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ATTORNEYS AT LAW

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(617) 951-1400

September 23, 2025

Ellen Golde, Division Clerk
Rhode Island Division of Public Utilities and Carriers
89 Jefferson Boulevard
Warwick, RI 02888

Re: Docket No. D-25-14-The Narragansett Electric Company d/b/a Rhode Island Energy Petition for Approval of Amendment to Firm Natural Gas Transportation Service Agreement with Manchester Street, L.L.C.
Responses to Advocacy Section Data Requests – Set 1

Dear Ms. Golde:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the "Company"), enclosed for filing is the Company's responses to the following data requests in the Advocacy Section's First Set of Data Requests in the above-referenced matter: AS 1-2, AS 1-4, AS 1-5, AS 1-6, AS 1-7, and AS 1-8. The Company has requested from counsel for the Division of Public Utilities and Carriers ("Division") Advocacy Section a one-week extension of time to respond to AS 1-1 and AS 1-3.

This filing also contains a Motion for Protective Treatment of Confidential Information in accordance with 815-RICR-00-00-1.3(D) of the Division's Rules of Practice and Procedure ("Rule 1.3(D)") and R.I. Gen. Laws § 38-2-2(4)(B). The Company seeks protection from public disclosure of confidential and privileged information contained Attachment AS-1-2. In compliance with Rule 1.3(D), the Company has provided the Division with one complete, unredacted copy of the confidential information in a sealed envelope marked **"HIGHLY CONFIDENTIAL INFORMATION – DO NOT RELEASE! Contains Critical Energy Infrastructure Information ("CEII")"** and has included redacted copies of the materials for the public filing.

Please do not hesitate to contact me if you have any questions. Thank you for your attention to this matter.

Very truly yours,

Robert J. Humm

Enclosures

cc: Docket No. D-25-14 Service List
Al Mancini, Division (w/confidential attachment)

STATE OF RHODE ISLAND
DIVISION OF PUBLIC UTILITIES AND CARRIERS

The Narragansett Electric Company d/b/a Rhode Island Energy's Petition for Approval of Amendment to Firm Natural Gas Transportation Service Agreement with Manchester Street, L.L.C.	)	Docket No. D-25-14

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") respectfully requests that the Rhode Island Division of Public Utilities and Carriers ("Division") provide confidential treatment and grant protection from public disclosure of certain confidential, sensitive, and proprietary information submitted in this proceeding in accordance with R.I. Gen. Laws § 38-2-2(4)(B) and 815-RICR-00-00-1.3(D)(3) of the Division's Rules of Practice and Procedure ("Rules"). The Company also respectfully requests that, pending entry of that finding, the Division preliminarily grant the Company's request for confidential treatment pursuant to815-RICR-00-00-1.3(D)(2).

I. BACKGROUND

On June 6, 2025, the Company filed with the Division a Petition for Approval of Amendment to Firm Natural Gas Transportation Service Agreement with Manchester Street, L.L.C. (the "Customer") (the "Petition"). Thereafter, on September 23, 2025, the Company submitted responses to the Division Advocacy Section's ("Advocacy Section") First Set of Data Requests (Advocacy Section Set 1). Advocacy Section Set 1 includes AS 1-2, which seeks a "map or site plan of the infrastructure used to service Manchester St., including all connections

back to the Algonquin transmission line." Attachment AS 1-2 in response to AS 1-2 includes confidential information and Critical Energy Infrastructure Information ("CEII"), which provides the requested confidential map of the infrastructure used to service the Manchester Street Power Station. For purposes of the Company's responses to PUC Set 1, the Company is providing both redacted and un-redacted versions of Attachment AS 1-2.

Therefore, the Company seeks protective treatment for the confidential information and CEII in Attachment AS 1-2.

II. LEGAL STANDARD

815-RICR-00-00-1.3(D) of the Division's Rules provides that access to public records shall be granted in accordance with the Access to Public Records Act ("APRA"), R.I. Gen. Laws § 38-2-1, et seq. Under the APRA, all documents and materials submitted in connection with the transaction of official business by an agency is deemed to be a "public record," unless the information contained in such documents and materials falls within one of the exemptions specifically identified in R.I. Gen. Laws § 38-2-2(4). To the extent that information in a record provided to the Division falls within one of the designated ARPA exemptions, the Division has the authority under the terms of the APRA to deem such information 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 disclosure of information would likely either (1) impair the government's ability to obtain necessary information in the future; or (2) 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 voluntarily 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.

III. BASIS FOR CONFIDENTIALITY

The information contained in Attachment AS 1-2 is confidential and should be protected from public disclosure because it includes confidential map of the infrastructure used to service the Manchester Street Power Station, which is deemed CEII. The Manchester Street Power Station is a natural gas electric generation facility owned by the Customer located in Providence that operates as a 350-megawatt merchant power plant. The Manchester Street Gas Gate Station is a natural gas gate station located on Manchester Street in Providence, that is connected directly to the Algonquin interstate gas transmission line through a dedicated gas take station and distribution pipeline owned and operated by the Company and that supplies the Manchester Street Power Station. Under the agreement requested to be extended in this proceeding, the Company transports and delivers to the Manchester Street Gas Gate Station an amount of gas up to the Daily Base Volume amount of 95,000 million British thermal units of natural gas per day. Therefore, public disclosure of the information identified as CEII in Attachment AS 1-2 would negatively impact the Company's ability to effectively operate to provide safe and reliable service to its customers. Public disclosure of the information identified as CEII would also negatively impact the Customer's ability to generate electricity to serve electric distribution customers in Rhode Island. This information is of the type that the Company does not ordinarily make public. Accordingly, the Company is providing Attachment AS 1-2 on a voluntary basis to assist the Division with its decision-making in this proceeding but respectfully requests that the

Division provide confidential treatment to the confidential information and CEII contained in the document.

IV. CONCLUSION

For the foregoing reasons, the Company respectfully requests that the Division grant this Motion for Protective Treatment of Confidential Information.

Respectfully submitted,

The Narragansett Electric Company
d/b/a Rhode Island Energy

By its attorneys,

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Dated: September 23, 2025

AS 1-2

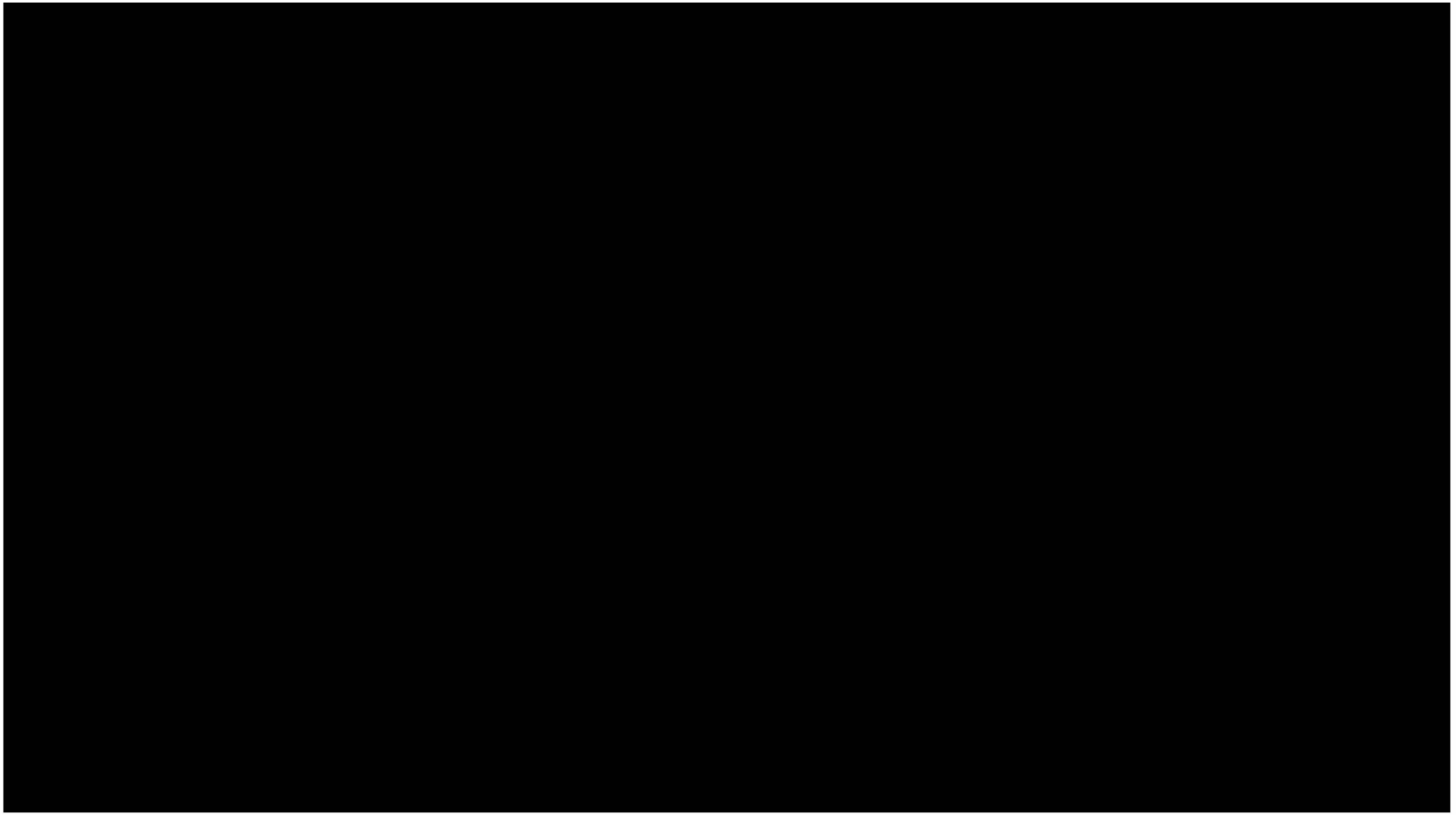
Request:

Please provide a map or site plan of the infrastructure used to service Manchester St. including all connections back to the Algonquin transmission line.

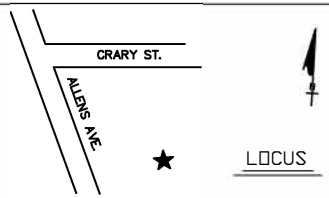
Response:

Please see Attachment AS 1-2.

Prepared by or under the supervision of: Laeyeng Hunt



INSTALLATION DATE:



MANCHESTER GATE STATION FLOW DIAGRAM

30 ALLENS AVE., PROVIDENCE, RI

INLET MAOP: 750 PSIG, OUTLET MAOP: 350 PSIG.

NOT TO SCALE

Rhode Island Energy™
a PPL company

NO	DESCRIPTION	DATE	DFT	APP
1	FLOW DIAGRAM CREATION			

REVISIONS

DWG. NO.

FD-RIS-400

ASSET ID: RIS-400

AS 1-4

Request:

Please explain how the heater gas costs are treated in RIE's gas recovery mechanism. Please include documentation.

Response:

The revenue requirement in the Company's last base distribution rate case, Docket No. 4770, was reduced for the entire Dominion Energy Manchester Street, Inc. (predecessor to Manchester Street, L.L.C. and referred to herein as "Dominion") contract revenue, which includes operation and maintenance costs as well as heater gas costs. Because customers are already receiving the necessary credit through lower base distribution rates to offset Dominion-related commodity costs, there is no need to reflect the heater gas costs revenue in the Company's gas cost recovery mechanism ("GCR"). The Company provided a detailed explanation of this process upon implementation of new base distribution rates effective September 1, 2018, in its response to Division 1-40, part b, in the 2019 GCR filing, Docket No. 4963.

Please see Attachment AS 1-4 for a copy of the referenced response from Docket No. 4963.

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4963
2019 Annual Gas Cost Recovery Filing
Responses to the Division's First Set of Data Requests
Issued August 16, 2019

Division 1-40

Request:

Please provide an explanation for each of the following line items included in the June 28, 2019 Annual Gas Recovery Reconciliation filing:

a. Schedule 2, page 3, lines 74 and 75. Storage Fixed Costs-Facilities and Storage Fixed Costs-Deliveries;
b. Schedule 3, page 1, lines 10 and 11. Manchester Street Volumes and Fixed Cost Factor;
c. Schedule 3, page 1, lines 18-20. Please explain why revenues are not realized in each month there are sales volumes;
d. Schedule 3, page 1, lines 21-23. Please explain why the variable supply costs fluctuates significantly from month to month; and
e. Schedule 3, page 1, line 25. Referred Responsibility.

Response:

a. Storage Fixed Costs-Facilities represents fixed costs incurred by the Company to reserve space in various storage facilities to store gas for use during winter months. Conversely, Storage Fixed Cost-Deliveries represents fixed costs incurred by the Company to reserve capacity on various pipeline segments used to deliver natural gas from underground storage facilities to the city gate when called upon.

b. Lines (10)-(11) and (27)-(28) reflect revenues generated by the Company's special contract to provide firm gas supply service to Dominion Power (Dominion) at the Manchester Street Gate Station in Providence, Rhode Island. In accordance with the terms of the contract, the Company charges Dominion a flat annual fee, which includes the commodity cost of gas necessary to operate the boilers located at the gate station. Therefore, to ensure that the Company does not recover the cost of commodity it purchases to serve Dominion from tariff sales customers, the Company reflects an estimate of commodity revenue received under this contract in the GCR reconciliation. This estimate is derived by multiplying Dominion's monthly throughput volumes by the GCR Fixed Cost Factor (lines (10)-(11)) and the Variable Cost Factor (lines (27)-(28)), grossed up by the uncollectible percentage approved in the most recent base distribution rate case. Therefore, commodity cost incurred by the Company to serve Dominion is offset by this revenue reflected in the GCR reconciliation.

However, in preparing this response, the Company discovered that it inadvertently credited this commodity revenue to customers twice beginning in September 2018 with the implementation of new base distribution rates approved in Docket No. 4770. In

designing the new base distribution rates, the Company credited the entire annual fee associated with the Dominion contract, which includes both distribution and commodity revenue, to firm tariff customers. See Docket No. 4770 Compliance Attachment 14, Schedule 2, Page 5, Line 10. Therefore, customers are already receiving the necessary credit through lower base distribution rates to offset Dominion-related commodity costs. Consequently, to avoid crediting customers for the commodity portion of the Dominion revenue twice, once through base distribution rates and again through the GCR, the Company will cease crediting the Dominion commodity costs in future GCR reconciliations beginning in November 2019. The Company will not revise its November 2018 through October 2019 GCR reconciliation to exclude the Dominion credits.

c. The Transition Sales Service (TSS) is a surcharge billed to those customers who migrate from transportation service back to sales service. The TSS surcharge is calculated[1] each month in accordance with the Company's Tariff[2] and posted to the Company's website. There is no revenue reflected in Schedule 3, page 1, lines (18)-(20) for the months of April 2018 through November 2018 and January 2019 through March 2019 because the TSS surcharge was zero during those periods. Please see Attachment DIV 1-40 for the historical summary of TSS rates posted on the Company's external website.

d. Schedule 3, page 1, lines (21)-(23) show the calculation of revenues attributable to Default Transportation Service as described in the Company's Tariff, Section 6, Transportation Terms and Conditions, Schedule C, Section 2.04.0. This service is available for customers who do not have pipeline capacity assignment from the Company and whose marketers are no longer delivering gas on their behalf. This service is intended as a temporary backstop for customers to receive gas service while securing a new marketer. The Default Service Rate is calculated[3] each month and will vary monthly depending upon the daily index as well as seasonal multipliers. Please see Attachment DIV 1-40 for the historical summary of the Default Service Rates posted on the Company's external website.

e. Schedule 3, page 1, line (25) shows the revenue associated with Deferred Responsibility charge, which ensures that customers migrating from sales service to transportation service are charged or credited their fair share of the deferred gas cost balance. As described in detail in the Company's Tariff, Section 2, Schedule A, Section 9.0, the Deferred Gas Cost Responsibility seeks to assess to migrating customers their fair share of (1) the prior period deferred gas cost reconciliation amount reflected in the Company's current Gas Charge; and (2) any incremental under-recovery or over-recovery of actual costs versus projected costs that accrue while the current Gas Charge is in effect. These

[1] Each month the Company provides the detail calculation of the TSS Rate to the Division and PUC via email.
[2] See RIPUC NG-GAS No. 101, Section 5, Commercial and Industrial Services, Schedule H
[3] Each month the Company provides the detail calculation of the Default Rate to the Division and PUC via email.

charges or credits are reflected in the GCR reconciliation (Schedule 3, page 1, line (25)) to ensure that the remaining sales customers are unaffected by customer migration.

AS 1-5

Request:

Please explain how the revenues and expenses under this Agreement were treated in Docket 4770. Please provide documentation supporting the rate treatment.

Response:

The revenues for Dominion Energy Manchester Street, Inc. (currently known as Manchester Street, L.L.C.) reduced the revenue requirement in Docket No. 4770 on Compliance Attachment 2, Schedule-2-GAS, Page 1 of 1, Line 14, as provided in Attachment AS 1-5, Page 1.

The Company does not track operation and maintenance ("O&M") costs associated with the facilities to serve the Manchester Street Power Station. The O&M costs for this contract, along with the O&M activities for its other natural gas distribution facilities, would be accounted for in the appropriate O&M schedules in Docket No. 4770 on Compliance Attachment 2, Schedule MAL-3, as provided in Attachment AS 1-5, Pages 2 through 7.

THE NARRAGANSETT ELECTRIC COMPANY
d/b/a NATIONAL GRID
RIPUC Docket Nos. 4770/4780
Compliance Attachment 2
Schedule 2-GAS
Page 1 of 1

The Narragansett Electric Company d/b/a National Grid
Gas Operations Revenues by Component
For the Test Year Ended June 30, 2017 and the Rate Year Ending August 31, 2019

	Description	Test Year Ended June 30, 2017	Normalizing Adjustments	Test Year Ended June 30, 2017 (Adjusted)	Proforma Adjustments	Rate Year Ending August 31, 2019	Adjustments to Reflect Conditions in Rate Year Ending August 31, 2020	Rate Year Ending August 31, 2020	Adjustments to Reflect Conditions in Rate Year Ending August 31, 2021	Rate Year Ending August 31, 2021
		(a)	(b)	(c) = (a) + (b)	(d)	(e) = (c) + (d)	(f)	(g) = (e) + (f)	(h)	(i) = (g) + (h)
	Firm Revenues:									
1	Delivery- Base Revenues excluding AGT,LIHEAP, and Envir Base Rate	$169,061,454	$2,391,422	$171,452,876	$1,955,965	$173,408,841	$5,823,471	$179,232,312	$5,726,761	$184,959,073
2	LIAP in Base Rates			$0		$0	$0	$0	$0	$0
3	Energy Efficiency-Weatherization Program in Base Rates			$0		$0	$0	$0	$0	$0
4	Advanced Gas Technologies in Base Rates			$0		$0	$0	$0	$0	$0
5	Environmental Cost Recovery in Base Rates	$1,402,848	($92,848)	$1,310,000	$0	$1,310,000	$0	$1,310,000	$0	$1,310,000
6	Gas Lights	$22,148	$0	$22,148	$0	$22,148	$0	$22,148	$0	$22,148
7	Sub-Total Delivery Rates	$170,486,450	$2,298,574	$172,785,024	$1,955,965	$174,740,989	$5,823,471	$180,564,460	$5,726,761	$186,291,221
8										
9	Gas Cost Recovery Revenues	$123,331,582	($123,331,582)	$0	$0	$0	$0	$0	$0	$0
10	DAC Revenues	$31,264,074	($31,264,074)	$0	$0	$0	$0	$0	$0	$0
11	Energy Efficiency Revenues	$27,861,870	($27,861,870)	$0	$0	$0	$0	$0	$0	$0
12	Sub-Total Firm Tariff Revenues	$352,943,977	($180,158,953)	$172,785,024	$1,955,965	$174,740,989	$5,823,471	$180,564,460	$5,726,761	$186,291,221
13				$0		$0	$0	$0	$0	$0
14	Special Contract- Dominion Power	$224,996		$224,996	$0	$224,996	$0	$224,996	$0	$224,996
15				$0	$0	$0	$0	$0	$0	$0
16	Non Firm Revenues	$2,466,036	($1,030,032)	$1,436,004	$0	$1,436,004	$0	$1,436,004	$0	$1,436,004
17										
18	Total Billed Revenues	$355,635,009	($181,188,985)	$174,446,024	$1,955,965	$176,401,989	$5,823,471	$182,225,460	$5,726,761	$187,952,221
19							$0	$0	$0	$0
20	**Other Operating Revenues:**						$0	$0	$0	$0
21							$0	$0	$0	$0
22	Miscellaneous Fees/Credits						$0	$0	$0	$0
23	Paperless Bill Credits			$0		$0				
24	Account Restoration Fee		$81,848	$81,848	$232,454	$314,302	$0	$314,302	$0	$314,302
25	Customer Arrearage Fee (Late Payment Fees)	($1,428)	$411,080	$409,652		$409,652	$0	$409,652	$0	$409,652
26	Return Check Fee		$63,735	$63,735	($33,984)	$29,751	$0	$29,751	$0	$29,751
27	AMR Opt Out Fee	$286	$0	$286	$0	$286	$0	$286	$0	$286
28	Sub-total Fees/Credits	($1,143)	$556,663	$555,520	$198,470	$753,990	$0	$753,990	$0	$753,990
29										
30	Rental Expense	$248,262		$248,262		$248,262	$0	$248,262	$0	$248,262
31	AFUDC- Equity/Debt	$0	($23,725)	($23,725)		($23,725)	$0	($23,725)	$0	($23,725)
32	Miscellaneous Revenue Adjustments	($51,583)		($51,583)		($51,583)	$0	($51,583)	$0	($51,583)
33	Non Utility Billing		$937,241	$937,241		$937,241	$0	$937,241	$0	$937,241
34										
35	Revenue Decoupling Adj	$1,332,052		$1,332,052	($3,916,702)	($2,584,650)	$0	($2,584,650)	$0	($2,584,650)
36	ISR FY16 Recon FY 17	$24,428,803	($24,428,803)	$0	$37,129,852	$37,129,852	$0	$37,129,852	$0	$37,129,852
37	On System Margin Adj	($63,674)	$63,674							
38	Settlement Agreement DK 4323 Article III. B.4.	($322,761)	$322,761	$0		$0	$0	$0	$0	$0
39	Gross Receipts Tax Revenues	$10,722,138	($10,722,138)	$0		$0	$0	$0	$0	$0
40				$0		$0	$0	$0	$0	$0
41	Off System Sales	$10,540,373	($10,540,373)							
42	Unbilled Revenues & Cost	($7,340,302)	$7,340,302	$0		$0	$0	$0	$0	$0
43	EE Shareholder Incentive	$1,541,775	($1,541,775)	$0		$0	$0	$0	$0	$0
44	NGPMP Shareholder Incentive	$904,843	($904,843)							
45				$0		$0	$0	$0	$0	$0
46	Offsetting Manual Journal Entries			$0		$0	$0	$0	$0	$0
47	LIAP in Base Rates	($1,664,685)	$1,664,685	$0		$0	$0	$0	$0	$0
48	Energy Efficiency-Weatherization Program in Base Rates	($200,000)	$200,000	$0		$0	$0	$0	$0	$0
49	Advanced Gas Technologies in Base Rates	($313,393)	$313,393							
50	Environmental Cost Recovery in Base Rates	($1,368,476)	$1,368,476	$0		$0	$0	$0	$0	$0
51	GCR Deferral	$8,305,653	($8,305,653)							
52	DAC Deferral	($23,700,728)	$23,700,728	$0		$0	$0	$0	$0	$0
53	EE Deferral	($555,371)	$555,371							
54	Other Accounting Adj.	($918,567)	$918,567	$0		$0	$0	$0	$0	$0
55				$0	$0	$0	$0	$0	$0	$0
56	Total Other Operating Revenues	$21,523,216	($18,525,450)	$2,997,766	$33,411,620	$36,409,386	$0	$36,409,386	$0	$36,409,386
57										
58	Total Operating Revenues	$377,158,225	($199,714,435)	$177,443,790	$35,367,585	$212,811,375	$5,823,471	$218,634,846	$5,726,761	$224,361,607
59										
60	Gas Cost Expense									
61										
62	Total	$135,754,254	($135,754,254)	$0	$0	$0	$0	$0	$0	$0
63										
64	Net Margin	$241,403,971	($63,960,182)	$177,443,790	$35,367,585	$212,811,375	$5,823,471	$218,634,846	$5,726,761	$224,361,607

Column Notes

(a)	Per Company Books
1(b)	Schedule PP-1-GAS Pg. 2 Ln.24 Col (e)
1(d)	Schedule PP-1-GAS Pg. 2 Ln.24 Col (g)
5(b)	Normalization Adjustment to establish Environmental base rate recovery at $1,310,000
16(b)	Gas Costs for Non Firm Sales Customers
24(b)	Account Restoration Fee Reallocated from FERC Acct. 908.
24(d)	Schedule PP-3(a) Pg 1 Ln 12
25(b)	Customer Arrearage Fees Reallocated from FERC Acct. 419
26(b)	Return Check Fess Reallocated from Narragansett Electric
26(d)	Schedule PP-3(c) Pg 1 Ln 28
31(b)	AFUDC Reallocated from FERC Acct. 419
33(b)	Non Utiliy Billing Reallocated from Narragansett Electric
35(d)	Schedule PP-1 (c)-GAS Pg. 1 Ln 7
36(d)	Workpaper 12-GAS (REV-2)

Line Notes

7	Sum of Line 1 through Line 6
12	Sum of Line 7 through Line 11
18	Sum of Line 12 through Line 16
28	Sum of Line 23 through Line 27
56	Sum of Line 28 through Line 54
58	Line 18 + Line 56
64	Line 58 + Line 62

THE NARRAGANSETT ELECTRIC COMPANY
d/b/a NATIONAL GRID
RIPUC Docket Nos. 4770/4780
Compliance Attachment 2
Schedule MAL-3
Page 1 of 8

The Narragansett Electric Company d/b/a National Grid
Operating Expenses by Component
Summary (ELECTRIC & GAS)

		Schedule Reference	Test Year Ended June 30, 2017(Per Books)			Normalizing Adjustments			Test Year Ended June 30, 2017(as Adjusted)		
			Total	Electric	Gas	Total	Electric	Gas	Total	Electric	Gas
			(a) = (b) + (c)	(b)	(c)	(d) = (e) + (f)	(e)	(f)	(g) = (h) + (i)	(h) = (b) + (e)	(i) = (c) + (f)
	Operation & Maintenance Expenses:										
1	Labor	Schedule 12	$90,778,557	$54,756,249	$36,022,308	($16,463,419)	($10,639,332)	($5,824,087)	$74,315,139	$44,116,917	$30,198,221
2	Health Care	Schedule 13	$12,341,700	$7,901,703	$4,439,997	($1,217,312)	($1,214,503)	($2,810)	$11,124,388	$6,687,200	$4,437,188
3	Group Life Insurance	Schedule 14	$930,683	$579,702	$350,981	($92,905)	($92,745)	($160)	$837,778	$486,957	$350,821
4	Thrift Plan	Schedule 15	$3,865,292	$2,489,542	$1,375,749	($407,946)	($406,993)	($954)	$3,457,345	$2,082,550	$1,374,796
5	FAS 112 / ASC 712	Schedule 16	($572,522)	($333,759)	($238,762)	$572,522	$333,759	$238,762	($0)	($0)	($0)
6	Service Company Rents	Schedule 17	$17,062,952	$13,985,369	$3,077,583	($6,995,280)	($6,644,381)	($350,899)	$10,067,672	$7,340,988	$2,726,684
7	Joint Facilities	Schedule 18	$1,579,848	$1,018,396	$561,452	$100,328	$106,159	($5,831)	$1,680,176	$1,124,555	$555,621
8	Uninsured Claims	Schedule 19	$1,648,059	$801,565	$846,495	($124,043)	($123,909)	($134)	$1,524,017	$677,655	$846,361
9	Insurance Premium	Schedule 20	$2,926,210	$2,097,226	$828,984	($286,481)	($286,481)	$0	$2,639,729	$1,810,745	$828,984
10	Regulatory Assessment Fees	Schedule 21	$6,862,284	$4,964,621	$1,897,662	($678,167)	($678,167)	$0	$6,184,116	$4,286,454	$1,897,662
11	Uncollectible Accounts	Schedule 22	$12,978,156	$8,952,665	$4,025,491	($3,294,644)	($4,987,981)	$1,693,337	$9,683,512	$3,964,684	$5,718,828
12	Postage	Schedule 23	$3,780,429	$2,460,952	$1,319,478	($24,107)	($16,697)	($7,410)	$3,756,323	$2,444,255	$1,312,068
13	Strike Contingency	Schedule 24	$8,194	$8,194	$0	$0	$0	$0	$8,194	$8,194	$0
14	Environmental Response Fund	Schedule 25	$3,078,000	$3,078,000	$0	$0	$0	$0	$3,078,000	$3,078,000	$0
15	Paperless Bill Credit	Schedule 26	$0	$0	$0	$816,516	$551,281	$265,235	$816,516	$551,281	$265,235
16	PBOP	Schedule 27	$7,914,078	$5,421,584	$2,492,494	($740,588)	($740,588)	$0	$7,173,490	$4,680,995	$2,492,494
17	Pension	Schedule 28	$22,239,834	$14,856,485	$7,383,350	($2,190,304)	($2,190,304)	$0	$20,049,530	$12,666,181	$7,383,350
18	Energy Efficiency Program	Schedule 29	$97,169,672	$73,467,743	$23,701,929	($97,169,672)	($73,467,743)	($23,701,929)	$0	$0	$0
19	Other Operating and Maintenance Expenses	Schedule 30	$86,785,496	$59,391,324	$27,394,172	($23,893,332)	($22,373,643)	($1,519,689)	$62,892,164	$37,017,681	$25,874,483
20	Storm Cost Recovery	Schedule 31	$7,338,972	$7,338,972	$0	($27,840)	($27,840)	$0	$7,311,132	$7,311,132	$0
21	Gas Commodity OM	Schedule 32	$0	$0	$0	$1,132,067	$0	$1,132,067	$1,132,067	$0	$1,132,067
22	NEP IFA Credit	Schedule 33	($138,452,360)	($138,452,360)	$0	$138,452,360	$138,452,360	$0	$0	$0	$0
23	Wheeling	Schedule 34	$179,791,010	$179,791,010	$0	($179,791,010)	($179,791,010)	$0	$0	$0	$0
24	Energy Innovation Hub	Schedule 35	$0	$0	$0	$0	$0	$0	$0	$0	$0
25	Gas Business Enablement	Schedule 36	$0	$0	$0	$0	$0	$0	$0	$0	$0
26	Electric Operations	Schedule 37	$0	$0	$0	$0	$0	$0	$0	$0	$0
27	Gas Operations	Schedule 38	$0	$0	$0	$0	$0	$0	$0	$0	$0
28	Customer Affordability Program	Schedule 39	$0	$0	$0	$0	$0	$0	$0	$0	$0
29	Sub Total		$420,054,545	$304,575,180	$115,479,365	($192,323,257)	($164,238,756)	($28,084,501)	$227,731,287	$140,336,424	$87,394,863
30											
31	Purchased Power/ Purchased Gas	Schedule 40	$440,524,701	$304,255,398	$136,269,302	($440,524,701)	($304,255,398)	($136,269,302)	$0	$0	$0
32											
33	Sub Total		$440,524,701	$304,255,398	$136,269,302	($440,524,701)	($304,255,398)	($136,269,302)	$0	$0	$0
34											
35	TOTAL		$860,579,245	$608,830,578	$251,748,667	($632,847,958)	($468,494,154)	($164,353,804)	$227,731,287	$140,336,424	$87,394,863
			($0)	($0)	$0	$0	($0)	$0	$0	$0	$0

The Narragansett Electric Company d/b/a National Grid
Operating Expenses by Component
Summary (ELECTRIC & GAS)

		Schedule Reference	Test Year Ended June 30, 2017(as Adjusted) Total	Electric	Gas	Proforma Adjustments Total	Electric	Gas	Rate Year Ending August 31, 2019 Total	Electric	Gas
			(a) = (b) + (c)	(b)	(c)	(d) = (e) + (f)	(e)	(f)	(g) = (h) + (i)	(h) = (b) + (e)	(i) = (c) + (f)
	Operation & Maintenance Expenses:										
1	Labor	Schedule 12	$74,315,139	$44,116,917	$30,198,221	$9,824,987	$6,692,369	$3,132,619	$84,140,126	$50,809,286	$33,330,840
2	Health Care	Schedule 13	$11,124,388	$6,687,200	$4,437,188	($392,792)	($295,776)	($97,016)	$10,731,596	$6,391,424	$4,340,172
3	Group Life Insurance	Schedule 14	$837,778	$486,957	$350,821	$148,107	$73,691	$74,416	$985,884	$560,647	$425,237
4	Thrift Plan	Schedule 15	$3,457,345	$2,082,550	$1,374,796	$458,489	$315,923	$142,566	$3,915,834	$2,398,472	$1,517,362
5	FAS 112 / ASC 712	Schedule 16	($0)	($0)	($0)	$0	$0	$0	($0)	($0)	($0)
6	Service Company Rents	Schedule 17	$10,067,672	$7,340,988	$2,726,684	$7,585,117	$5,776,023	$1,809,094	$17,652,789	$13,117,011	$4,535,777
7	Joint Facilities	Schedule 18	$1,680,176	$1,124,555	$555,621	$77,792	$52,067	$25,725	$1,757,968	$1,176,621	$581,346
8	Uninsured Claims	Schedule 19	$1,524,017	$677,655	$846,361	$955,618	$1,162,517	($206,899)	$2,479,635	$1,840,172	$639,463
9	Insurance Premium	Schedule 20	$2,639,729	$1,810,745	$828,984	$373,090	$280,149	$92,940	$3,012,818	$2,090,894	$921,924
10	Regulatory Assessment Fees	Schedule 21	$6,184,116	$4,286,454	$1,897,662	$0	$0	$0	$6,184,116	$4,286,454	$1,897,662
11	Uncollectible Accounts	Schedule 22	$9,683,512	$3,964,684	$5,718,828	($2,164,572)	$157,586	($2,322,158)	$7,518,940	$4,122,270	$3,396,670
12	Postage	Schedule 23	$3,756,323	$2,444,255	$1,312,068	$173,918	$113,169	$60,749	$3,930,240	$2,557,424	$1,372,817
13	Strike Contingency	Schedule 24	$8,194	$8,194	$0	$379	$379	$0	$8,573	$8,573	$0
14	Environmental Response Fund	Schedule 25	$3,078,000	$3,078,000	$0	$0	$0	$0	$3,078,000	$3,078,000	$0
15	Paperless Bill Credit	Schedule 26	$816,516	$551,281	$265,235	$0	$0	$0	$816,516	$551,281	$265,235
16	PBOP	Schedule 27	$7,173,490	$4,680,995	$2,492,494	($3,582,582)	$134,937	($3,717,518)	$3,590,908	$4,815,932	($1,225,024)
17	Pension	Schedule 28	$20,049,530	$12,666,181	$7,383,350	($10,775,306)	($6,665,307)	($4,110,000)	$9,274,224	$6,000,874	$3,273,350
18	Energy Efficiency Program	Schedule 29	$0	$0	$0	$0	$0	$0	$0	$0	$0
19	Other Operating and Maintenance Expenses	Schedule 30	$62,892,164	$37,017,681	$25,874,483	$1,589,701	$863,146	$726,555	$64,481,865	$37,880,827	$26,601,038
20	Storm Cost Recovery	Schedule 31	$7,311,132	$7,311,132	$0	($287,406)	($287,406)	$0	$7,023,726	$7,023,726	$0
21	Gas Commodity OM	Schedule 32	$1,132,067	$0	$1,132,067	($1,132,067)	$0	($1,132,067)	$0	$0	$0
22	NEP IFA Credit	Schedule 33	$0	$0	$0	$0	$0	$0	$0	$0	$0
23	Wheeling	Schedule 34	$0	$0	$0	$0	$0	$0	$0	$0	$0
24	Energy Innovation Hub	Schedule 35	$0	$0	$0	$287,379	$186,193	$101,186	$287,379	$186,193	$101,186
25	Gas Business Enablement	Schedule 36	$0	$0	$0	$3,329,316	$482,041	$2,847,275	$3,329,316	$482,041	$2,847,275
26	Electric Operations	Schedule 37	$0	$0	$0	$611,550	$611,550	$0	$611,550	$611,550	$0
27	Gas Operations	Schedule 38	$0	$0	$0	$1,032,482	$0	$1,032,482	$1,032,482	$0	$1,032,482
28	Customer Affordability Program	Schedule 39	$0	$0	$0	$906,337	$613,623	$292,714	$906,337	$613,623	$292,714
29	Sub Total		$227,731,287	$140,336,424	$87,394,863	$9,019,537	$10,266,874	($1,247,337)	$236,750,824	$150,603,298	$86,147,527
30											
31	Purchased Power/ Purchased Gas	Schedule 40	$0	$0	$0	$0	$0	$0	$0	$0	$0
32											
33	Sub Total		$0	$0	$0	$0	$0	$0	$0	$0	$0
34											
35	TOTAL		$227,731,287	$140,336,424	$87,394,863	$9,019,537	$10,266,874	($1,247,337)	$236,750,824	$150,603,298	$86,147,527
	Column Notes		$0	$0	$0	($0)	($0)	$0	$0	$0	$0
	(b Column (h)										
	(c Column (i)										

The Narragansett Electric Company d/b/a National Grid
Operating Expenses by Component
Summary (ELECTRIC & GAS)

		Schedule Reference	Rate Year Ending August 31, 2019 Electric (a)	Adjustments to Reflect Conditions in Rate Year Electric (b)	Rate Year Ending August 31, 2020 Electric (c) = (a) + (b)	Adjustments to Reflect Conditions in Rate Year Electric (d)	Rate Year Ending August 31, 2021 Electric (e) = (c) + (d)
	Operation & Maintenance Expenses:						
1	Labor	Schedule 12	$50,809,286	$1,824,395	$52,633,681	$1,593,433	$54,227,114
2	Health Care	Schedule 13	$6,391,424	$229,452	$6,620,876	$200,613	$6,821,489
3	Group Life Insurance	Schedule 14	$560,647	$35,040	$595,688	$32,525	$628,212
4	Thrift Plan	Schedule 15	$2,398,472	$86,105	$2,484,577	$75,283	$2,559,860
5	FAS 112 / ASC 712	Schedule 16	($0)	$0	($0)	$0	($0)
6	Service Company Rents	Schedule 17	$13,117,011	$380,409	$13,497,420	$390,531	$13,887,951
7	Joint Facilities	Schedule 18	$1,176,621	$31,298	$1,207,920	$29,353	$1,237,272
8	Uninsured Claims	Schedule 19	$1,840,172	$48,949	$1,889,121	$45,906	$1,935,026
9	Insurance Premium	Schedule 20	$2,090,894	$55,618	$2,146,512	$52,160	$2,198,672
10	Regulatory Assessment Fees	Schedule 21	$4,286,454	$0	$4,286,454	$0	$4,286,454
11	Uncollectible Accounts	Schedule 22	$4,122,270	$156,855	$4,279,125	$50,426	$4,329,551
12	Postage	Schedule 23	$2,557,424	$68,027	$2,625,451	$63,798	$2,689,250
13	Strike Contingency	Schedule 24	$8,573	$228	$8,801	$214	$9,015
14	Environmental Response Fund	Schedule 25	$3,078,000	$0	$3,078,000	$0	$3,078,000
15	Paperless Bill Credit	Schedule 26	$551,281	$0	$551,281	$0	$551,281
16	PBOP	Schedule 27	$4,815,932	$0	$4,815,932	$0	$4,815,932
17	Pension	Schedule 28	$6,000,874	($1,158,292)	$4,842,582	($1,086,286)	$3,756,296
18	Energy Efficiency Program	Schedule 29	$0	$0	$0	$0	$0
19	Other Operating and Maintenance Expenses	Schedule 30	$37,880,827	$1,000,191	$38,881,018	$938,013	$39,819,031
20	Storm Cost Recovery	Schedule 31	$7,023,726	$0	$7,023,726	$0	$7,023,726
21	Gas Commodity OM	Schedule 32	$0	$0	$0	$0	$0
22	NEP IFA Credit	Schedule 33	$0	$0	$0	$0	$0
23	Wheeling	Schedule 34	$0	$0	$0	$0	$0
24	Energy Innovation Hub	Schedule 35	$186,193	($32,395)	$153,798	$0	$153,798
25	Gas Business Enablement	Schedule 36	$482,041	$29,312	$511,352	($16,493)	$494,859
26	Electric Operations	Schedule 37	$611,550	($39,550)	$572,000	$46,083	$618,083
27	Gas Operations	Schedule 38	$0	$0	$0	$0	$0
28	Customer Affordability Program	Schedule 39	$613,623	($70,367)	$543,256	($255,128)	$288,128
29	Sub Total		$150,603,298	$2,645,275	$153,248,572	$2,160,429	$155,409,002
30							
31	Purchased Power/ Purchased Gas	Schedule 40	$0	$0	$0	$0	$0
32							
33	Sub Total		$0	$0	$0	$0	$0
34							
35	TOTAL		$150,603,298	$2,645,275	$153,248,572	$2,160,429	$155,409,002
	Column Notes		$0	$0	$0	($0)	$0
	(a) Column (h)						

The Narragansett Electric Company d/b/a National Grid
Operating Expenses by Component
Summary (ELECTRIC & GAS)

		Schedule Reference	Rate Year Ending August 31, 2019 Gas (a)	Adjustments to Reflect Conditions in Rate Year Gas (b)	Rate Year Ending August 31, 2020 Gas (c) = (a) + (b)	Adjustments to Reflect Conditions in Rate Year Gas (d)	Rate Year Ending August 31, 2021 Gas (e) = (c) + (d)
	Operation & Maintenance Expenses:						
1	Labor	Schedule 12	$33,330,840	$1,411,867	$34,742,707	$1,089,746	$35,832,453
2	Health Care	Schedule 13	$4,340,172	$184,023	$4,524,195	$142,060	$4,666,255
3	Group Life Insurance	Schedule 14	$425,237	$29,341	$454,578	$25,320	$479,898
4	Thrift Plan	Schedule 15	$1,517,362	$64,336	$1,581,698	$49,665	$1,631,363
5	FAS 112 / ASC 712	Schedule 16	($0)	$0	($0)	$0	($0)
6	Service Company Rents	Schedule 17	$4,535,777	$219,840	$4,755,618	($260)	$4,755,358
7	Joint Facilities	Schedule 18	$581,346	$15,464	$596,810	$14,502	$611,313
8	Uninsured Claims	Schedule 19	$639,463	$17,010	$656,472	$15,952	$672,425
9	Insurance Premium	Schedule 20	$921,924	$24,441	$946,365	$22,328	$968,693
10	Regulatory Assessment Fees	Schedule 21	$1,897,662	$0	$1,897,662	$0	$1,897,662
11	Uncollectible Accounts	Schedule 22	$3,396,670	$111,079	$3,507,749	$109,234	$3,616,983
12	Postage	Schedule 23	$1,372,817	$36,517	$1,409,334	$34,247	$1,443,580
13	Strike Contingency	Schedule 24	$0	$0	$0	$0	$0
14	Environmental Response Fund	Schedule 25	$0	$0	$0	$0	$0
15	Paperless Bill Credit	Schedule 26	$265,235	$0	$265,235	$0	$265,235
16	PBOP	Schedule 27	($1,225,024)	$0	($1,225,024)	$0	($1,225,024)
17	Pension	Schedule 28	$3,273,350	($782,995)	$2,490,355	($732,618)	$1,757,736
18	Energy Efficiency Program	Schedule 29	$0	$0	$0	$0	$0
19	Other Operating and Maintenance Expenses	Schedule 30	$26,601,038	$704,127	$27,305,166	$659,247	$27,964,413
20	Storm Cost Recovery	Schedule 31	$0	$0	$0	$0	$0
21	Gas Commodity OM	Schedule 32	$0	$0	$0	$0	$0
22	NEP IFA Credit	Schedule 33	$0	$0	$0	$0	$0
23	Wheeling	Schedule 34	$0	$0	$0	$0	$0
24	Energy Innovation Hub	Schedule 35	$101,186	($17,605)	$83,581	$0	$83,581
25	Gas Business Enablement	Schedule 36	$2,847,275	$664,720	$3,511,995	$153,248	$3,665,243
26	Electric Operations	Schedule 37	$0	$0	$0	$0	$0
27	Gas Operations	Schedule 38	$1,032,482	($76,782)	$955,700	$0	$955,700
28	Customer Affordability Program	Schedule 39	$292,714	$2,518	$295,232	($138,649)	$156,583
29	Sub Total		$86,147,527	$2,607,902	$88,755,428	$1,444,023	$90,199,451
30							
31	Purchased Power/ Purchased Gas	Schedule 40	$0	$0	$0	$0	$0
32							
33	Sub Total		$0	$0	$0	$0	$0
34							
35	TOTAL		$86,147,527	$2,607,902	$88,755,428	$1,444,023	$90,199,451
	Column Notes		$0	$0	$0	$0	$0

(a) Column (i)

THE NARRAGANSETT ELECTRIC COMPANY
d/b/a NATIONAL GRID
RIPUC Docket Nos. 4770/4780
Compliance Attachment 2
Schedule MAL-3
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The Narragansett Electric Company d/b/a National Grid
Adjustments to Operating Expenses
Normalizing Adjustments to Other O & M Expenses (ELECTRIC & GAS)

		Test Year Ended June 30, 2017 (Per Books)	IFA	Vegetation Management (ISR)	Inspection & Maintenance (ISR)	Parent Company Initiative	Gas Business Enablement (GBE)	Storms	Gas Cost Recovery (GCR)	Other	Total Normalizing Adjustments	Test Year Ended June 30, 2017 (as Adjusted)
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j) sum (b through i)	(k) = (a)+(j)
1	Test Year Amounts that are Specifically Adjusted:											
2												
3												
4												
5	Operating & Maintenance Expense											
6	Labor	$90,778,557	($8,107,062)	($277,467)	($391,633)	$0	$0	($1,012,529)	($829,823)	($5,844,904)	($16,463,419)	$74,315,139
7	Health Care	$12,341,700	($1,079,373)	$0	($53,188)	$0	$0	($53,705)	$0	($31,047)	($1,217,312)	$11,124,388
8	Group Life Insurance	$930,683	($79,187)	$0	($5,379)	($4,236)	$0	($1,384)	$0	($2,719)	($92,905)	$837,778
9	Thrift Plan	$3,865,292	($340,078)	$0	($14,936)	$0	$0	($14,021)	$0	($38,912)	($407,946)	$3,457,345
10	FAS 112 / ASC 712	($572,522)	$45,592	$0	$2,857	$0	$0	$10,407	$0	$513,666	$572,522	$0
11	Service Company Rents	$17,062,952	($2,543,016)	$0	$0	$0	$0	$0	$0	($4,452,264)	($6,995,280)	$10,067,672
12	Joint Facilities	$1,579,848	$0	$0	$0	$0	$0	$0	$0	$100,328	$100,328	$1,680,176
13	Uninsured Claims	$1,648,059	($109,494)	$0	($5,235)	($4,180)	$0	($2,690)	$0	($2,444)	($124,043)	$1,524,017
14	Insurance Premium	$2,296,210	($286,481)	$0	$0	$0	$0	$0	$0	$0	($286,481)	$2,009,729
15	Regulatory Assessment Fees	$6,662,284	($678,167)	$0	$0	$0	$0	$0	$0	$0	($678,167)	$6,184,116
16	Uncollectible Accounts	$12,978,156	$0	$0	$0	$0	$0	$0	$0	($3,294,644)	($3,294,644)	$9,683,512
17	Postage	$3,780,429	($2,997)	$0	$0	($7)	$0	$0	$0	($21,103)	($24,107)	$3,756,323
18	Strike Contingency	$8,194	$0	$0	$0	$0	$0	$0	$0	$0	$0	$8,194
19	Environmental Response Fund	$3,078,000	$0	$0	$0	$0	$0	$0	$0	$0	$0	$3,078,000
20	Paperless Bill Credit	$0	($109,494)	$0	$0	$0	$0	$0	$0	$816,516	$816,516	$816,516
21	PBOP	$7,914,078	($740,588)	$0	$0	$0	$0	$0	$0	$0	($740,588)	$7,173,490
22	Pension	$22,239,834	($2,029,396)	$0	$0	$0	$0	$0	$0	($160,908)	($2,190,304)	$20,049,530
23	Energy Efficiency Program	$97,169,672	$0	$0	$0	$0	$0	$0	$0	($97,169,672)	($97,169,672)	$0
24	Other Operating and Maintenance Expenses	$86,785,496	($8,913,604)	($8,736,983)	($110,171)	($1,231,649)	($1,511,923)	$525,543	($2,58,832)	($3,655,714)	($23,893,332)	$62,892,164
25	Storm Cost Recovery	$7,338,972	$0	$0	$0	$0	$0	$0	$0	($27,840)	($27,840)	$7,311,132
26	Gas Commodity OM	$0	$0	$0	$0	$0	$0	$0	($43,411)	$1,175,478	$1,132,067	$1,132,067
27	NEP IFA Credit	($138,452,360)	$138,452,360	$0	$0	$0	$0	$0	$0	$0	$138,452,360	$0
28	Wheeling	$179,791,010	$0	$0	$0	$0	$0	$0	$0	($179,791,010)	($179,791,010)	$0
29	Energy Innovation Hub	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
30	Gas Business Enablement	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
31	Electric Operations	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
32	Gas Operations	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
33	Customer Affordability Program	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
34	Sub Total Operating & Maintenance Expense	$420,054,545	$113,588,510	($9,014,450)	($577,685)	($1,240,072)	($1,511,923)	($548,379)	($1,132,067)	($291,887,193)	($192,323,257)	$227,731,287
35												
36	Purchased Power/ Purchased Gas	$440,524,701	$0	$0	$0	$0	$0	$0	$0	($440,524,701)	($440,524,701)	$0
37												
38	Sub Total	$440,524,701	$0	$0	$0		$0	$0	$0	($440,524,701)	($440,524,701)	$0
39												
40	TOTAL	$860,579,245	$113,588,510	($9,014,450)	($577,685)		($1,511,923)	($548,379)	($1,132,067)	($732,411,894)	($632,847,958)	$227,731,287
	Check Totals	$860,579,245	$113,588,510	($9,014,450)	($577,685)	($1,240,071)	($1,511,923)	($548,380)	($1,132,067)	($732,411,893)	($632,847,958)	$227,731,287
	Difference	$0	$0	$0	$0	$0	$0	$1	$0	($1)	$0	$0

Column Notes
(a) Page 1, Column (a)

Line Notes
6(b) Schedule 12 Page 5, Lines 2(a) to 4(a)
6(c) Schedule 12 Page 5, Line 5(a)
6(d) Schedule 12 Page 5, Line 6(a) to 8(a)
6(g) Schedule 12 Page 5, Line 21(a) to 23(a)
6(h) Schedule 12 Page 5, Line 28(a) to 30(a)
6(i) Schedule 12 Page 5, Line 9(a) to 20(a) + Line 24(a) + Lines 25(a) to 27(a)
7(b) Schedule 13, Page 5 Lines 2(a) through 4(a)
7(c) Schedule 13, Page 5 Lines 5(a) through 6(a)
7(g) Schedule 13, Page 5 Lines 19(a) through 12(a)
7(h) Schedule 14, Page 5 Lines 2(a) through 4(a)
8(d) Schedule 14, Page 5 Lines 6(a) through 8(a)
8(e) Schedule 14, Page 5 Lines 10(a)
8(g) Schedule 14, Page 5 Lines 12(a) through 14(a)
9(b) Schedule 15, Page 5 Lines 2(a) through 4(a)
9(d) Schedule 15, Page 5 Lines 6(a) through 8(a)
9(g) Schedule 15, Page 5 Lines 12(a) through 14(a)
9(i) Schedule 15, Page 5 Lines 10(a)
10(b) Schedule 16, Page 5 Lines 2(a) through 4(a)
10(d) Schedule 16, Page 5 Lines 6(a) through 8(a)
10(g) Schedule 16, Page 5 Lines 10(a) through 12(a)
10(i) Schedule 16, Page 5 Lines 14(a) through 16(a)
11(b) Schedule 17, Page 5 Lines 2(a) through 5(a)
11(h) Schedule 17, Page 5 Lines 7(a) through 8(a)
11(i) Schedule 17, Page 5 Lines 2(a) through 5(a)
13(b) Schedule 19, Page 5 Lines 2(a) through 4(a)
13(d) Schedule 19, Page 5 Lines 5(a) through 7(a)
13(e) Schedule 19, Page 5 Line 8(a)
13(g) Schedule 19, Page 5 Lines 9(a) through 11(a)
14(b) Schedule 20, Page 5 Lines 2(a) through 3(a)
15(b) Schedule 21, Page 5 Lines 2(a)
16(i) Schedule 22, Page 5 Lines 4(a)
17(b) Schedule 23, Page 5 Lines 2(a) through 4(a)
17(i) Schedule 23, Page 5 Lines 8(a) through 11(a)
20(i) Schedule 26, Page 5 Line 3(a)
21(b) Schedule 27, Page 5 Lines 2(a) through 4(a)
22(b) Schedule 28, Page 5 Lines 2(a) through 4(a)
22(i) Schedule 28, Page 5 Line 8(a)
23(i) Schedule 29, Page 5 Lines 2(a) through 3(a)
24(b) Schedule 30, Page 6 Lines 2(b) through 17(b)
24(c) Schedule 30, Page 6 Lines 2(d) through 17(d)
24(d) Schedule 30, Page 6 Lines 2(e) through 17(e)
24(e) Schedule 30, Page 6 Lines 2(f) through 17(f)
24(f) Schedule 30, Page 7 Lines 2(b) through 17(b)
24(g) Schedule 30, Page 6 Lines 2(g) through 17(g)
24(h) Schedule 30, Page 7 Lines 2(c) through 17(c)
Schedule 30, Page 6, Lines 2(c) through 17(c) + Page 6 Lines 2(h) through 17(h) + Page 7 Lines 2(d) through 17(d)
24(i) Schedule 31, Page 5 Lines 2(a)
25(i) Schedule 32 Page 5, Line 2(a) to Line 14(a)
26(b) - 26(i) Schedule 33 Page 5, Line 9(b)
27(b) Schedule 34 Page 5, Line 2(a) to Line 3(a)
28(i) Schedule 34 Page 5, Line 2(a) to Line 3(a)

The Narragansett Electric Company d/b/a National Grid
Adjustments to Electric Operating Expenses
Normalizing Adjustments to O & M Expenses (ELECTRIC)

		Test Year Ended June 30, 2017 (Per Books)	IFA	Vegetation Management (ISR)	Inspection & Maintenance (ISR)	Parent Company Initiative	Storms	Other	Total Normalizing Adjustments	Test Year Ended June 30, 2017 (as Adjusted)
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h) sum (b through g)	(i) = (a) + (i)
1	Test Year Amounts that are Specifically Adjusted:									
2										
3										
4										
5	Operating & Maintenance Expense									
6	Labor	$54,756,249	($8,107,062)	($277,467)	($391,633)	$0	($1,012,529)	($850,640.47)	($10,639,332)	$44,116,917
7	Health Care	$7,901,703	($1,079,373)	$0	($53,188)	$0	($53,705)	($28,237)	($1,214,503)	$6,687,200
8	Group Life Insurance	$579,702	($79,187)	$0	($5,379)	($4,236)	($1,384)	($2,559)	($92,745)	$486,957
9	Thrift Plan	$2,489,542	($340,078)	$0	($14,936)	$0	($14,021)	($37,958)	($406,993)	$2,082,550
10	FAS 112 / ASC 712	($333,759)	$45,592	$0	$2,857	$0	$10,407	$274,904	$333,759	$0
11	Service Company Rents	$13,985,369	($2,543,016)	$0	$0	$0	$0	($4,101,365)	($6,644,381)	$7,340,988
12	Joint Facilities	$1,018,396	$0	$0	$0	$0	$0	$106,159	$106,159	$1,124,555
13	Uninsured Claims	$801,565	($109,494)	$0	($5,235)	($4,180)	($2,690)	($2,311)	($123,909)	$677,655
14	Insurance Premium	$2,097,226	($286,481)	$0	$0	$0	$0	$0	($286,481)	$1,810,745
15	Regulatory Assessment Fees	$4,964,621	($678,167)	$0	$0	$0	$0	$0	($678,167)	$4,286,454
16	Uncollectible Accounts	$8,952,665	$0	$0	$0	$0	$0	($4,987,981)	($4,987,981)	$3,964,684
17	Postage	$2,460,952	($2,997)	$0	$0	($7)	$0	($13,693)	($16,697)	$2,444,255
18	Strike Contingency	$8,194	$0	$0	$0	$0	$0	$0	$0	$8,194
19	Environmental Response Fund	$3,078,000	$0	$0	$0	$0	$0	$0	$0	$3,078,000
20	Paperless Bill Credit	$0	$0	$0	$0	$0	$0	$551,281	$551,281	$551,281
21	PBOP	$5,421,584	($740,588)	$0	$0	$0	$0	$0	($740,588)	$4,680,995
22	Pension	$14,856,485	($2,029,396)	$0	$0	$0	$0	($160,908)	($2,190,304)	$12,666,181
23	Energy Efficiency Program	$73,467,743	$0	$0	$0	$0	$0	($73,467,743)	($73,467,743)	$0
24	Other Operating and Maintenance Expenses	$59,391,324	($8,913,604)	($8,736,983)	($110,171)	($1,231,649)	$525,543	($3,906,780)	($22,373,643)	$37,017,681
25	Storm Cost Recovery	$7,338,972	$0	$0	$0	$0	$0	($27,840)	($27,840)	$7,311,132
26	Gas Commodity OM	$0	$0	$0	$0	$0	$0	$0	$0	$0
27	NEP IFA Credit	($138,452,360)	$138,452,360	$0	$0	$0	$0	$0	$138,452,360	$0
28	Wheeling	$179,791,010	$0	$0	$0	$0	$0	($179,791,010)	($179,791,010)	$0
29	Energy Innovation Hub	$0	$0	$0	$0	$0	$0	$0	$0	$0
30	Gas Business Enablement	$0	$0	$0	$0	$0	$0	$0	$0	$0
31	Electric Operations	$0	$0	$0	$0	$0	$0	$0	$0	$0
32	Gas Operations	$0	$0	$0	$0	$0	$0	$0	$0	$0
33	Customer Affordability Program	$0	$0	$0	$0	$0	$0	$0	$0	$0
34	Sub Total Operating & Maintenance Expense	$304,575,180	$113,588,510	($9,014,450)	($577,685)	($1,240,072)	($548,378)	($266,446,681)	($164,238,756)	$140,336,424
35										
36	Purchased Power/ Purchased Gas	$304,255,398	$0	$0	$0	$0	$0	($304,255,398)	($304,255,398)	$0
37										
38	Sub Total	$304,255,398	$0	$0	$0	$0	$0	($304,255,398)	($304,255,398)	$0
39										
40	TOTAL	$608,830,578	$113,588,510	($9,014,450)	($577,685)	($1,240,072)	($548,378)	($570,702,080)	($468,494,154)	$140,336,424
	Check Totals	$608,830,578	$113,588,510	($9,014,450)	($577,685)	($1,240,071)	($548,380)	($570,702,078)	($468,494,154)	$140,336,424
	Difference	$0	$0	$0	$0	$0	$1	($1)	$0	$0

Column Notes

Line Notes

6(b) Schedule 12 Page 5, Lines 2(b) to 4(b)
6(c) Schedule 12 Page 5, Line 5(b)
6(d) Schedule 12 Page 5, Line 6(b) to 8(b)
6(f) Schedule 12 Page 5, Line 21(b) to 23(b)
6(g) Schedule 12 Page 5, Line 9(b) to 20(b) + Line 24(b) + Lines 25(b) to 27(b)
7(b) Schedule 13, Page 5 Lines 2(b) through 4(b)
7(d) Schedule 13, Page 5 Lines 6(b) through 8(b)
7(f) Schedule 13, Page 5 Lines 10(b) through 12(b)
8(b) Schedule 14, Page 5 Lines 2(b) through 4(b)
8(d) Schedule 14, Page 5 Lines 6(b) through 8(b)
8(e) Schedule 14, Page 5 Lines 10(b)
8(f) Schedule 14, Page 5 Lines 12(b) through 14(b)
9(b) Schedule 15, Page 5 Lines 2(b) through 4(b)
9(d) Schedule 15, Page 5 Lines 6(b) through 8(b)
9(f) Schedule 15, Page 5 Lines 12(b) through 14(b)
9(g) Schedule 15, Page 5 Lines 10(b)
10(b) Schedule 16, Page 5 Lines 2(b) through 4(b)
10(d) Schedule 16, Page 5 Lines 6(b) through 8(b)
10(f) Schedule 16, Page 5 Lines 10(b) through 12(b)
10(g) Schedule 16, Page 5 Lines 14(b) through 16(b)
11(b) Schedule 17, Page 5 Lines 7(b) through 8(b)
11(g) Schedule 17, Page 5 Lines 2(b) through 5(b)
13(b) Schedule 19, Page 5 Lines 2(b) through 4(b)
13(d) Schedule 19, Page 5 Lines 5(b) through 7(b)
13(e) Schedule 19, Page 5 Line 8(b)
13(f) Schedule 19, Page 5 Lines 9(b) through 11(b)
14(b) Schedule 20, Page 5 Lines 2(b) through 3(b)
15(b) Schedule 21, Page 5 Lines 2(b)
16(g) Schedule 22, Page 5 Lines 4(b)
17(b) Schedule 23, Page 5 Lines 2(b) through 4(b)
17(g) Schedule 23, Page 5 Lines 8(b) through 11(b)
20(g) Schedule 26, Page 5 Line 3(b)
21(b) Schedule 27, Page 5 Lines 2(b) through 4(b)
22(b) Schedule 28, Page 5 Lines 2(b) through 4(b)
22(g) Schedule 28, Page 5 Line 8(b)
23(g) Schedule 29, Page 5 Lines 2(b) through 3(b)
24(b) Schedule 30, Page 6 Lines 2(b) through 17(b)
24(c) Schedule 30, Page 6 Lines 2(d) through 17(d)
24(d) Schedule 30, Page 6 Lines 2(e) through 17(e)
24(e) Schedule 30, Page 6 Lines 2(f) through 17(f)
24(f) Schedule 30, Page 6 Lines 2(g) through 17(g)
24(g) Schedule 30, Page 6, Lines 2(c) through 17(c) + Lines 2(h) through 17(h)
25(g) Schedule 31, Page 5 Lines 2(a)
27(b) Schedule 33 Page 5, Line 9(b)
28(g) Schedule 34 Page 5, Line 2(a) to Line 3(a)

The Narragansett Electric Company d/b/a National Grid
Adjustments to Gas Operating Expenses
Normalizing Adjustments to O & M Expenses (GAS)

		Test Year Ended June 30, 2017 (Per Books)	Gas Business Enablement (GBE)	Gas Cost Recovery (GCR)	Other	Total Normalizing Adjustments	Test Year Ended June 30, 2017 (as Adjusted)
		(c)	(b)	(c)	(d)	(e) = (b) + (c) + (d)	(f) = (c) + (e)
1	Test Year Amounts that are Specifically Adjusted:						
2							
3							
4							
5	Operating & Maintenance Expense						
6	Labor	$36,022,308	$0	($829,823)	($4,994,264)	($5,824,087)	$30,198,221
7	Health Care	$4,439,997	$0	$0	($2,810)	($2,810)	$4,437,188
8	Group Life Insurance	$350,981	$0	$0	($160)	($160)	$350,821
9	Thrift Plan	$1,375,749	$0	$0	($954)	($954)	$1,374,796
10	FAS 112 / ASC 712	($238,762)	$0	$0	$238,762	$238,762	$0
11	Service Company Rents	$3,077,583	$0	$0	($350,899)	($350,899)	$2,726,684
12	Joint Facilities	$561,452	$0	$0	($5,831)	($5,831)	$555,621
13	Uninsured Claims	$846,495	$0	$0	($134)	($134)	$846,361
14	Insurance Premium	$828,984	$0	$0	$0	$0	$828,984
15	Regulatory Assessment Fees	$1,897,662	$0	$0	$0	$0	$1,897,662
16	Uncollectible Accounts	$4,025,491	$0	$0	$1,693,337	$1,693,337	$5,718,828
17	Postage	$1,319,478	$0	$0	($7,410)	($7,410)	$1,312,068
18	Strike Contingency	$0	$0	$0	$0	$0	$0
19	Environmental Response Fund	$0	$0	$0	$0	$0	$0
20	Paperless Bill Credit	$0	$0	$0	$265,235	$265,235	$265,235
21	PBOP	$2,492,494	$0	$0	$0	$0	$2,492,494
22	Pension	$7,383,350	$0	$0	$0	$0	$7,383,350
23	Energy Efficiency Program	$23,701,929	$0	$0	($23,701,929)	($23,701,929)	$0
24	Other Operating and Maintenance Expenses	$27,394,172	($1,511,923)	($258,832)	$251,065	($1,519,689)	$25,874,483
25	Storm Cost Recovery	$0	$0	$0	$0	$0	$0
26	Gas Commodity OM	$0	$0	($43,411)	$1,175,478	$1,132,067	$1,132,067
27	NEP IFA Credit	$0	$0	$0	$0	$0	$0
28	Wheeling	$0	$0	$0	$0	$0	$0
29	Energy Innovation Hub	$0	$0	$0	$0	$0	$0
30	Gas Business Enablement	$0	$0	$0	$0	$0	$0
31	Electric Operations	$0	$0	$0	$0	$0	$0
32	Gas Operations	$0	$0	$0	$0	$0	$0
33	Customer Affordability Program	$0	$0	$0	$0	$0	$0
34	Sub Total Operating & Maintenance Expense	$115,479,365	($1,511,923)	($1,132,067)	($25,440,512)	($28,084,501)	$87,394,863
35							
36	Purchased Power/ Purchased Gas	$136,269,302	$0	$0	($136,269,302)	($136,269,302)	$0
37							
38	Sub Total	$136,269,302	$0	$0	($136,269,302)	($136,269,302)	$0
39							
40	TOTAL	$251,748,667	($1,511,923)	($1,132,067)	($161,709,815)	($164,353,804)	$87,394,863
	Check Totals	$251,748,667	($1,511,923)	($1,132,067)	($161,709,814)	($164,353,804)	$87,394,863
	Difference	$0	$0	$0	($0)	($0)	($0)

Line Notes
6(c) Schedule 12 Page 5, Line 28(c) to 30(c)
6(d) Schedule 12 Page 5, Line 6(c) to 8(c)
10(d) Schedule 16, Page 5 Lines 14(c) through 16(c)
11(d) Schedule 17, Page 5 Lines 2(c) through 5(c)
16(d) Schedule 22, Page 5 Lines 4(c)
17(d) Schedule 23, Page 5 Lines 8(c) through 11(c)
20(d) Schedule 26, Page 5 Line 3(c)
23(d) Schedule 29, Page 5 Lines 2(c) through 3(c)
24(b) Schedule 30, Page 7 Lines 2(b) through 17(b)
24(c) Schedule 30, Page 7 Lines 2(c) through 17(c)
24(d) Schedule 30, Page 7 Lines 2(d) through 17(d)
26(c) Schedule 32 Page 5, Line 2(a) to Line 14(a)
26(d) Schedule 32 Page 5, Line 2(a) to Line 14(a)

AS 1-6

Request:

Please provide RI Energy's annual O&M expense amounts for the Facilities from 2020 through 2024 in a format similar to Exhibit 3, p. 1 of 10. Also, please provide the costs for 2025 through June 30th.

Response:

The Company does not track operation and maintenance ("O&M") costs associated with the facilities to serve the Manchester Street Power Station and did not track those costs for the period 2020 through June 30, 2025. The O&M expenses provided in Exhibit 3 reflect the Company's best estimates for asset and work type and show that actual costs can fluctuate up and down from year to year.

AS 1-7

Request:

During the term of the proposed Amendment 2 which party pays for any capital investments to the facilities?

Response:

In the event capital investments to replace, modify, or improve certain facilities are made during the term of the proposed Amendment 2, the Company (the "Seller") would have to reach an agreement with Manchester Street, L.L.C. (the "Buyer") for reimbursement of the costs, including a return on investment and any incremental depreciation expense and estimate of property taxes associated with the replacement, modification, or improvement of the assets before the Seller would agree to such investments.

AS 1-8

Request:

Referring to the original agreement, "Article III, Term of Agreement," section 4.3 states:

> "In the event of the expiration or termination of the Agreement, Buyer shall either (I) purchase on the date of termination the facilities between the Point of Receipt and the Point of Delivery necessary to provide service to BEGF (the "Facilities") at a purchase price ("Purchase Price") equal to the greater of (x) $1.00 or (y) book value of the Facilities, or (iI) at termination pay to Seller an amount equal to the Purchase Price and not purchase the Facilities."

Please explain why RIE chose to extend the 10-year agreement rather than initiating either of these two options stated above.

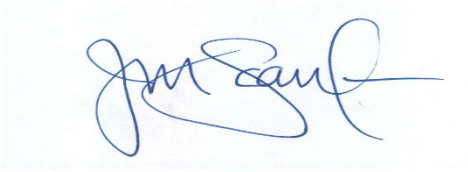
Response:

As specified in Section 4.4 of proposed Amendment 2 to Firm Natural Gas Transportation Service Agreement, the Seller (i.e., the Company) has notified the Buyer (i.e., Manchester Street, L.L.C.) that replacement, modification, or improvement of certain facilities ("Work") may be required and that more detailed engineering is required to estimate the scope and cost of the Work. The estimated scope and cost of the Work determined through the engineering may be a material factor in the Buyer's decision to terminate the ongoing arrangement between the Company and the Buyer under the Firm Natural Gas Transportation Agreement that became effective June 13, 2025 ("Agreement") and exercise either option (I) or (II) in Section 4.3 of the original Agreement. The decision to extend the original ten-year Agreement for an additional 24 months was made so that the engineering can be performed and the Buyer has adequate opportunity to evaluate the results prior to making any decision on whether to purchase the Facilities.

Certificate of Service

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

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



Joanne M. Scanlon

September 23, 2025
Date

Docket No. D-25-14
The Narragansett Electric Company d/b/a Rhode Island Energy
Petition for Approval of Amendment to Firm Natural Gas Transportation Service Agreement with Manchester Street, LLC

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(Updated 6/9/25)

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