

April 27, 2012

VIA HAND DELIVERY & ELECTRONIC MAIL

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

**RE: Docket No. 4315
2013 Standard Offer Service Procurement Plan and
2013 Renewable Energy Standards Procurement Plan**

Dear Ms. Massaro:

Enclosed are the responses of National Grid¹ to the Division's First set of Data Requests in the above referenced docket. This filing is also accompanied by a Motion for Protective Treatment in accordance with Rule 1.2(g) of the Commission's Rules of Practice and Procedure and R.I.G.L. §38-2-2(4)(i)(B). Consequently and pursuant to Commission rules, the Company has provided the Commission with one copy of the confidential materials for its review, and has otherwise included redacted copies of those materials.

Thank you for your attention to this transmittal. If you have any questions, please feel free to contact me at (401) 784-7667.

Very truly yours,



Thomas R. Teehan

Enclosure

cc: Leo Wold, Esq.
Steve Scialabba, Division

¹ The Narragansett Electric Company d/b/a National Grid.

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

RHODE ISLAND PUBLIC UTILITIES COMMISSION

National Grid

2013 Standard Offer Service Procurement Plan

Docket No. 4315

2013 Renewable Energy Standards Procurement Plan

**MOTION OF THE NARRAGANSETT ELECTRIC COMPANY,
D/B/A NATIONAL GRID
FOR PROTECTIVE TREATMENT OF CONFIDENTIAL INFORMATION**

Now comes The Narragansett Electric Company, d/b/a National Grid (“Company”) and hereby requests that the Rhode Island Public Utilities Commission (“Commission”) grant protection from public disclosure of certain confidential, competitively sensitive, and proprietary information submitted in this proceeding, as permitted by Commission Rule 1.2(g) and R.I.G.L. § 38-2-2(4)(i)(B).

I. BACKGROUND

On April 27, 2012 the Company filed with the Commission its responses to Divisions Data Requests Set 1. The Company’s responses contain confidential information regarding block sizes (DIV 1-2), winning prices (DIV 1-3), and number of bidders (DIV 1-5) relative to Standard Offer procurement RFPs. This information is competitively sensitive, proprietary information that the Company wishes to keep confidential. For the reasons stated below, the Company requests that this information be protected from public disclosure. The Company has also filed redacted copies of its filing deleting the competitively sensitive information in question.

II. LEGAL STANDARD

Rule 1.2(g) of the Commission's Rules of Practice and Procedure provides that access to public records shall be granted in accordance with the Access to Public Records Act ("APRA"), R.I.G.L. §38-2-1, *et seq.* Under 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 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 the public records law, 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.G.L. §38-2-2(4)(i)(B) provides that the following 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 the determination as to whether this exemption applies requires the application of a two-pronged test set forth in Providence Journal Company v. Convention Center Authority, 774 A.2d 40 (R.I.2001). The first prong of the test assesses whether the information was provided voluntarily to the governmental agency. Providence Journal, 774 A.2d at 47. If the answer to the first question is affirmative, then the question becomes whether the information is "of a kind that would customarily not be released to the public by the person from whom it was obtained." Id.

In addition, the Court has held that the agencies making determinations as to the disclosure of information under APRA may apply the balancing test established by the Court in Providence Journal v. Kane, 577 A.2d 661 (R.I.1990). Under this balancing test, 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.

III. BASIS FOR CONFIDENTIALITY

The Company seeks confidential treatment on winning bid prices, block sizes and number of bidders involved in Standard Offer procurement RFPs. Release of this type of information would be commercially harmful to the Company and to its customers since potential bidders could use this information in such a way that would impede the Company's ability to obtain the best possible bid for its customers.

V. CONCLUSION

In light of the foregoing, the Company respectfully requests that the Commission grant its Motion for Protective Treatment as stated herein.

Respectfully submitted,

**THE NARRAGANSETT ELECTRIC
COMPANY**

By its attorney,



Thomas R. Teehan (RI #4698)
280 Melrose Street
Providence, RI 02907
(401) 784-7667

Dated: April 27, 2012

Division 1-1

Request:

Please compare monthly customer migration (to competitive supply) data and rates in RI for each customer class to those of Massachusetts Electric in MA over the last 3 years.

Response:

Please see DIV 1-1 Att-1 for a comparison of monthly customer migration (to competitive supply) data and rates for Narragansett Electric Company customers to those of Massachusetts Electric Company (“Mass Electric”)¹ over the last 3 years.

For Narragansett Electric Company, the Residential group consists of rate class A-16 (Basic Residential) and A-60 (Residential Low Income); the Commercial group consists of rate class C-06 (Small C&I), S-10 (Private Lighting), S-14 (General Street and Area Lighting) and G-02 (General C&I); and the Industrial group consists of rate classes B-32 (C&I Back-up Service), G-32 (200 kW Demand), B-62 (3,000 kW Demand Back-up Service), G-62 (3,000kW Demand) and X-01 (Electric Propulsion).

For Mass Electric, the Residential group consists of rate class R-1 (Regular Residential), R-2 (Residential Low Income) and R-4 (Optional Time-of-Use); the Commercial group consists of rate class G-1 (General Service – Small C&I) and Streetlights; and the Industrial Group consists of rate class G-2 (General Service - Demand) and G-3 (Time-of-Use).

Mass Electric offers both a fixed price and a variable price option for all Basic Service classes. In addition, rates for Industrial customers differ by ISO-NE reliability zone. For the Residential and Commercial classes, the fixed price option is the “default” option, and for Industrial customers, the variable price option is the “default” option. For the Mass Electric Residential and Commercial Basic Service rates shown on pages 1 and 2 of the attachment, the rates represent the fixed price rates. The Mass Electric Industrial Basic Service rates, as shown on page 4 of the attachment, are the variable rates by ISO-NE reliability load zone. The rates shown on page 3 represent a weighted average of the three zonal prices for the Mass Electric Industrial group.

For Narragansett Electric, the Commercial class rates reflect both the Small Customer and the Large Customer rates for the period January 2010 through March 2011. Rate G-02 is now part

¹ Includes Nantucket Electric Company data

The Narragansett Electric Company
d/b/a National Grid
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of the Commercial class, but prior to April 2011 Rate G-02 was part of the Large Customer class. The SO Service Rate includes the Renewable Energy Standard Charge.

Prepared by or under the supervision of: Jeanne A. Lloyd

Massachusetts Electric Company
Residential

The Narragansett Electric Company
Residential

	Competitive Supply			Competitive Supply			Basic Service Rate - Fixed Rate	Competitive Supply			Competitive Supply			SO Service Rate
	Customers	Total Customers	% of Total	kWh	Total kWh	% of Total		Customers	Total Customers	% of Total	kWh	Total kWh	% of Total	
Jan	54,876	1,106,126	5.0%	53,707,147	907,034,192	5.9%	\$0.12660	272	428,862	0.1%	680,108	315,103,359	0.2%	\$0.09293
Feb	63,671	1,126,995	5.6%	55,991,678	816,972,016	6.9%	\$0.12660	283	429,636	0.1%	728,689	254,899,942	0.3%	\$0.09293
Mar	64,848	1,121,708	5.8%	51,473,382	709,243,461	7.3%	\$0.12660	287	430,306	0.1%	688,802	243,988,164	0.3%	\$0.09293
Apr	73,242	1,127,466	6.5%	54,185,054	690,827,572	7.8%	\$0.12660	297	429,777	0.1%	821,326	229,158,071	0.4%	\$0.09293
May	75,023	1,112,398	6.7%	45,693,926	564,578,553	8.1%	\$0.09714	320	430,760	0.1%	686,624	197,629,459	0.3%	\$0.09293
Jun	75,088	1,113,181	6.7%	47,979,532	581,864,038	8.2%	\$0.09714	560	422,293	0.1%	785,766	201,735,968	0.4%	\$0.09293
Jul	77,249	1,122,113	6.9%	55,899,898	675,576,570	8.3%	\$0.09714	583	429,849	0.1%	811,063	240,802,494	0.3%	\$0.09293
Aug	79,985	1,119,504	7.1%	66,200,200	772,071,700	8.6%	\$0.09714	589	417,035	0.1%	844,644	289,370,680	0.3%	\$0.09293
Sep	82,461	1,120,076	7.4%	68,636,041	800,415,669	8.6%	\$0.09714	706	429,765	0.2%	1,115,760	301,367,244	0.4%	\$0.09293
Oct	83,014	1,130,348	7.3%	53,970,828	608,473,055	8.9%	\$0.09714	709	424,626	0.2%	949,124	210,804,475	0.5%	\$0.09293
Nov	81,366	1,112,105	7.3%	53,578,057	599,152,409	8.9%	\$0.08639	780	429,481	0.2%	1,028,385	210,658,865	0.5%	\$0.09293
Dec	82,108	1,129,297	7.3%	66,912,163	734,867,834	9.1%	\$0.08639	811	424,481	0.2%	1,198,617	244,114,073	0.5%	\$0.09293
2009	892,931	13,441,317	6.6%	674,227,906	8,461,077,069	8.0%		6,197	5,126,871	0.1%	10,338,908	2,939,632,794	0.4%	
Jan	81,225	1,121,889	7.2%	81,884,212	909,949,447	9.0%	\$0.08828	841	429,745	0.2%	1,634,989	306,500,115	0.5%	\$0.09293
Feb	81,030	1,125,174	7.2%	71,333,491	801,497,788	8.9%	\$0.08828	706	430,093	0.2%	1,020,666	261,394,869	0.4%	\$0.09293
Mar	81,024	1,129,485	7.2%	64,902,884	735,623,431	8.8%	\$0.08828	758	431,047	0.2%	1,120,209	244,864,987	0.5%	\$0.09655
Apr	79,956	1,126,937	7.1%	56,685,869	657,312,707	8.6%	\$0.08828	798	418,879	0.2%	994,961	219,491,797	0.5%	\$0.09655
May	78,413	1,116,681	7.0%	48,196,716	565,512,427	8.5%	\$0.08110	861	430,875	0.2%	884,988	204,322,772	0.4%	\$0.09655
Jun	79,321	1,138,542	7.0%	57,062,117	666,295,197	8.6%	\$0.08110	900	419,336	0.2%	1,032,530	222,274,830	0.5%	\$0.09655
Jul	78,632	1,160,301	6.8%	78,165,392	937,578,462	8.3%	\$0.08110	929	429,707	0.2%	1,413,243	352,748,399	0.4%	\$0.09655
Aug	77,460	1,117,659	6.9%	73,540,947	921,001,553	8.0%	\$0.08110	1,042	417,944	0.2%	1,555,092	337,614,092	0.5%	\$0.09655
Sep	77,893	1,133,766	6.9%	64,623,153	800,198,874	8.1%	\$0.08110	1,059	424,844	0.2%	1,297,442	291,160,247	0.4%	\$0.09655
Oct	76,213	1,117,149	6.8%	48,638,001	604,145,902	8.1%	\$0.08110	1,167	429,803	0.3%	1,124,706	221,761,588	0.5%	\$0.09489
Nov	76,918	1,130,446	6.8%	50,893,669	613,401,164	8.3%	\$0.08083	1,586	429,794	0.4%	1,407,356	214,825,924	0.7%	\$0.09489
Dec	75,824	1,119,035	6.8%	63,995,588	768,900,803	8.3%	\$0.08083	2,009	411,175	0.5%	2,079,256	248,680,711	0.8%	\$0.09489
2010	943,909	13,537,064	7.0%	759,922,039	8,981,417,755	8.5%		12,656	5,103,242	0.2%	15,565,438	3,125,640,331	0.5%	
Jan	75,919	1,128,563	6.7%	73,853,708	888,843,401	8.3%	\$0.08083	2,362	430,774	0.5%	2,877,830	300,816,490	1.0%	\$0.09489
Feb	75,567	1,135,046	6.7%	68,063,641	838,197,842	8.1%	\$0.08083	2,515	431,032	0.6%	2,558,384	270,708,288	0.9%	\$0.09489
Mar	75,241	1,137,770	6.6%	62,124,905	769,373,643	8.1%	\$0.08083	2,626	413,407	0.6%	2,527,905	244,377,656	1.0%	\$0.09489
Apr	74,843	1,138,224	6.6%	55,930,843	707,544,715	7.9%	\$0.08083	2,983	430,863	0.7%	2,259,389	231,248,656	1.0%	\$0.06902
May	73,260	1,115,883	6.6%	46,355,105	587,804,272	7.9%	\$0.07282	3,134	430,973	0.7%	2,241,734	203,607,359	1.1%	\$0.06902
Jun	73,948	1,132,798	6.5%	52,879,964	655,831,541	8.1%	\$0.07282	3,207	431,476	0.7%	2,508,039	227,044,026	1.1%	\$0.06902
Jul	74,042	1,136,338	6.5%	62,735,071	810,170,790	7.7%	\$0.07282	3,191	430,509	0.7%	3,310,984	313,118,284	1.1%	\$0.06902
Aug	74,351	1,132,544	6.6%	71,371,593	930,423,592	7.7%	\$0.07282	3,098	418,265	0.7%	3,472,314	342,832,395	1.0%	\$0.06902
Sep	75,422	1,130,808	6.7%	60,002,673	779,498,938	7.7%	\$0.07282	3,179	430,453	0.7%	2,964,256	289,507,477	1.0%	\$0.06902
Oct	77,096	1,140,301	6.8%	50,105,030	632,224,998	7.9%	\$0.07282	3,196	431,319	0.7%	2,416,757	229,571,144	1.1%	\$0.06902
Nov	78,229	1,139,337	6.9%	53,263,987	641,995,951	8.3%	\$0.08265	3,263	430,152	0.8%	2,455,772	224,732,857	1.1%	\$0.06902
Dec	78,436	1,120,569	7.0%	59,327,231	708,052,438	8.4%	\$0.08265	3,292	418,593	0.8%	2,639,389	236,749,225	1.1%	\$0.06902
2011	906,354	13,588,181	6.7%	716,013,751	8,949,962,121	8.0%		36,046	5,127,816	0.7%	32,232,753	3,114,313,857	1.0%	

Massachusetts Electric Company
Commercial

The Narragansett Electric Company
Commercial

	Competitive Supply			Competitive Supply			Basic Service Rate -	Competitive Supply			Competitive Supply			SO Service	Small Customer	Large Customer
	Customers	Total Customers	% of Total	kWh	Total kWh	% of Total	Fixed Rate	Customers	Total Customers	% of Total	kWh	Total kWh	% of Total	Rate	Group Rate	Group Rate
Jan	25,085	150,987	16.6%	60,774,802	219,110,051	27.7%	\$0.12431	3,251	58,233	5.6%	29,073,611	184,919,231	15.7%	\$0.09293		
Feb	25,862	153,536	16.8%	58,764,957	219,509,253	26.8%	\$0.12431	3,490	58,884	5.9%	30,247,076	165,971,208	18.2%	\$0.09293		
Mar	26,128	154,449	16.9%	55,719,856	183,591,673	30.3%	\$0.12431	3,611	58,885	6.1%	29,770,505	201,321,655	14.8%	\$0.09293		
Apr	26,951	152,863	17.6%	53,900,783	185,386,580	29.1%	\$0.12431	3,976	58,689	6.8%	32,124,547	153,956,431	20.9%	\$0.09293		
May	26,966	152,252	17.7%	50,735,123	164,322,530	30.9%	\$0.09734	4,117	58,699	7.0%	31,059,456	144,070,430	21.6%	\$0.09293		
Jun	26,634	151,157	17.6%	52,027,361	170,191,993	30.6%	\$0.09734	5,671	58,161	9.8%	33,932,026	147,739,306	23.0%	\$0.09293		
Jul	27,553	152,470	18.1%	56,912,505	186,454,616	30.5%	\$0.09734	5,673	58,863	9.6%	40,338,135	188,091,752	21.4%	\$0.09293		
Aug	27,946	152,701	18.3%	60,661,231	197,110,386	30.8%	\$0.09734	6,275	57,756	10.9%	39,868,408	171,589,487	23.2%	\$0.09293		
Sep	28,067	152,098	18.5%	63,546,145	202,820,759	31.3%	\$0.09734	6,617	58,695	11.3%	49,397,571	183,879,067	26.9%	\$0.09293		
Oct	28,537	153,293	18.6%	57,003,257	195,705,012	29.1%	\$0.09734	6,667	58,411	11.4%	43,565,249	157,337,829	27.7%	\$0.09293		
Nov	28,511	151,649	18.8%	55,325,754	149,938,560	36.9%	\$0.08757	6,853	58,786	11.7%	41,165,244	142,801,764	28.8%	\$0.09293		
Dec	28,875	153,537	18.8%	63,215,828	186,958,041	33.8%	\$0.08757	6,932	58,205	11.9%	45,631,050	156,449,668	29.2%	\$0.09293		
2009	327,115	1,830,992	17.9%	688,587,602	2,261,099,454	30.5%		63,133	702,267	9.0%	446,172,878	1,998,127,828	22.3%			
Jan	28,898	153,023	18.9%	70,719,020	218,549,599	32.4%	\$0.08720	7,128	58,927	12.1%	50,275,293	166,252,614	30.2%	\$0.09293	\$0.09293	\$0.07984
Feb	28,806	153,275	18.8%	63,538,254	200,736,676	31.7%	\$0.08720	7,223	58,626	12.3%	46,445,205	160,069,567	29.0%	\$0.09293	\$0.09293	\$0.08231
Mar	28,905	153,665	18.8%	61,749,851	193,890,329	31.8%	\$0.08720	7,337	59,005	12.4%	47,239,305	160,478,455	29.4%	\$0.09655	\$0.09655	\$0.08467
Apr	28,820	153,325	18.8%	58,635,002	180,193,754	32.5%	\$0.08720	7,239	58,267	12.4%	46,082,238	152,098,800	30.3%	\$0.09655	\$0.09655	\$0.08062
May	28,679	152,756	18.8%	52,248,429	162,271,476	32.2%	\$0.08102	7,496	58,938	12.7%	43,382,398	139,843,643	31.0%	\$0.09655	\$0.09655	\$0.07919
Jun	29,038	154,816	18.8%	59,534,170	181,999,115	32.7%	\$0.08102	7,632	58,308	13.1%	50,238,072	155,286,264	32.4%	\$0.09655	\$0.09655	\$0.07873
Jul	28,800	154,820	18.6%	68,098,794	217,359,867	31.3%	\$0.08102	7,849	59,043	13.3%	61,568,596	194,455,694	31.7%	\$0.09655	\$0.09655	\$0.07142
Aug	28,511	152,789	18.7%	68,794,345	222,214,325	31.0%	\$0.08102	7,927	58,499	13.6%	61,985,279	193,092,525	32.1%	\$0.09655	\$0.09655	\$0.07495
Sep	28,814	154,241	18.7%	63,322,584	204,129,768	31.0%	\$0.08102	7,997	59,101	13.5%	59,315,251	183,484,953	32.3%	\$0.09655	\$0.09655	\$0.06953
Oct	28,577	153,392	18.6%	59,035,507	177,812,429	33.2%	\$0.08102	8,043	59,566	13.5%	51,869,387	154,834,911	33.5%	\$0.09489	\$0.09489	\$0.07024
Nov	28,538	153,950	18.5%	54,784,704	172,101,617	31.8%	\$0.08020	8,179	59,389	13.8%	50,839,640	145,313,804	35.0%	\$0.09489	\$0.09489	\$0.07271
Dec	28,473	153,218	18.6%	62,464,513	194,067,831	32.2%	\$0.08020	8,016	57,572	13.9%	52,527,482	153,415,708	34.2%	\$0.09489	\$0.09489	\$0.07694
2010	344,859	1,843,270	18.7%	742,925,173	2,325,326,786	31.9%		92,066	705,241	13.1%	621,768,146	1,958,626,938	31.7%			
Jan	29,190	155,465	18.8%	66,572,455	208,150,492	32.0%	\$0.08020	8,470	59,974	14.1%	58,212,353	172,756,731	33.7%	\$0.09489	\$0.09489	\$0.07347
Feb	29,443	156,136	18.9%	65,041,857	203,177,073	32.0%	\$0.08020	8,417	59,734	14.1%	53,086,081	161,763,509	32.8%	\$0.09489	\$0.09489	\$0.07212
Mar	29,615	156,585	18.9%	70,089,028	200,981,242	34.9%	\$0.08020	8,324	58,815	14.2%	53,273,387	158,495,503	33.6%	\$0.09489	\$0.09489	\$0.06370
Apr	29,579	156,438	18.9%	61,668,451	190,171,804	32.4%	\$0.08020	8,408	59,751	14.1%	50,913,273	152,858,751	33.3%	\$0.06999		
May	29,330	153,910	19.1%	55,214,937	163,620,936	33.7%	\$0.07247	8,589	59,898	14.3%	49,076,173	144,493,995	34.0%	\$0.06999		
Jun	29,606	155,247	19.1%	59,685,192	187,048,966	31.9%	\$0.07247	8,579	59,885	14.3%	52,715,394	156,498,276	33.7%	\$0.06999		
Jul	29,600	156,053	19.0%	66,365,423	196,436,891	33.8%	\$0.07247	8,561	60,094	14.2%	60,168,639	183,938,832	32.7%	\$0.06999		
Aug	29,458	155,707	18.9%	69,900,266	219,147,704	31.9%	\$0.07247	8,230	59,048	13.9%	61,384,779	193,267,121	31.8%	\$0.06999		
Sep	29,481	155,858	18.9%	65,917,690	203,283,141	32.4%	\$0.07247	8,322	59,910	13.9%	56,649,848	177,531,261	31.9%	\$0.06999		
Oct	29,746	156,917	19.0%	59,687,431	178,619,533	33.4%	\$0.07247	8,363	60,188	13.9%	53,059,651	159,624,715	33.2%	\$0.06999		
Nov	29,552	155,982	18.9%	60,315,321	177,575,038	34.0%	\$0.08045	8,474	59,788	14.2%	52,186,143	151,680,552	34.4%	\$0.06999		
Dec	29,539	154,850	19.1%	61,928,451	183,993,084	33.7%	\$0.08045	8,571	59,233	14.5%	51,618,295	149,796,309	34.5%	\$0.06999		
2011	354,139	1,869,148	18.9%	762,386,502	2,312,205,904	33.0%		101,308	716,318	14.1%	652,344,016	1,962,705,555	33.2%			

* As of 2010 Q4, M1 and self-supplier data is excluded from migration report

Massachusetts Electric Company
Industrial - All Zones

The Narragansett Electric Company
Industrial

	Competitive			Competitive			Weighted Average	Competitive			Competitive			SO
	Supply Customers	Total Customers	% of Total	Supply kWh	Total kWh	% of Total	Rate - Variable Rate	Supply Customers	Total Customers	% of Total	Supply kWh	Total kWh	% of Total	Service Rate
Jan	8,360	14,572	57.4%	765,387,216	963,828,890	79.4%	\$0.12428	365	1,076	33.9%	106,396,003	256,735,320	41.4%	\$0.09293
Feb	8,429	14,530	58.0%	713,815,167	889,947,289	80.2%	\$0.09960	382	1,095	34.9%	99,696,654	218,204,936	45.7%	\$0.09293
Mar	8,512	14,731	57.8%	656,717,934	816,292,353	80.5%	\$0.08928	394	1,061	37.1%	97,187,725	204,012,688	47.6%	\$0.09293
Apr	8,606	14,702	58.5%	830,037,198	887,737,611	93.5%	\$0.08801	438	1,078	40.6%	76,678,188	165,414,994	46.4%	\$0.09293
May	8,701	14,740	59.0%	678,100,314	818,181,619	82.9%	\$0.07135	456	1,083	42.1%	149,947,572	249,039,804	60.2%	\$0.09293
Jun	8,714	14,657	59.5%	687,273,525	795,432,075	86.4%	\$0.07415	443	1,040	42.6%	115,146,901	210,549,857	54.7%	\$0.09293
Jul	8,797	14,757	59.6%	714,310,453	904,234,105	79.0%	\$0.07895	938	1,074	87.3%	123,946,166	214,890,674	57.7%	\$0.09293
Aug	8,853	14,797	59.8%	722,160,732	876,829,068	82.4%	\$0.25908	483	1,040	46.4%	131,151,214	222,441,538	59.0%	\$0.09293
Sep	8,813	14,695	60.0%	780,857,164	935,458,449	83.5%	\$0.06912	488	1,030	47.4%	141,500,432	235,960,621	60.0%	\$0.09293
Oct	8,933	14,876	60.0%	704,295,720	844,099,543	83.4%	\$0.07413	512	1,050	48.8%	143,150,375	221,680,308	64.6%	\$0.09293
Nov	8,861	14,729	60.2%	686,307,869	817,422,224	84.0%	\$0.06588	482	1,034	46.6%	126,569,381	205,114,133	61.7%	\$0.09293
Dec	8,969	14,886	60.3%	713,120,021	857,863,007	83.1%	\$0.07587	480	1,033	46.5%	133,217,259	219,642,567	60.7%	\$0.09293
2009	104,548	176,672	59.2%	8,652,383,313	10,407,326,233	83.1%		5,861	12,694	46.2%	1,444,587,870	2,623,687,440	55.1%	
Jan	8,884	14,905	59.6%	728,074,147	888,966,063	81.9%	\$0.08815	508	1,076	47.2%	146,532,077	231,072,855	63.4%	\$0.07984
Feb	8,856	14,908	59.4%	695,018,085	852,982,036	81.5%	\$0.09004	537	1,072	50.1%	138,551,126	212,658,689	65.2%	\$0.08231
Mar	8,824	14,938	59.1%	695,876,946	846,390,134	82.2%	\$0.08693	539	1,082	49.8%	134,094,176	211,231,184	63.5%	\$0.08467
Apr	8,856	15,034	58.9%	647,965,826	786,903,107	82.3%	\$0.08749	528	1,074	49.2%	138,261,296	212,373,493	65.1%	\$0.08062
May	8,898	15,155	58.7%	703,628,652	851,200,091	82.7%	\$0.07366	561	1,082	51.8%	137,112,602	203,871,405	67.3%	\$0.07919
Jun	8,848	14,934	59.2%	734,412,025	884,886,666	83.0%	\$0.07358	563	1,077	52.3%	145,812,080	218,001,148	66.9%	\$0.07873
Jul	8,857	14,902	59.4%	797,417,924	968,953,948	82.3%	\$0.07706	559	1,066	52.4%	163,264,562	248,076,502	65.8%	\$0.07142
Aug	8,861	14,756	60.1%	801,098,368	971,140,239	82.5%	\$0.07865	587	1,076	54.6%	168,465,054	248,310,601	67.8%	\$0.07495
Sep	8,961	14,869	60.3%	761,235,854	920,408,994	82.7%	\$0.07282	588	1,083	54.3%	168,501,698	245,580,933	68.6%	\$0.06953
Oct	8,907	14,773	60.3%	692,224,130	831,282,503	83.3%	\$0.07452	581	1,078	53.9%	146,900,179	218,032,854	67.4%	\$0.07024
Nov	8,852	14,655	60.4%	668,867,844	797,104,310	83.9%	\$0.06834	574	1,076	53.3%	141,373,119	206,156,364	68.6%	\$0.07271
Dec	8,686	14,382	60.4%	692,081,042	835,485,695	82.8%	\$0.07366	550	1,033	53.2%	142,657,505	210,213,117	67.9%	\$0.07694
2010	106,290	178,211	59.6%	8,617,900,843	10,435,703,786	82.6%		6,675	12,875	51.8%	1,771,525,474	2,665,579,145	66.5%	
Jan	8,850	14,805	59.8%	697,852,058	850,831,328	82.0%	\$0.07921	566	1,053	53.8%	146,646,230	210,078,578	69.8%	\$0.07347
Feb	8,916	14,793	60.3%	716,025,206	864,248,851	82.8%	\$0.07574	584	1,070	54.6%	148,627,001	219,763,201	67.6%	\$0.07212
Mar	9,036	14,878	60.7%	704,881,955	856,719,013	82.3%	\$0.07465	593	1,085	54.7%	152,323,613	216,662,364	70.3%	\$0.06370
Apr	9,048	14,879	60.8%	659,968,441	799,927,606	82.5%	\$0.07576	570	1,062	53.7%	140,272,299	196,402,664	71.4%	\$0.06370
May	8,927	14,664	60.9%	699,496,325	831,342,032	84.1%	\$0.06942	582	1,070	54.4%	151,234,088	216,480,908	69.9%	\$0.06377
Jun	8,965	14,752	60.8%	705,450,623	851,050,413	82.9%	\$0.06708	585	1,080	54.2%	153,996,230	221,307,408	69.6%	\$0.06250
Jul	8,933	14,697	60.8%	737,801,826	898,072,043	82.2%	\$0.06986	564	1,066	52.9%	158,918,902	228,207,946	69.6%	\$0.06495
Aug	8,779	14,487	60.6%	800,403,922	967,727,034	82.7%	\$0.07253	576	1,068	53.9%	160,876,935	253,265,718	63.5%	\$0.06663
Sep	8,862	14,710	60.2%	769,898,960	934,830,855	82.4%	\$0.07167	577	1,065	54.2%	148,937,527	229,040,452	65.0%	\$0.06718
Oct	8,907	14,859	59.9%	701,536,353	851,411,458	82.4%	\$0.07202	584	1,085	53.8%	141,915,604	219,877,935	64.5%	\$0.06088
Nov	8,718	14,640	59.5%	664,528,203	810,437,527	82.0%	\$0.07014	560	1,044	53.6%	133,411,982	209,519,127	63.7%	\$0.06373
Dec	8,598	14,287	60.2%	673,566,236	816,203,618	82.5%	\$0.08341	568	1,051	54.0%	137,558,712	208,767,339	65.9%	\$0.07603
2011	106,539	176,451	60.4%	8,531,410,108	10,332,801,778	82.6%		6,909	12,799	54.0%	1,774,719,123	2,629,373,640	67.5%	

* As of 2010 Q4, M1 and self-supplier data is excluded from migration report

Division 1-2

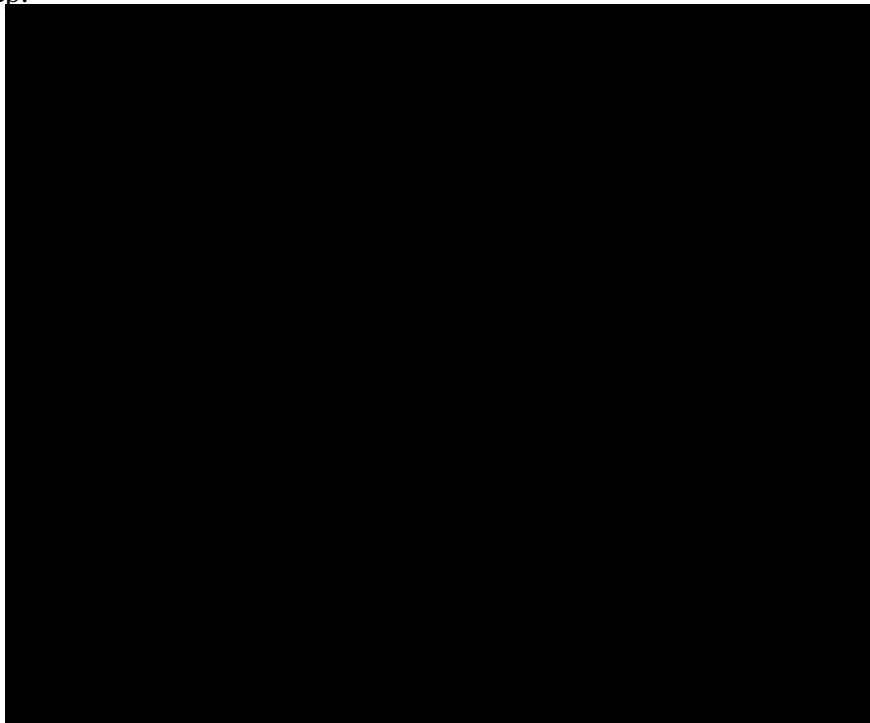
Request:

What are the block sizes that have been or are to be used for the commercial and residential group procurements conducted in Q2 2012 through Q1 2013?

Response:

Each customer group is constructed as a load asset with the ISO-NE. The owners of a load asset are responsible for all ISO settlement charges related to providing customers Standard Offer Service. The Company's transaction quantities are for a percentage share of a load asset, also known as a "block". The actual quantities of these blocks will not be known until a month has ended. For the second quarter of 2012 through the first quarter of 2013, each Commercial Group transaction quantity will be 30% of the Commercial Group's load asset. Residential Group transaction quantities will be either 15% or 20% of the Residential Group's load asset.

Transaction terms are either for the period January through June or for the period July through December. Below are the Forecasted Wholesale Loads, which were included in the Testimony of Margaret M. Janzen as Schedule 3B, adjusted by the transaction percentage share of each customer group.



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The Total row in each table shows each customer group's estimated MWhs for 100% and for the different transaction percentages by time period.

Prepared by or under the supervision of: Margaret M. Janzen

REDACTED VERSION

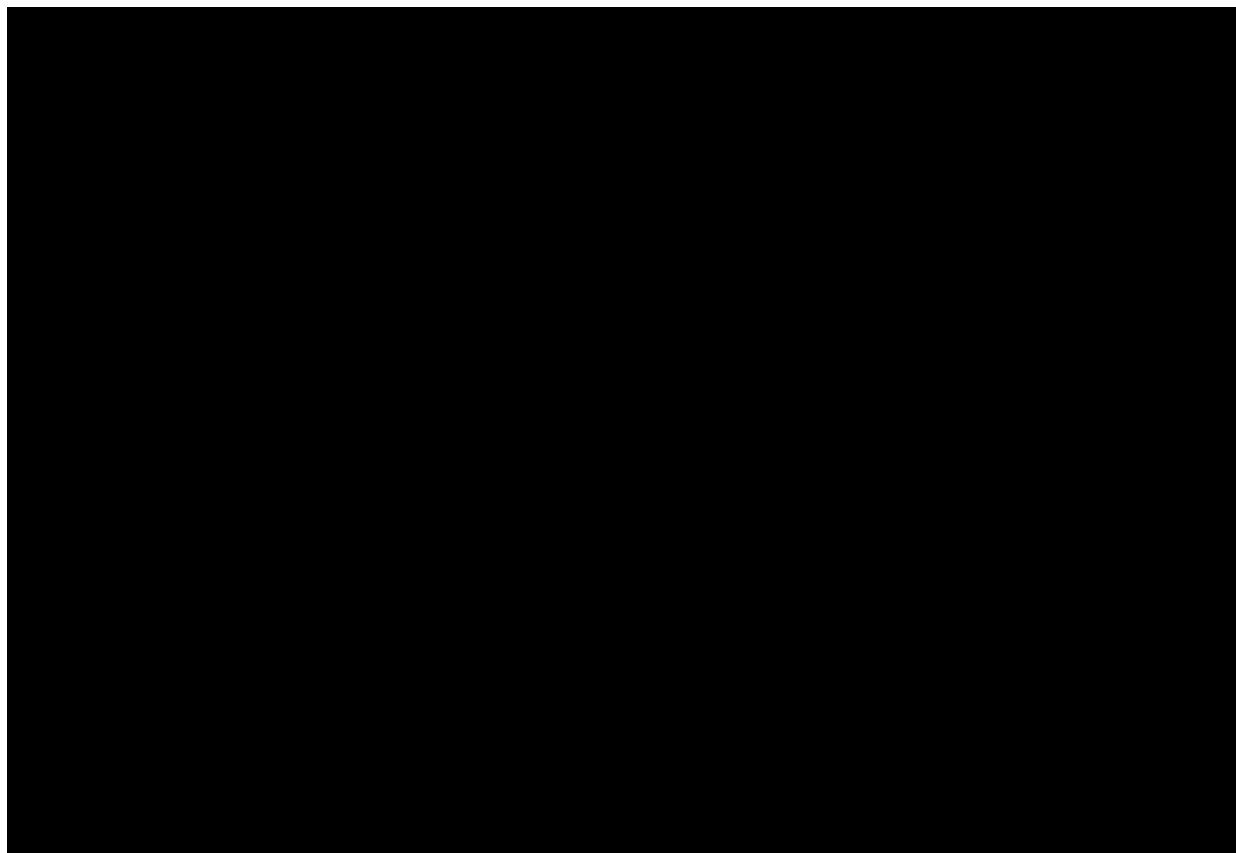
Division 1-3

Request:

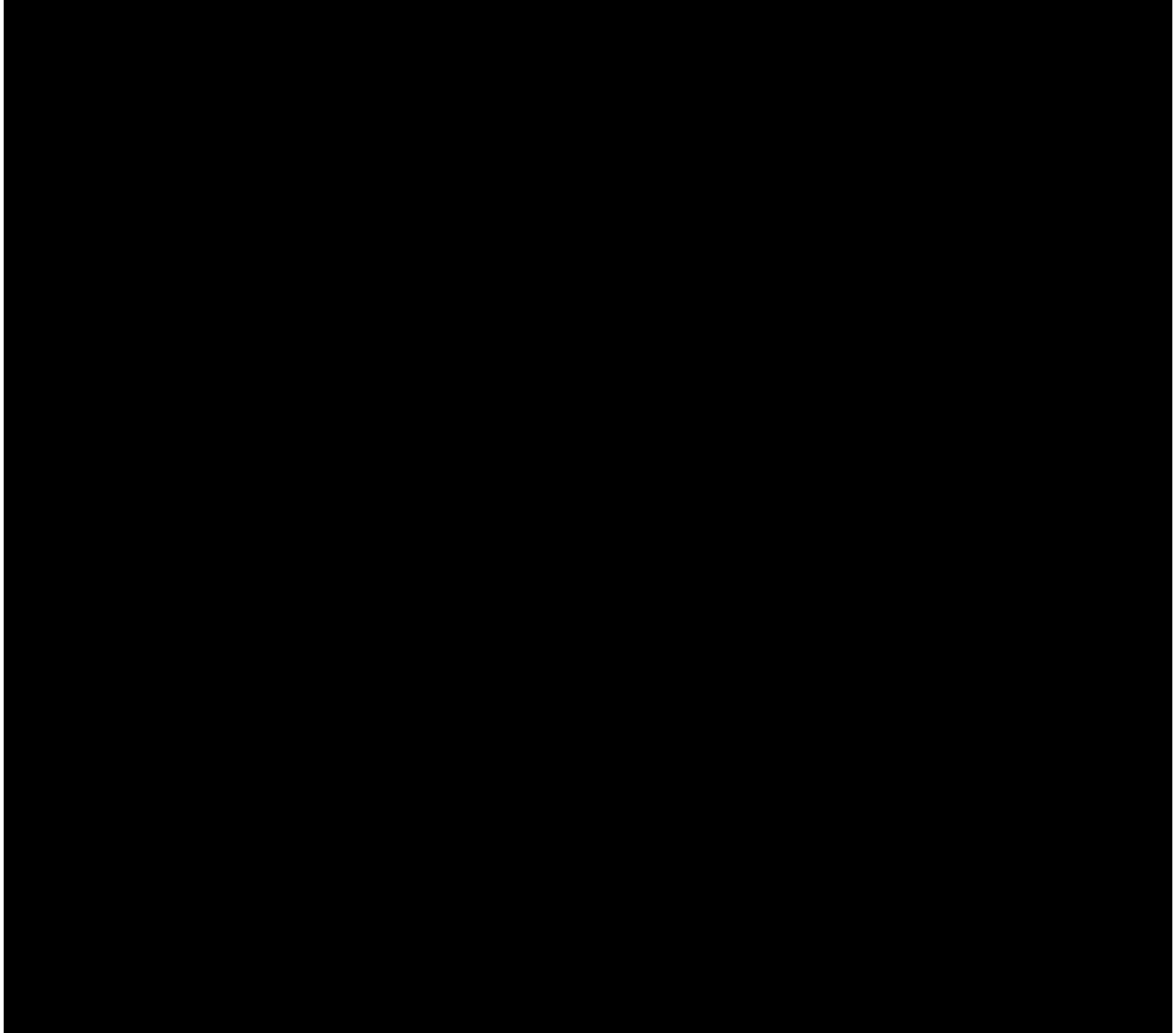
Please provide the prices obtained in the industrial, residential, and commercial procurements conducted during 2010 and 2011.

Response:

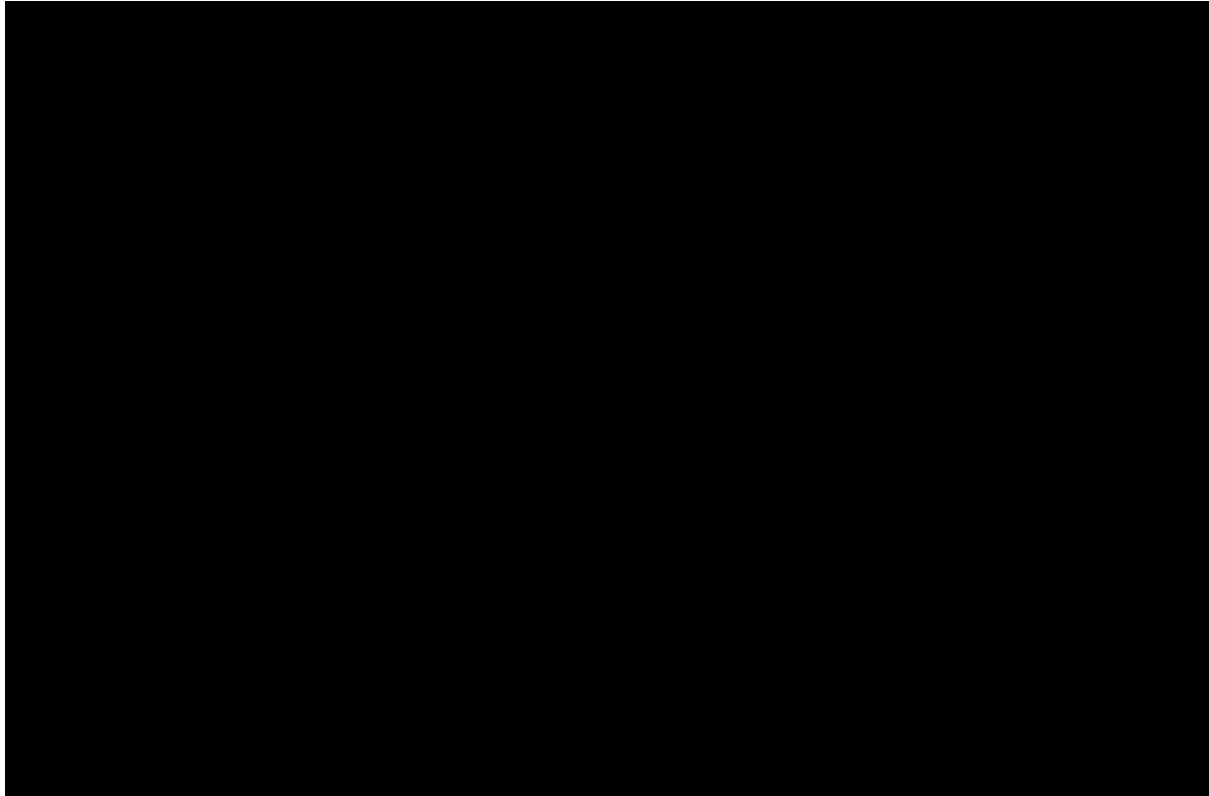
Winning bid prices for each transaction executed in 2010 and 2011 are listed below. This information is also filed with the Commission every RFP as a “Summary of Bids” within 24 hours of receiving indicative and final bids. This was most recently filed on February 9, 2012 and was titled “Re: Docket 4227: Standard Offer Service Plan Summary of Bids And Request for Confidential Treatment”. Also, each RFP Summary included in the proposed Standard Offer Service Rates quarterly filing contains the winning bid prices and all submitted bids.



REDACTED VERSION
Division 1-3 (continued, p2)



REDACTED VERSION
Division 1-3 (continued, p3)



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Division 1-4

Request:

Please provide the amounts of energy and capacity that are expected to be purchased through December 2015 from each of the three sources described on pp. 11 and 12 of the Janzen testimony.

Response:

Please see the table below for the amounts of renewable energy and capacity that are expected to be purchased through December 2015 from RI Long Term Contracts, Net Metered Facilities and Qualifying Facilities (QFs).

Renewable Generation Type	2013		2014		2015	
	Energy (MWh)	Capacity (MW)	Energy (MWh)	Capacity (MW)	Energy (MWh)	Capacity (MW)
Long Term Contracts (1)	246,010	30.0	366,138	42.0	464,688	48.3
Net Metered Facilities (2)	3,616	-	4,158	-	4,782	-
Qualifying Facilities (3)	15,043	0.7	15,043	0.7	15,043	0.8
TOTAL	264,669	30.7	385,339	42.7	484,513	49.1

Notes:

- (1) For the assumptions related to the Long Term Contracts, please see the response to Division 1-9.
- (2) The actual 2011 Net Metered excess generation output of 2,734 MWh with an estimated annual growth rate of 15% was used to estimate the energy purchases for 2013-2015. Net Metered Facilities are not qualified as capacity resources.
- (3) The actual 2011 renewable Qualifying Facility generation was used to estimate 2013-2015 QF energy purchases. The Company has not seen in the last several months any increase in the number of QFs seeking to sell energy to the Company. Actual qualified capacity values in the ISO-NE Forward Capacity Market for 2013-15 were used for capacity purchases.

Prepared by or under the supervision of: Margaret M. Janzen

REDACTED VERSION

Division 1-5

Request:

Please identify if and when a different FRS bidder would have won the SOS competitive solicitations if the Company had awarded the FRS transaction based on total (SOS and RES) pricing.

Response:

Each RFP Summary filed with the proposed Standard Offer Service Rates includes all submitted SOS bids, all submitted RES pricing bids, and an analysis of bidders' combined SOS and RES pricing. A review of past bidder submission shows that in multiple cases, based on submitted bids, a different bidder would have won the FRS solicitation if the contract were awarded based on combined SOS and RES pricing. However, the Company cautions that this analysis does not take into account that RES pricing was not required to be submitted by bidders, and thus the pricing and participation levels would have both been different from the results shown here.

Below is a summary of each competitive solicitation since 2010 and the impact to awards and number of bidders if RES pricing was required. If an FRS bidder did not submit RES pricing, or if it submitted RES pricing equal to or greater than the ACP, it was removed from the analysis.

For the February 17, 2010 solicitation, [REDACTED] submitted ACP rates for the RES pricing. Removing [REDACTED] from the analysis would not have impacted bid awards. The number of qualified bidders participating in the solicitation would have decreased.

Block	# of Bidders	Revised # of Bidders
A	[REDACTED]	[REDACTED]
B	[REDACTED]	[REDACTED]
C	[REDACTED]	[REDACTED]
D	[REDACTED]	[REDACTED]

For the May 12, 2010 solicitation, [REDACTED] did not submit RES pricing. Removing [REDACTED] from the analysis would have resulted in a different winner for Block A. The number of qualified bidders participating in the solicitation would have decreased.

Block	# of Bidders	Revised # of Bidders
A	[REDACTED]	[REDACTED]
B	[REDACTED]	[REDACTED]
C	[REDACTED]	[REDACTED]

REDACTED VERSION
Division 1-5 (continued, p2)

For the August 18, 2010 solicitation, [REDACTED] did not submit RES pricing. Removing [REDACTED] from the analysis would have resulted in a different winner for Block A. The number of qualified bidders participating in the solicitation would have decreased.

Block	# of Bidders	Revised # of Bidders
A	[REDACTED]	[REDACTED]
B	[REDACTED]	[REDACTED]

For the September 29, 2010 solicitation, [REDACTED] did not submit RES pricing. [REDACTED] submitted RES pricing that was greater than the ACP rates. Removing [REDACTED] from the analysis would have resulted in a different winner for Block C. The number of qualified bidders participating in the solicitation would have decreased.

Block	# of Bidders	Revised # of Bidders
A	[REDACTED]	[REDACTED]
B	[REDACTED]	[REDACTED]
C	[REDACTED]	[REDACTED]

For the November 10, 2010 solicitation, [REDACTED] did not submit RES pricing. [REDACTED] submitted RES pricing that was greater than the ACP rates. Removing [REDACTED] from the analysis would not have impacted bid awards. The number of qualified bidders participating in the solicitation would have decreased.

Block	# of Bidders	Revised # of Bidders
A	[REDACTED]	[REDACTED]
B	[REDACTED]	[REDACTED]
C	[REDACTED]	[REDACTED]
D	[REDACTED]	[REDACTED]
E	[REDACTED]	[REDACTED]

REDACTED VERSION
Division 1-5 (continued, p3)

For the February 9, 2011 solicitation, [REDACTED] did not submit RES pricing. [REDACTED] submitted RES pricing that was greater than the ACP rates. Removing [REDACTED] from the analysis would have resulted in different winners for Blocks H and I. The number of qualified bidders participating in the solicitation would have decreased.

Block	# of Bidders	Revised # of Bidders
A	[REDACTED]	[REDACTED]
B	[REDACTED]	[REDACTED]
C	[REDACTED]	[REDACTED]
D	[REDACTED]	[REDACTED]
E	[REDACTED]	[REDACTED]
F	[REDACTED]	[REDACTED]
G	[REDACTED]	[REDACTED]
H	[REDACTED]	[REDACTED]
I	[REDACTED]	[REDACTED]

For the May 11, 2011 solicitation, [REDACTED] did not submit RES pricing. [REDACTED] submitted RES pricing that was greater than the ACP rates. Removing [REDACTED] from the analysis would have resulted in different winners for Blocks A and E. The number of qualified bidders participating in the solicitation would have decreased.

Block	# of Bidders	Revised # of Bidders
A	[REDACTED]	[REDACTED]
B	[REDACTED]	[REDACTED]
C	[REDACTED]	[REDACTED]
D	[REDACTED]	[REDACTED]
E	[REDACTED]	[REDACTED]

The winning bidder for Block D did submit RES pricing. However the bidder's combined SOS and RES pricing would have been higher than a different bidder's combined bid. Therefore Block D would have been awarded to a different bidder.

For the August 10, 2011 solicitation, [REDACTED] did not submit RES pricing. Removing [REDACTED] from the analysis would not have impacted bid awards. The number of qualified bidders participating in the solicitation would have decreased.

REDACTED VERSION
Division 1-5 (continued, p4)

Block	# of Bidders	Revised # of Bidders
A		
B		
C		
D		

For the November 9, 2011 solicitation, [REDACTED] did not submit RES pricing. Removing [REDACTED] from the analysis would have resulted in a different winner for Block F. The number of qualified bidders participating in the solicitation would have decreased.

Block	# of Bidders	Revised # of Bidders
A		
B		
C		
F		
G		

The Company did not request RES pricing for Blocks D and E in this solicitation. The winning bidder for Block G did submit RES pricing. However the bidder's combined SOS and RES pricing would have been higher than a different bidder's combined bid. Therefore Block G would have been awarded to a different bidder.

For the February 8, 2012 solicitation, [REDACTED] did not submit RES pricing. Removing [REDACTED] from the analysis would have resulted in different winners for Blocks A and D. The number of qualified bidders participating in the solicitation would have decreased.

Block	# of Bidders	Revised # of Bidders
A		
B		
D		

The Company did not request RES pricing for Block C in this solicitation.

Division 1-6

Request:

Please explain the benefits/costs of the Company only evaluating bidders' RES pricing for the first year when evaluating multiple-year FRS bids. Have market conditions changed the Company's position since the 2012 Procurement Plan was filed?

Response:

In Order 20431 the Commission approved the Company's 2012 Renewable Energy Standard Procurement Plan which was filed in Docket No. 4227. In this plan the Company proposed to evaluate RES pricing for the first year of an FRS transaction that spanned multiple years. The Company provided two reasons for this proposal. First, there are fewer price sources available for REC vintages beyond the first year. Second, REC market prices have been historically higher in the years following the first year. In subsequent data requests the Company provided the underlying information to support these statements.

As stated in the Testimony of Margaret M. Janzen, the Company compares RES pricing submitted by FRS bidders to the most recent market prices. If the Company has not recently held a standalone solicitation for RECs, it will obtain REC market prices from the most recent broker sheets. Since Commission approval on July 29, 2011 the Company has completed two SOS competitive solicitations under this new evaluation method.

The November 9, 2011 SOS RFP requested SOS pricing for 2012 and 2013. Per the approved process, the Company solicited RES pricing for only 2012. Only one of the three RI REC price sources provided 2013 prices on the final bid date. Also, as described in the Response to Division Data Request 1-5, six bidders did not submit RES pricing for 2012. None of the winning FRS bidders submitted RES pricing below the 2012 market price.

The February 8, 2012 SOS RFP also requested SOS pricing for 2012 and 2013. Per the approved process, the Company solicited RES pricing for only 2012. Again, only one of the three RI REC price sources provided 2013 prices on the final bid date. Also, as described in the Response to Division Data Request 1-5, seven bidders did not submit RES pricing for 2012. None of the winning FRS bidders submitted RES pricing below the 2012 market price.

As of April 11, 2012, only one of the three RI REC price sources provided 2013 REC prices. Because of this lack of price data the Company continues to believe that RES pricing should not be awarded for later years until more price sources are available. For the most recent two SOS RFPs, the Company can only speculate that the 2013 RES pricing most likely would not have

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been awarded if it was solicited. Since none of the RES pricing submitted for 2012 was below the market price, those submissions were therefore rejected. Also, the majority of FRS bidders did not submit RES pricing for 2012. It is unlikely that these FRS bidders would have submitted RES pricing for 2013.

Prepared by or under the supervision of: Margaret M. Janzen

Division 1-7

Request:

Over what period(s) is the “actual SOS load requirement” (discussed on p. 21 of Janzen testimony) calculated and does it differ by customer group? Does the “linking” of the purchase of remaining RES obligation with actual SOS load requirements imply that the Company would not purchase RECs to satisfy obligations beyond this period(s)?

Response:

The transaction period for the Industrial Group is different from that for the Residential and Commercial Groups. Each transaction for the Industrial Group is for a three-month period while each transaction for the Residential and Commercial Groups is for a six-month period, but may be contracted for up to 24 months at a time through contiguous period contracting of these transactions.

The “actual SOS load requirement” will be the reconciled volumes for each transaction and is unknown when the agreement is executed. As discussed in the Response to Division Data Request 1-2, transaction quantities are structured as a percentage share of a load asset, also known as a “block”. The actual SOS load requirement will be calculated after a month is completed. For example, a transaction could be 15% of the Residential Group’s volume (load requirement) for the period January 2013 through June 2013. The actual SOS load requirement for January 2013 would be 15% multiplied by the reconciled volumes of all residential customers in January 2013.

If all SOS transactions included RES pricing, it would not be necessary to purchase RECs for these load requirements. At present, as described in the testimony, the Company believes it would be beneficial to maintain the option to contract for RECs in conjunction with SOS transactions, or separately through dedicated RFPs and broker transactions. In either case, the Company would still also be required to procure RECs through standalone RES RFPs (or another method) to satisfy RES obligations for the 10% Residential and Commercial Groups’ load requirements that are procured in the ISO-NE spot-market. In neither case does the Company propose to contract for RECs needed for RES compliance that is beyond the period that has been contracted for through the SOS solicitations, which can be up to two years. While the Company does have banking capabilities under the RES regulations, purchasing and banking RECs from current periods to comply with periods beyond the completed SOS transactions is not contemplated as a strategy in the proposed RES plan; rather, banking will be a useful tool for balancing the exact number of RECs the Company needs for compliance in a given period. Also, for periods with completed SOS transactions, the Company will bank RECs for RES compliance if market conditions make it advantageous to do so. For example, for 2012 compliance the

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Company would purchase 2011 RECs and bank them for 2012 compliance if 2011 RECs were less expensive.

Prepared by or under the supervision of: Margaret M. Janzen

Division 1-8

Request:

Has the Company investigated the possibility of selling the New RECs from the Long Term Renewable contracts in other states' markets if market conditions are advantageous (i.e., additional revenues can more than cover the transaction costs involved)?

Response:

At the Company's request, the counterparty of a Long Term Renewable contract is required to seek qualification under the renewable portfolio standard or similar law of one or more New England states (in addition to Rhode Island) and/or any federal renewable energy standard. Once the RECs are qualified, the Company may sell the New RECs to comply with other states' renewable portfolio standards.

As described in the 2013 Renewable Energy Standard Procurement Plan, the Company proposes to utilize the New RECs from the Long Term Renewable contracts to satisfy the RES obligations of the SOS customers. Eventually RECs generated by Long Term Renewable contracts will exceed the New RES obligations for SOS customers. When this occurs, the Company would sell excess RECs in whichever market provided the best price.

Prepared by or under the supervision of: Margaret M. Janzen

Division 1-9

Request:

Please provide the assumptions regarding the Company's Long-Term Renewable contracts discussion on p.25 of the Janzen testimony that are used to determine the quantity of RECs supplied shown in Schedule 7. Provide the assumptions the New REC requirement data shown in Schedule 7.

Response:

As described on p. 25 of the testimony, the Company made various assumptions regarding its Long-Term Renewable Contracts "LTCs" including commercial operation dates, project size, output, and contract capacity. The Company used reasonable estimates for the commercial operation dates of the executed LTCs (including the Distributed Generation "DG" Standard Contracts) and for future LTC obligations to estimate the quantity of RECs supplied. For the future LTC obligations, the Company divided the remaining LTC obligations into two equal solicitations that would require projects to become commercially operable and to produce RECs in 2016 and 2018 respectively. The remaining DG Standard Contracts to be executed were forecasted from the current DG contract enrollment schedule and construction timelines detailed in the rules for the DG enrollments.

Please see the table below for the assumptions regarding the quantity of RECs supplied from the Long-Term Renewable Contracts.

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RILTC REC Forecast											
Estimated COD	Forecasted RI LTC RECs (Under Contract)						Forecasted RI LTC RECs (not yet contracted)				Total
	Deepwater Wind	RI Landfill Gas	Orbit HSAD Biogas	Black Bear Hydro	2011 RI DG	Sum	Half of remaining LTC	Half of remaining LTC	RI DG Future	Sum	
	Oct-2014	Oct-2012	Jan-2014	Jan-2014	Jan-2013		Jan-2016	Jan-2018			
2011	0	0	0	0	0	0				0	0
2012	0	59,751	0	0	0	59,751				0	59,751
2013	0	239,002	0	0	7,008	246,010				0	246,010
2014	26,280	239,002	23,160	31,268	7,008	326,718			39,420	39,420	366,138
2015	105,120	239,002	23,160	31,268	7,008	405,558			59,130	59,130	464,688
2016	105,120	239,002	23,160	31,268	7,008	405,558	155,505		78,840	234,345	639,903
2017	105,120	239,002	23,160	31,268	7,008	405,558	155,505		71,832	227,337	632,895
2018	105,120	239,002	23,160	31,268	7,008	405,558	155,505	155,505	71,832	382,842	788,400
2019	105,120	239,002	23,160	31,268	7,008	405,558	155,505	155,505	71,832	382,842	788,400
2020	105,120	239,002	23,160	31,268	7,008	405,558	155,505	155,505	71,832	382,842	788,400
2021	105,120	239,002	23,160	31,268	7,008	405,558	155,505	155,505	71,832	382,842	788,400
2022	105,120	239,002	23,160	31,268	7,008	405,558	155,505	155,505	71,832	382,842	788,400
2023	105,120	239,002	23,160	31,268	7,008	405,558	155,505	155,505	71,832	382,842	788,400
2024	105,120	239,002	23,160	31,268	7,008	405,558	155,505	155,505	71,832	382,842	788,400
2025	105,120	239,002	23,160	31,268	7,008	405,558	155,505	155,505	71,832	382,842	788,400
2026	105,120	239,002	23,160	31,268	7,008	405,558	155,505	155,505	71,832	382,842	788,400
2027	105,120	179,252	23,160	31,268	7,008	345,808	155,505	155,505	71,832	382,842	728,650
2028	105,120	0	23,160	31,268	0	159,548	155,505	155,505	71,832	382,842	542,390
2029	105,120	0	0	0	0	105,120	155,505	155,505	39,420	350,430	455,550
2030	105,120	0	0	0	0	105,120	155,505	155,505	19,710	330,720	435,840
2031	105,120	0	0	0	0	105,120		155,505	0	155,505	260,625
2032	105,120	0	0	0	0	105,120		155,505	0	155,505	260,625
2033	105,120	0	0	0	0	105,120			0	0	105,120
2034	78,840	0	0	0	0	78,840			0	0	78,840
2035	0	0	0	0	0	0			0	0	0

The Company used a forecast of the Standard Offer load to calculate the New REC requirement. The forecasted annual Standard Offer loads were then multiplied by the RI RES New Renewable Resource Requirement (Section 4.2 of the Rules and Regulations Governing The Implementation Of A Renewable Energy Standard promulgated pursuant to the Renewable Energy Standard Law Section 39-26-1 et seq. of the General Laws of Rhode Island that implement a Renewable Energy Standard to facilitate the development of renewable energy resources for the benefit of customers in Rhode Island.) to determine the New REC requirement. Please see the table below for a detailed calculation of the Company's New REC requirement.

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Year	Std Offer Load Forecast	RES New % Obligation	RES New REC Requirement
2011	5,561,303	3.50%	194,646
2012	5,469,174	4.50%	246,113
2013	5,446,265	5.50%	299,545
2014	5,421,514	6.50%	352,399
2015	5,389,499	8.00%	431,160
2016	5,355,667	9.50%	508,789
2017	5,327,817	11.00%	586,060
2018	5,300,112	12.50%	662,515
2019	5,272,552	14.00%	738,158
2020	5,245,135	14.00%	734,319
2021	5,217,860	14.00%	730,501
2022	5,190,727	14.00%	726,702
2023	5,163,735	14.00%	722,923
2024	5,136,884	14.00%	719,164
2025	5,110,172	14.00%	715,425
2026	5,083,599	14.00%	711,704
2027	5,057,164	14.00%	708,004
2028	5,030,867	14.00%	704,322
2029	5,004,707	14.00%	700,659
2030	4,978,682	14.00%	697,016
2031	4,952,793	14.00%	693,392
2032	4,927,039	14.00%	689,786
2033	4,901,418	14.00%	686,199
2034	4,875,931	14.00%	682,631
2035	4,850,576	14.00%	679,081

Prepared by or under the supervision of: Margaret M. Janzen