	0.0000
02/03/23 20:00	988.9385	0.0000
02/03/23 21:00	976.7095	0.0000
02/03/23 22:00	968.1924	0.0000
02/03/23 23:00	976.1855	0.0000
02/04/23 00:00	991.9170	0.0000
02/04/23 01:00	1028.0771	0.0000
02/04/23 02:00	1057.0273	0.0000
02/04/23 03:00	1062.7520	0.0000
02/04/23 04:00	1069.8809	6.6002
02/04/23 05:00	1009.5010	99.3614

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02/04/23 06:00	935.0049	215.0615
02/04/23 07:00	788.7197	382.5619
02/04/23 08:00	804.9863	326.4787
02/04/23 09:00	906.9023	156.8573

Date and Time	Portsmouth Gate Station DTH	Portsmouth LNG DTH
02/04/23 10:00	899.1074	119.1143
02/04/23 11:00	861.6504	109.9981
02/04/23 12:00	803.3848	110.6019
02/04/23 13:00	790.1172	57.3933
02/04/23 14:00	831.7559	0.0000
02/04/23 15:00	826.8770	0.0000
02/04/23 16:00	849.4590	0.0000
02/04/23 17:00	852.9414	0.0000
02/04/23 18:00	839.0898	0.0000
02/04/23 19:00	817.4434	0.0000
02/04/23 20:00	793.8301	0.0000
02/04/23 21:00	762.4316	0.0000
02/04/23 22:00	725.4746	0.0000
02/04/23 23:00	686.7441	0.0000
02/05/23 00:00	659.4395	0.0000
02/05/23 01:00	649.9473	0.0000
02/05/23 02:00	642.9121	0.0000
02/05/23 03:00	627.6133	0.0000
02/05/23 04:00	620.3008	0.0000
02/05/23 05:00	625.4512	0.0000
02/05/23 06:00	634.5898	0.0000
02/05/23 07:00	626.1074	0.0000
02/05/23 08:00	560.6699	0.0000
02/05/23 09:00	511.8750	0.0000

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b. Please see the table below for the requested information.

Verification Date		Portsmouth Demand	HDD
Gas Day	Calendar Day	Peak Hour [Dth]	HDD
6-Jan-18	7-Jan-18	1,076.0	60
21-Jan-19	21-Jan-19	951.8	59
17-Jan-20	18-Jan-20	793.8	47
29-Jan-21	30-Jan-21	887.7	51
15-Jan-22	16-Jan-22	864.7	54
3-Feb-23	4-Feb-23	1171.3	62

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Division 3-9

Request:

Please provide the billed therms for Aquidneck Island customers by month for each of the last five years

Response:

Below are the monthly billed therms from 2018 to present.

Year-Month	Total Therms
2018-01	3027479.144
2018-02	3050686.042
2018-03	2477505.336
2018-04	2469340.676
2018-05	1722357.057
2018-06	738951.031
2018-07	485789.446
2018-08	428670.616
2018-09	424958.031
2018-10	521688.789
2018-11	1135080.071
2018-12	2358234.339
2019-01	2785033.52
2019-02	2901224.566
2019-03	2893336.676
2019-04	2471153.237
2019-05	1572412.493
2019-06	988425.007
2019-07	517951.17
2019-08	470670.03
2019-09	505566.449
2019-10	512466.328
2019-11	989632.91

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2019-12	2355891.566
2020-01	2865577.146
2020-02	2985228.306
2020-03	2497557.364
2020-04	2136365.399
2020-05	1806826.54
2020-06	968396.658
2020-07	489804.345
2020-08	473755.595
2020-09	449785.218
2020-10	541670.423
2020-11	956761.864
2020-12	2031198.538
2021-01	3057264.07
2021-02	3233256.502
2021-03	2414613.848
2021-04	2543062.028
2021-05	1616116.167
2021-06	914832.237
2021-07	541820.047
2021-08	537926.699
2021-09	479327.595
2021-10	526694.688
2021-11	837468.91
2021-12	2259239.885
2022-01	2851522.077
2022-02	3533431.818
2022-03	3157788.771
2022-04	2627013.495
2022-05	1753122.087
2022-06	957099.073
2022-07	578566.815

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2022-08	523414.107
2022-09	504291.925
2022-10	608107.746
2022-11	1070613.404
2022-12	2147051.418
2023-01	3294127.826
2023-02	3097220.372
2023-03	3071423.142
2023-04	1786973.968

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Division 3-10

Request:

Re: TNEC's response to Division Data Request 2-3. The Division's request sought the amount of Interruptible served by TNEC on Aquidneck Island on the three highest demand days for Aquidneck Island in each of the last five calendar years. The Company's response only addresses "*the last four years.*" Please:

- a. Provide the amount of Interruptible load served on Aquidneck Island for each of the three highest demand days in calendar year 2018;
- b. Provide the amount of Interruptible load served on Aquidneck Island for each of the three highest demand days in calendar year 2018;
- c. Provide the amount of Interruptible load served on Aquidneck Island during the peak hour for the 2017-2018 winter heating season.

Response:

- a. There was zero consumption measured with respect to interruptible load during each of the three highest demand days in calendar year 2018.
- b. Please see response to part a.
- c. There was zero consumption measured with respect to interruptible load during the peak hour for the 2017-2018 winter heating season.

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Division 3-11

Request:

Re: TNEC's response to Division Data Request 2-6. Please:

- a. Verify that each of the pipes serving Burrillville are part of the AGT G system, and if not, identify the interstate pipeline from which supplies for each pipeline the serving the Burrillville gas station are received. Also, indicate the diameter and maximum hourly throughput for each pipe through which gas may be delivered to the Burrillville gas station.
- b. Verify that each of the pipes serving Tiverton are part of the AGT G system, and if not, identify the interstate pipeline from which supplies for each pipeline the serving the Tiverton gas station are received. Also, indicate the diameter and maximum hourly throughput for each pipe through which gas may be delivered to the Tiverton gas station.
- c. Identify the Interstate pipeline company that operates each gas transmission line through which supplies are delivered to the Company's service area around Westerly, RI. Also, indicate the diameter and maximum hourly throughput for each pipe through which gas may be delivered to Westerly TNEC's Westerly service area.

Response:

- a. No, pipes serving Meter 44 Burrillville are not on the AGT G System; the station is on the AGT Mainline. It is served from both the 36" and 24" parallel mainlines with two parallel spurs to the meter station. The Company does not have specific information regarding the maximum hourly throughput for the pipes to this station.
- b. Yes, the pipes serving Meter 33 Tiverton are on the AGT G System. The station is served by 8" and 12" parallel lines with two parallel spurs to the meter station. The Company does not have specific information regarding the maximum hourly throughput for the pipes to this station.
- c. Westerly is served by the AGT E system at Meter 4, via a single 4" pipeline. The Company also has an interconnect with Yankee Gas/Eversource at Montville. The Company does not have specific information on the infrastructure at the interconnect, but the Company is contractually allowed up to 5,000 Dth per day.

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Division 3-12

Request:

- a. Document the growth in numbers of customers and service volumes by rate class that has resulted from the Company's Southern RI Gas Expansion program in each calendar year since the start of that program;
- b. Document the Company's projected growth in numbers of customers and service volumes by rate class that the Company expects to result from the Southern RI Gas Expansion program for each of the next 10 years;
- c. Identify by year the impacts in terms (sic) of added customers and service volumes for Aquidneck Island that the Company expects its Southern RI Gas Expansion program will produce.

Objection:

The Company objects to this data request as it is not proper pursuant to Public Utilities Commission Rule of Procedure 1.19 (C) which allows parties to seek "such data, studies, workpapers, reports, and information as are reasonably relevant to the proceeding." As described in further detail in the Company's memorandum in support of its objection, the data request seeks information that is not relevant to this proceeding nor likely to result in the discovery of relevant information.

Response:

- a. and b. Please reference the Company's response to a similar question in the FY23 Gas ISR, PUC Docket No. 5210 (PUC 2-22) and the response to Record Request 13 in that same docket that provides additional information. Both responses are enclosed.
- c. There is no impact as the Southern RI Gas Expansion program (also known as the "Southern RI Growth Reinforcement Project") is not connected to the Aquidneck Island natural gas distribution system and is supplied by a different transmission company.