

September 21, 2023

VIA ELECTRONIC MAIL AND HAND DELIVERY

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

Dear Ms. Massaro:

**Re: Docket No. 23-23-NG - Rhode Island Energy Gas Cost Recovery Filing
Responses to Division Data Request – Set 5 (Full Set)**

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”), I have enclosed the Company’s responses the Fifth Set of Data Requests (Full Set) issued by the Division of Public Utilities and Carriers in the above-referenced docket. Please note that Attachment DIV 5-16 is provided in Excel format.

The Company’s responses to Division Data Requests 5-12 and 5-20 and Attachments DIV 5-2 and 5-21 contain gas pricing and other commercially sensitive confidential information. Therefore, the Company has provided redacted and confidential versions of these materials and has requested confidential treatment pursuant to R.I. Gen. Laws § 38-2-2(4)(B) and Rule 810-RICR-00-00-1.3(H) of the PUC’s Rules of Practice and Procedure. The Company has also provided confidential versions of the responses and attachments to the Division pursuant to a non-disclosure agreement.

Robinson+Cole

September 21, 2023

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Please contact me if you have any questions. Thank you for your attention to this matter.

Very truly yours,



Steven J. Boyajian

cc: Docket 23-23-NG Service List
Leo Wold, Esq.
John Bell, Division
Al Mancini, Division

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

September 21, 2023

Date

**Docket No. 23-23-NG – Narragansett Electric Co. d/b/a Rhode Island Energy 2023 Gas
Cost Recovery Filing (GCR)
2023 Distribution Adjustment Clause (DAC)
Service List as of 8/15/2023**

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**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

THE NARRAGANSETT ELECTRIC)
COMPANY d/b/a RHODE ISLAND ENERGY) DOCKET NO. 23-23-NG
2023 DISTRIBUTION ADJUSTMENT CHARGE AND)
2023 GAS COST RECOVERY FILING)

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

The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”) hereby respectfully requests that the Public Utilities Commission (the “Commission”) grant protection from public disclosure for certain confidential responses to the Rhode Island Division and Public Utilities and Carriers’ (the “Division”) Fifth Set of Data Requests. Specifically, the Company seeks protective treatment for its responses to Division Data Requests 5-12 and 5-20 and Attachments DIV 5-2 and DIV 5-21 (the “Confidential Materials”). 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 seeks protective treatment for the Confidential Materials because they contain commercially sensitive contract terms and pricing information that the Company negotiates with counterparties. The disclosure of this information would be detrimental to the commercial interests of the Company or the commercial interests of the Company’s counterparties.

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 Materials included within the Company’s responses to the Division’s Fifth Set of Data Requests include commercially sensitive pricing information and other commercial terms that the Company maintains as confidential for a number of reasons. First, if the Company were to disclose the prices or other terms that it has agreed to with contract counterparties, then the Company’s ability to negotiate more advantageous terms in the future would be hampered since market participants would be informed of what the Company has been willing to agree to in the past. Similarly, if the Company were to publicly disclose advantageous pricing or commercial terms that it had obtained through negotiation, counterparties would hesitate to offer the Company advantageous terms in the future since disclosure of those terms would hamper counterparties’ ability to negotiate with other customers. For these reasons, the Confidential Materials are 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.

III. CONCLUSION

For the foregoing reasons, the Company respectfully requests that the Commission grant this motion for protective treatment of the Confidential Materials contained in the Company’s responses to Division Data Requests 5-12 and 5-20 and in Attachments DIV 5-5 and 5-21.

[SIGNATURE ON NEXT PAGE]

Respectfully submitted,

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

By its attorneys,



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Dated: September 21, 2023

CERTIFICATE OF SERVICE

I hereby certify that on September 21, 2023, I delivered a true copy of the foregoing Motion via electronic mail to the parties on the Service List for Docket No. 23-23-NG.



Heidi J. Seddon

Division 5-1

Request:

Reference the Gas Supply Panel Testimony, page 12, lines 1–4. Please identify the MDQ of the capacity the Company will maintain to meet peak hour requirements. Provide supporting calculations.

Response:

The MDQ of the capacity to meet peak hour requirements for 2023/24 totals 65,100 Dth/day.

The Company's peak hour requirement is calculated as a percentage of its peak day need. In addition to the Company's portfolio being used to serve peak day requirements, the Company has allocated capacity of 35,000 Dth/day on Tennessee from Dracut to the Company's citygates, 5,000 Dth/day on Algonquin from Beverly to the Company's citygates, and portable storage and vaporization at both Old Mill Lane and Cumberland. These are collectively summarized below as peaking assets.

The peaking assets within the Company's portfolio are as follows:

Dracut Capacity:	35,000
Beverly Capacity:	5,000
Algonquin Citygate Supply:	14,100
Old Mill Lane Portable LNG:	6,500
Cumberland Portable LNG:	4,500
Peak Hour Assets (Dth/Day):	<u>65,100</u>

Division 5-2

Request:

Reference the Gas Supply Panel testimony, page 15, lines 9-16.

- a. Please identify the costs associated with items 1–5 by component. Include supporting calculations;
- b. Please identify the MDQ for items 1, 3, and 4;
- c. Please provide a copy of the contracts for items 1 and 4, and the transaction confirmation/Exhibit A for item 3. If already provided, please identify the source document and the name of the counter-party for items 1 and 4;
- d. Please provide a detailed explanation as to how the Company determined that these five resources would be used to meet design hour demands; and
- e. Please provide the transportation confirmation/Exhibit A for the gas supply contracts that will be used to supply the capacity for items 2 and 5. Explain whether the demand charges associated with these supply contracts will be recovered through the system pressure factor. If there are no contracts, explain how the capacity will be supplied.

Response:

- a. Please see Confidential Attachment Division 5-2, which breaks down the costs attributed to items 1-5. See, also, page 11 of 17 and page 12 of 17 of Attachment GSP-1 to the Joint Pre-Filed Direct Testimony of the Gas Supply Panel in this docket.

The Winter Liquid refill deal is a known demand charge, as it relates to the UGI Energy Services deal, as well as the AGT Citygate, Beverly Supply and Dracut Supply deals. Under the hourly peaking fixed costs, the Portable LNG costs are the costs attributed to the Old Mill Lane operations.

The Beverly and Dracut transportation fixed costs reflect the total demand charges for the use of those contracts in the portfolio based on current pipeline rates.

- b. The maximum vaporization capacities for the portable LNG facilities (item 1) are provided in the table below.

Division 5-2, page 2

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

The Algonquin Citygate deal with Constellation LNG (item 3) is for a maximum daily quantity (“MDQ”) of 14,100 Dth/day and total annual contract quantity of 507,600 Dth.

The UGI Energy Services deal (item 4) is for a total supply of 120,000 Dth.

- c. Copies of the contracts and/or transaction confirmations for items 1, 3, and 4 were provided in the Company’s response to Division 4-12 in this docket. The table below identifies the counterparties associated with items 1 and 4.

Entity	Service Type
UGI Energy Services	LNG refill
Prometheus/Stabilis	Portable LNG rental and support services

- d. In Docket Nos. 5040 and 5066, in consultation with the Division of Public Utilities and Carriers (“Division”), it was recommended the Company recover the fixed costs associated with certain incremental peak hour resources¹ through the System Pressure Factor component of the Distribution Adjustment Clause (“DAC”) because all customers benefit from the contracts associated with meeting peak hour demand.² At that time (i.e., in the Company’s 2020 GCR filing), the incremental peak hour resources included: (1) portable LNG storage and vaporization equipment at Old Mill Lane and Cumberland; (2)

¹ In Docket No. 4963, the Company discussed the need for incremental resources to meet peak hour requirements as a result of the hourly flow restrictions imposed by TGP and AGT. See Joint Pre-filed Direct Testimony of Elizabeth D. Arangio and Samara A. Jaffe, 2019 Gas Cost Recovery (“GCR”) Filing, Docket No. 4963, September 3, 2019.

² In a memorandum filed on September 23, 2020, by its consultants, the Division noted: “It has been established that maintaining proper operating pressure in the Company’s distribution system is required to provide adequate service to customers,” and the “peak hour deficiency that would exist without the incremental resources cannot be attributed to a single type of customer.” See Memorandum from the Consultant to the Division to the Rhode Island Public Utilities Commission, “Review of National Grid’s 2020 DAC Filing, Docket No. 5040,” September 23, 2020, at 3-4. See, also, Direct Testimony of Jerome D. Mierzwa on behalf of the Division, 2020 GCR Filing, Docket No. 5066, October 7, 2020, at 9-12.

Division 5-2, page 3

winter liquid volumes (LNG); (3) incremental Tennessee capacity from Dracut, Massachusetts to Cranston, Rhode Island (20,000 Dth/day); and (4) a portion of two Tennessee capacity contracts from Everett, Massachusetts and associated gas supply (with a combined volume of 25,000 Dth/day).³

Since then, the Company has used a consistent process to identify the various contracts needed to support peak hour demand that is in excess of peak day demand. In the Company's 2021 GCR filing, the assets allocated to the peak hour included: (1) portable LNG; (2) a portion of the Tennessee contract from Everett, Massachusetts; (3) a citygate delivered arrangement on Algonquin; and (4) LNG refill and trucking. In the Company's 2022 GCR filing, the assets allocated to the peak hour included: (1) portable LNG; (2) Tennessee contracts with receipts within the pipeline's Zone 6 market area; (3) a citygate delivered arrangement on Algonquin; (4) LNG refill and trucking; and (5) an Algonquin contract from Beverly, Massachusetts. Finally, in this 2023 GCR filing, the assets allocated to the peak hour included: (1) portable LNG; (2) the Tennessee contracts with a receipt point of Dracut, Massachusetts; (3) a citygate delivered arrangement on Algonquin; (4) LNG refill and trucking; and (5) an Algonquin contract from Beverly, Massachusetts.

- e. The gas supply contracts that will be used to supply the capacity for items 2 and 5 were provided as Attachment GSP-7.2, Attachment GSP-7.3, and Attachment GSP-7.4 to the Joint Pre-Filed Direct Testimony of the Gas Supply Panel in this docket. The demand charges associated with the gas supply contracts that will be used to supply the capacity for items 2 and 5 are recovered through the System Pressure Factor component of the DAC.

The accompanying Attachment Division 5-2 contains confidential and commercially sensitive pricing information; therefore, the Company is providing a redacted version of Attachment Division 5-2, as well as an unredacted confidential version subject to a Motion for Protective Treatment.

³ See Docket No. 4963, Response to Division 1-5. See, also, Direct Testimony of Jerome D. Mierzwa on behalf of the Division, 2020 GCR Filing, Docket No. 5066, October 7, 2020, at 9-12.

Division 5-3

Request:

For the most recent three year period available, please provide monthly high load factor and monthly low load factor sales by class.

Response:

Please see Attachment DIV 5-3.

The Narragansett Electric Company
d/b/a Rhode Island Energy
Gas Cost Recovery (GCR) Filing
High Load and Low Load Sales for past 36-Months (Therms)

Rate Class	Category	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Total
(1) Residential Non-Heating	High Load Factor	133,505	161,788	255,406	344,181	527,689	529,930	473,137	361,593	245,764	189,320	133,046	126,340	3,481,699
(2) Residential Heating	Low Load Factor	3,786,580	5,334,996	11,917,214	20,815,000	33,567,340	36,913,527	30,419,049	19,826,733	11,475,824	6,331,864	4,087,104	4,081,609	188,556,840
(3) Small C&I	Low Load Factor	387,440	547,580	1,309,878	2,544,058	4,471,993	5,121,308	4,229,475	2,440,670	1,257,709	620,029	368,285	665,087	23,963,512
(4) Medium C&I	Low Load Factor	1,273,323	1,930,379	3,725,656	5,936,069	8,913,844	9,755,349	8,238,074	5,781,374	3,501,076	2,061,971	1,449,083	1,661,715	54,227,913
(5) Large Low Load Factor	Low Load Factor	381,630	689,282	1,985,373	3,204,631	5,320,779	5,815,270	4,775,911	3,086,919	1,748,032	447,828	46,894	558,827	28,061,376
(6) Large High Load Factor	High Load Factor	606,824	750,485	877,757	1,159,384	1,545,022	1,469,199	1,386,387	1,103,632	873,511	867,446	663,481	897,005	12,200,133
(7) Extra Large Low Load Factor	Low Load Factor	248,437	484,491	1,201,316	1,622,505	2,437,218	2,327,560	1,637,020	1,316,203	564,808	(34,183)	6,129	224,214	12,035,718
(8) Extra Large High Load Factor	High Load Factor	4,825,103	4,226,812	4,399,585	5,836,622	6,380,743	6,178,140	4,645,992	5,890,673	4,108,922	4,368,433	4,644,431	4,453,800	59,959,256
(9) Total		11,642,842	14,125,813	25,672,185	41,462,450	63,164,628	68,110,283	55,805,045	39,807,797	23,775,646	14,852,708	11,398,453	12,668,597	382,486,447
(10) Low Load Factor		6,077,410	8,986,728	20,139,437	34,122,263	54,711,174	59,933,014	49,299,529	32,451,899	18,547,449	9,427,509	5,957,495	7,191,452	306,845,359
(11) High Load Factor		5,565,432	5,139,085	5,532,748	7,340,187	8,453,454	8,177,269	6,505,516	7,355,898	5,228,197	5,440,958	5,477,145	5,477,145	75,641,088
Rate Class	Category	Sep-21	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Total
(12) Residential Non-Heating	High Load Factor	116,520	140,225	184,951	302,922	377,034	462,446	375,816	328,408	234,113	139,253	135,998	111,138	2,908,824
(13) Residential Heating	Low Load Factor	3,776,639	4,489,530	9,774,246	23,086,275	30,597,961	38,197,597	28,994,848	21,153,636	12,190,714	5,333,732	4,344,332	3,588,201	185,527,711
(14) Small C&I	Low Load Factor	231,087	438,436	1,025,249	2,803,093	4,121,641	5,411,826	4,063,599	2,513,266	1,357,313	575,089	465,085	399,538	23,405,222
(15) Medium C&I	Low Load Factor	1,263,708	1,857,961	2,892,862	6,654,623	8,134,881	10,096,376	7,770,938	5,668,039	3,887,868	2,031,549	1,590,041	1,598,334	53,447,180
(16) Large Low Load Factor	Low Load Factor	427,021	195,020	1,567,202	4,299,701	4,748,067	6,222,730	4,377,292	3,281,261	1,723,860	469,892	441,523	372,436	28,126,005
(17) Large High Load Factor	High Load Factor	603,939	743,649	743,141	1,338,747	1,244,715	1,611,841	1,256,126	958,148	861,203	723,254	667,303	619,759	11,371,825
(18) Extra Large Low Load Factor	Low Load Factor	205,965	302,295	775,034	2,049,654	1,913,113	2,644,713	1,842,043	1,142,794	582,090	22,384	(23,299)	188,510	11,645,296
(19) Extra Large High Load Factor	High Load Factor	4,856,375	4,374,896	5,183,503	5,905,855	6,344,809	6,622,512	5,176,215	5,621,971	4,286,359	4,522,323	4,574,772	4,555,837	62,025,427
(20) Total		11,481,254	12,542,012	22,146,188	46,440,870	57,482,221	71,270,041	53,856,877	40,667,523	25,123,520	13,817,476	12,195,755	11,433,753	378,457,490
(21) Low Load Factor		5,904,420	7,283,242	16,034,593	38,893,346	49,515,663	62,573,242	47,048,720	33,758,996	19,741,845	8,432,646	6,817,682	6,147,019	302,151,414
(22) High Load Factor		5,576,834	5,258,770	6,111,595	7,547,524	7,966,558	8,696,799	6,808,157	6,908,527	5,381,675	5,384,830	5,378,073	5,286,734	76,306,076
Rate Class	Category	Sep-22	Oct-22	Nov-22	Dec-22	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Total
(23) Residential Non-Heating	High Load Factor	118,049	138,215	187,104	273,197	402,801	358,220	362,202	296,020	199,284	161,424	132,276	114,608	2,743,400
(24) Residential Heating	Low Load Factor	3,922,314	5,359,942	10,559,805	20,543,354	32,105,153	27,650,087	27,122,918	19,998,066	9,915,390	6,085,750	4,554,957	3,659,711	171,477,447
(25) Small C&I	Low Load Factor	367,496	533,888	1,095,571	2,520,515	4,279,709	3,793,053	3,621,578	2,587,114	1,166,882	507,634	542,423	329,992	21,345,855
(26) Medium C&I	Low Load Factor	1,566,927	2,129,995	3,718,393	5,850,854	8,543,399	7,641,894	7,520,117	6,084,096	2,803,146	1,929,063	1,689,886	1,658,191	51,135,961
(27) Large Low Load Factor	Low Load Factor	396,808	430,459	2,077,834	2,887,993	4,949,927	4,449,328	4,014,048	3,379,694	1,290,850	581,755	219,535	451,161	25,129,392
(28) Large High Load Factor	High Load Factor	663,301	829,097	1,257,585	1,309,319	1,539,690	1,293,074	725,431	1,201,441	775,841	704,224	752,279	663,842	11,715,124
(29) Extra Large Low Load Factor	Low Load Factor	201,515	360,446	1,012,557	1,616,731	1,964,956	2,195,809	1,832,943	1,507,392	341,875	154,924	2,841	198,259	11,390,248
(30) Extra Large High Load Factor	High Load Factor	4,454,863	3,534,425	5,414,134	6,494,794	6,355,388	5,933,796	4,894,536	6,251,153	3,582,029	4,498,627	4,146,455	4,245,917	59,806,117
(31) Total		11,691,273	13,316,467	25,322,983	41,496,757	60,141,023	53,315,261	50,093,773	41,304,976	20,075,297	14,623,401	12,040,652	11,321,681	354,743,544
(32) Low Load Factor		6,455,060	8,814,730	18,464,160	33,419,447	51,843,144	45,730,171	44,111,604	33,556,362	15,518,143	9,259,126	7,009,642	6,297,314	280,478,903
(33) High Load Factor		5,236,213	4,501,737	6,858,823	8,077,310	8,297,879	7,585,090	5,982,169	7,748,614	4,557,154	5,364,275	5,031,010	5,024,367	74,264,641

Source: Internal Company Records (Classified Sales Report)

Division 5-4

Request:

Reference Exhibit 16, page 1, of the Gas Long-Range Resource and Requirements Plan for the Forecast Period 2023/24 to 2027/28 ("Long-Range Plan"). Please explain whether the Company incorporates any type of reserve margin or forecast error adjustment into its firm sendout projections.

Response:

From the gas supply planning side, the Company does not incorporate any type of reserve margin into the forecast for design day. From the forecasting side, the Company assesses prior forecast errors as part of the creating of the firm sendout projections and may adjust projections as a result, but there are no reserve margin adjustments.

Division 5-5

Request:

Reference the response to Division 1-6 in the Long-Range Plan proceeding and the Gas Supply Panel testimony on page 15, lines 9-16. Please explain whether the incremental 5,000 Dth/day referenced in Division 1-6 is included as a design hour resource. Also identify where the 5,000 Dth/day step-up is reflected in Attachment GSP-1 of the GCR filing.

Response:

Yes, the incremental 5,000 Dth/day referenced in the Company's response to Division 1-6 is included as a design hour resource. This 5,000 Dth/day step-up is reflected in Attachment GSP-1 of the Gas Cost Recovery filing dated September 1, 2023 in the Trans Fixed Detail schedule, under the Dracut line. This capacity can also be seen on Attachment GSP-1 in the Hrly Peaking Fixed Costs schedule, under the Dracut Line item because this capacity is attributed to peak hour costs.

Division 5-6

Request:

Reference the response to Division 1-7(b) in the Long-Range Plan proceeding. Please explain how Marketers are allowed to call upon the four managed paths.

Response:

Marketers are allowed to call on the four managed paths as part of their storage nomination. The Maximum Daily Quantity of the Managed paths are allocated to the marketers as part of their storage allocation.

Division 5-7

Request:

Please explain in detail why the system pressure factor/design hour costs to be reflected in the DAC for the period November 2023 – October 2024 are significantly lower than the system pressure factor/design hour costs reflected in the DAC for the period November 2022 – October 2023.

Response:

The system pressure factor/design hour costs to be reflected in the DAC for the period November 2023 through October 2024 are significantly lower than the system pressure factor/design hour costs reflected in the DAC for the period November 2022 through October 2023 primarily because of the cost of imported LNG supplies. Last year, when the Company issued its RFPs, world events, specifically the war in Ukraine greatly impacted the global LNG prices. The cost of LNG supplies is significantly lower this year. Please see the table below for the TTF Index for the period August 2022 through March 2023 compared to the period August 2023 through March 2024 (*October 2023 through March 2024 indices are as of September 5, 2023*).

8/1/2022	\$50.69	8/1/2023	\$9.66
9/1/2022	\$69.36	9/1/2023	\$11.10
10/1/2022	\$59.81	10/1/2023	\$10.67
11/1/2022	\$39.91	11/1/2023	\$14.00
12/1/2022	\$35.38	12/1/2023	\$15.86
1/1/2023	\$36.98	1/1/2024	\$16.52
2/1/2023	\$20.42	2/1/2024	\$16.67
3/1/2023	\$16.71	3/1/2024	\$16.53

Division 5-8

Request:

Reference the response to Division 1-2. Please update Exhibit 15 as applicable.

Response:

Please see Attachment DIV 5-8.

Rhode Island Energy
Comparison of Resources and Requirements
Design Year (Sales and Customer Choice)
(BBtu)

Design Day 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>						
Firm Sendout	Valley	64	65	65	66	66
	Providence	310	313	316	318	319
	Warren	11	12	12	12	12
	Westerly	6	6	6	7	7
Fuel Reimbursement		4	4	4	4	4
Underground Storage Refill		0	0	0	0	0
LNG Refill		0	0	0	0	0
TOTAL		396	400	403	405	407
<u>RESOURCES</u>						
TGP	Dawn PNGTS	29	29	29	29	29
	Dawn Iroquois	1	1	1	1	1
	Niagara	1	1	1	1	1
	Zone 4	41	41	41	41	41
	Dracut	28	50	50	50	50
	TGP Citygate	0	0	0	0	0
	Storage	11	11	11	11	11
TET/AGT	M2	49	49	49	49	49
	EGTS South Point	1	1	1	1	1
	TCO Appalachia	41	41	41	41	41
	Transco Leidy	1	1	1	1	1
	AIM (Ramapo)	8	8	0	0	0
	AIM (Millennium)	9	9	18	18	18
	M3	17	17	16	17	17
	AGT Citygate	2	0	0	0	0
	Beverly	5	0	0	0	0
	Storage	29	29	29	29	29
Liquid for Portables and Refill		4	0	0	0	0
LNG From Storage		119	110	113	115	117
Unserved	Valley	0	0	0	0	0
	Providence	0	0	0	0	0
	Warren	0	2	2	2	2
	Westerly	0	0	0	0	0
		0	2	2	2	2
TOTAL		396	400	403	405	407

Rhode Island Energy
Comparison of Resources and Requirements
Design Year (Sales and Customer Choice)
(BBtu)

Design Heating Season (Nov-Mar) 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>						
Firm Sendout	Valley	4,989	4,992	5,035	5,060	5,124
	Providence	24,191	24,208	24,414	24,534	24,845
	Warren	895	896	903	908	919
	Westerly	496	496	500	503	509
Fuel Reimbursement		457	454	444	487	496
Underground Storage Refill		0	0	0	0	0
LNG Refill		127	0	0	0	0
TOTAL		31,155	31,046	31,297	31,491	31,894
<u>RESOURCES</u>						
TGP	Dawn PNGTS	2,517	2,482	2,367	2,368	2,598
	Dawn Iroquois	74	74	73	73	78
	Niagara	114	134	113	88	91
	Zone 4	5,893	5,226	5,013	5,125	5,391
	Dracut	908	1,492	1,561	1,597	1,657
	TGP Citygate	0	0	0	0	0
	Storage	1,109	1,332	1,332	1,334	1,334
TET/AGT	M2	7,185	5,743	4,349	5,788	5,880
	EGTS South Point	83	82	82	82	83
	TCO Appalachia	5,759	4,568	3,652	4,905	4,934
	Transco Leidy	130	111	96	99	124
	AIM (Ramapo)	375	391	0	0	0
	AIM (Millennium)	1,377	1,368	2,466	2,468	2,485
	M3	1,850	4,604	6,662	3,983	3,571
	AGT Citygate	351	0	0	0	0
	Beverly	100	0	0	0	0
	Storage	2,329	2,555	2,583	2,593	2,637
Liquid for Portables and Refill		120	0	0	0	0
LNG From Storage		880	753	753	753	753
Unserviced	Valley	0	0	0	0	0
	Providence	0	128	190	231	273
	Warren	0	3	4	4	4
	Westerly	0	0	0	0	0
		0	131	194	235	277
TOTAL		31,155	31,046	31,297	31,491	31,894

Rhode Island Energy
Comparison of Resources and Requirements
Design Year (Sales and Customer Choice)
(BBtu)

Design Non-Heating Season (Apr-Oct) 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>						
Firm Sendout	Valley	1,848	1,863	1,872	1,879	1,886
	Providence	8,959	9,032	9,075	9,109	9,146
	Warren	332	334	336	337	338
	Westerly	184	185	186	187	187
Fuel Reimbursement		354	338	346	384	391
Underground Storage Refill		3,525	3,935	3,918	3,929	4,116
LNG Refill		887	887	887	887	887
TOTAL		16,088	16,575	16,619	16,713	16,952
<u>RESOURCES</u>						
TGP	Dawn PNGTS	25	270	0	0	0
	Dawn Iroquois	0	27	1	1	1
	Niagara	165	98	66	1	1
	Zone 4	3,118	3,547	3,827	3,911	3,922
	Dracut	0	0	26	27	28
	TGP Citygate	0	0	0	0	0
	Storage	0	0	0	0	0
TET/AGT	M2	7,217	6,254	4,750	6,168	6,291
	EGTS South Point	85	67	60	107	107
	TCO Appalachia	203	203	203	203	203
	Transco Leidy	12	33	23	26	28
	AIM (Ramapo)	42	87	88	0	0
	AIM (Millennium)	1,939	1,115	2,254	3,419	3,352
	M3	3,059	4,692	5,184	2,713	2,742
	AGT Citygate	0	0	0	0	0
	Beverly	0	0	0	0	0
	Storage	87	49	3	3	145
Liquid for Portables and Refill		0	0	0	0	0
LNG From Storage		134	134	134	134	134
Unserved	Valley	0	0	0	0	0
	Providence	0	0	0	0	0
	Warren	0	0	0	0	0
	Westerly	0	0	0	0	0
TOTAL		16,088	16,575	16,619	16,713	16,952

Rhode Island Energy
Comparison of Resources and Requirements
Design Year (Sales and Customer Choice)
(BBtu)

		Design Annual 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>						
Firm Sendout	Valley	6,837	6,855	6,907	6,938	7,010
	Providence	33,150	33,240	33,489	33,643	33,991
	Warren	1,227	1,230	1,239	1,245	1,258
	Westerly	679	681	686	690	697
Fuel Reimbursement		811	793	790	871	887
Underground Storage Refill		3,525	3,935	3,918	3,929	4,116
LNG Refill		1,014	887	887	887	887
TOTAL		47,243	47,621	47,916	48,204	48,846
<u>RESOURCES</u>						
TGP	Dawn PNGTS	2,542	2,752	2,367	2,368	2,598
	Dawn Iroquois	74	100	74	74	79
	Niagara	279	232	179	89	92
	Zone 4	9,011	8,774	8,841	9,036	9,313
	Dracut	908	1,492	1,588	1,624	1,685
	TGP Citygate	0	0	0	0	0
	Storage	1,109	1,332	1,332	1,334	1,334
TET/AGT	M2	14,402	11,997	9,098	11,956	12,170
	EGTS South Point	168	149	142	189	189
	TCO Appalachia	5,962	4,771	3,854	5,108	5,137
	Transco Leidy	143	143	119	124	152
	AIM (Ramapo)	417	478	88	0	0
	AIM (Millennium)	3,317	2,483	4,720	5,887	5,837
	M3	4,909	9,296	11,846	6,697	6,313
	AGT Citygate	351	0	0	0	0
	Beverly	100	0	0	0	0
	Storage	2,416	2,603	2,586	2,595	2,782
Liquid for Portables and Refill		120	0	0	0	0
LNG From Storage		1,014	887	887	887	887
Unserved	Valley	0	0	0	0	0
	Providence	0	128	190	231	273
	Warren	0	3	4	4	4
	Westerly	0	0	0	0	0
		0	131	194	235	277
TOTAL		47,243	47,621	47,916	48,204	48,846

Rhode Island Energy
Comparison of Resources and Requirements
Cold Snap (Sales and Customer Choice)
(BBtu)

Cold Snap Heating Season (Nov-Mar) 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>						
Firm Sendout	Valley	4,485	4,487	4,525	4,547	4,603
	Providence	21,988	21,999	22,186	22,294	22,568
	Warren	792	792	799	803	813
	Westerly	454	454	458	460	466
Fuel Reimbursement		441	425	416	458	465
Underground Storage Refill		0	0	0	0	0
LNG Refill		85	0	0	0	0
TOTAL		28,245	28,157	28,385	28,562	28,915
<u>RESOURCES</u>						
TGP	Dawn PNGTS	2,010	1,982	1,817	1,842	2,023
	Dawn Iroquois	49	50	46	47	54
	Niagara	110	132	100	69	71
	Zone 4	5,312	4,612	4,411	4,503	4,776
	Dracut	746	807	842	867	892
	TGP Citygate	0	0	0	0	0
	Storage	1,109	1,331	1,332	1,334	1,334
TET/AGT	M2	7,149	5,703	4,282	5,746	5,830
	EGTS South Point	83	82	82	82	83
	TCO Appalachia	5,501	4,478	3,628	4,793	4,786
	Transco Leidy	102	90	78	88	99
	AIM (Ramapo)	199	271	0	0	0
	AIM (Millennium)	1,377	1,368	2,419	2,421	2,438
	M3	1,067	3,966	5,948	3,332	3,057
	AGT Citygate	45	0	0	0	0
	Beverly	100	0	0	0	0
	Storage	2,327	2,399	2,475	2,490	2,504
Liquid for Portables and Refill		120	0	0	0	0
LNG From Storage		838	753	753	753	753
Unserviced	Valley	0	0	0	0	0
	Providence	0	130	169	191	211
	Warren	0	4	4	4	5
	Westerly	0	0	0	0	0
		0	133	173	195	216
TOTAL		28,245	28,157	28,385	28,562	28,915

Rhode Island Energy
Comparison of Resources and Requirements
Cold Snap (Sales and Customer Choice)
(BBtu)

Cold Snap Non-Heating Season (Apr-Oct) 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>						
Firm Sendout	Valley	1,701	1,715	1,723	1,730	1,737
	Providence	8,341	8,409	8,448	8,480	8,514
	Warren	300	303	304	305	307
	Westerly	172	174	174	175	176
Fuel Reimbursement		346	327	335	373	379
Underground Storage Refill		3,523	3,806	3,810	3,826	3,983
LNG Refill		887	887	887	887	887
TOTAL		15,271	15,621	15,682	15,778	15,983
<u>RESOURCES</u>						
TGP	Dawn PNGTS	7	208	0	0	0
	Dawn Iroquois	0	26	1	1	1
	Niagara	165	98	66	1	1
	Zone 4	2,940	3,372	3,601	3,680	3,688
	Dracut	0	0	9	10	10
	TGP Citygate	0	0	0	0	0
	Storage	0	0	0	0	0
TET/AGT	M2	7,173	6,093	4,621	5,982	6,169
	EGTS South Point	85	67	60	107	105
	TCO Appalachia	198	203	203	203	203
	Transco Leidy	11	33	21	22	24
	AIM (Ramapo)	14	42	45	0	0
	AIM (Millennium)	1,939	1,115	2,232	3,407	3,320
	M3	2,517	4,153	4,686	2,230	2,182
	AGT Citygate	0	0	0	0	0
	Beverly	0	0	0	0	0
	Storage	87	76	3	3	145
Liquid for Portables and Refill		0	0	0	0	0
LNG From Storage		134	134	134	134	134
Unserved	Valley	0	0	0	0	0
	Providence	0	0	0	0	0
	Warren	0	0	0	0	0
	Westerly	0	0	0	0	0
TOTAL		15,271	15,621	15,682	15,778	15,983

Rhode Island Energy
Comparison of Resources and Requirements
Cold Snap (Sales and Customer Choice)
(BBtu)

Cold Snap Annual 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>						
Firm Sendout	Valley	6,186	6,202	6,249	6,277	6,340
	Providence	30,329	30,408	30,634	30,774	31,082
	Warren	1,092	1,095	1,103	1,108	1,120
	Westerly	626	628	632	635	642
Fuel Reimbursement		786	751	751	831	844
Underground Storage Refill		3,523	3,806	3,810	3,826	3,983
LNG Refill		972	887	887	887	887
TOTAL		43,516	43,778	44,066	44,340	44,897
<u>RESOURCES</u>						
TGP	Dawn PNGTS	2,017	2,190	1,817	1,842	2,023
	Dawn Iroquois	49	76	47	48	55
	Niagara	274	230	166	70	72
	Zone 4	8,252	7,984	8,012	8,182	8,464
	Dracut	746	807	850	877	902
	TGP Citygate	0	0	0	0	0
	Storage	1,109	1,331	1,332	1,334	1,334
TET/AGT	M2	14,322	11,796	8,903	11,728	11,999
	EGTS South Point	167	149	142	189	188
	TCO Appalachia	5,699	4,681	3,831	4,996	4,989
	Transco Leidy	113	123	98	110	123
	AIM (Ramapo)	214	313	45	0	0
	AIM (Millennium)	3,317	2,483	4,651	5,828	5,758
	M3	3,584	8,119	10,634	5,561	5,239
	AGT Citygate	45	0	0	0	0
	Beverly	100	0	0	0	0
	Storage	2,414	2,475	2,478	2,492	2,648
Liquid for Portables and Refill		120	0	0	0	0
LNG From Storage		972	887	887	887	887
Unserved	Valley	0	0	0	0	0
	Providence	0	130	169	191	211
	Warren	0	4	4	4	5
	Westerly	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
		0	133	173	195	216
TOTAL		43,516	43,778	44,066	44,340	44,897

Division 5-9

Request:

Reference the response to Division 1-21. Please explain the significant differences between November 2022 – October 2023 and November 2023 – October 2024 for items (b) and (i).

Response:

The projected volumes in item (b) in the referenced response to Division 1-21, FT-2 customer demands met by pipeline FT, reflect FT-2 nominations. November 2023 – October 2024 (18,420 Dth) is based upon February 3, 2023 data with a 62 heating degree day (“HDD”). The volume reflected in the November 2022 – October 2023 column (24,447 Dth) is based upon January 15, 2022 data with a 54 HDD.

The projected volumes in item (i) in the referenced response to Division 1-21, sales customer demands met by pipeline and LNG storage, also reference the peak days from the prior gas year. The pipeline storage volumes are actual AGT, TGP, and TGP Swing-On-Storage nominations for January 15, 2022 (for November 2022 – October 2023) and February 3, 2023 (for November 2023 – October 2024). The Peaking and LNG storage volumes are calculated by subtracting the pipeline and pipeline storage nominations on the prior year's peak day, from the 2023/2024 design forecasted sales volumes. For the Nov 2023 – Oct 2024 column of Division 1-21, the 23/24 design forecasted sales volumes were used and referenced the actual peak day (2/3/23) from winter 2022-2023 to project pipeline, storage, and peaking volumes for the data reflected. For the Nov 2022-Oct 2023 column, the 22/23 design forecasted sales volumes were used and also referenced the peak day (1/15/22) from winter 2021-2022 for the same projections described above.

Different assets were dispatched on the respective days; less pipeline storage volumes were used for January 15, 2022, than February 3, 2023, because there was a Force Majeure on Algonquin on January 15, 2022, and the Company experienced roughly 16,000 Dth in reductions to scheduled pipeline storage volumes. Because more pipeline storage was delivered on February 3, 2023, less LNG storage and peaking was needed to meet the difference between the design forecasted sales volume and pipeline and pipeline storage. The design forecasted sales volume for 2022/23 was 320,655 Dth and is 324,505 Dth for 2023/24. This year-over-year increase is consistent with the overall sales growth trend seen over approximately the last decade and primarily is due to growth in residential heating as a result of oil-to-gas switching.

Division 5-10

Request:

Reference the response to Division 1-22(c). Please explain how the costs associated with purchases are assigned to FT-2 Marketers after the supplies were actually purchased.

Response:

The Company has provided an updated response to Division 1-22 (c). The costs associated with these purchases were not assigned to FT-2 Marketers as this contract and associated fixed costs were allocated to the Distribution Adjustment Charge ("DAC") and recovered from customers, not Marketers. As the volumes were not called upon to meet peak hour needs, the commodity costs were not allocated to the DAC, but instead recovered through the Gas Cost Recovery factor.

Division 5-11

Request:

Reference the response to Division 1-24. If not already identified, please explain the extent to which Marketers were assessed the costs of supplies purchased under the two Repsol agreements.

Response:

The cost for supplies under the referenced Repsol agreements were allocated to the Distribution Adjustment Charge and charged to customers, not Marketers.

Division 5-12

REDACTED

Request:

Reference the response to Division 1-25. If not already provided, please provide a daily history of the use of the assets during the winter of 2022/23, and identify how the use of the assets was consistent with least cost procurement.

Response:

The Hourly Peaking Assets that were identified for winter 2022/23 were: Portable liquefied natural gas ("LNG"), the Company's Beverly and Dracut transportation contracts, Algonquin Gas Transmission ("AGT") Citygate supply agreement, Winter Liquid, Beverly supply agreement and Dracut supply agreement. Please see Attachment DIV 5-12.

[REDACTED]

Portable LNG and Winter Liquid were used and dispatched by Gas Control where needed. Neither of these assets was dispatched for hourly needs.

Finally, the AGT Citygate deal was only used six times during the winter and in each instance the resources were dispatched to meet forecasted demand.

<i>Units in Dth</i>	Asset				
	Portable LNG	Beverly Contract Beverly Supply Deal	Dracut Contracts Dracut Supply Deal	AGT Citygate Deal	Winter Liquid
Date					
11/1/2022	1,712	-	-	-	-
11/2/2022	1,746	-	-	-	-
11/3/2022	-	-	-	-	-
11/4/2022	-	-	-	-	-
11/5/2022	-	-	-	-	-
11/6/2022	-	-	-	-	-
11/7/2022	-	-	-	-	-
11/8/2022	-	-	-	-	-
11/9/2022	-	-	-	-	-
11/10/2022	-	-	-	-	-
11/11/2022	-	-	-	-	-
11/12/2022	-	-	-	-	-
11/13/2022	39	-	-	-	-
11/14/2022	25	-	-	-	-
11/15/2022	44	-	-	-	-
11/16/2022	-	-	-	-	-
11/17/2022	-	-	-	-	-
11/18/2022	-	-	-	-	-
11/19/2022	-	-	-	-	-
11/20/2022	-	-	-	-	-
11/21/2022	-	-	-	-	-
11/22/2022	-	-	-	-	-
11/23/2022	-	-	-	-	-
11/24/2022	-	-	-	-	-
11/25/2022	-	-	-	-	-
11/26/2022	-	-	-	-	-
11/27/2022	-	-	-	-	-
11/28/2022	-	-	-	-	-
11/29/2022	-	-	-	-	-
11/30/2022	885	-	-	-	-

<i>Units in Dth</i> Date	Asset				
	Portable LNG	Beverly Contract Beverly Supply Deal	Dracut Contracts Dracut Supply Deal	AGT Citygate Deal	Winter Liquid
12/1/2022	637	-	-	-	-
12/2/2022	-	-	-	-	-
12/3/2022	-	-	-	-	-
12/4/2022	-	-	-	-	-
12/5/2022	-	-	-	-	-
12/6/2022	-	-	-	-	-
12/7/2022	-	-	-	-	-
12/8/2022	-	-	-	-	-
12/9/2022	-	-	-	-	-
12/10/2022	-	-	-	-	-
12/11/2022	-	-	-	-	-
12/12/2022	-	-	-	-	-
12/13/2022	-	-	-	-	-
12/14/2022	-	-	-	-	-
12/15/2022	-	-	-	-	-
12/16/2022	-	-	-	-	-
12/17/2022	-	-	-	-	-
12/18/2022	-	-	-	-	1,725
12/19/2022	-	-	-	-	1,767
12/20/2022	-	-	-	-	1,708
12/21/2022	-	-	-	-	-
12/22/2022	-	-	-	-	-
12/23/2022	663	-	-	-	-
12/24/2022	695	-	20,000	14,100	-
12/25/2022	100	-	5,000	14,100	-
12/26/2022	107	-	5,000	-	1,731
12/27/2022	-	-	-	-	1,703
12/28/2022	-	-	-	-	3,418
12/29/2022	-	-	-	-	1,725
12/30/2022	15	-	-	-	-
12/31/2022	-	-	-	-	-

Units in Dth Date	Asset				
	Portable LNG	Beverly Contract Beverly Supply Deal	Dracut Contracts Dracut Supply Deal	AGT Citygate Deal	Winter Liquid
1/1/2023	-	-	-	-	-
1/2/2023	9	-	-	-	1,745
1/3/2023	7	-	-	-	2,618
1/4/2023	9	-	-	-	3,432
1/5/2023	20	-	-	-	1,745
1/6/2023	38	-	-	-	-
1/7/2023	-	-	-	-	-
1/8/2023	13	-	-	-	1,722
1/9/2023	15	-	-	-	3,377
1/10/2023	10	-	-	-	2,554
1/11/2023	618	-	-	-	4,339
1/12/2023	1,149	-	-	-	1,697
1/13/2023	50	-	-	-	-
1/14/2023	35	-	10,000	-	-
1/15/2023	-	-	15,000	-	1,706
1/16/2023	51	-	10,000	-	1,750
1/17/2023	49	-	5,000	-	3,418
1/18/2023	50	-	5,000	-	3,397
1/19/2023	40	-	5,000	-	-
1/20/2023	53	-	6,000	-	-
1/21/2023	46	-	20,000	-	-
1/22/2023	30	-	6,000	-	853
1/23/2023	33	-	15,000	-	856
1/24/2023	56	-	6,000	-	2,661
1/25/2023	52	-	6,000	-	2,681
1/26/2023	27	-	6,000	-	-
1/27/2023	50	-	7,000	-	-
1/28/2023	51	-	10,000	-	-
1/29/2023	53	-	2,000	-	858
1/30/2023	34	-	11,000	-	2,678
1/31/2023	41	-	7,000	-	2,695

Units in Dth Date	Asset				
	Portable LNG	Beverly Contract Beverly Supply Deal	Dracut Contracts Dracut Supply Deal	AGT Citygate Deal	Winter Liquid
2/1/2023	-	-	9,000	-	832
2/2/2023	-	-	8,000	-	2,537
2/3/2023	4,319	5,000	25,000	14,100	-
2/4/2023	820	5,000	25,000	14,100	-
2/5/2023	-	-	5,000	-	-
2/6/2023	22	-	15,000	-	-
2/7/2023	22	-	8,000	-	1,725
2/8/2023	25	-	8,000	-	4,436
2/9/2023	56	-	8,000	-	4,389
2/10/2023	11	-	8,000	-	-
2/11/2023	7	5,000	17,000	-	-
2/12/2023	14	-	17,000	-	2,577
2/13/2023	-	5,000	21,000	-	3,498
2/14/2023	22	5,000	20,000	-	5,257
2/15/2023	22	-	5,000	-	5,246
2/16/2023	27	-	-	-	3,487
2/17/2023	34	5,000	25,000	-	902
2/18/2023	27	5,000	25,000	-	-
2/19/2023	5	5,000	11,000	-	-
2/20/2023	38	5,000	15,000	-	2,585
2/21/2023	35	5,000	18,000	-	6,224
2/22/2023	-	5,000	20,000	-	1,903
2/23/2023	3	5,000	25,000	-	952
2/24/2023	63	5,000	25,000	8,000	953
2/25/2023	25	5,000	25,000	14,100	-
2/26/2023	33	-	25,000	-	2,603
2/27/2023	39	-	25,000	-	900
2/28/2023	32	5,000	25,000	-	4,291

Units in Dth Date	Asset				
	Portable LNG	Beverly Contract Beverly Supply Deal	Dracut Contracts Dracut Supply Deal	AGT Citygate Deal	Winter Liquid
3/1/2023	31	-	9,500	-	5,168
3/2/2023	32	-	9,500	-	3,517
3/3/2023	28	-	9,500	-	897
3/4/2023	31	5,000	9,500	-	-
3/5/2023	67	5,000	9,500	-	1,676
3/6/2023	30	-	9,500	-	3,500
3/7/2023	-	-	9,500	-	5,182
3/8/2023	40	-	9,500	-	5,170
3/9/2023	38	-	9,500	-	3,519
3/10/2023	45	-	9,500	-	1,809
3/11/2023	31	5,000	9,500	-	-
3/12/2023	30	5,000	9,500	-	1,684
3/13/2023	49	-	9,500	-	3,444
3/14/2023	43	-	9,500	-	-
3/15/2023	35	-	9,500	-	3,441
3/16/2023	32	-	9,500	-	3,444
3/17/2023	41	-	9,500	-	1,749
3/18/2023	57	-	9,500	-	-
3/19/2023	52	5,000	9,500	-	832
3/20/2023	46	-	9,500	-	866
3/21/2023	33	-	9,500	-	2,842
3/22/2023	47	-	9,500	-	2,863
3/23/2023	42	-	9,500	-	859
3/24/2023	58	-	9,500	-	-
3/25/2023	27	-	7,000	-	-
3/26/2023	48	-	3,000	-	1,692
3/27/2023	-	-	7,000	-	2,798
3/28/2023	584	-	-	-	1,683
3/29/2023	1,918	-	-	-	3,750
3/30/2023	1,356	-	-	-	-
3/31/2023	-	-	-	-	-
Totals	19,929	100,000	890,000	78,500	178,241

Division 5-13

Request:

Reference the response to Division 1-27(b). Please explain why the storage price changed significantly during the winter of 2022/23 when the gas withdrawn from storage was generally purchased during the previous summer.

Response:

The storage price charged to Marketers consists of two components; underground storage inventory price and weighted average price of the managed supply paths. The underground storage price accounts for almost ninety one percent of the total price and weighted average price of the managed supply paths accounts for approximately nine percent of the total price. The storage price will fluctuate due to the fact that price of the managed supply paths will change daily, however, the storage price should not vary significantly from the underground storage inventory price at the start of the winter season.

At this time, the Company has discovered an error in the calculation of the storage price which caused the storage price referenced in response to Division 1-27(b) to change significantly. The Company is in the process of correcting the calculation and the associated Marketer invoices.

Division 5-14

Request:

Reference the response to Division 1-10 in the Long-Range Plan proceeding. Please supplement/update this response as applicable.

Response:

Since the Company's response to Division 1-10 in Docket No. 22-06-NG, the Company has not entered into any additional Asset Management Agreements (AMAs). The Company is still in the process of negotiating additional AMAs for the coming winter and will supplement this response as additional agreements are executed.

Division 5-15

Request:

Reference Exhibit 16, page 1, of the Long-Range Plan. Please revise the Exhibit to show the maximum capacity of each resource for each year.

Response:

Please see Attachment DIV 5-15.

Attachment DIV 5-15
Rhode Island Energy
Comparison of Resources and Requirements
Design Year (Sales and Customer Choice)
(BBtu)

Design Day with Resources											
		<u>2023-2024</u>	MDQ	<u>2024-2025</u>	MDQ	<u>2025-2026</u>	MDQ	<u>2026-2027</u>	MDQ	<u>2027-2028</u>	MDQ
REQUIREMENTS											
Firm Sendout	Valley	64		65		65		66		66	
	Providence	310		313		316		318		319	
	Warren	11		12		12		12		12	
	Westerly	6		6		6		7		7	
Fuel Reimbursement		4		4		4		4		4	
Underground Storage Refill		0		0		0		0		0	
LNG Refill		0		0		0		0		0	
TOTAL		396		400		403		405		407	
RESOURCES											
TGP	Dawn PNGTS	29	29	29	29	29	29	29	29	29	29
	Dawn Iroquois	1	1	1	1	1	1	1	1	1	1
	Niagara	1	1	1	1	1	1	1	1	1	1
	Zone 4	41	41	41	41	41	41	41	41	41	41
	Dracut	35	50	50	50	50	50	50	50	50	50
	TGP Citygate	0	0	0	0	0	0	0	0	0	0
	Storage	11	11	11	11	11	11	11	11	11	11
TET/AGT	M2	49	49	49	49	49	49	49	49	49	49
	EGTS South Point	1	1	1	1	1	1	1	1	1	1
	TCO Appalachia	41	41	41	41	41	41	41	41	41	41
	Transco Leidy	1	1	1	1	1	1	1	1	1	1
	AIM (Ramapo)	8	9	8	9	0	0	0	0	0	0
	AIM (Millennium)	9	9	9	9	18	18	18	18	18	18
	M3	18	18	18	18	16	17	17	17	17	17
	AGT Citygate	2	14	0	0	0	0	0	0	0	0
	Beverly	5	5	5	5	5	5	5	5	5	5
	Storage	28	28	28	28	29	29	29	29	29	29
Liquid for Portables and Refill		0	11	0	0	0	0	0	0	0	0
LNG From Storage		116	119	104	119	107	119	109	119	110	119
Unservd	Valley	0		1		1		1		2	
	Providence	0		0		0		0		0	
	Warren	0		2		2		2		2	
	Westerly	0		0		0		0		0	
		0		3		3		4		4	
TOTAL		396		400		403		405		407	

NOTES:

1/ For TGP and TET/AGT Resources, MDQs represent peak day volume available for the associated transportation capacity.

2/ The volumes for M3 and TET/AGT Storage total 46K/day.

3/ The volumes for AIM (Ramapo) and AIM (Millennium) totals 18K/day

4/ Currently, there is no supply contract in place for Liquid for Portables and Refill or AGT Citygate beyond Winter 2023/24; MDQ is reflected as '0'.

Division 5-16

Request:

Please provide a schedule showing the extent to which Marketers actually purchased Company managed peaking/LNG supplies during the winter of 2022/23 on a daily basis and the variable price paid for those purchases.

Response:

Please see Attachment DIV 5-16 provided in Excel format.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 23-23-NG
In Re: 2023 Gas Cost Recovery Filing
Responses to Division's Fifth Set of Data Requests
Issued September 6, 2023

Attachment Division 5-16

Please see the Excel Worksheet of Attachment DIV 5-16

Prepared by or under the supervision of: Joseph Calabrese
(Pursuant to the Transition Services Agreement)

Division 5-17

Request:

Reference Attachment Division 1-13 (Confidential) in the Long-Range Plan proceeding. Please update the Company's response as applicable and include all calculations in Excel format.

Response:

Please see confidential Attachment Division 5-2. The supplies that were estimated for the response to Division 1-13 in Docket No. 22-06 were the Dracut supplies and the Winter Liquid Supply. Those supplies have been included in the Company's Gas Cost Recovery filing and are reflected in Attachment GSP-1 to the Joint Prefiled Direct Testimony of the Gas Supply Panel.

After the Company's Gas Long-Range Resource and Requirements Plan for the Forecast Period 2023/34 to 2027/28 was completed, the Company locked into 5,000 Dth/day of Tennessee capacity from Dracut to the Company's citygate and that capacity demand charge is also now reflected on the GSP-1, Hourly Peaking Fixed Costs schedule.

Division 5-18

Request:

Reference the response to Division 1-14 in the Long-Range Plan proceeding. Please supplement/update the response as applicable.

Response:

Since the Company's response to Division 1-14 in Docket No. 22-06-NG, the Company has executed two additional transaction confirmations. Please see Attachment GSP-7.3 and Attachment GSP-7.4 to the Preiled Joint Direct Testimony of the Gas Supply Panel in this docket for copies of these two transaction confirmations.

Division 5-19

Request:

Reference the responses to Division 3-8, 3-9, and 3-10 in Docket No. 22-20-NG. Please explain why the capacity identified in these responses is not released to Marketers.

Response:

The capacity referenced in the Company's response to Division 3-8 in Docket 22-20-NG, under Columbia Transmission, L.L.C. contract number #31523, is not released to marketers because marketers receive capacity on contract #31524. Both contracts provide the same primary delivery entitlement to Hanover, the interconnect with Columbia and Algonquin, and are the same rate schedule.

A portion of the capacity under Millennium Pipeline contract #210165, referenced in the Company's response to Division 3-9 in Docket No. 22-20-NG, is released to marketers. For the 2023/24 gas year, the Company has not entered into an Asset Management Agreement using this capacity.

With respect to the Company's response to Division 3-10 in Docket No, 22-20-NG; capacity is not released to marketers on Tennessee Gas Pipeline contract #349449 because capacity is released to marketers under Tennessee Gas Pipeline contract #62930. Both contracts provide the same primary receipt point access at Dracut and are the same rate schedule.

Division 5-20

REDACTED

Request:

Reference the Gas Supply Panel testimony, page 15, lines 9-16. Please identify the Company's total costs for items 1 and 4, and identify the portion of those costs that will be recovered through the DAC for the period November 2023 – October 2024.

Response:

Please see Confidential Attachment DIV 5-2. The data shown in that attachment is taken from Attachment GSP-1 Revised in the Supply Fixed Costs schedule and the Hourly Peaking Fixed Costs schedule. The costs that will be allocated to the Distribution Adjustment Charge ("DAC") are listed on the Hourly Peaking Fixed Cost schedule of GSP-1 Revised.

For item 1, Portable LNG, the figure presented in Confidential Attachment DIV 5-2 represents the fixed cost of the contract that the Company has in place with Stabilis for operations at Old Mill Lane. The entire fixed cost of that operation is recovered through the System Pressure Factor of the DAC, and can be seen on the Portable LNG line in the Hourly Peaking Fixed Cost Schedule of Attachment GSP-1 Revised.

For item 4, LNG Trucking, which is reflected as Winter refill in Attachment GSP-1 Revised, the Company has purchased 120,000 Dth of supply for the season from the counterparty. Because only 28,800 Dth is needed for portable operations for the winter season, the Company is only allocating 28,800 Dth of supply cost to the System Pressure Factor of the DAC as shown in the Hourly Peaking Fixed Cost schedule of Attachment GSP-1 Revised. On the Supply Fixed Costs schedule, the Winter Liquid total is [REDACTED] total, while the dollar amount allocated to the Hourly Peaking Fixed Costs is only [REDACTED]. The calculation is [REDACTED] / 120,000 Dth * 28,800 Dth = [REDACTED].

This response contains commercially sensitive and confidential information; therefore, the Company is providing confidential and redacted versions of of this response, subject to a Motion for Protective Treatment.

Division 5-21

Request:

Reference the Gas Supply Panel testimony, page 15, lines 9-16.

- a. In Excel format, please identify the actual monthly variable usage quantity and cost for each of the five resources during the period April 2022 through July 2023, and the projected monthly variable usage quantity and costs for each of the five resources during the period August 2023 through October 2024; and
- b. Identify the extent to which the actual and projected variable usage of each of the five resources was/is associated with satisfying peak hour demands. If variable usage was/is not associated with satisfying peak hour demand, explain why the resource was utilized.

Response:

- a. Please see Confidential Attachment DIV 5-21 provided in Excel format. Please note that the time period specified in this data request spans different Gas Cost Recovery periods during which the Company's peak hour resources have changed. From April 2022 through October 2022, a portion of the Company's Tennessee capacity had Everett as a receipt meter, which subsequently was amended to a Dracut, Massachusetts receipt effective November 2022. The Company's Algonquin Gas Transmission ("AGT") Beverly Capacity was not added to the portfolio until November 2022. Supply contract resources to fill the Company's Tennessee Dracut capacity as well as the AGT Beverly Capacity for the period covered through and including October 2023 were must take and therefore allocated to demand charges. The usage volumes and costs for August 2023 through October 2023 for the Company's liquefied natural gas ("LNG") trucking contract are forecasts because the figures are not yet actual. The projected usage volumes and costs from November 2023 through October 2024 are drawn from a Design Sales and Customer Choice run and are equivalent to the volumes on the tables submitted in response to Division 5-8.
- b. Please see the response to Division 5-12 for actual usage. For the Beverly and Dracut supply deal agreements, these costs were entirely fixed costs and were allocated to the System Pressure Factor of the Distribution Adjustment Charge ("DAC"). The Portable LNG and Winter Liquid were used and dispatched by Gas Control where needed. Neither of these resources were dispatched for hourly needs. Finally, the AGT Citygate deal supplies were only used six times this during the past winter and in each instance were used to meet forecasted demand.

Division 5-21, page 2

For the future, the Company will allocate the fixed charges of the assets identified for peak hour to the System Pressure Factor of the DAC where appropriate. Any volumes dispatched specifically for hourly needs, if significant will be reallocated from the Gas Cost Recovery factor after the winter.

REDACTED

	<u>Apr-22</u>	<u>May-22</u>	<u>Jun-22</u>	<u>Jul-22</u>	<u>Aug-22</u>	<u>Sep-22</u>	<u>Oct-22</u>	<u>Nov-22</u>	<u>Dec-22</u>	<u>Jan-23</u>	<u>Feb-23</u>	<u>Mar-23</u>	<u>Apr-23</u>	<u>May-23</u>	<u>Jun-23</u>	<u>Jul-23</u>
(1) Portable LNG																
Actual Variable Usage Quantity																
Actual Variable Cost																
(2) Tennessee Dracut Contracts																
Actual Variable Usage Quantity																
Actual Variable Cost																
(3) Citygate Delivered Arrangement on AGT																
Actual Variable Usage Quantity																
Actual Variable Cost																
(4) LNG Trucking																
Actual Variable Usage Quantity																
Actual Variable Cost																
(5) AGT Contract for 5,000 Dth/day																
Actual Variable Usage Quantity									0	0	0	75,000	25,000	0	0	0
Actual Variable Cost									\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

	<u>Aug-23</u>	<u>Sep-23</u>	<u>Oct-23</u>	<u>Nov-23</u>	<u>Dec-23</u>	<u>Jan-24</u>	<u>Feb-24</u>	<u>Mar-24</u>	<u>Apr-24</u>	<u>May-24</u>	<u>Jun-24</u>	<u>Jul-24</u>	<u>Aug-24</u>	<u>Sep-24</u>	<u>Oct-24</u>
(1) Portable LNG															
Projected Monthly Variable Usage Quantity									0	0	0	0	0	0	0
Projected Variable Costs									\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
(2) Tennessee Dracut Contracts															
Projected Monthly Variable Usage Quantity									-	-	-	-	-	-	-
Projected Variable Costs									\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
(3) Citygate Delivered Arrangement on AGT															
Projected Monthly Variable Usage Quantity									-	-	-	-	-	-	-
Projected Variable Costs									\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
(4) LNG Trucking															
Projected Monthly Variable Usage Quantity									Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown
Projected Variable Costs									Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown
(5) AGT Contract for 5,000 Dth/day															
Projected Monthly Variable Usage Quantity									0	0	0	0	0	0	0
Projected Variable Costs									\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -