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Also admitted in Massachusetts

September 19, 2023

## VIA HAND DELIVERY & ELECTRONIC MAIL

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

**RE: Docket 23-23-NG – 2023 Distribution Adjustment Charge and Gas Cost Recovery Filing - Responses to PUC Data Requests – Set 4 (Full Set)**

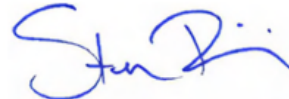
Dear Ms. Massaro:

On behalf of Rhode Island Energy,<sup>1</sup> I have enclosed the Company's responses to the Public Utilities Commission's ("Commission" or "PUC") Fourth Set of Data Requests (Full Set) in the referenced docket.

Please note that the Company's response to the Commission's Data Request 4-1 contains commercially sensitive confidential information that was the subject of a previously filed motion for protective treatment. A copy of that motion is included in this package for completeness.

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 23-23-NG Service List  
Leo Wold, Esq.  
John Bell, Division  
Al Mancini, Divisio

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<sup>1</sup> The Narragansett Electric Company d/b/a Rhode Island Energy ("Rhode Island Energy" or the "Company").

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 19, 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**

<b>Name/Address</b>	<b>E-mail</b>	<b>Phone</b>
<b>The Narragansett Electric Company d/b/d Rhode Island Energy</b>  Celia B. O'Brien, Esq. 280 Melrose Street Providence, RI 02907	<a href="mailto:cobrien@pplweb.com">cobrien@pplweb.com</a> ;	401-578-2700
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	<a href="mailto:lpimentel@rc.com">lpimentel@rc.com</a> ;	
	<a href="mailto:HSeddon@rc.com">HSeddon@rc.com</a> ;	
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David Effron <b>Berkshire Consulting</b> 12 Pond Path North Hampton, NH 03862-2243	<a href="mailto:Djeffron@aol.com">Djeffron@aol.com</a> ;	603-964-6526
<b>File an original &amp; nine (9) copies w/:</b> Luly E. Massaro, Commission Clerk <b>Public Utilities Commission</b> 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a> ;	401-780-2107
	<a href="mailto:Patricia.lucarelli@puc.ri.gov">Patricia.lucarelli@puc.ri.gov</a> ;	
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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  
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 (“PUC” or the “Commission”) grant protection from public disclosure for certain confidential responses to the Commission’s Fourth Set of Data Requests. Specifically, the Company seeks protective treatment for its response to PUC 4-1. 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 seeks protective treatment of its response to data request PUC 4-1 because it contains a description of commercially sensitive contract terms that were negotiated with its contract counterparty. The disclosure of this information would be detrimental to the commercial interests of the Company.

**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 Company’s response to data request PUC 4-1 contains a description of commercially sensitive contract terms that the Company maintains as confidential. The disclosure of the terms described in PUC 4-1 would hamper the Company’s ability to negotiate favorable terms with counterparties in the future either because: (1) potential counterparties would know what terms the Company has agreed to in the past, or (2) potential counterparties would be unwilling to agree to favorable terms out of concern that any negotiated concessions would be disclosed publicly in the future. For these reasons, the description of contract terms contained in the Company’s response to PUC 4-1 is information that would not 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 contract terms described in the response to data request PUC 4-1.

[SIGNATURE ON NEXT PAGE]

Respectfully submitted,

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

By its attorneys,



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Steven J. Boyajian (#7263)  
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Providence, RI 02903  
Tel. (401) 709-3300  
Fax. (401) 709-3399  
[sboyajian@rc.com](mailto:sboyajian@rc.com)

Dated: September 18, 2023

**CERTIFICATE OF SERVICE**

I hereby certify that on September 18, 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.



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Heidi J. Seddon

PUC 4-1

**REDACTED**

Request:

Schedule PRB/TGS-1S, line 1, shows a decrease in System Pressure costs of \$42.8 million compared to those same costs that were incurred in 2022/2023.

- (a) Please provide an explanation for why there is such a substantial difference in System Pressure cost incurrence forecasted for 2023/2024.
- (b) Comparing the actual cost incurrence of System Pressure costs shown in Attachment GPP-1, page 7, line 5, for 2022/2023, to the projected costs for 2023/2024 shown in Attachment GSP-1, page 12, please explain why the Company is projecting \$5.9 million for each of the months of December, January, February, and March for 2023/2024, when the actual cost incurrence for the same months widely varied in 2022/2023 with costs of \$3.8 million, \$10.8 million, \$33.7 million, and \$17.9 million, respectively.

Response:

- (a) Please refer to the Company's response to Division 5-7.
- (b) The amounts included for recovery in the Company's System Pressure Factor component of its Distribution Adjustment Charge ("DAC") for the periods November 2022 through October 2023 and November 2023 through October 2024 are associated with hourly peaking fixed costs (i.e., fixed costs associated with certain assets specifically allocated to the peak hour for the winter season).

[REDACTED]



PUC 4-2

Request:

Please explain the causes of the under-recovery of \$11,262,608 as shown on line 6 for the Reconciliation Factor on Schedule PRB/TGS-1S.

Response:

The Reconciliation Factor under-recovery of \$11,262,608 is primarily attributable to projected under-recoveries of two factors for the period November 2022 through October 2023:

(1) The System Pressure Factor

- For the period November 2022 through October 2023, the System Pressure Factor was designed to recover approximately \$68 million but, based on actuals for the period November 2022 through July 2023 and the Company's original forecast for August 2023 through October 2023, is projected to only recover approximately \$59 million.

(2) The Previous Reconciliation Factor

- For the period November 2022 through October 2023, the Reconciliation Factor was designed to recover approximately \$5 million but, based on actuals for the period November 2022 through July 2023 and the Company's original forecast for August 2023 through October 2023, is projected to only recover approximately \$3 million.

These under-recoveries are consistent with the fact that the Company's throughput for the period November 2022 through October 2023 is, based on actual throughput for the period November 2022 through July 2023 and the Company's original forecast for August 2023 through October 2023, on track to come in approximately 10 percent lower than originally forecast:

<b>November 2022 - October 2023 Throughput (millions of dth)</b>	
<b>Original Forecast (12 Months Forecast + 0 Months Actuals)</b>	<b>39.9</b>
<b>Supplemental DAC (3 Months Forecast + 9 Months Actuals)</b>	<b>35.9</b>
<b>% Variance</b>	<b>-10%</b>

The practical effect of actual lower throughput as compared to projected throughput is two-fold. First, rates were designed based upon a forecast that assumed higher than actual throughput and, as such, were lower than they would have been had lower throughput been forecasted. Second, that lower factor was applied over volumes that were lower than forecasted. Put differently, rates

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
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PUC 4-2, Page 2

were designed using forecasted throughput of 39.9 million Dth and then applied to an actual throughput of 35.9 million Dth. All else equal, these two effects drive the under-recovery observed in the Reconciliation Factor for the period November 2022 through October 2023 which serves as the basis of the Reconciliation Factor for the period November 2023 through October 2024.

PUC 4-3

Request:

Please provide the Gas Supply Panel's understanding of the market and other economic factors that have caused the forecasted gas costs (as forecasted using the NYMEX forward curve referenced on page 11 of the Gas Supply Panel testimony) to be so much lower for 2023/2024 than the forward curve relied upon for the same period during the winter of 2022/2023.

Response:

There are several natural gas market factors that have contributed to lower forward gas prices for the 2023/2024 period relative to the same period for 2022/2023. These factors include but are not limited to; natural gas storage inventory levels, U.S. liquefied natural gas ("LNG") exports, and global LNG markets.

As highlighted by the Federal Energy Regulatory Commission ("FERC") in its *Winter Energy Market and Reliability Assessment* for 2022/2023, the higher forward natural gas prices for the winter of 2022/2023 were impacted by lower-than-average natural gas storage inventory levels as the natural gas demand for both domestic consumption and LNG exports exceeded natural gas production.<sup>1</sup> According to data from the U.S. Energy Information Administration ("EIA"), "natural gas storage levels [were] expected to be 5.5% below the five-year average in November, for the start of [the 2022/2023] withdrawal season".<sup>2</sup> In addition, because the New England region relies on imported LNG in the winter to meet peak natural gas demand, the New England forward gas prices for 2022/2023 were significantly impacted by the record high global LNG prices caused by the Russian invasion of Ukraine.<sup>3</sup>

According to the EIA, due to relatively mild temperatures and lower domestic gas consumption, as well as record high natural gas production, natural gas prices have decreased in 2023.<sup>4</sup> In mid-July 2023, the EIA indicated that, "Working natural gas stocks have been at a surplus to the five-year average since January 2023" and are expected to remain above the five-year average for the rest of this year.<sup>5</sup> In addition, while U.S. LNG exports are expected to continue to increase to

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<sup>1</sup> See, FERC, "Winter Energy Market and Reliability Assessment, 2022-2023," October 25, 2022, at 5, available at <https://www.ferc.gov/media/report-2022-2023-winter-assessment>.

<sup>2</sup> Ibid., at 12.

<sup>3</sup> Ibid., at 6.

<sup>4</sup> See, U.S. EIA, "Natural gas prices fall in first half of 2023 amid record production and mild temperatures," July 24, 2023, available at <https://www.eia.gov/todayinenergy/detail.php?id=57200>.

<sup>5</sup> See, U.S. EIA, "Natural gas storage injections exceed five-year average so far this summer," July 17, 2023, available at <https://www.eia.gov/todayinenergy/detail.php?id=57120>.

The Narragansett Electric Company  
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PUC 4-3, Page 2

meet global demand,<sup>6</sup> global LNG prices (as represented by the Dutch Title Transfer Facility (“TTF”) natural gas price index, a European benchmark index) are significantly lower for 2023/2024 than the prior year as discussed in the Company’s response to Division 5-7.

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<sup>6</sup> See, U.S. EIA, “Short-Term Energy Outlook, Between the Lines: U.S. LNG exports will increase next year as two export terminals come online,” July 11, 2023, available at <https://www.eia.gov/outlooks/steo/report/BTL/2023/07-LNG/article.php>.

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
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Responses to Commission's Fourth Set of Data Requests  
Issued September 8, 2023

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PUC 4-4

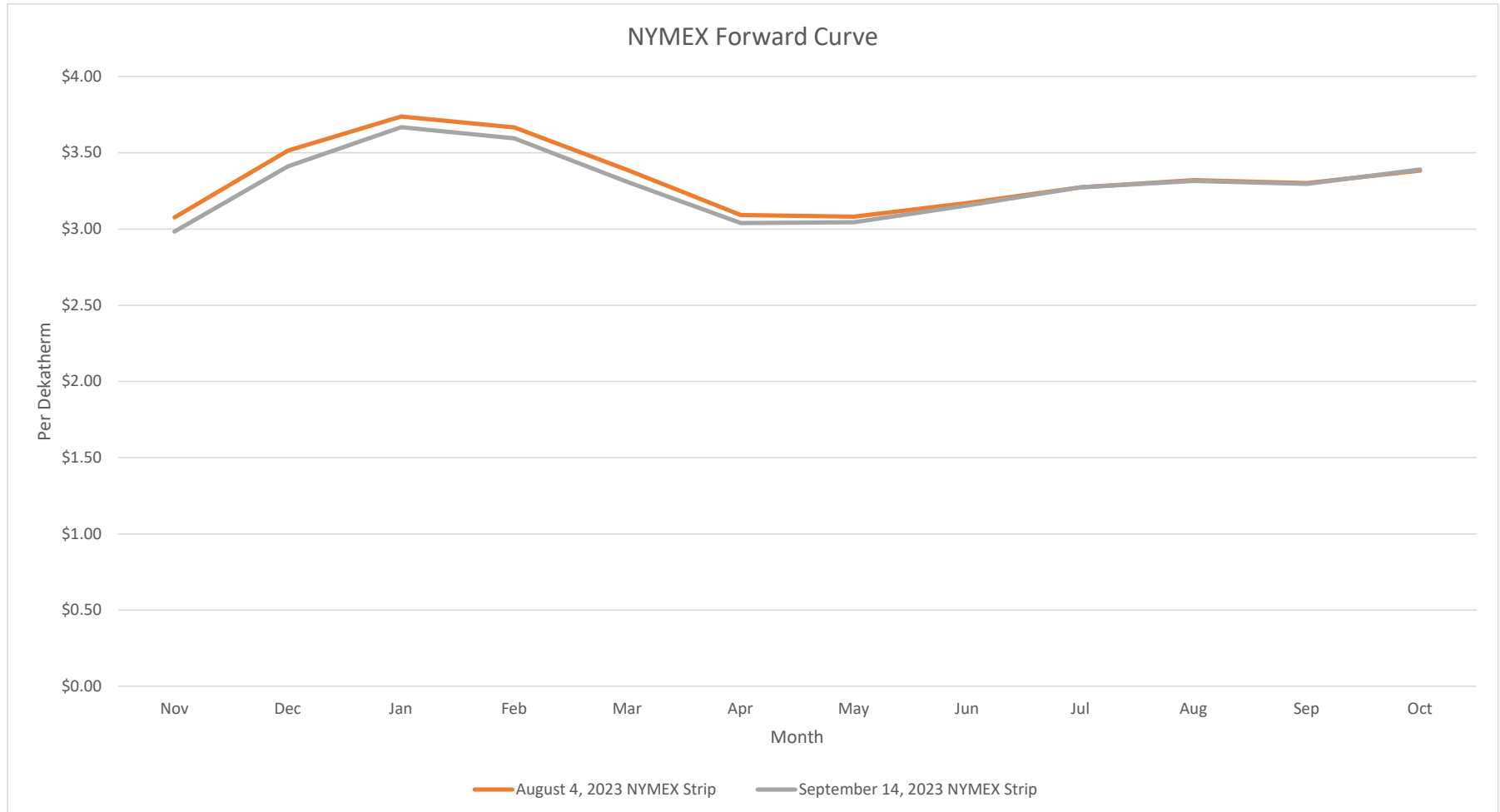
Request:

Please provide a schedule showing the NYMEX forward curve for the most up-to-date NYMEX strip available at the time of responding to this data request, compared to the NYMEX strip as of the close of trading on August 4, 2023 that was used for the proposed GCR factors, as shown on page 1 of Attachment GSP-1. Similarly, provide a supplemental response closer in time to the hearing scheduled for October 18, to be filed the week of October 9 by no later than noon on October 13, showing the most up-to-date NYMEX strip against August 4, 2023.

Response:

Please see Attachment PUC 4-4 for the NYMEX forward curve for the NYMEX strip as of September 14, 2023. The Company will update this response during the week of October 9 as requested.

	<u>Nov</u>	<u>Dec</u>	<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u>Oct</u>
August 4, 2023 NYMEX Strip	\$3.075	\$3.514	\$3.737	\$3.666	\$3.387	\$3.092	\$3.081	\$3.171	\$3.274	\$3.321	\$3.302	\$3.383
September 14, 2023 NYMEX Strip	\$2.983	\$3.411	\$3.668	\$3.595	\$3.309	\$3.039	\$3.045	\$3.155	\$3.273	\$3.315	\$3.296	\$3.391



The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 23-23-NG  
In Re: 2023 Distribution Adjustment Charge Filing  
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Issued September 8, 2023

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PUC 4-5

Request:

Assuming the bill impact analyses provided in Attachment GPP-4 does not include the effect of the exemption from Gross Receipts Tax, please provide a Supplemental Attachment GPP-4 that includes the effect of the exemption.

Response:

Attachment GPP-4 Revised (filed in the instant proceeding on September 15, 2023) does not include the effect of the exemption from the Gross Earnings Tax (“GET”) for the months of December 2023 through March 2024. Please refer to Attachment PUC 4-5 for the requested analysis.

Please see below for the main drivers causing the decrease presented in Attachment PUC 4-5 for an average Residential Heating customer using 845 therms per year:

	<u>\$ Inc (Dec)</u>	<u>%</u>
Annual Bill at Current Rates	\$1,753.55	
Demand Costs Allocated to DAC	(\$91.94)	-5.2%
Net Increase in Other DAC Components	\$58.59	3.3%
Net Decrease in GCR	(\$26.05)	-1.5%
Decrease in Gross Earnings Tax	<u>(\$1.84)</u>	-0.1%
Annual Bill at Proposed Rates	\$1,692.31	
GET Exemption (12/2023 – 3/2024)	<u>(\$30.85)</u>	-1.8%
Annual Bill at Proposed Rates (Incl. Exemption)	\$1,661.46	

Overall, the presently calculated decrease in an average residential heating customer’s bill of \$92.09, or 5.3%, is driven in large part by a decrease of \$91.94, or 5.2%, due to a decrease in demand costs allocated to the Distribution Adjustment Charge (“DAC”) and recovered via the System Pressure Factor component of the DAC, a decrease of \$26.05, or 1.5%, attributable to the Gas Cost Recovery factor, and a decrease of \$32.69, or 1.9%, attributable to the GET, offset by an increase of \$58.59, or 3.3%, attributable to other components of the DAC.

Prepared by or under the supervision of: Peter R. Blazunas, Tara Mou, and Tyler G. Shields

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
Gas Cost Recovery (GCR) Filing  
Bill Impact Analysis with Various Levels of Consumption  
(Including December 2023 - March 2024 Gross Earnings Tax (GET) Exemption)

**Residential Heating:**

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)		(i)	(j)	(k)	(l)	(m)
	Annual Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	GCR	Base DAC	Base DAC	ISR	EE	LJHEAP	GET	GET	GET Exemption
(1)														
(2)														
(3)														
(4)														
(5)	548	\$1,141.14	\$1,201.53	(\$60.39)	-5.0%	(\$16.89)	(\$21.65)	\$0.00	\$0.00	\$0.00	\$0.00	(\$1.19)	(\$0.89)	(\$20.66)
(6)	608	\$1,246.32	\$1,313.05	(\$66.74)	-5.1%	(\$18.70)	(\$24.01)	\$0.00	\$0.00	\$0.00	\$0.00	(\$1.32)	(\$0.99)	(\$22.71)
(7)	667	\$1,349.66	\$1,422.74	(\$73.08)	-5.1%	(\$20.53)	(\$26.34)	\$0.00	\$0.00	\$0.00	\$0.00	(\$1.45)	(\$1.08)	(\$24.76)
(8)	726	\$1,453.01	\$1,532.45	(\$79.44)	-5.2%	(\$22.36)	(\$28.69)	\$0.00	\$0.00	\$0.00	\$0.00	(\$1.58)	(\$1.18)	(\$26.81)
(9)	785	\$1,556.34	\$1,642.02	(\$85.68)	-5.2%	(\$24.17)	(\$31.00)	\$0.00	\$0.00	\$0.00	\$0.00	(\$1.71)	(\$1.27)	(\$28.80)
(10)	845	\$1,661.46	\$1,753.55	(\$92.09)	-5.3%	(\$26.05)	(\$33.35)	\$0.00	\$0.00	\$0.00	\$0.00	(\$1.84)	(\$1.37)	(\$30.85)
(11)	905	\$1,766.62	\$1,865.12	(\$98.50)	-5.3%	(\$27.86)	(\$35.77)	\$0.00	\$0.00	\$0.00	\$0.00	(\$1.97)	(\$1.47)	(\$32.90)
(12)	964	\$1,869.95	\$1,974.74	(\$104.79)	-5.3%	(\$29.71)	(\$38.08)	\$0.00	\$0.00	\$0.00	\$0.00	(\$2.10)	(\$1.57)	(\$34.90)
(13)	1,023	\$1,973.32	\$2,084.39	(\$111.06)	-5.3%	(\$31.50)	(\$40.39)	\$0.00	\$0.00	\$0.00	\$0.00	(\$2.22)	(\$1.66)	(\$36.95)
(14)	1,082	\$2,076.64	\$2,194.06	(\$117.42)	-5.4%	(\$33.33)	(\$42.74)	\$0.00	\$0.00	\$0.00	\$0.00	(\$2.35)	(\$1.76)	(\$39.00)
(15)	1,142	\$2,181.80	\$2,305.60	(\$123.80)	-5.4%	(\$35.17)	(\$45.10)	\$0.00	\$0.00	\$0.00	\$0.00	(\$2.48)	(\$1.85)	(\$41.05)

**Residential Heating Low Income:**

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)		(i)	(j)	(k)	(l)	(m)	(n)
	Annual Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	GCR	Discount	Base DAC	Base DAC	ISR	EE	LJHEAP	GET	GET	GET Exemption
(16)															
(17)															
(18)															
(19)															
(20)	548	\$846.09	\$891.05	(\$44.95)	-5.0%	(\$16.89)	\$9.59	(\$21.46)	\$0.00	\$0.00	\$0.00	\$0.00	(\$0.89)	(\$15.30)	(\$15.30)
(21)	608	\$923.89	\$973.59	(\$49.70)	-5.1%	(\$18.70)	\$10.63	(\$23.83)	\$0.00	\$0.00	\$0.00	\$0.00	(\$0.99)	(\$16.82)	(\$16.82)
(22)	667	\$1,000.36	\$1,054.78	(\$54.42)	-5.2%	(\$20.53)	\$11.67	(\$26.14)	\$0.00	\$0.00	\$0.00	\$0.00	(\$1.08)	(\$18.34)	(\$18.34)
(23)	726	\$1,076.82	\$1,135.96	(\$59.14)	-5.2%	(\$22.36)	\$12.70	(\$28.45)	\$0.00	\$0.00	\$0.00	\$0.00	(\$1.18)	(\$19.85)	(\$19.85)
(24)	785	\$1,153.25	\$1,217.07	(\$63.82)	-5.2%	(\$24.17)	\$13.74	(\$30.78)	\$0.00	\$0.00	\$0.00	\$0.00	(\$1.27)	(\$21.33)	(\$21.33)
(25)	845	\$1,231.03	\$1,299.63	(\$68.60)	-5.3%	(\$26.05)	\$14.79	(\$33.12)	\$0.00	\$0.00	\$0.00	\$0.00	(\$1.37)	(\$22.85)	(\$22.85)
(26)	905	\$1,308.84	\$1,382.19	(\$73.35)	-5.3%	(\$27.86)	\$15.84	(\$35.50)	\$0.00	\$0.00	\$0.00	\$0.00	(\$1.47)	(\$24.36)	(\$24.36)
(27)	964	\$1,385.28	\$1,463.30	(\$78.02)	-5.3%	(\$29.71)	\$16.87	(\$37.78)	\$0.00	\$0.00	\$0.00	\$0.00	(\$1.57)	(\$25.84)	(\$25.84)
(28)	1,023	\$1,461.75	\$1,544.47	(\$82.72)	-5.4%	(\$31.50)	\$17.90	(\$40.10)	\$0.00	\$0.00	\$0.00	\$0.00	(\$1.66)	(\$27.36)	(\$27.36)
(29)	1,082	\$1,538.20	\$1,625.65	(\$87.44)	-5.4%	(\$33.33)	\$18.94	(\$42.42)	\$0.00	\$0.00	\$0.00	\$0.00	(\$1.76)	(\$28.87)	(\$28.87)
(30)	1,142	\$1,615.99	\$1,708.20	(\$92.21)	-5.4%	(\$35.17)	\$19.99	(\$44.78)	\$0.00	\$0.00	\$0.00	\$0.00	(\$1.85)	(\$30.39)	(\$30.39)



The Narragansett Electric Company  
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Gas Cost Recovery (GCR) Filing  
Bill Impact Analysis with Various Levels of Consumption  
(Including December 2023 - March 2024 Gross Earnings Tax (GET) Exemption)

(31)	(a)	(b)	(c)	(d)	(e)	(f)	(g)		(i)	(j)	(l)	(m)
							Base DAC	ISR				
(32)	Annual Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	GCR	DAC		EE	LIHEAP	GET	GET Exemption
(33)	144	\$432.42	\$445.15	(\$12.73)	-2.9%	(\$1.18)	(\$5.68)	\$0.00	\$0.00	\$0.00	(\$0.21)	(\$5.66)
(34)	158	\$456.83	\$470.67	(\$13.84)	-2.9%	(\$1.30)	(\$6.23)	\$0.00	\$0.00	\$0.00	(\$0.23)	(\$6.08)
(35)	172	\$481.27	\$496.21	(\$14.94)	-3.0%	(\$1.43)	(\$6.80)	\$0.00	\$0.00	\$0.00	(\$0.25)	(\$6.45)
(36)	189	\$510.95	\$527.16	(\$16.21)	-3.1%	(\$1.57)	(\$7.48)	\$0.00	\$0.00	\$0.00	(\$0.28)	(\$6.88)
(37)	202	\$533.62	\$550.81	(\$17.19)	-3.1%	(\$1.65)	(\$7.99)	\$0.00	\$0.00	\$0.00	(\$0.30)	(\$7.25)
(38)	220	\$564.99	\$583.55	(\$18.55)	-3.2%	(\$1.80)	(\$8.70)	\$0.00	\$0.00	\$0.00	(\$0.32)	(\$7.73)
(39)	238	\$596.45	\$616.37	(\$19.92)	-3.2%	(\$1.97)	(\$9.39)	\$0.00	\$0.00	\$0.00	(\$0.35)	(\$8.21)
(40)	251	\$619.11	\$640.05	(\$20.94)	-3.3%	(\$2.08)	(\$9.91)	\$0.00	\$0.00	\$0.00	(\$0.37)	(\$8.58)
(41)	268	\$648.78	\$670.95	(\$22.17)	-3.3%	(\$2.19)	(\$10.58)	\$0.00	\$0.00	\$0.00	(\$0.39)	(\$9.01)
(42)	282	\$673.22	\$696.49	(\$23.27)	-3.3%	(\$2.34)	(\$11.14)	\$0.00	\$0.00	\$0.00	(\$0.42)	(\$9.38)
(43)	297	\$699.37	\$723.82	(\$24.45)	-3.4%	(\$2.45)	(\$11.76)	\$0.00	\$0.00	\$0.00	(\$0.44)	(\$9.80)

**Residential Non-Heating Low Income:**

(46)	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)		(i)	(j)	(l)	(m)	(n)
								Base DAC	ISR					
(47)	Annual Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	GCR	Total Bill	DAC		EE	LIHEAP	GET	GET Exemption	
(48)	144	\$321.74	\$331.20	(\$9.46)	-2.9%	(\$1.18)	\$1.70	(\$5.62)	\$0.00	\$0.00	\$0.00	(\$0.16)	(\$4.20)	
(49)	158	\$339.79	\$350.10	(\$10.32)	-2.9%	(\$1.30)	\$1.87	(\$6.20)	\$0.00	\$0.00	\$0.00	(\$0.17)	(\$4.52)	
(50)	172	\$357.85	\$368.99	(\$11.13)	-3.0%	(\$1.43)	\$2.05	(\$6.77)	\$0.00	\$0.00	\$0.00	(\$0.19)	(\$4.79)	
(51)	189	\$379.82	\$391.89	(\$12.07)	-3.1%	(\$1.57)	\$2.25	(\$7.43)	\$0.00	\$0.00	\$0.00	(\$0.21)	(\$5.11)	
(52)	202	\$396.59	\$409.40	(\$12.81)	-3.1%	(\$1.65)	\$2.40	(\$7.95)	\$0.00	\$0.00	\$0.00	(\$0.22)	(\$5.38)	
(53)	220	\$419.81	\$433.62	(\$13.81)	-3.2%	(\$1.80)	\$2.61	(\$8.64)	\$0.00	\$0.00	\$0.00	(\$0.24)	(\$5.74)	
(54)	238	\$443.07	\$457.90	(\$14.82)	-3.2%	(\$1.97)	\$2.82	(\$9.32)	\$0.00	\$0.00	\$0.00	(\$0.26)	(\$6.09)	
(55)	251	\$459.83	\$475.41	(\$15.57)	-3.3%	(\$2.08)	\$2.98	(\$9.83)	\$0.00	\$0.00	\$0.00	(\$0.28)	(\$6.37)	
(56)	268	\$481.79	\$498.29	(\$16.50)	-3.3%	(\$2.19)	\$3.18	(\$10.51)	\$0.00	\$0.00	\$0.00	(\$0.29)	(\$6.68)	
(57)	282	\$499.86	\$517.18	(\$17.32)	-3.3%	(\$2.34)	\$3.35	(\$11.07)	\$0.00	\$0.00	\$0.00	(\$0.31)	(\$6.96)	
(58)	297	\$519.23	\$537.38	(\$18.16)	-3.4%	(\$2.45)	\$3.52	(\$11.63)	\$0.00	\$0.00	\$0.00	(\$0.33)	(\$7.27)	

The Narragansett Electric Company  
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Gas Cost Recovery (GCR) Filing  
Bill Impact Analysis with Various Levels of Consumption  
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**C & I Small:**

(61)	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(l)	(m)
(62)	Annual Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	GCR	Base DAC	ISR	EE	LJHEAP	GET	GET Exemption
(63)	830	\$1,663.05	\$1,760.62	(\$97.57)	-5.5%	(\$25.53)	(\$39.34)	\$0.00	\$0.00	\$0.00	(\$2.01)	(\$30.69)
(64)	919	\$1,807.47	\$1,915.18	(\$107.72)	-5.6%	(\$28.30)	(\$43.55)	\$0.00	\$0.00	\$0.00	(\$2.22)	(\$33.65)
(65)	1,010	\$1,955.18	\$2,073.24	(\$118.06)	-5.7%	(\$31.11)	(\$47.86)	\$0.00	\$0.00	\$0.00	(\$2.44)	(\$36.65)
(66)	1,099	\$2,099.63	\$2,227.83	(\$128.20)	-5.8%	(\$33.88)	(\$52.07)	\$0.00	\$0.00	\$0.00	(\$2.66)	(\$39.60)
(67)	1,187	\$2,242.49	\$2,380.71	(\$138.22)	-5.8%	(\$36.55)	(\$56.25)	\$0.00	\$0.00	\$0.00	(\$2.87)	(\$42.55)
(68)	1,277	\$2,388.55	\$2,537.00	(\$148.45)	-5.9%	(\$39.31)	(\$60.55)	\$0.00	\$0.00	\$0.00	(\$3.09)	(\$45.50)
(69)	1,367	\$2,534.59	\$2,693.24	(\$158.65)	-5.9%	(\$42.11)	(\$64.79)	\$0.00	\$0.00	\$0.00	(\$3.31)	(\$48.45)
(70)	1,456	\$2,679.06	\$2,847.81	(\$168.75)	-5.9%	(\$44.82)	(\$69.01)	\$0.00	\$0.00	\$0.00	(\$3.52)	(\$51.40)
(71)	1,544	\$2,821.92	\$3,000.73	(\$178.81)	-6.0%	(\$47.55)	(\$73.18)	\$0.00	\$0.00	\$0.00	(\$3.73)	(\$54.35)
(72)	1,635	\$2,969.63	\$3,158.82	(\$189.18)	-6.0%	(\$50.38)	(\$77.50)	\$0.00	\$0.00	\$0.00	(\$3.96)	(\$57.35)
(73)	1,725	\$3,115.69	\$3,315.11	(\$199.42)	-6.0%	(\$53.17)	(\$81.78)	\$0.00	\$0.00	\$0.00	(\$4.17)	(\$60.30)

**C & I Medium:**

(76)	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(l)	(m)
(77)	Annual Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	GCR	Base DAC	ISR	EE	LJHEAP	GET	GET Exemption
(78)	6,907	\$10,820.58	\$11,601.99	(\$781.41)	-6.7%	(\$212.73)	(\$372.99)	\$0.00	\$0.00	\$0.00	(\$18.12)	(\$177.57)
(79)	7,650	\$11,871.75	\$12,736.06	(\$864.30)	-6.8%	(\$235.61)	(\$413.12)	\$0.00	\$0.00	\$0.00	(\$20.06)	(\$195.51)
(80)	8,391	\$12,919.53	\$13,866.52	(\$946.99)	-6.8%	(\$258.44)	(\$453.11)	\$0.00	\$0.00	\$0.00	(\$22.01)	(\$213.44)
(81)	9,136	\$13,973.27	\$15,003.45	(\$1,030.18)	-6.9%	(\$281.39)	(\$493.34)	\$0.00	\$0.00	\$0.00	(\$23.96)	(\$231.49)
(82)	9,880	\$15,025.73	\$16,138.92	(\$1,113.20)	-6.9%	(\$304.33)	(\$533.53)	\$0.00	\$0.00	\$0.00	(\$25.91)	(\$249.43)
(83)	10,623	\$16,076.84	\$17,272.92	(\$1,196.08)	-6.9%	(\$327.20)	(\$573.62)	\$0.00	\$0.00	\$0.00	(\$27.86)	(\$267.40)
(84)	11,366	\$17,127.93	\$18,406.96	(\$1,279.03)	-6.9%	(\$350.09)	(\$613.76)	\$0.00	\$0.00	\$0.00	(\$29.81)	(\$285.37)
(85)	12,111	\$18,181.71	\$19,543.86	(\$1,362.15)	-7.0%	(\$373.05)	(\$653.99)	\$0.00	\$0.00	\$0.00	(\$31.76)	(\$303.35)
(86)	12,855	\$19,234.16	\$20,679.31	(\$1,445.15)	-7.0%	(\$395.92)	(\$694.15)	\$0.00	\$0.00	\$0.00	(\$33.71)	(\$321.36)
(87)	13,596	\$20,281.99	\$21,809.87	(\$1,527.88)	-7.0%	(\$418.75)	(\$734.18)	\$0.00	\$0.00	\$0.00	(\$35.66)	(\$339.29)
(88)	14,340	\$21,334.41	\$22,945.30	(\$1,610.90)	-7.0%	(\$441.69)	(\$774.33)	\$0.00	\$0.00	\$0.00	(\$37.61)	(\$357.27)

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Bill Impact Analysis with Various Levels of Consumption  
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**C & I L L F Large:**

(91)	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(l)	(m)
(92)	Annual Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	GCR	Base DAC	ISR	EE	LJHEAP	GET	GET Exemption
(93)	37,587	\$52,226.82	\$58,458.84	(\$6,232.02)	-10.7%	(\$1,157.69)	(\$3,942.88)	\$0.00	\$0.00	\$0.00	(\$157.75)	(\$973.70)
(94)	41,634	\$57,584.91	\$64,485.31	(\$6,900.40)	-10.7%	(\$1,282.35)	(\$4,367.42)	\$0.00	\$0.00	\$0.00	(\$174.74)	(\$1,075.89)
(95)	45,683	\$62,946.23	\$70,515.22	(\$7,568.99)	-10.7%	(\$1,407.05)	(\$4,792.15)	\$0.00	\$0.00	\$0.00	(\$191.73)	(\$1,178.06)
(96)	49,731	\$68,306.20	\$76,543.69	(\$8,237.49)	-10.8%	(\$1,531.73)	(\$5,216.78)	\$0.00	\$0.00	\$0.00	(\$208.72)	(\$1,280.26)
(97)	53,777	\$73,663.19	\$82,568.80	(\$8,905.61)	-10.8%	(\$1,656.32)	(\$5,641.21)	\$0.00	\$0.00	\$0.00	(\$225.70)	(\$1,382.38)
(98)	57,825	\$79,023.13	\$88,597.31	(\$9,574.18)	-10.8%	(\$1,781.01)	(\$6,065.86)	\$0.00	\$0.00	\$0.00	(\$242.69)	(\$1,484.62)
(99)	61,873	\$84,383.13	\$94,625.84	(\$10,242.71)	-10.8%	(\$1,905.69)	(\$6,490.48)	\$0.00	\$0.00	\$0.00	(\$259.68)	(\$1,586.86)
(100)	65,920	\$89,741.28	\$100,652.27	(\$10,910.99)	-10.8%	(\$2,030.34)	(\$6,915.01)	\$0.00	\$0.00	\$0.00	(\$276.66)	(\$1,688.98)
(101)	69,967	\$95,100.06	\$106,679.44	(\$11,579.38)	-10.9%	(\$2,155.02)	(\$7,339.53)	\$0.00	\$0.00	\$0.00	(\$293.65)	(\$1,791.19)
(102)	74,016	\$100,461.29	\$112,709.30	(\$12,248.01)	-10.9%	(\$2,279.72)	(\$7,764.30)	\$0.00	\$0.00	\$0.00	(\$310.64)	(\$1,893.35)
(103)	78,063	\$105,819.41	\$118,735.76	(\$12,916.35)	-10.9%	(\$2,404.34)	(\$8,188.84)	\$0.00	\$0.00	\$0.00	(\$327.62)	(\$1,995.55)

**C & I H L F Large:**

(106)	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(l)	(m)
(107)	Annual Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	GCR	Base DAC	ISR	EE	LJHEAP	GET	GET Exemption
(108)	41,956	\$50,638.26	\$56,344.74	(\$5,706.48)	-10.1%	(\$344.01)	(\$4,598.39)	\$0.00	\$0.00	\$0.00	(\$152.86)	(\$611.22)
(109)	46,471	\$55,823.10	\$62,140.99	(\$6,317.89)	-10.2%	(\$381.04)	(\$5,093.20)	\$0.00	\$0.00	\$0.00	(\$169.31)	(\$674.35)
(110)	50,991	\$61,013.17	\$67,943.19	(\$6,930.02)	-10.2%	(\$418.12)	(\$5,588.62)	\$0.00	\$0.00	\$0.00	(\$185.78)	(\$737.50)
(111)	55,507	\$66,199.05	\$73,740.69	(\$7,541.64)	-10.2%	(\$455.16)	(\$6,083.59)	\$0.00	\$0.00	\$0.00	(\$202.23)	(\$800.66)
(112)	60,028	\$71,390.27	\$79,544.09	(\$8,153.82)	-10.3%	(\$492.22)	(\$6,579.08)	\$0.00	\$0.00	\$0.00	(\$218.70)	(\$863.82)
(113)	64,545	\$76,577.21	\$85,342.69	(\$8,765.48)	-10.3%	(\$529.24)	(\$7,074.14)	\$0.00	\$0.00	\$0.00	(\$235.16)	(\$926.94)
(114)	69,062	\$81,764.19	\$91,141.40	(\$9,377.21)	-10.3%	(\$566.32)	(\$7,569.21)	\$0.00	\$0.00	\$0.00	(\$251.61)	(\$990.07)
(115)	73,583	\$86,955.44	\$96,944.81	(\$9,989.37)	-10.3%	(\$603.38)	(\$8,064.68)	\$0.00	\$0.00	\$0.00	(\$268.08)	(\$1,053.23)
(116)	78,099	\$92,141.29	\$102,742.25	(\$10,600.96)	-10.3%	(\$640.42)	(\$8,559.62)	\$0.00	\$0.00	\$0.00	(\$284.54)	(\$1,116.38)
(117)	82,619	\$97,331.42	\$108,544.48	(\$11,213.06)	-10.3%	(\$677.47)	(\$9,055.05)	\$0.00	\$0.00	\$0.00	(\$301.01)	(\$1,179.54)
(118)	87,137	\$102,520.33	\$114,345.18	(\$11,824.85)	-10.3%	(\$714.50)	(\$9,550.18)	\$0.00	\$0.00	\$0.00	(\$317.46)	(\$1,242.70)

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Gas Cost Recovery (GCR) Filing  
Bill Impact Analysis with Various Levels of Consumption  
(Including December 2023 - March 2024 Gross Earnings Tax (GET) Exemption)

**C & I L L F Extra-Large:**

(121)	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(l)	(m)
(122)	Annual	Proposed	Current	Difference	% Chg	GCR	Base DAC	ISR	EE	LJHEAP	GET	GET
(123)	Consumption (Therms)	Rates	Rates						due to:			Exemption
(124)												
(125)	233,835	\$243,213.80	\$285,700.13	(\$42,486.33)	-14.9%	(\$7,202.11)	(\$29,767.20)	\$0.00	\$0.00	\$0.00	(\$1,143.38)	(\$4,373.64)
(126)	259,019	\$268,747.12	\$315,802.50	(\$47,055.38)	-14.9%	(\$7,977.78)	(\$32,973.09)	\$0.00	\$0.00	\$0.00	(\$1,266.52)	(\$4,837.99)
(127)	284,197	\$294,274.87	\$345,898.35	(\$51,623.48)	-14.9%	(\$8,753.27)	(\$36,178.29)	\$0.00	\$0.00	\$0.00	(\$1,389.64)	(\$5,302.28)
(128)	309,381	\$319,808.17	\$376,000.72	(\$56,192.55)	-14.9%	(\$9,528.93)	(\$39,384.21)	\$0.00	\$0.00	\$0.00	(\$1,512.78)	(\$5,766.63)
(129)	334,562	\$345,338.70	\$406,099.85	(\$60,761.15)	-15.0%	(\$10,304.51)	(\$42,589.75)	\$0.00	\$0.00	\$0.00	(\$1,635.90)	(\$6,230.98)
(130)	359,745	\$370,871.10	\$436,201.10	(\$65,330.00)	-15.0%	(\$11,080.11)	(\$45,795.55)	\$0.00	\$0.00	\$0.00	(\$1,759.04)	(\$6,695.30)
(131)	384,928	\$396,403.49	\$466,302.43	(\$69,898.93)	-15.0%	(\$11,855.78)	(\$49,001.35)	\$0.00	\$0.00	\$0.00	(\$1,882.18)	(\$7,159.62)
(132)	410,110	\$421,934.92	\$496,402.60	(\$74,467.67)	-15.0%	(\$12,631.39)	(\$52,207.00)	\$0.00	\$0.00	\$0.00	(\$2,005.31)	(\$7,623.97)
(133)	435,293	\$447,467.30	\$526,503.90	(\$79,036.60)	-15.0%	(\$13,407.01)	(\$55,412.82)	\$0.00	\$0.00	\$0.00	(\$2,128.45)	(\$8,088.32)
(134)	460,471	\$472,995.11	\$556,599.74	(\$83,604.63)	-15.0%	(\$14,182.49)	(\$58,617.97)	\$0.00	\$0.00	\$0.00	(\$2,251.56)	(\$8,552.61)
(135)	485,655	\$498,528.36	\$586,702.10	(\$88,173.73)	-15.0%	(\$14,958.21)	(\$61,823.86)	\$0.00	\$0.00	\$0.00	(\$2,374.70)	(\$9,016.96)

**C & I H L F Extra-Large:**

(136)	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(l)	(m)
(137)	Annual	Proposed	Current	Difference	% Chg	GCR	Base DAC	ISR	EE	LJHEAP	GET	GET
(138)	Consumption (Therms)	Rates	Rates						due to:			Exemption
(139)												
(140)	486,528	\$464,806.11	\$531,736.66	(\$66,930.54)	-12.6%	(\$3,989.53)	(\$56,048.06)	\$0.00	\$0.00	\$0.00	(\$1,856.83)	(\$5,036.12)
(141)	538,924	\$514,202.61	\$588,334.41	(\$74,131.80)	-12.6%	(\$4,419.18)	(\$62,084.04)	\$0.00	\$0.00	\$0.00	(\$2,056.80)	(\$5,571.78)
(142)	591,320	\$563,598.22	\$644,931.36	(\$81,333.14)	-12.6%	(\$4,848.82)	(\$68,120.06)	\$0.00	\$0.00	\$0.00	(\$2,256.77)	(\$6,107.49)
(143)	643,718	\$612,996.39	\$701,531.11	(\$88,534.73)	-12.6%	(\$5,278.45)	(\$74,156.35)	\$0.00	\$0.00	\$0.00	(\$2,456.75)	(\$6,643.18)
(144)	696,109	\$662,387.67	\$758,123.06	(\$95,735.39)	-12.6%	(\$5,708.09)	(\$80,191.77)	\$0.00	\$0.00	\$0.00	(\$2,656.70)	(\$7,178.83)
(145)	748,506	\$711,784.98	\$814,721.78	(\$102,936.80)	-12.6%	(\$6,137.75)	(\$86,227.86)	\$0.00	\$0.00	\$0.00	(\$2,856.67)	(\$7,714.52)
(146)	800,903	\$761,182.23	\$871,320.53	(\$110,138.30)	-12.6%	(\$6,567.41)	(\$92,264.04)	\$0.00	\$0.00	\$0.00	(\$3,056.64)	(\$8,250.21)
(147)	853,294	\$810,573.58	\$927,912.50	(\$117,338.93)	-12.6%	(\$6,996.99)	(\$98,299.48)	\$0.00	\$0.00	\$0.00	(\$3,256.59)	(\$8,785.86)
(148)	905,692	\$859,971.74	\$984,512.24	(\$124,540.50)	-12.6%	(\$7,426.66)	(\$104,335.72)	\$0.00	\$0.00	\$0.00	(\$3,456.57)	(\$9,321.55)
(149)	958,088	\$909,367.34	\$1,041,109.21	(\$131,741.87)	-12.7%	(\$7,856.33)	(\$110,371.74)	\$0.00	\$0.00	\$0.00	(\$3,656.54)	(\$9,857.26)
(150)	1,010,485	\$958,764.65	\$1,097,707.94	(\$138,943.29)	-12.7%	(\$8,285.97)	(\$116,407.89)	\$0.00	\$0.00	\$0.00	(\$3,856.51)	(\$10,392.92)