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Also admitted in Massachusetts

September 14, 2023

VIA ELECTRONIC MAIL

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

**RE: Docket No. 22-06-NG - Rhode Island Energy's Gas Long-Range Resource and Requirements Plan Forecast Period 2023/24 to 2027/28
Responses to Division Data Requests – Set 2 (Complete Set)**

Dear Ms. Massaro:

On behalf of Rhode Island Energy (“Company”), I have enclosed the Company’s complete set of responses to the Division’s Second Set of Data Requests issued in the above-referenced docket.

Thank you for your attention to this matter. If you have any questions, please contact me at 401-709-3359.

Very truly yours,



Steven J. Boyajian

Enclosures

cc: Docket No. 22-06-NG Service List

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-06-NG
In Re: Gas Long-Range Resource and Requirements Plan
For the Forecast Period 2023/24 to 2027/28
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Division 2-1

Request:

Reference Exhibit 15, page 1. Please provide a similar schedule for the Company's design hour with requirements and resources identified on a daily basis calculated by multiplying design hour requirements by 20 (per Section 111.G of the Long-Range Plan) and resources by 24 for 1/24 resources (per Exhibit 8) or 16.67 for 6% resources (per Exhibit 8).

Response:

Please see Attachment Division 2-1.

Rhode Island Energy
Comparison of Resources and Requirements
Design Year (Sales and FT-2, FT-1, and Capacity Exempt)
(Dth/hr)

Peak Hour with Existing Resources

		<u>2023-2024</u>	<u>2024-2025</u>	<u>2025-2026</u>	<u>2026-2027</u>	<u>2027-2028</u>
<u>REQUIREMENTS</u>						
Sales and FT-2, FT-1, and CE		21,384	21,569	21,742	21,840	21,927
<u>RESOURCES</u>						
TGP	Cranston	3,346	3,366	3,290	3,295	3,292
	Lincoln	1,283	1,283	1,283	1,283	1,283
	Smithfield	450	450	450	450	450
	Scott Rd (Pawtucket)	1,343	1,343	1,343	1,343	1,343
	Total TGP	6,423	6,443	6,367	6,372	6,369
TET/AGT	Barrington	0	0	0	0	0
	Bristol-Warren	811	769	769	769	769
	Burrillville	0	0	0	0	0
	Crary St	0	0	0	0	0
	Dey St	5,717	5,150	5,126	5,130	5,126
	Diamond Hill (Cumberland)	42	42	42	42	42
	Portsmouth	1,045	1,045	1,045	1,045	1,045
	Tiverton	56	56	56	56	56
	Wampanoag Trail (E. Prov)	1,698	1,698	1,698	1,698	1,698
	Westerly	144	144	144	144	144
	Montville (Yankee)	208	208	208	208	208
Total AGT	9,721	9,112	9,088	9,092	9,088	
LNG	Exeter	1,000	1,000	1,000	1,000	1,000
	Providence	3,958	3,958	3,958	3,958	3,958
	Old Mill Ln	225	650	650	650	650
	Scott Rd	57	406	679	750	750
	Total LNG from Storage	5,240	6,014	6,287	6,358	6,358
TOTAL	21,384	21,569	21,742	21,822	21,815	

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Division 2-2

Request:

Reference Exhibit 2, page 1, of the Long-Range Plan. Please provide the MDQ for each AGT, TGP, and LNG line item.

Response:

The contracted maximum daily quantity (MDQ) for each AGT and TGP line item is provided in Exhibit 8 of the 2023 Long-Range Plan. For example, as shown in Exhibit 2, the peak hour supply volume for the AGT Portsmouth gate station is 1,045 Dth/hr; and the corresponding daily volume for the AGT Portsmouth gate station is 22,089 Dth as shown in Exhibit 8.

The maximum vaporization capacities for the Providence and Exeter LNG facilities are provided in the table on page 21 from Section IV.C.3.a of the 2023 Long-Range Plan and replicated below for ease of review.

Location	Facility Type	Maximum Vaporization (Dth per day)	Gross Storage Capacity (Dth)
Providence	LNG	95,000	600,000
Exeter	LNG	24,000	202,000
Total	LNG	119,000	802,000

The maximum vaporization capacities for the Cumberland and Old Mill Lane portable LNG facilities are provided in the table below.

Location	Facility Type	Maximum Vaporization (Dth per hour)	Gross Storage Capacity (Dth)
Cumberland	Portable LNG	750	4,600
Old Mill Lane	Portable LNG	650	5,500
Total	Portable LNG	1,400	10,100

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Division 2-3

Request:

Reference Exhibit 2, page 1, Total TGP line item. Does this line item indicate that the Company needs a contract with TGP with a MDQ of 25,080 Dth to meet forecasted design hour requirements (1,045 Dth x 24 hours = 25,080 Dth)? If no, please identify the MDQ of the TGP contract that would be necessary to meet the design hour deficiency.

Response:

No. As shown in the response to Division 2-1, the Company's analysis indicates the need for incremental resources to meet peak hour requirements beginning in the 2026/27 gas year. Specifically, there is a peak hour resource shortfall of 18 Dth/hour in 2026/27 and 112 Dth/hour in 2027/28. The Company will evaluate the need for resources utilizing the process provided in the figure on page 17 of the Company's Gas Long-Range Resource and Requirements Plan for the Forecast Period 2023/24 to 2027/28 filed in Docket No. 22-06-NG.

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Division 2-4

Request:

Reference Exhibit 15, page 1; Exhibit 16, page 11; and Exhibit 22. Please explain why the difference between the 2023-2024 design day requirements and resources identified on Exhibit 15 and 16 is not equal to the assigned capacity reflected on Exhibit 22. If the difference is attributable to storage and LNG, please identify the amount of each storage and LNG resource to be assigned to Marketers.

Response:

Exhibit 15, page 1 shows design day requirements for sales and customer choice customers with a design day of 391 BBtu. This is the sum of the four regions Valley, Providence, Warren and Westerly. In exhibit 16 page 11 is design day is 331 BBtu.

The difference of 60 BBtu is attributed to storage and LNG. Exhibit 20 to the Long Range Plan represents the peak day transportation assets that are available to the marketers based on pool lock information in June 2023 ahead of the Long Range Plan filing. The total citygate capacity release volume is 36,782 Dth/day. The marketers would be getting assigned to them 5,755 Dth/Day in storage and 21,315 Dth/day in Peaking. The allocation between peaking, storage and transportation covers the difference in requirements.

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Division 2-5

Request:

Reference Attachment Division 1-10-1. Please identify the annual costs associated with the firm transportation capacity released under each AMA, and explain how the AMA affects the lease of firm transportation capacity to Choice Marketers. Also provide a calculation showing the total annual amount of the fee to be received under the AMA identified on page 10 of the Attachment.

Response:

In Attachment Division 1-10-1 is a confirmation provided for BP Energy 10,000 Dth/Day on the Dracut to Cranston, RI Path (A), a confirmation provided for Hartree Partners for 1,000 Dth/Day from Enbridge to the Tennessee gate of Lincoln (B) and then a confirmation with Castleton Commodities for the Enbridge and TransCanada Assets (C).

<u>Annual Demand Charges</u>						
	Pipeline	Contract	Volume (Dth)	Demand (Per Dth)	Monthly Demand	Annual Demand
(A)	Tennessee	349449	10,000	\$ 4.0474	\$ 40,474	\$ 485,688
(B)	Enbridge	M12164	1,025	\$ 3.0188	\$ 3,094	\$ 37,131
	TransCanada	42386	1,012	\$ 9.1358	\$ 9,245	\$ 110,945
	Iroquois	50001	1,012	\$ 4.8393	\$ 4,897	\$ 58,768
	Tennessee	95345	1,000	\$ 6.0905	\$ 6,091	\$ 73,086
						\$ 279,931
(C)	Enbridge	M12274	29,056	\$ 3.0188	\$ 87,714	\$ 1,052,573
	TransCanada	FT64273	29,056	\$ 15.4754	\$ 449,654	\$ 5,395,846
						\$ 6,448,419

The paths in the 10,000 Dth/Day Dracut to Cranston AMA and the 1,000 Dth/Day Enbridge to Tennessee AMA are not physically released to Customer Choice Marketers. Each month, the Enbridge to East Hereford path is released to Customer Choice Marketers. The remaining volume is then released to the AMA partner, Castleton.

Page 10 of the Attachment shows details of the Castleton Commodities AMA. The AMA fee is calculated each month as follows:

$$\text{Asset Management Fee/dekatherm} * (29,056 \text{ MDQ less volume released to customer choice marketers}) = \text{Monthly Asset Management Fee}$$

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Division 2-5, page 2

Since the volumes released to the marketers may vary each month, the total monthly AMA fee may also vary.

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Division 2-6

Request:

Reference Confidential Attachment Division 1-21-1, tab “Chart Data,” cell AD8, and Attachment Division 1-7-2, page 1, Total Peak Day City Gate MDQ of 423,328 Dth. Please explain why the two numbers are not equivalent.

Response:

The Division has clarified this request and indicated that the request was intended to reference Confidential Attachment Division 1-12-1 rather than 1-21-1.

The cited figures are not equivalent because portable liquefied natural gas volumes are included in the Design Load Duration Curves in Attachment Division 1-12-1, column AD, but are excluded from the Customer Choice Capacity Allocation chart in Attachment Division 1-7-2.

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Division 2-7

Request:

Reference Attachment Division 1-7-2, page 1. Please reconcile the Peak Day City Gate MDQs identified in the Attachment with the resources reflected on Exhibit 15, page 1.

Response:

Please see Attachment Division 2-7 for a mapping of the categories on Exhibit 15, page 1 with the Peak Day City Gate MDQs listed in Attachment Division 1-7-2, page 1.

Rhode Island Energy
Customer Choice Capacity Allocation
2023/24

Exhibit 15 Resources	Paths	Peak Day City Gate MDQ (Dth/day)	City Gate Contracts	Upstream	Percent of Portfolio
Zone 4	TGP Long Haul	29,335	TGP 1597		6.9%
Zone 4	TGP ConneXion	11,600	TGP 64025, TGP 64026		2.7%
Dawn PNGTS	Dawn via PNGTS	29,000	TGP 62930, TGP 330580	Enbridge M12274, TCPL 60659, TCPL 58577, PNGTS 210203	6.8%
AIM (Millennium), AIM (Ramapo)	AIM	18,000	AGT 510801	MPL 214129	4.3%
M2/M3	TETCO CDS Long Haul	45,934	AGT 93011E	TETCO 800303	10.8%
TCO Appalachia	TCO Appalachia	40,000	AGT 90107, AGT 90106, AGT 9001	TCO 31524, TCO 31523	9.4%
M3	AGT M3	18,099	AGT 93011E, AGT 90106, AGT 90107		4.3%
Dracut	Dracut	20,000	TGP 349449		4.7%
M2/M3	TETCO SCT Long Haul	2,099	AGT 93001ESC	TETCO 800156	0.5%
Niagara	Niagara	1,067	TGP 39173		0.3%
Dawn Iroquois	Dawn via Waddington	1,000	TGP 95345	Enbridge M12164, TCPL 42386, IGTS 50001	0.2%
Transco Leidy	Transco	1,240	AGT 90106, AGT 96004SC	Transco 9081767	0.3%
EGTS South Point	EGTS	537	AGT 96004SC		0.1%
		217,911			51.5%
TGP Storage, TET/AGT Storage	Storage	37,357	TGP 10807, AGT 9W009E, AGT 9B105, AGT 933005, AGT 90106, AGT 9B105, AGT 9S100S		8.8%
		37,357			8.8%
LNG from Storage, Liquid for Portables and Refill, Dracut, TGP Citygate, AGT Citygate, Beverly	Peaking	168,100	TGP 330580; NGLNG; Exeter; DOMAC; Beverly		39.7%
		168,100			39.7%
	TOTAL	423,368			100.0%

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Division 2-8

Request:

Reference Attachment Division 1-7-3, page 1. Please identify the Company's weighted average cost of demand for firm transportation capacity, storage capacity, and peaking resources listed in the Attachment (each separately), and the WACOD for the firm transportation capacity, storage capacity, and peaking resources to be released/allocated to Choice Marketers (each separately).

Response:

Referencing Attachment Division 1-7-3, page 1, the Company has provided the Company's weighted average cost of demand ("WACOD") for firm transportation capacity, storage capacity, and peaking resources and the WACOD for the firm transportation capacity, storage capacity, and peaking resources released/allocated to Choice Marketers in Attachment Division 2-8.

Marketers are released the same transportation assets as the Company, with the exception of LDC Managed, Storage and Peaking assets. The matrix as illustrated on Attachment Division 1-7-3, is not a complete picture of the Company's assets or portfolio. The matrix was intended to provide a summary of the transportation paths, managed paths, and the storage assets. The Company is working to expand the information provided for the next iteration of the matrix to be shared with Marketers. The matrix is unable to be all encompassing because of the confidential nature of the Company's peaking assets. As part of the Gas Cost Recovery filing, the FT-2 rate design takes into account the storage, storage transportation, and peaking assets and creates the annual FT-2 demand charge.

Capacity Allocations

Resource Type	High Load Factor	Low Load Factor
Pipeline	TBD	TBD
Storage	TBD	TBD
Peaking	TBD	TBD
TOTAL:	0.00%	0.00%

Proposed Capacity Resources effective November 1, 2023:

Resource	Pipeline Company	Rate Schedule	Contract #	Peak MDQ/ MDWQ	Storage MSQ	Rate \$/Dth/Month Demand	Storage Capacity	Cost Per Month	Termination Date	LDC Managed	Company's Weighted Average Cost of Demand		Marketer's Weighted Average Cost of Demand	
											Annual \$	Annual City Gate Volume (Dth)	Annual \$	Annual City Gate Volume (Dth)
Pipeline	TGP	FT-A	1597	29,335		\$18.2042		\$534,020	10/31/2024		\$6,408,242	10,707,275	\$6,408,242	10,707,275
	TGP	FT-A	64026	11,600		\$22.7822		\$264,274	10/31/2027		\$3,171,282	4,234,000	\$3,171,282	4,234,000
	Enbridge	M12	M12274	29,056		\$2.9173		\$84,766	10/31/2040		\$1,017,198		\$1,017,198	
	TransCanada	FT	64273	29,056		\$16.2415		\$471,914	10/31/2040		\$5,662,963		\$5,662,963	
	PNGTS	FT	233317	29,000		\$22.7943		\$661,033	10/31/2040		\$7,932,399		\$7,932,399	
	TGP	FT-A	62930	29,000		\$4.0474		\$117,375	8/31/2027		\$1,408,495	10,585,000	\$1,408,495	10,585,000
	MPL	FT-1	210165	9,000		\$19.7678		\$177,910	3/31/2034		\$2,134,922		\$2,134,922	
	AGT	AFT1AIM	510801	18,000		\$41.7862		\$752,152	1/6/2032		\$9,025,819	6,570,000	\$9,025,819	6,570,000
	Tetco	CDS	800303	45,934		\$16.9000		\$776,285	10/31/2024		\$9,315,415		\$9,315,415	
	AGT	AFT-E1	93011E	45,934		\$8.5927		\$394,697	10/31/2024		\$4,736,365		\$4,736,365	
	AGT	AFTCLMS	510985	45,934		\$2.7375		\$125,744	7/16/2032		\$1,508,932	16,765,910	\$1,508,932	16,765,910
	TCO	FTS	31524	40,000		\$10.2800		\$411,200	10/31/2025		\$4,934,400		\$4,934,400	
	AGT	AFT-14	90106	40,000		\$8.5927		\$343,708	10/31/2024		\$4,124,496		\$4,124,496	
	AGT	AFTCLMS	510985	40,000		\$2.7375		\$109,500	7/16/2032		\$1,314,000	14,600,000	\$1,314,000	14,600,000
	AGT	AFT-E1	93011E	10,650		\$8.5927		\$91,512	10/31/2024		\$1,098,147	3,887,250	\$1,098,147	3,887,250
	AGT	AFT-1W	90107	7,450		\$8.5927		\$64,016	10/31/2024		\$768,187	2,719,250	\$768,187	2,719,250
	AGT	AFTCLMS	510985	18,099		\$2.7375		\$49,546	7/16/2032		\$594,552	6,606,135	\$594,552	6,606,135
	TGP	FT-A	62930	20,000		\$4.0474		\$80,948	8/31/2027		\$971,376	7,300,000	\$971,376	7,300,000
	Tetco	SCT	800156	2,099		\$6.7870		\$14,246	10/31/2024		\$170,951		\$170,951	
	AGT	AFT-ES1	93001ESC	2,099		\$3.4371		\$7,214	10/31/2024		\$86,574		\$86,574	
	AGT	AFTCLMS	510985	2,099		\$2.7375		\$5,746	7/16/2032		\$68,952	766,135	\$68,952	766,135
										Totals			\$66,453,668	84,740,955
													Transportation WACOD \$	0.7842
	TGP	FT-A	39173	1,067		\$6.0905		\$6,499	10/31/2024	x	\$77,983	389,455	\$77,983	389,455
	Enbridge	M12	M12164	1,025		\$2.9173		\$2,990	10/31/2025	x	\$35,883		\$35,883	
	TCPL	FT-A	42386	1,012		\$9.7326		\$9,849	10/31/2026	x	\$118,193		\$118,193	
	Iroquois	RTS-1	50001	1,012		\$4.8393		\$4,897	11/1/2027	x	\$58,768		\$58,768	
	TGP	FT-A	95345	1,000		\$6.0905		\$6,091	10/31/2027	x	\$73,086	365,000	\$73,086	365,000
	Transco	FT	9081767	1,240		\$3.8979		\$4,833	3/31/2025	x	\$58,001		\$58,001	
	AGT	AFT	96004SC	1,695		\$3.4371		\$5,826	10/31/2024	x	\$69,911	618,675	\$69,911	618,675
	EGTS	FTNN	100118	537		\$5.9674		\$3,204	3/31/2027	x	\$38,454		\$38,454	
	Tetco	FTS	330845	537		\$6.3050		\$3,386	10/31/2024	x	\$40,629		\$40,629	
	AGT	AFT	96004SC	1,695		\$3.4371		\$5,826	10/31/2024	x	\$69,911	618,675	\$69,911	618,675
										Totals	\$67,094,487	86,732,760		
													Transportation WACOD \$	0.7736
Storage	Columbia	FSS	9630	2,545	203,957	\$2.8230	\$0.0513	\$17,648	4/1/2040	x	\$211,770	928,925	\$211,770	928,925
	EGTS	GSS	300168	1,401	154,050	\$2.6784	\$0.0258	\$7,727	3/31/2025	x	\$92,723	511,365	\$92,723	511,365
	EGTS	GSS	300169	2,061	206,100	\$2.6784	\$0.0258	\$10,838	3/31/2027	x	\$130,051	752,265	\$130,051	752,265
	EGTS	GSS	300170	5,324	490,340	\$2.6784	\$0.0258	\$26,911	3/31/2025	x	\$322,927	1,943,260	\$322,927	1,943,260
	EGTS	GSS	300171	2,617	188,814	\$2.6784	\$0.0258	\$11,881	3/31/2027	x	\$142,569	955,205	\$142,569	955,205
	EGTS	GSS-TE	600045	14,337	1,376,324	\$2.6784	\$0.0258	\$73,909	3/31/2027	x	\$886,913	5,233,005	\$886,913	5,233,005
	TGP	FSMA	501	10,920	605,343	\$1.2655	\$0.0173	\$24,292	10/31/2025	x	\$291,500	3,985,800	\$291,500	3,985,800
	TGP	FSMA	62918	10,249	210,000	\$1.2655	\$0.0173	\$16,603	10/31/2025	x	\$199,237	3,740,885	\$199,237	3,740,885
	Texas Eastern	SS-1	400185	665	51,990	\$7.5710	\$0.3469	\$23,070	4/30/2025	x	\$276,841	242,725	\$276,841	242,725
	Texas Eastern	SS-1	400221	14,137	1,188,033	\$7.5710	\$0.3469	\$519,160	4/30/2025	x	\$6,229,918	5,160,005	\$6,229,918	5,160,005
	Texas Eastern	FSS-1	400515	944	56,640	\$2.0800	\$0.3469	\$21,612	4/30/2025	x	\$259,343	344,560	\$259,343	344,560
Peaking	NGLNG	FST-LG	LNG003	95,000	600,000		\$0.4842	\$290,520	10/31/2024	x	\$3,486,240	34,675,000	\$3,486,240	34,675,000
	AGT	AFT-1H	511194	5,000		\$9.4048		\$47,024	10/31/2025	x	\$564,288	1,825,000	\$564,288	1,825,000
	TGP	FT-A	330580	30,000		\$4.0474		\$123,422	10/31/2038	x	\$1,457,064	10,950,000	\$1,457,064	10,950,000
										Totals	\$14,551,385	71,248,000	\$15,192,204	73,238,805
											Storage/Peaking WACOD \$	0.2042	Storage/Peaking WACOD \$	0.2074

Note: All capacity will be released at maximum tariff rates unless a discount has been negotiated. Above rates are maximum tariff rates effective 6/1/2023. Discounted/Negotiated rates are bolded. Because rates can change, please refer to the applicable pipeline tariff for current rates.

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Division 2-9

Request:

Reference the response to Division 1-8. Please explain how the demand and commodity costs associated with each contract discussed in the response will be allocated/assigned to Choice Marketers. If demand and commodity costs will not be allocated/assigned to Choice Marketers, explain why this is reasonable. Also explain if Choice Marketers will be required to purchase and pay for commodity supplies under the second contract identified in the first paragraph of the response.

Response:

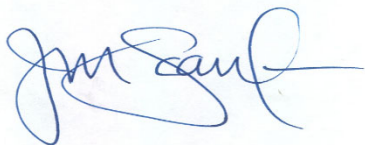
Referencing the Company's response to Division 1-8, the contracts referenced are allocated and/or assigned to Marketers in the Company's Customer Choice program as discussed below:

- The GazMetro summer refill contract is reflected in the LNG weighted average commodity cost of gas ("LNG WACOG"), which is charged to Marketers when they call upon peaking service;
- The total cost of the Repsol contracts is allocated entirely to the Distribution Adjustment Charge ("DAC") through the System Pressure factor and is charged to customers, not Marketers;
- The Constellation contract (demand cost) is allocated entirely to the DAC through the System Pressure factor and is charged to customers, not Marketers. The commodity costs are collected through the Gas Cost Recovery ("GCR") factor. At the end of the winter season, if volumes have been called upon to meet peak hour requirements, they would be reallocated from the GCR to the DAC and charged to customers, not Marketers; and
- Both the National Grid LNG LLC Liquefaction and the Northeast Energy Center Liquefaction contract demand charges are allocated to Marketers through the FT-2 Demand Rate. The variable costs incurred are included in the calculation of the LNG WACOG, which is charged to Marketers when they call upon peaking service.

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was 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.



Joanne M. Scanlon

September 14, 2023
Date

**Docket No. 22-06--NG – The Narragansett Electric Co. d/b/a Rhode Island Energy – Gas Long-Range Resource and Requirements Plan
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