Andrew S. Marcaccio, Counsel
PPL Services Corporation
AMarcaccio@pplweb.com

280 Melrose Street
Providence, RI 02907
Phone 401-784-4263

Rhode Island Energy™
a PPL company

October 27, 2026

VIA ELECTRONIC MAIL AND HAND DELIVERY

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

RE: Docket No. 26-23-NG – The Narragansett Electric Company d/b/a Rhode Island Energy
2026 Distribution Adjustment Charge and Gas Cost Recovery Filings
Motions for Protective Treatment

Dear Ms. De La Rosa:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the "Company"), the Company submits this letter to summarize its motions for protective treatment that are pending in this docket. Because the Commission is not conducting an evidentiary hearing at which the Company would customarily explain the reasons in support of each motion, the Company provides the following summary for ease of reference. The table identifies each motion, the materials that are the subject of the motion, and the basis for confidentiality of those materials as stated in the related motion.

Motion	Materials Subject to Motion	Basis for Confidentiality
2026 Gas Cost Recovery (GCR) Motion	Attachments GSP-1, GSP-4, GSP-5, GSP-6, GSP-7, and GSP-8 to the pre-filed direct Gas Supply Plan testimony of Kim N. Dao and James M. Stephens; Attachments TGS-1, TGS-3, and TGS-5 to Tyler G. Shields's pre-filed direct testimony; and Attachment NGPMP-2 to James M. Stephens's pre-filed direct testimony concerning the Natural Gas Portfolio Management Plan.	The attachments contain commercially sensitive gas-cost pricing and volume information, contract terms, and counterparty identities. Disclosure could impair the Company's ability to negotiate advantageous terms and could deter counterparties from offering favorable terms. Disclosure of gas volumes provided to marketers could also reveal sensitive information about market share and sales activity to competing marketers.

Motion	Materials Subject to Motion	Basis for Confidentiality
Division Set 1 Amended Motion	The Company's responses to Division Data Requests 1-3, 1-13, 1-16, 1-25, 1-26, 1-29, 1-30, 1-31, and 1-37; and Attachments DIV 1-1, 1-6, 1-7, 1-8, 1-10, 1-11, 1-22-1, 1-24, 1-28-1, 1-28-2, 1-28-3, 1-28-4, 1-30, 1-39, and 1-40. Attachments DIV 1-1, 1-6, 1-7, 1-8, 1-10 1-11, and 1-28-1 through 1-28-4 were provided in Excel format only, so redacted versions cannot be produced.	The materials contain commercially sensitive gas-pricing information; gas-volume information from which confidential per-unit gas costs could be derived; confidential marketer-allocation information; and procurement information. Disclosure could impair future negotiations, allow market participants to infer the Company's supply requirements, contracting strategies, and operational constraints, and reveal purchasing strategies, anticipated needs, and negotiating positions.
Supplemental Division Set 1-13 Motion	The Company's supplemental response to Division Data Request 1-13, providing additional marketer-imbalance information for June and July 2026.	The supplemental response contains commercially sensitive confidential information regarding allocations to marketers. Disclosure could allow market participants to infer the Company's supply requirements, contracting strategies, and operational constraints, placing the Company at a competitive disadvantage in future transactions. The Company maintains this information as confidential.
Division Set 3 Motion	Attachments DIV 3-1, DIV 3-2, and DIV 3-11 to the Company's responses to Division Data Requests 3-1, 3-2, and 3-11. Attachments DIV 3-1 and DIV 3-2 were provided in Excel format only, so redacted versions cannot be produced.	The materials contain commercially sensitive gas-pricing and procurement information. Disclosure of prices or terms agreed with gas suppliers, shippers, or marketers could hamper the Company's ability to negotiate advantageous terms and discourage counterparties from offering favorable terms. Disclosure of procurement information could reveal the Company's purchasing strategies, anticipated needs, and negotiating positions.
Division Set 4 Motion	The Company's response to Division Data Request 4-1.	The response contains commercially sensitive details concerning the Company's gas-procurement activities and the market's response to those activities. Disclosure could hamper future negotiations, discourage counterparties from offering advantageous terms, and reveal the Company's purchasing strategies, anticipated needs, and negotiating positions.

Please note that this transmittal includes an amended motion for protective treatment relating to the Company's responses to the Rhode Island Division of Public Utilities and Carriers' ("Division") first set of data requests. This amended motion is being filed because the Company's originally filed motion for protective treatment failed to identify Attachments DIV 1-6 and DIV 1-10 in the list of materials for which protective treatment was sought. The filing

letter that accompanied the Company's responses to the Division's first set of data requests correctly identified these two attachments as confidential and noted that they were provided in Excel format only. These attachments were not filed publicly and were only included in the Company's confidential August 26, 2026 transmittal.

The Company respectfully requests that the Commission grant each of the five motions for protective treatment. If the Commission is inclined to deny any motion, the Company respectfully requests that it be afforded a hearing before any such denial.

Thank you for your attention to this filing. If you have any questions concerning this matter, please do not hesitate to contact me at 401-784-4263.

Sincerely,



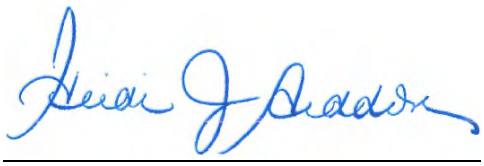
Andrew S. Marcaccio

cc: Docket No. 26-23-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 27, 2026
Date

Docket No. 26-23-NG – Narragansett Electric Co. d/b/a Rhode Island Energy
2026 Gas Cost Recovery Filing (GCR) and 2026 Distribution Adjustment Charge (DAC)
Service List as of 7/31/2026

Name/Address	E-mail	Phone
The Narragansett Electric Company d/b/d Rhode Island Energy Andrew Marcaccio, Esq. 280 Melrose Street Providence, RI 02907	JLicht1@pplweb.com;	401-784-4263
	AMarcaccio@pplweb.com;	
	JHutchinson@pplweb.com;	
	JScanlon@pplweb.com;	
Steven Boyajian, Esq. **Robinson & Cole LLP** One Financial Plaza, 14th Floor Providence, RI 02903	SBoyajian@rc.com;	401-709-3359
	LPimentel@rc.com;	
	HSeddon@rc.com;	
Rhode Island Energy Stephanie A. Briggs Jeffrey D. Oliveira Tyler G. Shields Peter R. Blazunas James M. Stephens Terry Crupi Scott Porter Tim Jones Jared Long Michele V. Leone Laeyeng H. Hunt Brandon W. Flynn Kim Dao Ariel McCord Phil LaFond Kathy Castro Kenneth M. Campbell	SBriggs@pplweb.com;	
	JOliveira@pplweb.com;	
	TGShields@pplweb.com;	
	PBlazunas@ceadvisors.com;	
	JMStephens@pplweb.com;	
	TJCrupi@pplweb.com;	
	SWPorter@pplweb.com;	
	Tim.Jones@lge-ku.com;	
	Jared.Long@lge-ku.com;	
	MVLeone@RIEnergy.com;	
	LHHunt@RIEnergy.com;	
	BFlynn@RIEnergy.com;	
	KDao@RIEnergy.com;	
	EMcCord@RIEnergy.com;	

	PLaFond@RIEnergy.com;	
	krcastro@rienergy.com;	
	KMCampbell@RIEnergy.com;	
Division of Public Utilities (DIV) Leo Wold, Esq. Division of Public Utilities	Leo.wold@dpuc.ri.gov;	401-780-2177
	John.bell@dpuc.ri.gov;	
	joel.munoz@dpuc.ri.gov;	
	Al.mancini@dpuc.ri.gov;	
	Margaret.L.Hogan@dpuc.ri.gov;	
	Mark.A.Simpkins@dpuc.ri.gov;	
	Kyle.J.Lynch@dpuc.ri.gov;	
	gregory.schultz@dpuc.ri.gov;	
	john.r.harrington@dpuc.ri.gov;	
	nicole.m.corbin@dpuc.ri.gov;	
	Ellen.Golde@dpuc.ri.gov;	
	Machaela.Seaton@dpuc.ri.gov;	
Exeter Associates, Inc. Jerome Mierzwa 10480 Little Patuxent Parkway, Suite 300 Columbia, MD 21044	jmierzwa@exeterassociates.com;	410-992-7500
Berkshire Consulting David Effron 12 Pond Path North Hampton, NH 03862-2243	Djeffron@aol.com;	603-964-6526
File an original & 9 copies w/ PUC: Stephanie De La Rosa, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	stephanie.delarosa@puc.ri.gov;	401-780-2107
	jordan.sasa@puc.ri.gov;	
	Alan.nault@puc.ri.gov;	
	Todd.bianco@puc.ri.gov;	
Office of Energy Resources David Augustyn, Esq. Christopher Kearns	David.Augustyn@energy.ri.gov;	
	Christopher.Kearns@energy.ri.gov;	
	William.Owen@energy.ri.gov;	
RI Attorney General Office Nicholas Vaz, Esq.	nvaz@riag.ri.gov;	
	mgomes@riag.ri.gov;	
Conservation Law Foundation James Crowley, Esq.	jcrowley@clf.org;	

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION

THE NARRAGANSETT ELECTRIC COMPANY d/b/a RHODE ISLAND ENERGY 2026 DISTRIBUTION ADJUSTMENT CHARGE AND 2026 GAS COST RECOVERY FILINGS	)	DOCKET NO. 26-23-NG

AMENDED[1] MOTION OF THE NARRAGANSETT ELECTRIC COMPANY FOR PROTECTIVE TREATMENT OF CONFIDENTIAL INFORMATION

Rhode Island Energy[2] hereby respectfully requests that the Public Utilities Commission ("Commission") grant protection from public disclosure for certain confidential responses to the Rhode Island Division and Public Utilities and Carriers' (the "Division") First Set of Data Requests. Specifically, the Company seeks protective treatment for its responses to Division Data Requests 1-3, 1-13, 1-16, 1-25, 1-26, 1-29, 1-30, 1-31 and 1-37 and Attachments DIV 1-1, 1-6, 1-7, 1-8, 1-10, 1-11, 1-22-1, 1-24, 1-28-1, 1-28-2, 1-28-3, 1-28-4, 1-30, 1-39 and 1-40 (the "Confidential Materials"). Please note that Attachments DIV 1-1, 1-7, 1-8, 1-11, 1-28-1, 1-28-2, 1-28-3, and 1-28-4 are being provided in Excel format only and, therefore, redacted versions cannot be produced. 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).

[1] Attachments DIV 1-6 and DIV 1-10 were filed confidentially on August 26, 2026, and identified in the Company's filing letter as confidential materials being submitted in Excel format, but were inadvertently omitted from the list of materials for which the Company seeks protective treatment in the Motion. This amended motion is submitted solely to include Attachments DIV 1-6 and DIV 1-10 among the materials for which protective treatment is requested. No other changes are made to the Motion.

[2] The Narragansett Electric Company d/b/a Rhode Island Energy ("Rhode Island Energy" or the "Company").

The Company seeks protective treatment for the Confidential Materials because they contain commercially sensitive gas pricing information, gas volumes from which gas unit prices could be calculated, confidential information regarding allocations to marketers, and procurement information, the disclosure of which would be detrimental to the commercial interests of the Company or the commercial interests of the Company's counterparties.

I. LEGAL STANDARD

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

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

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

The Rhode Island Supreme Court has held that this confidential information exemption applies where the disclosure of information would be likely either (1) to impair the government's ability to obtain necessary information in the future; or (2) to cause substantial harm to the competitive

position of the person from whom the information was obtained. *Providence Journal Company v. Convention Center Authority,* 774 A.2d 40 (R.I. 2001). The first prong of the test is satisfied when information is provided to the governmental agency and that information is of a kind that would customarily not be released to the public by the person from whom it was obtained. *Providence Journal*, 774 A.2d at 47.

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

II. BASIS FOR CONFIDENTIALITY

The Confidential Materials included within the Company's responses to the Division's First Set of Data Requests include commercially sensitive gas pricing information, gas volume information from which the Company's confidential per unit gas costs could be derived, confidential information regarding allocations to marketers, and other procurement information that the Company maintains as confidential for a number of reasons. First, if the Company were to disclose the prices or other terms that it has agreed to with gas suppliers, shippers 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. Further, if the Company were to disclosure allocations to marketers, market participants could use that information to infer the Company's supply requirements, contracting strategies, and operational constraints, thereby placing the Company at a competitive disadvantage in future transactions. Finally, the Company does not publicly disclose procurement information because its disclosure would reveal the Company's purchasing strategies, anticipated needs, and negotiating positions, which suppliers and other counterparties could use to obtain more favorable terms at the expense of the Company and its customers. For these reasons, the Confidential Materials are not of a kind that would customarily be released to the public by the Company. Therefore, the first prong of the *Providence Journal* test has been satisfied. *See Providence Journal, 774 A.2d at 47.*

III. CONCLUSION

For the foregoing reasons, the Company respectfully requests that the Commission grant this motion for protective treatment of the Confidential Materials contained in the Company's responses to the Division's First Set of Data Requests.

[Signature page following]

Respectfully submitted,

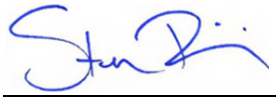
The Narragansett Electric Company
d/b/a Rhode Island Energy

By its attorneys,



Andrew S. Marcaccio (#8168)
Rhode Island Energy
280 Melrose Street
Providence, RI 02907
(401) 784-4263

- and-



Steven J. Boyajian (#7263)
Robinson & Cole LLP
One Financial Plaza, 14th Floor
Providence, RI 02903
Tel. (401) 709-3300
Fax. (401) 709-3399
sboyajian@rc.com

Dated: October 27, 2026

CERTIFICATE OF SERVICE

I hereby certify that on October 27, 2026, I delivered a true copy of the foregoing Motion via electronic mail to the parties on the Service List for Docket No. 26-23-NG.



Heidi J. Seddon