

October 24, 2025

VIA HAND DELIVERY AND ELECTRONIC MAIL

Stephanie De La Rosa, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

**Re: Docket No. 25-22-NG – The Narragansett Electric Company d/b/a Rhode Island Energy
2025 Distribution Adjustment Charge and 2025 Gas Cost Recovery Filings
Corrected Responses to Division Data Requests 4-13 and 4-25**

Dear Ms. De La Rosa:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”), I have enclosed the Company’s corrected responses to the Division of Public Utilities and Carriers’ Data Requests 4-13 and 4-25 for filing with the Public Utilities Commission (“PUC”) in the above-referenced docket.

The Company’s corrected response to Division Data Request 4-25 contains commercially sensitive gas pricing and gas volume information. Therefore, the Company has provided redacted and confidential versions of these materials and has requested confidential treatment pursuant to R.I. Gen. Laws § 38-2-2(4)(B) and Rule 810-RICR-00-00-1.3(H) of the PUC’s Rules of Practice and Procedure. The Company has also provided confidential versions of these responses and attachments to the Division pursuant to a non-disclosure agreement.

The Company has conferred with the Division regarding these corrected data request responses, and the Division has indicated that it does not object to the corrected responses being included in the record in this docket. The Division has also indicated that it does not object to the Company’s request for protective treatment of the confidential information contained in Division 4-25 (Corrected).

Stephanie De La Rosa, Commission Clerk

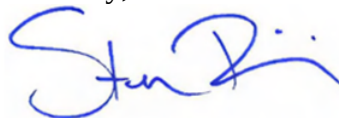
Re: Docket No. 25-22-NG – 2025 Distribution Adjustment Charge and
2025 Gas Cost Recovery Filings

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

Sincerely,



Steven J. Boyajian

Enclosure

cc: Docket No. 25-22-NG Service List

Certificate of Service

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

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



Heidi J. Seddon

October 24, 2025

Date

**Docket No. 25-22-NG – Narragansett Electric Co. d/b/a Rhode Island Energy
2025 Gas Cost Recovery Filing (GCR) and 2025 Distribution Adjustment Clause (DAC)
Service List as of 8/21/2025**

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**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

THE NARRAGANSETT ELECTRIC	)	
COMPANY d/b/a RHODE ISLAND ENERGY	)	DOCKET NO. 25-22-NG
2025 DISTRIBUTION ADJUSTMENT CHARGE AND	)	
2025 GAS COST RECOVERY FILINGS	)	

**MOTION OF THE NARRAGANSETT ELECTRIC COMPANY
FOR PROTECTIVE TREATMENT OF CONFIDENTIAL INFORMATION**

Rhode Island Energy¹ hereby respectfully requests that the Public Utilities Commission (“Commission”) grant protection from public disclosure its corrected confidential response to the Rhode Island Division and Public Utilities and Carriers’ (the “Division”) Data Request 4-25. (the “Confidential Response”). On October 16, 2025, the Commission granted the Company’s September 12, 2025 motion for protective treatment of confidential information contained within the Company’s original response to Division Data Request 4-25. The corrected response to Division Data Request 4-25 corrects a typographical error through which confidential gas volumes set forth in the table provided in subpart (c) of the response were placed in the wrong month. The Confidential Response corrects this error, but the basis for protective treatment remains the same, and the reasons for the protective treatment are set forth herein. The Company also requests that, pending entry of that finding, the Commission preliminarily grant the Company’s request for confidential treatment pursuant to 810-RICR-00-00-1.3(H)(2).

The Company seeks protective treatment for the Confidential Response because it contains commercially sensitive gas pricing and gas volume information, the disclosure of which would be

¹ The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”).

detrimental to the commercial interests of the Company and the marketers identified in the Confidential Response.

I. LEGAL STANDARD

Rhode Island's Access to Public Records Act ("APRA"), R.I.G.L. §38-2-1, *et seq.*, sets forth the parameters for public access to documents in the possession of state and local government agencies. Under APRA, all documents and materials submitted in connection with the transaction of official business by an agency are deemed to be a "public record," unless the information contained in such documents and materials falls within one of the exceptions specifically identified in R.I.G.L. §38-2-2(4). Therefore, to the extent that information provided to the Commission falls within one of the designated exceptions to APRA, the Commission has the authority under the terms of APRA to deem such information to be confidential and to protect that information from public disclosure.

In that regard, R.I. Gen. Laws § 38-2-2(4)(B) provides that the following types of records shall not be deemed public:

Trade secrets and commercial or financial information obtained from a person, firm, or corporation which is of a privileged or confidential nature.

The Rhode Island Supreme Court has held that this confidential information exemption applies where the disclosure of information would be likely either (1) to impair the government's ability to obtain necessary information in the future; or (2) to cause substantial harm to the competitive position of the person from whom the information was obtained. *Providence Journal Company v. Convention Center Authority*, 774 A.2d 40 (R.I. 2001). The first prong of the test is satisfied when information is provided to the governmental agency and that information is of a kind that would

customarily not be released to the public by the person from whom it was obtained. *Providence Journal*, 774 A.2d at 47.

The Rhode Island Supreme Court has also noted that the agencies making determinations as to the disclosure of information under APRA may apply a balancing test. *See Providence Journal v. Kane*, 577 A.2d 661 (R.I. 1990). Under this balancing test, after a record has been determined to be public, the Commission may protect information from public disclosure if the benefit of such protection outweighs the public interest inherent in disclosure of information pending before regulatory agencies. *Kane*, 557 A.2d at 663 (“Any balancing of interests arises only after a record has first been determined to be a public record.”).

II. BASIS FOR CONFIDENTIALITY

The Confidential Response includes commercially sensitive information gas pricing and gas volume information that the Company maintains as confidential for a number of reasons. First, if the Company were to disclose the prices that it has agreed to with gas suppliers or marketers then the Company’s ability to negotiate more advantageous terms in the future would be hampered since market participants would be informed of what the Company has been willing to agree to in the past. Similarly, if the Company were to publicly disclose advantageous pricing that it had obtained through negotiation, counterparties would hesitate to offer the Company advantageous terms in the future since disclosure of those terms would hamper counterparties’ ability to negotiate with other customers. Finally, the disclosure of specific volumes purchased by individual marketers would disclose commercially sensitive information that would disclose to other marketers the market share of competitors in the marketplace. For these reasons, the Confidential Response is not of a kind that would customarily be released to the public by the

Company. Therefore, the first prong of the *Providence Journal* test has been satisfied. See *Providence Journal*, 774 A.2d at 47.

III. CONCLUSION

For the foregoing reasons, the Company respectfully requests that the Commission grant this motion for protective treatment of the Confidential Response.

Respectfully submitted,

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

By its attorney,



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Dated: October 24, 2025

CERTIFICATE OF SERVICE

I hereby certify that on October 24, 2025, I delivered a true copy of the foregoing Motion via electronic mail to the parties on the Service List for Docket No. 25-22-NG.



Heidi J. Seddon

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 25-22-NG
In Re: 2025 Distribution Adjustment Charge Filing
Responses to Division's Fourth Set of Data Requests
Issued August 10, 2025

Division 4-13 (Corrected)

Request:

Please provide, on an aggregate basis (as opposed to an individual supplier basis), a monthly tabulation of FT-1 and FT-2 transportation customer imbalances for the period April 2024 through July 2025. That is, provide receipts of customer-owned gas adjusted for distribution system fuel retention and on-system storage activity versus consumption. Show how the imbalances were resolved, including those cashed-out, cashed-in, those carried forward, or resolved through other means. Include quantities and rates applicable to resolving imbalances (cash-out and cash-in separately) as appropriate.

Original Response:

Please see the table below for the requested information.

	Month	Imbalances in Dth		Total Imbalance in Dth	Index Rate
	(a)	FT-1 (b)	FT-2 (c)	(d)	(e)
(1)	Apr-24	2,338.9	(7,883.9)	(5,545.0)	\$1.53
(2)	May-24	(8,514.7)	(23,089.1)	(31,603.8)	\$1.86
(3)	Jun-24	(14,015.6)	8,956.7	(5,058.9)	\$1.93
(4)	Jul-24	(2,894.1)	(14,283.6)	(17,177.7)	\$1.78
(5)	Aug-24	(10,047.9)	(121,182.6)	(131,230.5)	\$1.61
(6)	Sep-24	(23,203.2)	(1,475.2)	(24,678.4)	\$1.78
(7)	Oct-24	(51,645.5)	43,879.8	(7,765.7)	\$1.81
(8)	Nov-24	(33,472.2)	25,070.4	(8,401.8)	\$2.26
(9)	Dec-24	77,311.1	32,348.6	109,659.8	\$9.26
(10)	Jan-25	83,357.5	2,917.0	86,274.4	\$17.08
(11)	Feb-25	74,871.6	16,537.2	91,408.9	\$14.63
(12)	Mar-25	12,729.3	28,063.2	40,792.6	\$4.29
(13)	Apr-25	(6,129.5)	15,750.6	9,621.1	\$3.18
(14)	May-25	(13,751.6)	63,423.5	49,671.8	\$2.58
(15)	Jun-25	26,551.3	(21,022.8)	5,528.5	\$2.86
(16)	Jul-25	6,305.6	4,962.2	11,267.8	\$4.30
(17)					
(18)		(165,962.0)	(125,571.9)	(291,533.9)	

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 25-22-NG
In Re: 2025 Distribution Adjustment Charge Filing
Responses to Division's Fourth Set of Data Requests
Issued August 10, 2025

Division 4-13 (Corrected), page 2

The FT-1 imbalances are cashout using the tier rates based off the index rates listed in the table above.

The FT-2 imbalances are separated into appropriate months using degree days, then multiplied by the average of the daily indices for the relevant month.

FT-1 and FT-2 transportation customer imbalances are resolved as described in the Company's gas tariff, RIPUC, NG-GAS No. 101, Section 6, Transportation Terms and Conditions, Schedule C.

Corrected Response:

Please see the table below for the requested information. All monthly imbalances and index rates shown on lines (1) through (16) were correctly stated in the Company's original response to this data request. The highlighted sums shown in line (18) were incorrectly stated and have been corrected below.

	Month	Imbalances in Dth		Total Imbalance in Dth	Index Rate
	(a)	FT-1 (b)	FT-2 (c)	(d)	(e)
(1)	Apr-24	2,338.9	(7,883.9)	(5,545.0)	\$1.53
(2)	May-24	(8,514.7)	(23,089.1)	(31,603.8)	\$1.86
(3)	Jun-24	(14,015.6)	8,956.7	(5,058.9)	\$1.93
(4)	Jul-24	(2,894.1)	(14,283.6)	(17,177.7)	\$1.78
(5)	Aug-24	(10,047.9)	(121,182.6)	(131,230.5)	\$1.61
(6)	Sep-24	(23,203.2)	(1,475.2)	(24,678.4)	\$1.78
(7)	Oct-24	(51,645.5)	43,879.8	(7,765.7)	\$1.81
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(14)	May-25	(13,751.6)	63,423.5	49,671.8	\$2.58
(15)	Jun-25	26,551.3	(21,022.8)	5,528.5	\$2.86
(16)	Jul-25	6,305.6	4,962.2	11,267.8	\$4.30
(17)					
(18)		119,791.0	52,972.1	172,763.1	

Division 4-13 (Corrected), page 3

The FT-1 imbalances are cashout using the tier rates based off the index rates listed in the table above.

The FT-2 imbalances are separated into appropriate months using degree days, then multiplied by the average of the daily indices for the relevant month.

FT-1 and FT-2 transportation customer imbalances are resolved as described in the Company's gas tariff, RIPUC, NG-GAS No. 101, Section 6, Transportation Terms and Conditions, Schedule C.

REDACTED

Division 4-25 (Corrected)

Request:

For each month during the winter of 2024/25, please identify the following for FT-2 service:

- a. Total deliveries by marketers;
- b. Marketer underground storage purchases and average purchase price; and
- c. Marketer peaking purchases and average purchase price.

Response:

- a. Below are the total marketer deliveries for the winter 2024/25 period for FT-2 service:

		24-Nov (a)	24-Dec (b)	25-Jan (c)	25-Feb (d)	25-Mar (e)	25-Apr (f)	Total Deliveries (g)
(1)								
(2)								
(3)								
(4)	Total							

- b. Below are the total marketer underground storage purchases for winter 2024/25:

		24-Nov (a)	24-Dec (b)	25-Jan (c)	25-Feb (d)	25-Mar (e)	25-Apr (f)	Total Deliveries (g)
(1)								
(2)								
(3)								
(4)	Total							
(5)	Price							

REDACTED

Division 4-25 (Corrected), page 2

c. Below are the total marketer peaking purchases for the winter 2024/25 period:

		24-Nov (a)	24-Dec (b)	25-Jan (c)	25-Feb (d)	25-Mar (e)	25-Apr (f)	Total Deliveries (g)
(1)								
(2)								
(3)								
(4)	Total							
(5)	Price							

This response contains commercially sensitive and confidential information regarding allocations to marketers and gas pricing. Accordingly, the Company is providing a redacted copy of this response along with an unredacted, confidential version subject to a motion for protective treatment.

Corrected Response:

This corrected response corrects a clerical error in the tabular information in the Company's original response to Division 4-25, part c. Specifically, January 2025, row (1), column (c) and February 2025, row (1) column (d), showing one marketer's peaking purchases, were incorrectly transposed. These corrections resulted in a change in the total volumes in row (4), columns (c) and (d). This correction has no financial impact, downstream implications, or any effect on other responses. The corrections are highlighted below in green. The remainder of the Company's original response to Division 4-25 was accurate as presented.

REDACTED

Division 4-25 (Corrected), page 3

c. Below are the total marketer peaking purchases for the winter 2024/25 period:

		24-Nov (a)	24-Dec (b)	25-Jan (c)	25-Feb (d)	25-Mar (e)	25-Apr (f)	Total Deliverie s (g)
(1)								
(2)								
(3)								
(4)	Total							
(5)	Price							