

March 22, 2013

**VIA HAND DELIVERY & ELECTRONIC MAIL**

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

**RE: Docket Nos. 4315 & 4391  
2013 Electric Retail Rate Filing &  
2013 Renewable Energy Standard Charge and Reconciliation**

Dear Ms. Massaro:

Enclosed are ten (10) copies of National Grid's<sup>1</sup> responses to the Commission's First Set of Data Requests concerning the above-captioned proceedings.

Please be advised that the Company is seeking protective treatment of its responses to Commission 1-6 and Commission 1-7, as permitted by Commission Rule 1.2(g) and by R.I.G.L. § 38-2-2(4)(i)(B). The Company has submitted a Motion for Protective Treatment to the Commission pending a determination on the Company's Motion. The Company has submitted a redacted version of these responses in this filing for the public record.

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: Docket 4315 & 4391 Service Lists  
Leo Wold, Esq.  
Steve Scialabba, Division

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<sup>1</sup> The Narragansett Electric Company d/b/a National Grid ("National Grid" or the "Company").

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS**

**RHODE ISLAND PUBLIC UTILITIES COMMISSION**

National Grid  
In re: 2013 Electric Retail Rate Filing &  
2013 Renewable Energy Standard Charge  
and Reconciliation

Docket Nos. 4315 & 4391

**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 March 22, 2013, the Company filed its responses to the Commission’s First Set of Data Requests. The Company is seeking confidential treatment of its response to Commission 1-6 and Commission 1-7. The Company’s response to Commission 1-6 contains pricing information relative to market costs. The Company’s response to Commission 1-7 contains the Company’s estimates of its current obligations and Renewable Energy Certificates purchased under contract with suppliers. The Company seeks confidential treatment for these responses since 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 relative to Commission 1-6 and Commission 1-7 be protected from public disclosure. The Company has also filed redacted copies of these responses 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**

With respect to the pricing information contained in Commission 1-6 and the status of the Company’s REC purchasing activities contained in the Company’s response to Commission 1-7, 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 results 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,



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

Dated: March 22, 2013

The Narragansett Electric Company  
d/b/a National Grid  
Docket Nos. 4315 & 4391  
In re: 2013 Electric Retail Rate Filing &  
2013 Renewable Energy Standard Charge and Reconciliation  
Responses to Commission Data Requests – Set 1  
Issued March 8, 2013

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Commission 1-1

Request:

Please provide a brief explanation of the “Disgorgement Fund”, including the background and nature of the matter before the Federal Energy Regulatory Commission.

Response:

On March 9, 2012, the Federal Energy Regulatory Commission (FERC) approved a Stipulation and Consent Agreement between FERC’s Office of Enforcement and Constellation Energy Commodities Group (CCG). The order resolved the investigation into whether CCG violated the Commission’s Anti-Manipulation Rule, 18 C.F.R. § 1c.2, and the Commission’s regulation prohibiting the submission of inaccurate information, 18 C.F.R § 35.41(b). CCG agreed to pay a civil penalty of \$135,000,000 and to disgorge unjust profits of \$110,000,000, including interest (the Disgorgement Fund). Pursuant to the order, \$20 million of the Disgorgement Fund was allocated to those states within the ISO-NE footprint.

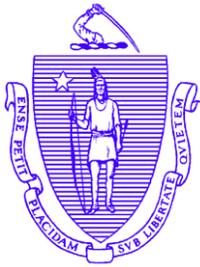
On September 10, 2012, the New England states filed a joint stipulation and agreement regarding the allocation and distribution of the \$20 million allocated to states within the ISO-NE market. Per the settlement, included as Attachment 1 to this response, The Narragansett Electric Company’s share was \$1,279,724.15. On October 18, 2012, the FERC issued an Order, included as Attachment 2 to this response, approving the New England Parties’<sup>1</sup> allocation and distribution proposal.

For detailed information, please refer to the Federal Energy Regulatory Commission Docket No. IN12-7-000 at [www.ferc.gov](http://www.ferc.gov).

Prepared by or under the supervision of: Legal Department

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<sup>1</sup> The New England Parties are the Connecticut Public Utilities Regulatory Authority; the Connecticut Office of Consumer Counsel; George Jepsen, Attorney General for the State of Connecticut; the State of Maine Public Utilities Commission; the Massachusetts Department of Public Utilities; Martha Coakley, Attorney General of the Commonwealth of Massachusetts; the New Hampshire Public Utilities Commission; Peter F. Kilmartin, Attorney General of the State of Rhode Island; the Rhode Island Division of Public Utilities and Carriers; the Vermont Department of Public Service; the Massachusetts Municipal Wholesale Electric Company; the Eastern Massachusetts Consumer-Owned Systems; Groveland Municipal Light Department; and Merrimac Municipal Light Department.



THE COMMONWEALTH OF MASSACHUSETTS  
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MARTHA COAKLEY  
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September 10, 2012

SENT VIA ELECTRONIC FILING  
Hon. Bobbie J. McCartney  
Deputy Chief Administrative Law Judge  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Room 11F-21  
Washington, D.C. 20426

Re: Docket No. IN12-7-000  
Constellation Energy Commodities Group, Inc.

Dear Deputy Chief Judge McCartney:

Enclosed please find the New England State Parties' Joint Stipulation Agreement Regarding Allocation and Distribution of the \$20 million Portion of the ISO-New England Disgorgement Fund (the "Joint Stipulation"). The eligible parties in the six New England States in the ISO-New England footprint are pleased to inform you that the eligible parties have agreed to an allocation methodology among the New England states for the Commission's consideration. The terms of that agreement are contained in the Joint Stipulation. The manner in which the funds will be distributed within each state was also agreed upon by all relevant eligible parties in each state. The terms of the distribution within each state are contained in the appendices attached to the Joint Stipulation. We hope you will favorably consider our proposal for allocation by and among the states and for distribution within each state.

On behalf of the New England State Parties, thank you for your thoughtful review of our proposal, and we remain available to respond to any questions or concerns presented by you, FERC staff or any of the parties to this proceeding.

Very Truly Yours,

Martha Coakley, Attorney General  
of the Commonwealth of  
Massachusetts, by,

/s/ Patrick J. Tarmey

Patrick J. Tarmey  
Assistant Attorney General

Cc: Service list

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

*Constellation Energy Commodities  
Group, Inc.* ) ) Docket No. IN12-7-000  
)  
)  
)

**NEW ENGLAND PARTIES’ JOINT STIPULATION  
AGREEMENT REGARDING ALLOCATION  
AND DISTRIBUTION OF THE \$20 MILLION  
PORTION OF THE ISO-NEW ENGLAND DISGORGEMENT FUND**

The parties to this Stipulation, the Connecticut Public Utilities Regulatory Authority, the Connecticut Office of Consumer Counsel, George Jepsen, Attorney General for the State of Connecticut, the State of Maine Public Utilities Commission, the Massachusetts Department of Public Utilities, Martha Coakley, Attorney General of the Commonwealth of Massachusetts, the New Hampshire Public Utilities Commission, Peter F. Kilmartin, Attorney General of the State of Rhode Island, the Rhode Island Division of Public Utilities and Carriers, the Vermont Department of Public Service, the Massachusetts Municipal Wholesale Electric Company, the Eastern Massachusetts Consumer-Owned Systems, Groveland Municipal Light Department and Merrimac Municipal Light Department (collectively hereinafter “Eligible New England Parties” or “Settling Parties”) hereby stipulate and agree as follows:

**I. Factual Basis Underlying Stipulation**

A. On March 9, 2012, the Federal Energy Regulatory Commission (“Commission”) issued an order approving a Stipulation and Consent Agreement in the above-captioned docket. *Constellation Energy Commodities Group, Inc.*, 138 FERC

¶61,168 (2012). Paragraph 37.b. of the approved agreement creates a “fund for the benefit of the electric energy consumers in the affected States within the . . . ISO-NE . . . (the Fund).” The Fund is to be apportioned by a Commission Administrative Law Judge upon the request of state agencies, including state consumer advocate offices, in those regions. Pursuant to the order, \$20,000,000 of the Fund was allocated to those states within the ISO-NE geographic footprint.

B. At a March 29, 2012, Prehearing Conference held in the above-captioned matter at the Commission, Deputy Chief Administrative Law Judge Bobbie J. McCartney requested interested parties to file, by April 30, 2012, Motions for Determination of Eligibility to apportion monies collected in the Fund for the benefit of electric energy consumers in their respective states.

C. On April 30, 2012, the New England State Agencies<sup>1</sup> submitted a Joint Stipulation Agreement and Motion for a Determination of Eligibility which was unopposed. Also on April 30, 2012, the Massachusetts Municipal Wholesale Electric Company (MMWEC),<sup>2</sup> the Eastern Massachusetts Consumer-Owned Systems

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<sup>1</sup> The New England State Agencies consist of: the Connecticut Public Utilities Regulatory Authority (“CTPURA”); the Connecticut Office of Consumer Counsel (“CT OCC”); the Attorney General for the State of Connecticut (“CTAG”); the Maine Public Utilities Commission (“MPUC”); the Massachusetts Department of Public Utilities (“Mass DPU”); the Massachusetts Attorney General; the New Hampshire Public Utilities Commission (“NHPUC”); the Rhode Island Division of Public Utilities and Carriers (“RIDPUC”) and the Attorney General of the State of Rhode Island (“RI Attorney General”); and the Vermont Department of Public Service (“VDPS”).

<sup>2</sup> As explained in its April 30, 2012, motion in this proceeding, MMWEC is a joint action agency in which membership is open to any city or town in the Commonwealth that has a municipal electric department. MMWEC’s members are the Ashburnham Municipal Light Department, Boylston Municipal Light Department, Chicopee Electric Light Department, Groton Electric Light Department, Holden Municipal Light Department, Holyoke Gas & Electric Department, Hull Municipal Lighting Plant, Ipswich Municipal Light Department, Mansfield Municipal Electric Department, Marblehead Municipal Light Department, Paxton Municipal Light Department, Peabody Municipal Light Plant, Princeton Municipal Light Department, Russell

(EMCOS)<sup>3</sup>, Groveland Municipal Light Department (Groveland) and Merrimac

Municipal Light Department (Merrimac) filed Motions for Determination of Eligibility to which no party objected.

D. On June 7, 2012, the ALJ granted all of the above-referenced unopposed Motions for Determination of Eligibility as to the portion of the fund allocated to the ISO-NE market. Accordingly, the New England State Agencies, MMWEC, EMCOS, Groveland, and Merrimac (collectively, the “Eligible New England Parties”) are eligible to apportion such monies in the Energy Consumers Fund for the benefit of electric energy consumers in their respective states.

E. On July 11, 2012, the ALJ issued an Order Denying Opposed Motions for Eligibility Determination and Directing Parties to File Joint Stipulations. The July 11, 2012 Order provided, *inter alia*,

The eligible state agency parties in the ISO-NE footprint are directed to file a joint stipulation within sixty (60) days of this order regarding a proposed allocation and distribution method of the \$20 million portion of the ISO-NE disgorgement fund. The eligible state agency parties are to inform the undersigned if a joint stipulation cannot be reached, and oral argument will be held.

NOW THEREFORE, consistent with the July 11, 2012 Order, the Eligible New England Parties stipulate and agree as follows:

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Municipal Light Department, Shrewsbury Electric & Cable Operations, South Hadley Electric Light Department, Sterling Municipal Light Department, Templeton Municipal Light & Water Plant, Wakefield Municipal Gas & Light Department, West Boylston Municipal Light Plant, Westfield Gas & Electric Department.

<sup>3</sup> The Eastern Massachusetts Consumer-Owned Systems are: Braintree Electric Light Department, Concord Municipal Light Plant, Hingham Municipal Lighting Plant, Middleton Electric Light Department, Reading Municipal Light Department, Wellesley Municipal Light Plant, and Taunton Municipal Lighting Plant.

## II. Allocation Among the New England States

A. The New England State Agencies have stipulated, in their April 30, 2012 Joint Stipulation Agreement referenced in Recital 3 above, to a methodology that allocates funds among the New England States based upon each state's proportion of monthly energy<sup>4</sup> use within the ISO-NE Control Area, in kilowatt hours, over the period beginning September 1, 2007 and ending December 31, 2008. Under this methodology, within each load zone of ISO-NE energy is attributed to a state and all kilowatt hours of energy consumption over the relevant time period are totaled. The proposed allocation is based upon each state's proportion of that total, and is set forth below (shown in gigawatt-hours) for convenient reference.

Year	Mon	Tot	ME	NH	VT	CT	RI	MA
2007	9	10621	934	938	474	2686	696	4893
2007	10	10448	971	927	484	2641	672	4753
2007	11	10384	957	943	504	2600	657	4723
2007	12	11650	1047	1073	560	2909	735	5326
2008	1	11578	1028	1062	561	2910	727	5290
2008	2	10709	947	965	508	2704	675	4910
2008	3	10844	984	979	517	2702	683	4979
2008	4	9675	881	883	462	2375	614	4460
2008	5	9767	887	886	459	2414	625	4496
2008	6	11167	941	980	487	2850	746	5163
2008	7	12835	1059	1115	530	3290	878	5963
2008	8	11407	1010	1013	510	2859	759	5256
2008	9	10472	973	920	475	2615	681	4808

<sup>4</sup> The energy values used for allocation are those by ISO NE in its monthly settlement process.

2008	10	10058	964	903	479	2471	641	4600
2008	11	10158	926	917	495	2531	644	4645
2008	12	11234	1004	996	550	2831	712	5141
<b>Total</b>		<b>173007</b>	<b>15513</b>	<b>15500</b>	<b>8055</b>	<b>43388</b>	<b>11145</b>	<b>79406</b>
Percent Allocation			0.0897	0.0896	0.0466	0.2508	0.0644	0.4590
Dollars (thousands)			\$1,793	\$1,792	\$931	\$5,016	\$1,288	\$9,180

B. This methodology meets the criteria expressed by Deputy Chief Judge McCartney at the Prehearing Conference. The methodology is transparent because the data utilized is from reports posted by ISO-NE at its website:

([http://www.iso-ne.com/markets/hstdata/znl\\_info/monthly/index.html](http://www.iso-ne.com/markets/hstdata/znl_info/monthly/index.html)).<sup>5</sup>

3. The proposed allocation methodology is fair and reasonable because: 1) CCG's violations affected electric energy consumers through energy markets, and 2) the proposed time period matches that described in ¶ 6 of the Order.

4. ISO-NE will calculate the final interstate allocation using the methodology agreed upon by the New England State Agencies in their April 30, 2012 Joint Stipulation, and agreed to herein by Settling Parties, but will utilize more refined energy consumption data from its billing system.

### III. Intrastate Allocation

Each New England State has set forth in the attached appendices a statement or stipulation of that state's proposed intrastate allocation and process for distribution in the attached appendices. These appendices are provided for informational purposes, and no state party shall be bound by the intrastate allocation of another state party.

- A. As to Connecticut, the CT Parties (CTPURA, CTOCC and CTAG) have stipulated and agreed that Connecticut's allocation of the Fund should be further allocated within Connecticut such that 75.10% is refunded to customers of The Connecticut Light and Power Company, 18.36% is refunded to customers of The United Illuminating Company, and 6.54% is refunded to customers of the Connecticut Municipal Electric Energy Cooperative. As described more fully in the appended intrastate agreement, the intrastate allocation methodology mirrors that used for interstate allocation. Specifically, like the interstate allocation, it is based on energy consumption over the time period described in ¶ 6 of the Order. Also described more fully in the agreement are the mechanics by which the refund would be accomplished, which would ensure a timely return of funds to ratepayers at the earliest opportunity. A copy of the CT Parties' Stipulation is attached as Appendix A.
- B. As to Maine, the funds will be allocated as set out in Appendix B.
- C. As to Massachusetts, the Massachusetts Parties (Mass DPU, Mass AG, MMWEC, EMCOS, Groveland, and Merrimac) have agreed to disburse the funds within Massachusetts for the benefit of all electric customers as set out in Appendix C.
- D. As to New Hampshire, the NH Parties (NH PUC and NH OCA) have stipulated and agreed that New Hampshire's allocation of the Fund should be further

allocated within New Hampshire such that 72.1606% is refunded to customers of Public Service of New Hampshire, 11.0399% is refunded to customers of Unitil Energy Systems, 8.0673% is refunded to customers of Granite State Electric, 6.9996% is refunded to customers of New Hampshire Electric Cooperative, 0.1685% is refunded to customers of the Ashland Electric Department, 0.7149% is refunded to customers of the Littleton Water & Light Department, 0.0274% is refunded to customers of New Hampton Village Precinct, 0.6293% is refunded to customers of the Town of Wolfeboro Electric Department, 0.1925% is refunded to customers of the Woodsville Water & Light Department. As described more fully in the appended intrastate agreement, the intrastate allocation methodology generally mirrors that used for interstate allocation. Specifically, like the interstate allocation, it is based on energy consumption over the time period described in ¶ 6 of the Order. Also described more fully in the agreement are the mechanics by which the refund would be accomplished, which would ensure a timely return of funds to ratepayers at the earliest opportunity. A copy of the NH Parties' Stipulation is attached as Appendix D.

E. As to Rhode Island, the RI parties (the Division of Public Utilities and Carriers ("RIDPUC") and Peter F. Kilmartin, Attorney General for the State of Rhode Island ("RIAG")), have agreed to disburse within the State of Rhode Island according to Appendix E.

F. As to Vermont, the funds will be allocated as set out in Appendix F.

**STIPULATED** this 10<sup>th</sup> day of September, 2012.

/s/ Seth A. Hollander

Seth A. Hollander  
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Public Utilities Regulatory Authority  
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UTILITIES  
REGULATORY AUTHORITY

/s/ Elin Swanson Katz

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For GEORGE JEPSEN  
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/s/ Lisa Fink

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/s/ Patrick J. Tarmey

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For MARTHA COAKLEY  
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/s/ Lynn Fabrizio

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For NEW HAMPSHIRE  
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/s/Scott H. Strauss

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/s/ Leo J. Wold

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For PETER F. KILMARTIN  
ATTORNEY GENERAL OF THE  
STATE OF RHODE ISLAND  
and RHODE ISLAND DIVISION OF  
PUBLIC UTILITIES AND CARRIERS

/s/ John P. Coyle

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Department and Merrimac Municipal Light  
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/s/ Sheila Grace

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For VERMONT DEPARTMENT  
OF PUBLIC SERVICE

**CERTIFICATE OF SERVICE**

I, Patrick J. Tarmey, hereby certify that on this day I caused the foregoing to be served via electronic mail or first class mail upon all parties identified on this agency's service list for this proceeding in accordance with 18 C.F.R. § 385.2010 (2012).

/s/ Patrick J. Tarmey  
Patrick J. Tarmey

Dated: September 10, 2012

**APPENDIX A**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

Constellation Energy Commodities Group, Inc.

Docket No. IN12-7-000

**To: Hon. Bobbie J. McCartney, Deputy Chief Administrative Law Judge  
Presiding Judge****STIPULATION**  
(September 5, 2012)

IT IS HEREBY STIPULATED AND AGREED, by and among the Connecticut Public Utilities Regulatory Authority (“CTPURA”), the Connecticut Office of Consumer Counsel (“CTOCC”), and George Jepsen, Attorney General for the State of Connecticut (“CTAG”) (collectively, “the CT Parties”), as follows:

**A. Background**

1. On March 9, 2012, the Federal Energy Regulatory Commission (“FERC”) approved an “Order Approving Stipulation and Consent Agreement”<sup>1</sup> (“Order”) in Docket No. IN12-7-000 which, *inter alia*, allocated \$20 million of disgorged funds to electric energy consumers within the geographic footprint of the bulk power system control area operated by ISO New England Inc. (the “ISO-NE Control Area”). On April 30, 2012, the New England State Agencies<sup>2</sup> submitted a “Joint Stipulation Agreement and Motion for a Determination of Eligibility” in which the signatories (1) stipulated as to their eligibility to participate in the

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<sup>1</sup> “Order Approving Stipulation and Consent Agreement,” *Constellation Energy Commodities Group*, 138 FERC ¶ 61,168 (2012).

<sup>2</sup> The New England State Agencies consist of: the Connecticut Public Utilities Regulatory Authority; the Connecticut Office of Consumer Counsel; the Attorney General for the State of Connecticut; the Maine Public Utilities Commission; the Massachusetts Department of Public Utilities; the Massachusetts Attorney General; the New Hampshire Public Utilities Commission; the Rhode Island Division of Public Utilities and Carriers and the Attorney General of the State of Rhode Island; and the Vermont Department of Public Service.

allocation and distribution of the \$20 million Energy Consumers Fund within the ISO-NE

Control Area; and (2) agreed upon the basis to allocate the Energy Consumers Fund between the New England States.

2. The New England State Agencies agreed upon a methodology that allocates funds between the New England States based upon each state's proportion of monthly energy<sup>3</sup> use within the ISO-NE Control Area, in kilowatt hours, over the period beginning September 1, 2007 and ending December 31, 2008. Under this methodology, energy within each load zone of the ISO-NE Control Area is attributed to a state and all kilowatt hours of energy consumption over the relevant time period are totaled. The proposed allocation is based upon each state's proportion of that total, and results in the following estimated<sup>4</sup> distribution of funds:

Maine	\$1,793,000
New Hampshire	\$1,792,000
Vermont	\$931,000
Connecticut	\$5,016,000
Rhode Island	\$1,288,000
Massachusetts	\$9,180,000
<b>Total</b>	<b>\$20,000,000</b>

3. As set forth in the "Joint Stipulation Agreement and Motion for a Determination of Eligibility," the interstate allocation methodology is transparent, fair and reasonable. The

<sup>3</sup> Energy is defined as the load used in the settlement process.

<sup>4</sup> ISO-NE will compute the actual allocation based upon data residing within its internal billing system. The internal billing system expresses the relevant energy consumption data with more precision because the data is carried out to additional decimal places.

allocation is transparent because it is constructed of data readily available from the ISO-NE website ([http://www.iso-ne.com/markets/hstdata/znl\\_info/monthly/index.html](http://www.iso-ne.com/markets/hstdata/znl_info/monthly/index.html)).

4. The instant intrastate agreement further divides the approximate \$5,016,000 allocation to Connecticut electric energy consumers in a similar fashion.

## **B. Intrastate Allocation**

5. The energy settlement reports maintained by ISO-NE are based upon the loads reported at the various metering domains. In Connecticut, these loads are reported by The Connecticut Light and Power Company (“CL&P”), The United Illuminating Company (“UI”), and the Connecticut Municipal Electric Energy Cooperative (“CMEEC”). These three entities collaborated to compile energy data reported by each to ISO-NE over the period beginning September 1, 2007 and ending December 31, 2008. The intrastate energy consumption over that time period was totaled, and each entity’s proportion of that total was calculated to create an intrastate allocation. The results of this calculation are shown in the table on the next page:

### Non-PTF Load as Reported to ISO-NE

Amounts in kWh

Month	CL&P	UI	CMEEC	Total
9/2007	2,004,569,786	504,774,875	177,274,000	2,686,618,661
10/2007	1,973,330,499	494,146,282	174,635,000	2,642,111,781
11/2007	1,956,247,638	475,775,786	169,508,000	2,601,531,424
12/2007	2,204,421,420	521,866,254	184,598,000	2,910,885,674
1/2008	2,202,599,460	521,321,333	187,555,000	2,911,475,793
2/2008	2,048,223,940	481,076,460	175,535,000	2,704,835,400
3/2008	2,043,008,476	483,693,639	176,872,000	2,703,574,115
4/2008	1,778,670,964	438,859,237	157,869,000	2,375,399,201
5/2008	1,807,726,865	442,406,552	164,983,000	2,415,116,417
6/2008	2,132,023,920	531,033,144	187,991,000	2,851,048,064
7/2008	2,458,020,979	620,044,013	212,585,000	3,290,649,992
8/2008	2,131,091,194	537,883,059	191,000,000	2,859,974,253
9/2008	1,950,502,354	491,087,437	174,415,000	2,616,004,791
10/2008	1,856,724,921	456,510,135	163,592,000	2,476,827,056
11/2008	1,910,436,919	459,635,139	162,361,000	2,532,433,058
12/2008	2,143,403,395	511,592,319	177,501,000	2,832,496,714
<b>Total</b>	32,601,002,731	7,971,705,664	2,838,274,000	43,410,982,395 <sup>5</sup>
<b>% Allocation</b>	<b>75.10%</b>	<b>18.36%</b>	<b>6.54%</b>	<b>100.00%</b>

<sup>5</sup> The data supplied by CL&P, UI and CMEEC over the relevant time period differs negligibly from the energy consumption attributed to the Connecticut Load Zone in the monthly reports of ISO-NE. This difference amounts to 23 out of 43,388 gWh over the relevant time period, or a negligible -0.053% (ISO-NE reports slightly fewer gWh). The CT Parties agree that the discrepancy is *de minimus* and nonmaterial, and in no way detracts from the reasonableness of the allocator agreed to herein.

6. Based upon the preliminary data used in the New England State Agencies'

agreement, the intrastate allocator would further allocate funds within Connecticut as follows:

CL&P	UI	CMEEC	Total
\$3,767,016	\$920,938	\$328,046	\$5,016,000

### C. Further Administrative Steps

7. The interstate and intrastate allocation methodologies will work in tandem to return funds to all electric energy consumers in Connecticut. The process will require four steps:

- a. ISO-NE will calculate the final interstate allocation using the methodology agreed upon by the New England State Agencies in their April 30, 2012 Joint Stipulation, but will utilize more refined energy consumption data from its billing system.
- b. ISO-NE will then apportion the Connecticut allocation based upon the allocation percentages agreed upon herein.
- c. ISO-NE will credit the calculated amounts back to CL&P, UI and CMEEC through the ISO-NE Monthly Bill.
- d. CL&P, UI and CMEEC will fully credit to customers the amounts returned on the ISO-NE Monthly Bill. CL&P and UI will credit these amounts back to customers within appropriate, fully reconcilable charges that appear on customers' monthly bills. These rate mechanisms will likely return funds back to customers over a six month period. CMEEC has represented that it will credit each municipal electric utility and applicable wholesale customer it supplies through its monthly wholesale power bill. Each municipal electric utility will in turn credit its end use customers over a comparable six month period.

**D. Stipulation**

In consideration of the foregoing facts, the CT Parties agree as follows:

1. The CT Parties support approval of the New England State Agencies' Joint Stipulation Agreement and Motion for a Determination of Eligibility, which establishes a methodology to allocate the \$20 million New England portion of the disgorgement fund among the New England States.
2. The interstate methodology, which allocates the disgorgement fund among the New England States on the basis of energy consumed during the time period over which Constellation manipulated markets, is transparent fair, just and reasonable, satisfying the criteria established by Deputy Chief Judge McCartney at the March 29, 2012 in this proceeding. At the prehearing conference, Judge McCartney stated that any proposed allocation methodology should be transparent, fair and reasonable. Transcript, March 29, 2012, pp. 85, 86.
3. An intrastate methodology that allocates Connecticut disgorgement funds on the same basis, energy consumed during the time period over which Constellation manipulated markets, is transparent fair, just and reasonable.
4. CL&P, UI and CMEEC each contributed energy consumption data for the purpose of creating an intrastate allocation, and concur in the allocation results, lending a significant degree of transparency to the process.
5. The allocation agreed upon herein divides the Connecticut disgorgement funds such that 75.10% is allocated to CL&P, 18.36% is allocated to UI, and 6.54% is allocated to CMEEC.
6. The intrastate allocation agreement fully distributes funds to all Connecticut electric energy consumers in a timely manner.

**WHEREFORE**, the CT Parties respectfully request that the Commission accept the stipulated methodology for allocating the Energy Consumers Fund within Connecticut.

**STIPULATED** and moved this 5th day of September, 2012.

IN WITNESS WHEREOF, the duly authorized representatives of the CT Parties have set

forth their signatures below as of the date first written above.

/s/ Seth A. Hollander

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## **APPENDIX B**

### **Statement of the Maine Public Utilities Commission Regarding Allocation and Distribution of Maine's Portion of the ISO-NE Disgorgement Funds**

Based on the New England State Agencies agreed upon a methodology set forth in the attached New England Parties Stipulation and the Joint Stipulation Agreement filed in this matter by the New England State Agencies on April 30, 2012, that allocates funds between the New England States based upon each state's proportion of monthly energy<sup>1</sup> use within the ISO-NE Control Area, Maine's estimated<sup>2</sup> distribution of funds is \$1,793,000.

The Maine Public Utility Commission ("MPUC"), as the only Maine state agency designated by the ALJ in this matter as an eligible state agency party, proposes to allocate the approximate \$1,793,000 distribution to Maine electric energy consumers in a similar fashion to the interstate allocation. The energy settlement reports maintained by ISO-NE are based upon the loads reported at the various metering domains. In Maine, these loads are reported by Central Maine Power Company ("CMP") and Bangor Hydro-Electric Company ("BHE"). These two entities collaborated to compile energy data reported by each to ISO-NE over the period beginning September 1, 2007 and ending December 31, 2008. The intrastate energy consumption over that time period was totaled, and each entity's proportion of that total was calculated to create an intrastate allocation. Embedded within each of the investor owned utility's Metering Domains are multiple municipally owned utilities whose historical consumption has also been calculated. In CMP's Metering Domain these include Madison Electric Works ("MEW"), Kennebunk Light and Power District ("KLPD") and the Fox Island

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<sup>1</sup> Energy is defined as the load used in the settlement process.

<sup>2</sup> ISO-NE will compute the actual allocation based upon data residing within its internal billing system. The internal billing system expresses the relevant energy consumption data with more precision because the data is carried out to additional decimal places.

Electric Cooperative (“FIEC”). In BHE’s Metering Domain they include Swans Island Electric Cooperative (“SIEC”) and Isle-Au-Haut Electric Power Company (“IAHEPC”). The results of these calculation are shown in the table on the next page:

### Non-PTF Load as Reported to ISO-NE

Amounts in kWh

Month	CMP Metering Domain				BHE Metering Domain			Total
	CMP	KL&P	MEW	FIEC	BHE	SIEC	IAHEPC	
Sep-07	760,525,000	8,249,998	27,148,604	895,395	137,244,672	222,391	28,445	934,314,505
Oct-07	783,047,000	8,313,636	33,385,226	837,101	145,564,551	212,482	25,304	971,385,300
Nov-07	780,947,000	8,487,169	60,717,545	854,226	139,352,003	205,578	22,860	990,586,381
Dec-07	857,201,000	9,859,408	47,512,669	978,832	153,156,790	235,993	22,150	1,068,966,842
Jan-08	891,469,755	9,634,453	25,708,678	918,933	150,497,546	228,533	22,436	1,078,480,334
Feb-08	774,840,091	8,809,313	18,969,319	817,789	138,505,189	208,190	20,378	942,170,269
Mar-08	806,747,247	8,963,416	20,214,159	855,999	141,477,110	211,492	20,689	978,490,112
Apr-08	720,483,878	7,759,868	21,404,494	763,509	127,699,929	183,212	19,829	878,314,719
May-08	727,470,057	7,840,823	20,630,963	812,502	128,849,090	192,441	23,030	885,818,906
Jun-08	774,023,425	8,321,548	41,867,231	876,900	134,354,826	205,145	28,127	959,677,202
Jul-08	875,197,581	9,345,151	44,885,693	1,097,369	149,278,952	260,510	36,360	1,080,101,616
Aug-08	827,158,697	8,821,376	45,546,027	1,178,473	148,479,256	288,442	39,433	1,031,511,704
Sep-08	806,257,932	8,094,838	21,740,560	876,884	133,663,857	217,783	29,983	970,881,837
Oct-08	789,682,996	8,094,328	27,008,831	842,763	134,147,247	209,565	25,696	960,011,426
Nov-08	757,251,066	8,127,296	19,467,285	811,981	134,745,555	187,588	22,844	920,613,615
Dec-08	819,199,207	9,344,513	18,441,318	907,615	149,987,339	209,329	23,348	998,112,669
<b>Total</b>	<b>12,751,501,932</b>	<b>138,067,134</b>	<b>494,648,602</b>	<b>14,326,271</b>	<b>2,247,003,912</b>	<b>3,478,674</b>	<b>410,912</b>	<b>15,649,437,437</b>
<b>% Allocation</b>	<b>81.4822%</b>	<b>0.8822%</b>	<b>3.1608%</b>	<b>0.0915%</b>	<b>14.3584%</b>	<b>0.0222%</b>	<b>0.0026%</b>	<b>100.0000%</b>
<b>Metering Domain Allocation</b>	<b>85.6168%</b>				<b>14.3832%</b>			<b>100.0000%</b>

The MPUC proposes the following intrastate allocation and process for distribution of Maine's share of the ISO-NE Disgorgement fund. Based upon the preliminary data used in the New England State Agencies' agreement, the intrastate allocator would further allocate funds within Maine as follows:

CMP	KL&P	MEW	FIEC	BHE	SIEC	IAHEPC	Total
\$1,460,975	\$15,819	\$56,673	\$1,641	\$257,446	\$399	\$47	\$1,793,000


**Summary of Proposed Process for Distribution of Maine’s Portion of the ISO-NE Disgorgement Fund**

- a) ISO-NE will apportion the Maine allocation to the CMP and BHE Metering Domains based upon the allocation percentages set forth above.
- b) ISO-NE will credit the calculated Metering Domain amounts back to CMP and BHE through the ISO-NE Monthly Bill.
- c) CMP and BHE will forward allocated payments to their embedded municipal utilities based upon the allocation percentages set forth above.
- d) CMP, BHE, MEW, KLPD, FIEC, SIEC and IAHEPC will credit these amounts, with any applicable interest, back to their retail customers based upon rate mechanism proposals that are submitted by each utility and approved by the MPUC.

### APPENDIX C - MASSACHUSETTS

The Massachusetts Parties (collectively, Mass DPU, Mass AG, MMWEC, EMCOS, Groveland, and Merrimac) stipulate and agree as follows:

1. The energy settlement reports maintained by ISO-New England (“ISO-NE”) with respect to Massachusetts are based upon the loads reported at the various metering domains. These loads are reported by the five Massachusetts electric distribution companies (as defined in G.L. c. 164, § 1) (“EDCs”) (Fitchburg Gas and Electric Company, Massachusetts Electric Company, Nantucket Electric Company, NSTAR Electric Company and Western Massachusetts Electric Company), the Massachusetts municipal lighting plants (organized or operated pursuant to G.L. c. 164, §§ 34-65), the Massachusetts Port Authority (“Massport”)<sup>1</sup> the Massachusetts Bay Transportation Authority (“MBTA”),<sup>2</sup> and by the Medical Area Total Energy Plant (“MATEP”).<sup>3,4</sup>
2. Energy data for these entities has been compiled for the period of the market manipulation beginning September 1, 2007 and ending December 31, 2008. The intrastate energy consumption over this time period was totaled, and each entity’s proportion of that total was calculated to create an intrastate allocation. The results of the calculation are shown on the following table:

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<sup>1</sup> Massport is a Massachusetts port authority that owns and operates various Massachusetts airports and public terminals.

<sup>2</sup> The MBTA is a body politic and corporate and political subdivision of the Commonwealth of Massachusetts and is the public operator of most bus, subway, commuter rail, and ferry routes in greater Boston, Massachusetts.

<sup>3</sup> The Medical Area Total Energy Plant (“MATEP”) is a cogeneration facility in Boston that provides steam, chilled water and electricity to six medical institutions associated with Harvard Medical School.

<sup>4</sup> Massport, MBTA and MATEP have not intervened in this proceeding; nevertheless, the Massachusetts Parties agree that they should receive their respective share of the Fund based upon kWh usage over the period beginning September 1, 2007 and ending December 31, 2008.

Month/Yr	Real-Time Load (kwh)									
	Total	FG&E	MEC	NEC	NSTAR	WMECo	Massport	MATEP	MBTA	Municipals
9/2007	4,861,604,233	40,629,699	1,834,146,934	13,470,897	1,881,190,339	335,569,946	16,512,668	34,244,949	31,801,080	674,037,721
10/2007	4,714,301,459	40,617,531	1,786,730,508	11,449,363	1,811,417,650	330,348,621	17,169,252	33,359,950	33,025,520	650,183,063
11/2007	4,684,657,171	40,512,723	1,798,778,115	11,411,950	1,762,110,627	333,102,195	16,768,787	29,684,792	33,700,000	658,587,983
12/2007	5,282,414,686	44,904,179	2,051,040,146	13,520,804	1,976,669,788	369,344,132	18,613,118	30,960,245	42,595,000	734,767,275
1/2008	5,255,363,102	46,719,835	2,041,597,389	12,880,365	1,967,096,518	366,452,607	18,425,115	31,417,811	42,767,000	728,006,462
2/2008	4,882,162,644	42,099,799	1,898,120,773	11,728,946	1,824,100,513	345,003,853	17,289,266	30,245,341	41,038,780	672,535,373
3/2008	4,957,253,971	42,635,998	1,933,634,334	11,766,321	1,854,424,055	346,606,019	18,121,052	30,788,198	40,389,976	678,888,018
4/2008	4,440,768,539	38,530,118	1,710,253,632	10,293,377	1,688,992,593	306,250,073	16,790,982	30,224,649	34,551,427	604,881,688
5/2008	4,473,573,056	38,217,734	1,719,434,375	11,538,687	1,710,687,329	303,543,761	17,032,073	32,113,232	32,822,424	608,183,441
6/2008	5,135,063,387	42,217,824	1,958,532,953	13,792,020	1,983,964,136	341,787,916	18,205,167	33,623,656	33,082,981	709,856,734
7/2008	5,909,794,688	45,592,018	2,233,880,164	19,688,585	2,325,365,929	384,118,899	20,122,708	34,214,004	34,956,885	811,855,496
8/2008	5,218,405,044	42,453,152	1,967,040,240	18,601,972	2,043,041,361	344,582,545	18,575,066	32,859,621	33,822,336	717,428,751
9/2008	4,763,816,573	40,168,590	1,797,665,964	13,140,712	1,863,086,876	321,193,274	17,490,990	31,360,065	32,690,545	647,019,557
10/2008	4,566,114,098	39,720,915	1,736,471,714	11,516,136	1,761,430,804	309,703,122	17,140,432	30,650,826	33,235,678	626,244,472
11/2008	4,608,933,862	39,952,245	1,770,033,776	11,389,858	1,754,305,112	315,284,310	16,989,454	29,351,576	34,358,975	637,268,556
12/2008	5,088,734,618	37,344,623	1,963,177,908	12,395,102	1,929,375,600	347,043,460	18,270,187	31,633,161	41,490,001	708,004,576
<b>Total</b>	<b>78,842,961,131</b>	<b>662,316,983</b>	<b>30,200,538,925</b>	<b>208,585,095</b>	<b>30,137,259,230</b>	<b>5,399,934,732</b>	<b>283,516,317</b>	<b>506,732,076</b>	<b>576,328,608</b>	<b>10,867,749,165</b>
<b>% Allocation</b>	<b>100.00%</b>	<b>0.84%</b>	<b>38.30%</b>	<b>0.26%</b>	<b>38.22%</b>	<b>6.85%</b>	<b>0.36%</b>	<b>0.64%</b>	<b>0.73%</b>	<b>13.78%</b>

3. Applying the intrastate allocation percentages to the \$9,180,000 allocated to the state of Massachusetts results in the following dollar amounts being returned to the EDCs for the benefit of all retail customers, the Massachusetts Municipal Light Plants, Massport, MBTA, and MATEP:

Total	\$9,180,000
FG&E	\$77,116.20
MEC	\$3,516,369.04
NEC	\$24,286.39
NSTAR	\$3,509,001.13
WMECo	\$628,735.91
Massport	\$33,010.93
MATEP	\$59,000.83
MBTA	\$67,104.24
Municipals	\$1,265,375.32

4. The interstate and the intrastate allocation methodologies work together to return funds to all electric energy consumers in Massachusetts. The process requested is as follows:

For the EDCs,

- a. FERC shall refund the monies allocated to the EDCs to ISO-NE in the amounts listed in the chart in paragraph 3.
- b. ISO-NE will then credit those amounts to each of the EDCs through their ISO-NE wholesale bills.
- c. The EDCs will fully credit to retail customers either through a line item refund or through a reconciliation factor that applies to all

customers, the amounts ISO-NE credited to the EDCs on their  
wholesale bills.

- d. The EDCs will provide a one-time credit to all retail customers on the next available monthly retail bill in proportion to each retail customer's estimated kWh usage for that month.
- e. The EDCs will notify customers of the one-time credit and the reason for same on customers' retail bills.
- f. Within one month of the one-time credit to customers the EDCs will make a filing with the Massachusetts DPU that provides sufficient information to evidence compliance with the requirements above.

For the Municipal Parties,

- a. FERC shall refund to MMWEC the amounts allocated to the municipal light plants. MMWEC shall serve as agent for the municipal light plants and shall disburse the funds in proportion to the monthly energy use of the end use customers served by each municipal light plant, in kilowatt hours, during the period beginning September 1, 2007 and ending December 31, 2008. The portion of the fund disbursed through MMWEC to the Massachusetts municipal lighting plants shall be used solely for the benefit of the customers of those entities.

For Massport and the MBTA,

- a. FERC shall refund the monies allocated to Massport and the MBTA to ISO-NE.

- b. ISO-NE will then credit those amounts to Massport and the MBTA through their ISO-NE wholesale bills.

For MATEP,

- a. FERC shall refund the monies allocated to MATEP to ISO-NE.
- b. ISO-NE will then credit those amounts to MATEP through their ISO-NE wholesale bills.
- c. MATEP shall provide a one-time credit to customers on the next available monthly retail bill based on kWh usage.

- 5. The Massachusetts Parties assert that the allocation method described meets the Commission's directive that the funds be used for the benefit of electric energy consumers and does so in a fair and transparent manner.

IN WITNESS WHEREOF, the Massachusetts Parties have set forth their signatures below as of the date first written above.

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## APPENDIX D

### STIPULATION

(September 7, 2012)

IT IS HEREBY STIPULATED AND AGREED, by and between the New Hampshire Public Utilities Commission (“NHPUC”) and the New Hampshire Office of Consumer Advocate (“NH OCA”) (collectively, “the NH Parties”), as follows:

#### **A. Background**

1. On March 9, 2012, the Federal Energy Regulatory Commission (“FERC”) approved an “Order Approving Stipulation and Consent Agreement”<sup>1</sup> (“Order”) in Docket No. IN12-7-000 which, *inter alia*, allocated \$20 million of disgorged funds to electric energy consumers within the geographic footprint of the bulk power system control area operated by ISO New England Inc. (the “ISO-NE Control Area”). On April 30, 2012, the New England State Agencies<sup>2</sup> submitted a “Joint Stipulation Agreement and Motion for a Determination of Eligibility” in which the signatories (1) stipulated as to their eligibility to participate in the allocation and distribution of the \$20 million Energy Consumers Fund within the ISO-NE Control Area; and (2) agreed upon the basis to allocate the Energy Consumers Fund between the New England States.

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<sup>1</sup> “Order Approving Stipulation and Consent Agreement,” *Constellation Energy Commodities Group*, 138 FERC ¶ 61,168 (2012).

<sup>2</sup> The New England State Agencies consist of: the Connecticut Public Utilities Regulatory Authority; the Connecticut Office of Consumer Counsel; the Attorney General for the State of Connecticut; the Maine Public Utilities Commission; the Massachusetts Department of Public Utilities; the Massachusetts Attorney General; the New Hampshire Public Utilities Commission; the Rhode Island Division of Public Utilities and Carriers and the Attorney General of the State of Rhode Island; and the Vermont Department of Public Service.

2. The New England State Agencies agreed upon a methodology that allocates funds between the New England States based upon each state's proportion of monthly energy<sup>3</sup> use within the ISO-NE Control Area, in kilowatt hours, over the period beginning September 1, 2007 and ending December 31, 2008. Under this methodology, energy within each load zone of the ISO-NE Control Area is attributed to a state and all kilowatt hours of energy consumption over the relevant time period are totaled. The proposed allocation is based upon each state's proportion of that total, and results in the following estimated<sup>4</sup> distribution of funds:

Maine	\$1,793,000
New Hampshire	\$1,792,000
Vermont	\$931,000
Connecticut	\$5,016,000
Rhode Island	\$1,288,000
Massachusetts	\$9,180,000
<b>Total</b>	<b>\$20,000,000</b>

3. As set forth in the "Joint Stipulation Agreement and Motion for a Determination of Eligibility," the interstate allocation methodology is transparent, fair and reasonable. The allocation is transparent because it is constructed of data readily available from the ISO-NE website ([http://www.iso-ne.com/markets/hstdata/znl\\_info/monthly/index.html](http://www.iso-ne.com/markets/hstdata/znl_info/monthly/index.html)).

<sup>3</sup> Energy is defined as the load used in the settlement process.

<sup>4</sup> ISO-NE will compute the actual allocation based upon data residing within its internal billing system. The internal billing system expresses the relevant energy consumption data with more precision because the data is carried out to additional decimal places.

4. The instant intrastate agreement further divides the approximate \$1,792,000 allocation to New Hampshire electric energy consumers in a similar fashion.

**B. Intrastate Allocation**

5. The energy settlement reports maintained by ISO-NE are based upon the loads reported at the various metering domains. In New Hampshire, these loads are reported by Public Service of New Hampshire (“PSNH”), Unitil Energy Systems, Inc. (“UES”), Granite State Electric (“Granite State”), the New Hampshire Electric Cooperative (“NHEC”), and the municipal electric departments of Ashland, Littleton, New Hampton, Wolfeboro, and Woodsville.<sup>5</sup> These nine entities collaborated to compile energy data reported by each to ISO-NE over the period beginning September 1, 2007 and ending December 31, 2008. The intrastate energy consumption over that time period was totaled, and each entity’s proportion of that total was calculated to create an intrastate allocation. The results of this calculation are shown in the table on the next page:

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<sup>5</sup> Ashland Electric Department, Littleton Water & Light Department, New Hampton Village Precinct, Town of Wolfeboro Electric Department and Woodsville Water & Light Department.

**Non-Pool Transmission Facility (Non-PTF) Load as Reported to ISO-NE**  
Amounts in kWh

Month	PSNH	UES	Granite State	NHEC	Ashland	Littleton	New Hampton	Wolfeboro	Woodsville	Total
Sept 2007	682,174,142	105,328,111	76,364,329	59,136,026	1,543,191	6,942,554	228,206	5,540,081	1,634,093	929,533,311
Oct 2007	674,221,949	102,725,023	76,372,481	59,064,255	1,622,986	6,985,289	243,542	5,599,920	1,606,343	917,105,442
Nov 2007	680,966,783	103,286,124	75,006,799	69,128,308	1,734,707	6,799,061	299,941	5,867,164	1,606,072	931,649,245
Dec 2007	767,675,942	117,340,059	82,657,072	89,152,495	1,914,219	7,421,712	325,055	7,227,536	1,813,115	1,062,669,332
Jan 2008	766,369,370	115,314,608	82,253,050	82,224,448	1,930,676	7,625,616	335,849	7,127,775	1,854,464	1,048,194,024
Feb 2008	693,676,770	106,402,843	76,089,188	72,987,370	1,751,845	7,126,492	317,816	6,604,945	1,811,931	950,323,218
Mar 2008	707,933,450	108,548,022	77,857,598	70,329,995	1,687,678	7,187,907	265,872	6,560,140	1,911,341	963,344,369
Apr 2008	643,514,990	97,187,142	71,711,133	57,190,538	1,411,955	6,509,417	243,526	5,482,206	1,808,422	868,719,380
May 2008	646,520,415	98,174,045	73,231,623	55,905,483	1,435,396	6,371,785	230,130	5,329,291	1,860,610	874,313,605
Jun 2008	713,750,998	110,165,109	80,948,272	61,341,361	1,524,042	6,873,129	213,337	5,850,775	2,020,728	972,236,416
Jul 2008	809,916,840	126,646,118	91,027,093	72,995,113	1,703,191	7,494,572	224,027	6,990,273	2,236,770	1,106,729,459
Aug 2008	733,146,887	113,726,447	84,694,053	68,067,966	1,542,818	6,937,409	215,044	6,414,812	2,093,569	1,004,110,697
Sep 2008	667,373,260	103,041,212	77,279,079	58,705,567	1,487,802	6,577,379	234,431	5,439,889	1,939,712	911,062,197
Oct 2008	653,510,086	99,717,707	75,209,992	60,481,215	1,515,302	6,664,240	254,606	5,511,454	1,889,199	890,732,676
Nov 2008	660,543,546	100,712,951	74,096,905	67,823,871	1,568,961	6,401,162	293,495	5,513,302	1,836,430	902,718,442
Dec 2008	711,737,736	107,178,451	78,771,262	83,174,472	1,807,435	7,176,626	329,532	6,730,169	1,989,965	981,651,831
<b>Total</b>	11,213,033,164	1,715,493,972	1,253,569,929	1,087,668,483	26,182,204	111,094,350	4,254,409	97,789,732	29,912,764	15,538,999,007
<b>% Allocation</b>	72.1606%	11.0399%	8.0673%	6.9996%	0.1685%	0.7149%	0.0274%	0.6293%	0.1925%	<b>100.00%</b>

6. Application of the percentage allocations calculated in B.5 above to the proposed allocation of funds to New

Hampshire shown in A.2 results in the distribution of the following amounts to the nine New Hampshire load serving entities:

PSNH	UES	Granite State	NHEC	Ashland	Littleton	New Hampton	Wolfeboro	Woodsville	Total
\$1,293,117.75	\$197,835.47	\$144,565.12	\$125,432.91	\$3,019.40	\$12,811.71	\$490.63	\$11,277.38	\$3,449.62	\$1,792,000.00

### **C. Further Administrative Steps**

7. The interstate and intrastate allocation methodologies will work in tandem to return funds to all electric energy consumers in New Hampshire. The process will require four steps:

- a. ISO-NE will calculate the final interstate allocation using the methodology agreed upon by the New England State Agencies in their April 30, 2012 Joint Stipulation, but will utilize more refined energy consumption data from its billing system.
- b. ISO-NE will then apportion the New Hampshire allocation based upon the allocation percentages agreed upon herein.
- c. ISO-NE will credit the calculated amounts back to PSNH, UES, Granite State, NHEC, and the municipal electric departments of Ashland, Littleton, New Hampton, Wolfeboro, and Woodsville through the ISO-NE Monthly Bill.
- d. PSNH, UES, Granite State, NHEC, and the five municipal electric departments will fully credit to customers the amounts returned on the ISO-NE Monthly Bill. PSNH, UES, and Granite State will credit these amounts back to distribution customers within appropriate, fully reconcilable charges that appear on customers' monthly bills. These rate mechanisms will likely return funds back to customers over a period not to exceed 12 months. NHEC and each municipal electric utility will in turn credit their distribution customers over a comparable period.

### **D. Stipulation**

In consideration of the foregoing facts, the NH Parties agree as follows:

1. The NH Parties support approval of the New England State Agencies' Joint Stipulation Agreement and Motion for a Determination of Eligibility, which establishes a

methodology to allocate the \$20 million New England portion of the disgorgement fund among the New England States.

2. The interstate methodology, which allocates the disgorgement fund among the New England States on the basis of energy consumed during the time period over which Constellation manipulated markets, is transparent, fair, just and reasonable, satisfying the criteria established by Deputy Chief Judge McCartney at the March 29, 2012 in this proceeding. At the prehearing conference, Judge McCartney stated that any proposed allocation methodology should be transparent, fair and reasonable. Transcript, March 29, 2012, pp. 85, 86.

3. An intrastate methodology that allocates New Hampshire disgorgement funds on the same basis, energy consumed during the time period over which Constellation manipulated markets, is transparent, fair, just and reasonable, because all electric energy consumers in the state affected by Constellation's market activity will generally benefit from the agreed-upon allocation.

4. PSNH, UES, Granite State, NHEC and the municipal electric departments of Ashland, Littleton, New Hampton, Wolfeboro and Woodsville each contributed energy consumption data for the purpose of creating an intrastate allocation, and concur in the allocation results, lending a significant degree of transparency to the process.

5. The allocation agreed upon herein divides the New Hampshire disgorgement funds such that 72.1606% is allocated to PSNH, 11.0399% is allocated to UES, 8.0673% is allocated to Granite State, 6.9996% is allocated to NHEC, 0.1685% is allocated to the Ashland Electric Department, 0.7149% is allocated to the Littleton Water & Light Department, 0.0274% to New Hampton Village Precinct, 0.6293% to the Town of Wolfeboro Electric Department, and 0.1925% to the Woodsville Water & Light Department.

6. The intrastate allocation agreement fully distributes funds to all New Hampshire electric energy consumers in an efficient and timely manner.

**WHEREFORE**, the NH Parties respectfully request that the Commission accept the stipulated methodology for allocating the Energy Consumers Fund within New Hampshire.

**STIPULATED** and moved this 7 day of September, 2012.

IN WITNESS WHEREOF, the duly authorized representatives of the NH Parties have set forth their signatures below as of the date first written above.

/s/ Lynn Fabrizio  
Lynn Fabrizio, Esq.  
Staff Attorney  
N.H. Public Utilities Commission  
21 South Fruit Street, Ste. 10  
Concord, NH 03301  
Tel: 603-271-6030  
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[lynn.fabrizio@puc.nh.gov](mailto:lynn.fabrizio@puc.nh.gov)  
For the NEW HAMPSHIRE  
PUBLIC UTILITIES  
COMMISSION

/s/ Rorie E.P. Hollenberg  
Rorie E.P. Hollenberg, Esq.  
Assistant Consumer Advocate  
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For the NEW HAMPSHIRE OFFICE OF  
CONSUMER ADVOCATE



**APPENDIX E**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

Constellation Energy Commodities Group, Inc.

Docket No. IN12-7-000

**To: Hon. Bobbie J. McCartney, Deputy Chief Administrative Law Judge  
Presiding Judge****STIPULATION**  
(September 5, 2012)

IT IS HEREBY STIPULATED AND AGREED, by and among the Division of Public Utilities and Carriers (“RIDPUC”) and Peter F. Kilmartin, Attorney General for the State of Rhode Island (“RIAG”) (collectively, “the RI Parties”), as follows:

**A. Background**

1. On March 9, 2012, the Federal Energy Regulatory Commission (“FERC”) approved an “Order Approving Stipulation and Consent Agreement”<sup>1</sup> (“Order”) in Docket No. IN12-7-000 which, *inter alia*, allocated \$20 million of disgorged funds to electric energy consumers within the geographic footprint of the bulk power system control area operated by ISO New England Inc. (the “ISO-NE Control Area”). On April 30, 2012, the New England State Agencies<sup>2</sup> submitted a “Joint Stipulation Agreement and Motion for a Determination of Eligibility” in which the signatories (1) stipulated as to their eligibility to participate in the

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<sup>1</sup> “Order Approving Stipulation and Consent Agreement,” *Constellation Energy Commodities Group*, 138 FERC ¶ 61,168 (2012).

<sup>2</sup> The New England State Agencies consist of: the Connecticut Public Utilities Regulatory Authority; the Connecticut Office of Consumer Counsel; the Attorney General for the State of Connecticut; the Maine Public Utilities Commission; the Massachusetts Department of Public Utilities; the Massachusetts Attorney General; the New Hampshire Public Utilities Commission; the Rhode Island Division of Public Utilities and Carriers and the Attorney General of the State of Rhode Island; and the Vermont Department of Public Service.

allocation and distribution of the \$20 million Energy Consumers Fund within the ISO-NE Control Area; and (2) agreed upon the basis to allocate the Energy Consumers Fund between the New England States.

2. The New England State Agencies agreed upon a methodology that allocates funds between the New England States based upon each state's proportion of monthly energy<sup>3</sup> use within the ISO-NE Control Area, in kilowatt hours, over the period beginning September 1, 2007 and ending December 31, 2008. Under this methodology, energy within each load zone of the ISO-NE Control Area is attributed to a state and all kilowatt hours of energy consumption over the relevant time period are totaled. The proposed allocation is based upon each state's proportion of that total, and results in the following estimated<sup>4</sup> distribution of funds:

Maine	\$1,793,000
New Hampshire	\$1,792,000
Vermont	\$931,000
Connecticut	\$5,016,000
Rhode Island	\$1,288,000
Massachusetts	\$9,180,000
<b>Total</b>	<b>\$20,000,000</b>

3. As set forth in the "Joint Stipulation Agreement and Motion for a Determination of Eligibility," the interstate allocation methodology is transparent, fair and reasonable. The

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<sup>3</sup> Energy is defined as the load used in the settlement process.

<sup>4</sup> ISO-NE will compute the actual allocation based upon data residing within its internal billing system. The internal billing system expresses the relevant energy consumption data with more precision because the data is carried out to additional decimal places.

allocation is transparent because it is constructed of data readily available from the ISO-NE website ([http://www.iso-ne.com/markets/hstdata/znl\\_info/monthly/index.html](http://www.iso-ne.com/markets/hstdata/znl_info/monthly/index.html)).

4. The instant intrastate agreement further divides the approximate \$1,288,000 allocation to Rhode Island electric energy consumers in a similar fashion.

## **B. Intrastate Allocation**

5. The energy settlement reports maintained by ISO-NE are based upon the loads reported at the various metering domains. In Rhode Island, these loads are reported by The Narragansett Electric Company d/b/a National Grid (“Narragansett”) and the Pascoag Utility District (“Pascoag”). These entities collaborated to compile energy data reported by each to ISO-NE over the period beginning September 1, 2007 and ending December 31, 2008. The intrastate energy consumption over that time period was totaled, and each entity’s proportion of that total was calculated to create an intrastate allocation. The results of this calculation are shown in the table on the next page:

### Non-PTF Load as Reported to ISO-NE

Amounts in kWh

<b>Month</b>	<b>Narragansett</b>	<b>Pascoag</b>	<b>Total</b>
9/2007	678,841,922	4,428,690	683,270,612
10/2007	654,404,985	4,385,560	658,790,545
11/2007	643,319,077	4,434,290	647,753,367
12/2007	718,749,044	4,933,300	723,682,344
1/2008	713,055,978	4,769,220	717,825,198
2/2008	659,067,299	4,399,620	663,466,919
3/2008	667,866,390	4,482,130	672,348,520
4/2008	606,235,705	3,936,280	610,171,985
5/2008	609,554,119	4,005,980	613,560,099
6/2008	724,795,507	4,681,430	729,476,937
7/2008	855,822,076	5,515,750	861,337,826
8/2008	740,704,468	4,770,470	745,474,938
9/2008	664,882,683	4,353,260	669,235,943
10/2008	628,599,315	4,245,540	632,844,855
11/2008	623,974,555	4,377,500	628,352,055
12/2008	686,529,836	4,937,480	691,467,316
<b>Total</b>	10,876,402,959	72,656,500	10,949,059,459
<b>% Allocation</b>	<b>99.33641%</b>	<b>.66359%</b>	<b>100%</b>

6. Based upon the preliminary data used in the New England State Agencies' agreement, the intrastate allocator would further allocate funds within Rhode Island as follows:

Narragansett	Pascoag	Total
1,279,452.9608	8,547.0392	1,288,000

### **C. Further Administrative Steps**

7. The interstate and intrastate allocation methodologies will work in tandem to return funds to all electric energy consumers in Rhode Island. The process will require four steps:

- a. ISO-NE will calculate the final interstate allocation using the methodology agreed upon by the New England State Agencies in their April 30, 2012 Joint Stipulation, but will utilize more refined energy consumption data from its billing system.
- b. ISO-NE will then apportion the Rhode Island allocation based upon the allocation percentages agreed upon herein.
- c. ISO-NE will credit the calculated amounts back to Narragansett and Pascoag through the ISO-NE Monthly Bill.
- d. Narragansett and Pascoag will fully credit to customers the amounts returned on the ISO-NE Monthly Bill. Narragansett and Pascoag will credit these amounts back to customers within appropriate, fully reconcilable charges that appear on customers' monthly bills. These rate mechanisms will likely return funds back to customers over a six month period.

### **D. Stipulation**

In consideration of the foregoing facts, the RI Parties agree as follows:

1. The RI Parties support approval of the New England State Agencies' Joint Stipulation Agreement and Motion for a Determination of Eligibility, which establishes a methodology to allocate the \$20 million New England portion of the disgorgement fund among the New England States.

2. The interstate methodology, which allocates the disgorgement fund among the New England States on the basis of energy consumed during the time period over which Constellation manipulated markets, is transparent fair, just and reasonable, satisfying the criteria established by Deputy Chief Judge McCartney at the March 29, 2012 in this proceeding. At the prehearing conference, Judge McCartney stated that any proposed allocation methodology should be transparent, fair and reasonable. Transcript, March 29, 2012, pp. 85, 86.

3. An intrastate methodology that allocates Rhode Island disgorgement funds on the same basis, energy consumed during the time period over which Constellation manipulated markets, is transparent fair, just and reasonable.

4. Narragansett and Pascoag each contributed energy consumption data for the purpose of creating an intrastate allocation, and concur in the allocation results, lending a significant degree of transparency to the process.

5. The allocation agreed upon herein divides the Rhode Island disgorgement funds such that 99.33641% is allocated to Narragansett and .66359% is allocated to Pascoag.

6. The intrastate allocation agreement fully distributes funds to all Rhode Island electric energy consumers in a timely manner.

**WHEREFORE**, the RI Parties respectfully request that the Commission accept the stipulated methodology for allocating the Energy Consumers Fund within Rhode Island.

**STIPULATED** and moved this 5<sup>th</sup> day of September, 2012.

IN WITNESS WHEREOF, the duly authorized representatives of the RI Parties have set forth

their signature below as of the date first written above.

/s/ Leo J. Wold

Assistant Attorney General

150 South Main Street

Providence, Rhode Island 02903

401-274-4400, ext. 2218

401-222-3016

Counsel for the DIVISION OF PUBLIC

UTILITIES AND CARRIERS and for PETER

F. KILMARTIN, ATTORNEY GENERAL FOR

THE STATE OF RHODE ISLAND

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<sup>1</sup> ISO-NE will compute the actual allocation based upon data residing within its internal billing system. The internal billing system expresses the relevant energy consumption data with more precision because the data is carried out to additional decimal places.

<sup>2</sup> Energy is defined as the load used in the settlement process.





Vermont asserts that the allocation method described meets the Commission's directive that the funds be used for the benefit of electric energy consumers and does so in a fair and transparent manner.

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Document Content(s)

New England Parties Joint Stipulation.PDF..... 2013 Renewable Energy Standard Charge and Reconciliation  
Responses to Commission Data Requests – Set 1

UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION

Constellation Energy Commodities Group, Inc.

Docket No. IN12-7-000

ORDER APPROVING NEW ENGLAND PARTIES' ALLOCATION AND  
DISTRIBUTION PROPOSAL

(Issued October 18, 2012)

1. On September 10, 2012, New England Parties<sup>1</sup> filed a *Joint Stipulation Agreement Regarding Allocation and Distribution of the \$20 Million Portion of the ISO-New England Disgorgement Fund* (Joint Stipulation). Because the Joint Stipulation is transparent, non-discriminatory, appears fair and reasonable, and benefits consumers in the ISO-New England (ISO-NE) footprint, the Joint Stipulation is approved.

**I. BACKGROUND**

2. On March 8, 2012, the FERC's Office of Enforcement (OE) and Constellation Energy Commodities Group (CCG) entered into a Stipulation and Consent Agreement (Consent Agreement) which resolved an investigation conducted under Part 1b of the Commission's regulations, 18 C.F.R. Part 1b (2011).<sup>2</sup> The Commission approved the Consent Agreement on March 9, 2012.<sup>3</sup>

3. The Consent Agreement created a disgorgement fund for the benefit of electric energy consumers in the affected states of the NYISO, ISO-NE, and PJM markets. Pursuant to the April 2, 2012 *Order Confirming Rulings from Prehearing Conference*,

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<sup>1</sup> The New England Parties are the Connecticut Public Utilities Regulatory Authority; the Connecticut Office of Consumer Counsel; George Jepsen, Attorney General for the State of Connecticut; the State of Maine Public Utilities Commission; the Massachusetts Department of Public Utilities; Martha Coakley, Attorney General of the Commonwealth of Massachusetts; the New Hampshire Public Utilities Commission; Peter F. Kilmartin, Attorney General of the State of Rhode Island; the Rhode Island Division of Public Utilities and Carriers; the Vermont Department of Public Service; the Massachusetts Municipal Wholesale Electric Company; the Eastern Massachusetts Consumer-Owned Systems; Groveland Municipal Light Department; and Merrimac Municipal Light Department.

<sup>2</sup> *Constellation Energy Commodities Group, Inc.*, 138 FERC ¶ 61,168 (2012).

<sup>3</sup> *Id.*

Docket No. IN12-7-000

parties were directed to file Motions for Determination of Eligibility to participate in the requests for apportionment of the fund.

4. On June 7, 2012, an *Order Granting Unopposed Motions for Determination of Eligibility* was issued. The order granted eligibility status to a number of designated state agencies, including the Vermont Department of Public Service; the Massachusetts Municipal Wholesale Electric Company; the Eastern Massachusetts Consumer-Owned Systems,<sup>4</sup> Groveland Municipal Light Department and Merrimac Municipal Light Department; and the New England State Agencies.<sup>5</sup>

5. On July 11, 2012, an *Order Denying Opposed Motions for Eligibility Determination and Directing Parties to File Joint Stipulations* (July 11 Order) was issued. The July 11 Order directed the designated eligible state agency parties in the ISO-NE footprint to file a joint stipulation within sixty (60) days of the order regarding a proposed allocation and distribution method of the \$20 million portion of the ISO-NE disgorgement fund. If the parties could not come to an agreement, they were to inform the presiding judge, and oral argument would be held.

## II. NEW ENGLAND PARTIES' ALLOCATION AND DISTRIBUTION PLAN

### A. Standard of Review

6. The Consent Agreement, approved by the Commission on March 9, 2012, created a fund “for the benefit of electric energy consumers in the affected states within ... ISO-NE.”<sup>6</sup> As indicated at the March 29, 2012 Prehearing Conference, a proposal for the allocation and distribution of the disgorged funds would be evaluated based on whether the proposal is transparent, fair, reasonable, and not discriminatory.

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<sup>4</sup> The Eastern Massachusetts Consumer-Owned Systems are Braintree Electric Light Department, Concord Municipal Light Plant, Hingham Municipal Lighting Plant, Middleton Electric Light Department, Reading Municipal Light Department, Wellesley Municipal Light Plant, and Taunton Municipal Lighting Plant.

<sup>5</sup> The New England State Agencies are the Connecticut Public Utilities Regulatory Authority (CTPURA); the Connecticut Office of Consumer Counsel (CT OCC); the Attorney General for the State of Connecticut (CTAG); the Maine Public Utilities Commission (MPUC); the Massachusetts Department of Public Utilities (Mass DPU); the Massachusetts Attorney General; the New Hampshire Public Utilities Commission (NHPUC); the Rhode Island Division of Public Utilities and Carriers (RIDPUC) and the Attorney General of the State of Rhode Island (RI Attorney General); and the Vermont Department of Public Service (VDPS).

<sup>6</sup> *Constellation Energy Commodities Group, Inc.*, 138 FERC ¶ 61,168 (2012).

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7. AARP filed comments requesting that the presiding judge consider additional factors in approving proposed allocation and distribution plans.<sup>7</sup> Because AARP is not an eligible state agency designated by the Commission to petition for the allocation and distribution of the disgorged funds on behalf of energy consumers within their respective jurisdictions, and because the designated eligible state agencies have submitted a joint stipulation that is transparent, fair, reasonable, non-discriminatory, and beneficial to consumers which may not necessarily meet AARP's unilaterally proposed factors, imposition of those additional factors as a prerequisite to approval of the joint proposal would effectively permit AARP to supplant the proposal submitted by the designated eligible state agencies. Such a result would undermine the express provisions of the Consent Agreement as well as the standard for approval of such proposals laid out by the presiding judge at the March 29, 2012 Prehearing Conference. Therefore, AARP's request for imposition of its additional factors must be **DENIED**.

#### **B. New England Parties' Proposed Allocation and Distribution Plan**

8. On September 10, 2012, New England Parties filed the Joint Stipulation in accordance with the June 11 Order. The Joint Stipulation proposes a methodology for allocating the \$20 million portion of the disgorgement fund among the states within the ISO-NE footprint. The Joint Stipulation also proposes intrastate allocation and distribution methods. AARP filed comments in response to New England Parties' proposal. New England Parties filed reply comments.

9. The Joint Stipulation proposes to allocate funds among the New England States<sup>8</sup> based upon each state's proportion of monthly energy use over the period of September 1, 2007 to December 31, 2008. New England Parties state that ISO-NE will calculate the final interstate allocation using energy consumption data from its billing system. New England Parties assert that this methodology (1) meets the criteria expressed by the

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<sup>7</sup> Specifically, AARP requests the following factors be considered: (1) the disgorged funds should benefit electric energy *consumers*, not utilities or other market participants; (2) the proposed use of disgorgement funds should not supplant funding that otherwise would be available to fund a project or activity; (3) the proposal should enhance protection of consumers and therefore help reduce the possibility of future abuse, malfunction, or manipulation of wholesale electricity markets; (4) the proposed allocation should alleviate hardship for consumers likely to have suffered most from higher bills for electric service caused by the manipulation, i.e., low income customers; (5) the proposed use should have lasting or long term beneficial impact for electric energy consumers.

<sup>8</sup> The New England States are Maine, New Hampshire, Vermont, Connecticut, Rhode Island and Massachusetts.

Docket No. IN12-7-000

presiding judge at the Prehearing Conference; (2) is transparent because the data utilized is from reports posted on the ISO-NE website; and (3) is fair and reasonable.

10. Similar to the interstate allocation, each individual state proposes to refund customers within the ISO-NE footprint based on the loads reported at the various metering domains within their state over the time period of September 1, 2007 to December 31, 2008. Each state has also proposed an administrative process that ensures electricity customers receive their refund in a timely manner.

11. Acknowledging that refunds to consumers are the typical remedy for excessive rates, AARP states that a broader range of remedies may be necessary and appropriate in this proceeding. AARP further states that in this case, it is particularly difficult to identify the persons harmed or the amount of economic harm they suffered from the alleged market manipulation. Moreover, AARP argues that the Commission must independently evaluate the proposed plans and not delegate decisional responsibility to state agencies.

12. AARP also notes that ISO-NE is the only affected region which has not recommended using a portion of the funds for consumer advocacy. AARP argues that enhancement of independent consumer advocacy and fuller participation of residential consumers in decisions regarding wholesale markets will provide long term benefits to consumers.

13. In response, New England Parties state that the question before the Commission is if the designated eligible state agencies have filed a stipulation that demonstrates that the funds will be used for the benefit of electric energy consumers. New England Parties argue that providing a refund to consumers clearly meets the standard and that even if there are other reasonable approaches, New England Parties' proposed allocation and distribution should be approved.

14. New England Parties' proposed allocation and distribution plan is transparent, non-discriminatory, appears fair and reasonable and would benefit consumers within the ISO-NE footprint. New England Parties' proposal uses information from the ISO-NE website to allocate funds based on actual electricity consumption. Further, the refund provides a direct benefit to consumers. Lastly, all of the designated eligible state agencies in the ISO-NE footprint support the proposal.

15. As previously indicated, AARP argues that the Commission should consider a broader range of remedies and notes that no money was allocated to consumer advocacy. However, it would undermine the express provisions of the Consent Agreement to allow AARP to effectively supplant the joint proposal of all the designated eligible state agencies by imposition of AARP's unilaterally imposed additional standards. This is particularly true where no eligible state agency has opposed the proposal. Thus, although there may be other uses that also meet the standards for approval, as described above,

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New England Parties' proposal is fair, reasonable, transparent, non-discriminatory, and beneficial to electricity consumers within the ISO-NE. Therefore, the proposed allocation and distribution plan is **APPROVED**.

### III. DISBURSEMENT PROCESS

16. New England Parties may now file Requests for Disbursement in this docket. The Parties requesting disbursement are strongly encouraged to make this administrative process as simple as possible to facilitate timely and efficient distribution on the funds. The Request for Disbursement should cite to this order granting approval of the proposed plan, indicate the amount of money to be disbursed, and provide all other necessary information required, with the exception of account wiring instructions, to effect distribution to the designated eligible state agency or agencies that will actually receive the disbursement, or their designee if necessary,<sup>9</sup> either in the primary filing or under separate cover if appropriate. Parties will have fifteen (15) days from the date of filing the Request for Disbursement to file comments if it becomes necessary to do so.

17. If no party has opposed the Request for Disbursement within fifteen (15) days from the date of filing, the eligible state agency or agencies that will actually receive the disbursement, or their designee if necessary, may proceed to contact Tegan Flynn, Federal Energy Regulatory Commission, Office of Enforcement at (202) 502-6585 or [Tegan.Flynn@ferc.gov](mailto:Tegan.Flynn@ferc.gov) to provide wiring instructions for the state agency or agencies, or their designee, and to otherwise coordinate the final distribution of funds. If objections to the Request for Disbursement are timely filed, the presiding judge must first issue an order ruling on the objections before the distribution process may move forward.

### IV. SUMMARY AND CONCLUSION

18. Because New England Parties' proposal is fair, reasonable, transparent, non-discriminatory, and beneficial to electricity consumers within the ISO-NE, and because all of the designated eligible state agencies in the ISO-NE footprint support the proposal, New England Parties' allocation and distribution plan is **APPROVED**.

SO ORDERED.

Bobbie J. McCartney  
Deputy Chief Administrative Law Judge

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<sup>9</sup> It is recognized that some state agencies may be prevented from directly receiving funds. However, those state agencies are directed to limit the number of designees to one designee per eligible state agency and to provide the relevant information concerning the designee in the Request for Disbursement.

Document Content(s)

IN12-7-000C.DOC.....

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Request:

Please provide the percentage calculation of the over- or under-collection for each category of factors by class.

Response:

Attachment 1 to this response includes an analysis showing the over or under collection, by rate class, of the Standard Offer Service (“SOS”) expense, the SOS Administrative Cost, Transition expense and Transmission expense for the period January 1, 2012 through December 31, 2012. Page 1 of Attachment 1 is a summary indicating for each reconciliation, the total over/under collection, the over/under collection by class and the percentage that the over/under collection represents of the total class revenue billed through the respective adjustment factor during the reconciliation period.

Standard Offer Service

The total SOS over collection for the period January 1, 2012 through December 31, 2012 was \$4.7 million (line 2 of Attachment 1, page 1). The Residential group over collection during the reconciliation period of \$2.6 million is approximately 1.2% of the total SOS revenue for the Residential group for the same period. The Commercial under collection of \$1.1 million represents 1.4 % of the total Commercial SOS revenue. The Industrial group over collection of \$3.3 million is approximately 8.1% of the total Industrial class SOS revenue for calendar year 2012.

The over collection related to the Industrial group may be due in part to out-of-period reconciliations, i.e. the monthly reconciliation that is part of the ISO-NE process for determination of supplier loads. The process for determining hourly supplier loads is described in the Company’s Terms and Conditions for Nonregulated Power Producers, R.I.P.U.C. No. 1191. This process applies to suppliers providing service directly to customers and to suppliers providing SOS. To determine the kilowatt-hours that are the basis for wholesale supplier billing, the Company accumulates readings hourly from meters located at various delivery points throughout the system. These hourly reads are aggregated into calendar month totals at the end of each month. The aggregate load, including an estimate for losses, is allocated to suppliers based on an estimate of each supplier’s share of the retail load. Approximately four months after each month’s initial billing, a reconciliation of the calendar month kWh occurs, comparing

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the actual kWh billed (i.e. kWh readings obtained from customer meter readings) in the month to the original calendar month estimate. The difference, either positive or negative, results in an adjustment to the supplier's original monthly bill and is paid to the supplier or credited to the Company at the rate in effect in the month in which the service was rendered. Therefore, the total SOS expense booked in any month also includes a reconciliation for service rendered several months prior. These "out-of-period" reconciliations can cause a variance in any particular month and in any twelve month SOS reconciliation final balance. The under or over collections caused by these out-of-period reconciliations are "self-correcting" since the reconciliation amounts associated with monthly service for the months of September 2012 through December 2012 will be reflected in next year's reconciliation.

In addition, part of the 2012 over collection may be due to the difference between the estimated loss values used to determine the monthly retail rates and the actual losses that occurred during the pricing period. An analysis of the data available indicates that, on average, actual losses for the Industrial group during the reconciliation period were less than the estimates used to derive the retail rates.

Standard Offer Service Administrative Cost

Attachment 1, page 1, line 6 indicates that the SOS Administrative Cost over collection is 9.8%, 10.4% and 18.6% for the Residential, Commercial and Industrial groups, respectively. SOS Administrative Cost is comprised primarily of uncollectible related expense. The SOS related uncollectible expense to be recovered during the reconciliation period is calculated as actual SOS revenue for the period January 1, 2012 through December 31, 2012 multiplied by the current uncollectible percentage.

The SOS Administrative Cost Adjustment factor is determined each year based upon an estimate of SOS uncollectible allowance for the upcoming twelve months beginning April 1. The over collection during 2012 resulted from the fact that actual SOS revenue, and consequently actual SOS uncollectible expense, was less than what was estimated in last year's annual filing. The lower revenue was driven by lower than estimated SOS kWh deliveries and SOS prices. The Industrial group experienced the biggest decline in SOS kWh deliveries, with actual kWh approximately 15% less than estimated. Actual SOS kWh was 0.2% less than estimated for the Residential group and 9.3% less for the Commercial group. For the Commercial and Industrial groups, actual SOS prices during the period were approximately 15% less than estimated, and approximately 10% less for the Residential group.

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Transition Charge

As shown on page 1 of Attachment 1, line 8, the transition charge under collection is \$1.5 million or approximately 35.2% of the total billed transition revenue. The Contract Termination Charge (“CTC”) billed to the Company by New England Power Company is adjusted annually beginning January 1<sup>st</sup>. However, the Transition Charge billed to Narragansett Electric customers is adjusted annually beginning April 1. As a result, every year, the transition reconciliation is impacted by the lag in the implementation of the Transition rate change.

For calendar year 2011, the CTC on average was a credit of \$.00005 per kWh. For calendar year 2012, the CTC on average was a charge of \$0.00081 per kWh. The difference between the two rates is \$0.00086. The rate differential multiplied by the January 2012 through March 2012 kilowatt-hour deliveries equals approximately \$1.2 million. Therefore, of the total under collection of \$1.6 million, most is attributable to the timing of the NEP CTC rate change on January 1 and the Narragansett Electric transition charge change on April 1.

Transmission Base Revenue & Transmission Uncollectible

Attachment 1, page 1, line 11 indicates that the Transmission related over collection is approximately \$5.7 million in total for the reconciliation period. This over collection is primarily the result of actual transmission expenses that were lower than forecasted in last year’s annual filing. The driver of the lower expense was primarily lower than estimated Schedule 21 charges billed to Narragansett Electric by New England Power Company. In addition, a credit to expense of \$1.2 million reflecting Narragansett Electric’s share of the ISO-NE Disgorgement Fund that is discussed on page 19 and 20 of the testimony of Jeanne A. Lloyd, also contributed to the over collection.

The over collection resulting from the lower actual versus estimated transmission expense was partially offset by transmission revenue that was also lower than estimated due primarily to lower actual kWh than had been forecasted.

The over or under collection of transmission expense attributable to each rate class is affected by the allocation factors used to allocate the forecasted expense in R.I.P.U.C. Docket No. 4314, which was the basis of the rates billed to customers during the April 1, 2012

The Narragansett Electric Company  
d/b/a National Grid  
Docket Nos. 4315 & 4391  
In re: 2013 Electric Retail Rate Filing &  
2013 Renewable Energy Standard Charge and Reconciliation  
Responses to Commission Data Requests – Set 1  
Issued March 8, 2013

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through March 31, 2013 period and the allocation factor used to allocate the actual expense incurred during the reconciliation period. The forecasted expense was allocated based upon each class's contribution to monthly system peak demand during calendar year 2010. The actual expense was allocated using each class's contribution to monthly system peak demand during calendar year 2012. A comparison of the 2010 and 2012 allocation factors shows that the residential class share of system peak was less during 2012 than during 2010, and the small and medium commercial classes (Rates C-06 and G-02) had a higher share of the system peak demand. Therefore, the residential class was allocated less of the actual reconciliation period transmission expense, resulting in an over collection of expense, and Rates C-06 and G-02 were allocated more expense, resulting in an under collection of expense for these two classes. The Rate G-02 under collection of expense was more than offset by an increase in actual revenue as compared to estimated revenue for this class, resulting in a net over collection for Rate G-02.

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

**Summary of Over(Under) Recoveries by Rate Class**

Line No.	A-16/A60	C-06	G-02	Streetlights	Commercial Group	B-32 / G-32	B-62/ G-62/ X-01	Industrial Group	Total
1 Standard Offer Service Base Revenue	\$214,420,010	\$29,594,922	\$45,799,316	\$719,565	\$76,113,802	\$34,270,014	\$5,795,168	\$40,065,181	\$330,598,994
2 Over(Under) Recovery - SOS Adjustment Factor Revenue	\$2,567,667	(\$177,074)	(\$811,374)	(\$86,618)	(\$1,075,066)	\$2,776,571	\$483,807	\$3,260,378	\$4,752,979
3 SOS Adjustment Factor Over(Under) Recovery - %	1.2%	-0.6%	-1.8%	-12.0%	-1.4%	8.1%	8.3%	8.1%	1.4%
4 Standard Offer Service Administrative Cost Revenue	\$3,473,303	\$502,500	\$775,250	\$12,965	\$1,290,715	\$604,567	\$98,324	\$702,891	\$5,466,909
5 Over(Under) Recovery - SOS Administrative Factor Revenue	\$341,491	\$53,604	\$78,871	\$1,359	\$133,833	\$116,713	\$14,137	\$130,850	\$606,174
6 SOS Administrative Costs Over(Under) Recovery - %	9.8%	10.7%	10.2%	10.5%	10.4%	19.3%	14.4%	18.6%	11.1%
7 Transition Base Revenue	\$1,764,911	\$320,655	\$737,267	\$35,461		\$1,149,917	\$399,647		\$4,407,857
8 Over(Under) Recovery - Transition Revenue	(\$665,349)	(\$120,618)	(\$264,632)	(\$13,408)		(\$444,558)	(\$43,508)		(\$1,552,073)
9 Transition Revenue Over (Under) Recovery - %	-37.7%	-37.6%	-35.9%	-37.8%		-38.7%	-10.9%		-35.2%
10 Transmission Base and Uncollectible Factor Revenue	\$58,873,395	\$10,480,711	\$23,409,750	\$687,821		\$30,114,851	\$7,687,260		\$131,253,788
11 Over(Under) Recovery - Transmission Revenue	\$3,822,847	(\$169,837)	\$2,052,095	(\$132,888)		(\$777,563)	\$853,245		\$5,647,898
12 Transmission Over(Under) Recovery - %	6.5%	-1.6%	8.8%	-19.3%		-2.6%	11.1%		4.3%

Line Descriptions:

- |                                 |                       |
|---------------------------------|-----------------------|
| 1 from Page 2 Line 14 + Line 28 | 8 per Page 4, Line 32 |
| 2 per Page 2, Line 49           | 9 Line 8 ÷ Line 7     |
| 3 Line 2 ÷ Line 1               | 10 from Page 5 Line 3 |
| 4 from Page 3 Line 14           | 11 per Page 5, Line 6 |
| 5 per Page 3, Line 32           | 12 Line 11 ÷ Line 10  |
| 6 Line 5 ÷ Line 4               |                       |
| 7 from Page 4 Line 14           |                       |

**2012 Standard Offer Service Over(Under) Recovery by Rate Class**

Line No.		A16/A60 - Residential Group	C06	G02	Streetlights	Total Commercial Group	B32/G32	B62/G62/X01	Total Industrial Group	M1	Grand Total
<u>Standard Offer Service Base Revenue</u>											
1	January 2012	\$8,174,919	\$1,157,337	\$2,075,158	\$54,879	\$3,287,374	\$1,807,078	\$418,401	\$2,225,480		\$13,687,772
2	February 2012	\$18,815,702	\$2,793,715	\$5,241,096	\$102,858	\$8,137,668	\$4,513,654	\$1,136,492	\$5,650,146		\$32,603,517
3	March 2012	\$18,228,495	\$2,779,808	\$4,721,940	\$83,899	\$7,585,648	\$3,793,797	\$977,241	\$4,771,038		\$30,585,181
4	April 2012	\$16,782,714	\$2,628,157	\$4,155,672	\$251	\$6,784,079	\$2,815,918	\$749,315	\$3,565,233		\$27,132,026
5	May 2012	\$14,576,890	\$2,437,800	\$3,323,222	\$55,850	\$5,816,873	\$2,187,785	\$621,224	\$2,809,008		\$23,202,771
6	June 2012	\$16,893,556	\$2,639,608	\$3,896,229	(\$2,850)	\$6,532,987	\$2,302,615	\$663,308	\$2,965,923		\$26,392,465
7	July 2012	\$21,999,361	\$2,778,256	\$4,017,532	\$50,079	\$6,845,867	\$2,519,473	\$112,133	\$2,631,606		\$31,476,834
8	August 2012	\$23,641,205	\$2,703,449	\$3,978,703	\$48,735	\$6,730,887	\$2,751,971	\$248,955	\$3,000,926		\$33,373,018
9	September 2012	\$20,138,633	\$2,472,136	\$3,658,905	\$54,815	\$6,185,856	\$2,682,037	\$231,639	\$2,913,676		\$29,238,165
10	October 2012	\$13,931,756	\$1,876,122	\$2,762,275	\$58,586	\$4,696,983	\$2,206,493	\$217,817	\$2,424,310		\$21,053,049
11	November 2012	\$13,607,400	\$1,800,134	\$2,767,672	\$66,788	\$4,634,594	\$2,219,550	\$243,664	\$2,463,215		\$20,705,209
12	December 2012	\$16,808,261	\$2,123,708	\$3,012,908	\$82,398	\$5,219,013	\$2,535,846	\$266,277	\$2,802,123		\$24,829,397
13	January 2013	\$10,821,117	\$1,404,692	\$2,191,896	\$63,277	\$3,659,864	\$2,049,270	\$6,858	\$2,056,127		\$16,537,108
14	Total	\$214,420,010	\$29,594,922	\$45,803,206	\$719,565	\$76,117,693	\$34,385,488	\$5,893,323	\$40,278,811	\$0	\$330,816,514
<u>Less: HVM Discount</u>											
15	January 2012	\$0		(\$0)		(\$0)	(\$4,499)	(\$5,003)	(\$9,502)		(\$9,502)
16	February 2012	\$0		(\$472)		(\$472)	(\$12,778)	(\$11,226)	(\$24,004)		(\$24,476)
17	March 2012	\$0		(\$393)		(\$393)	(\$11,066)	(\$11,069)	(\$22,135)		(\$22,528)
18	April 2012	\$0		(\$338)		(\$338)	(\$9,790)	(\$9,200)	(\$18,990)		(\$19,329)
19	May 2012	\$0		(\$295)		(\$295)	(\$8,939)	(\$8,309)	(\$17,248)		(\$17,543)
20	June 2012	\$0		(\$340)		(\$340)	(\$9,364)	(\$8,573)	(\$17,937)		(\$18,278)
21	July 2012	\$0		(\$376)		(\$376)	(\$10,043)	(\$7,804)	(\$17,847)		(\$18,223)
22	August 2012	\$0		(\$382)		(\$382)	(\$9,876)	(\$7,819)	(\$17,695)		(\$18,077)
23	September 2012	\$0		(\$342)		(\$342)	(\$9,971)	(\$7,273)	(\$17,244)		(\$17,586)
24	October 2012	\$0		(\$256)		(\$256)	(\$8,156)	(\$6,436)	(\$14,592)		(\$14,848)
25	November 2012	\$0		(\$246)		(\$246)	(\$7,408)	(\$6,331)	(\$13,739)		(\$13,985)
26	December 2012	\$0		(\$281)		(\$281)	(\$8,976)	(\$6,471)	(\$15,447)		(\$15,727)
27	January 2013	\$0		(\$168)		(\$168)	(\$4,609)	(\$2,641)	(\$7,250)		(\$7,417)
28	Total	\$0	\$0	(\$3,891)	\$0	(\$3,891)	(\$115,474)	(\$98,155)	(\$213,629)	\$0	(\$217,520)
<u>SOS Expenses</u>											
29	January 2012	\$22,364,871	\$3,394,106	\$5,568,366	\$138,056	\$9,100,528	\$4,431,300	\$1,036,362	\$5,467,661		\$36,933,061
30	February 2012	\$19,177,846	\$3,103,660	\$5,018,504	\$99,541	\$8,221,705	\$3,666,963	\$917,320	\$4,584,284		\$31,983,835
31	March 2012	\$14,812,756	\$2,598,301	\$4,131,731	\$79,378	\$6,809,411	\$2,963,685	\$744,469	\$3,708,153		\$25,330,320
32	April 2012	\$13,540,861	\$2,114,235	\$3,566,345	\$202	\$5,680,782	\$2,015,587	\$520,827	\$2,536,414		\$21,758,057
33	May 2012	\$14,279,167	\$2,425,091	\$3,630,762	\$61,419	\$6,117,272	\$2,019,879	\$562,835	\$2,582,714		\$22,979,152
34	June 2012	\$16,913,153	\$2,525,571	\$4,162,259	\$52,217	\$6,740,047	\$2,251,958	\$641,666	\$2,893,624		\$26,546,823
35	July 2012	\$23,184,827	\$2,668,966	\$4,171,514	\$54,268	\$6,894,748	\$2,886,329	(\$181,777)	\$2,704,552		\$32,784,127
36	August 2012	\$22,941,799	\$2,715,851	\$3,991,963	\$49,161	\$6,756,975	\$2,472,201	\$225,397	\$2,697,598		\$32,396,372
37	September 2012	\$14,555,701	\$1,901,443	\$2,891,897	\$44,553	\$4,837,894	\$2,085,739	\$178,920	\$2,264,659		\$21,658,254
38	October 2012	\$13,986,255	\$1,795,951	\$2,815,573	\$59,661	\$4,671,184	\$2,035,083	\$199,112	\$2,234,195		\$20,891,634
39	November 2012	\$16,619,894	\$1,913,323	\$3,068,631	\$72,809	\$5,054,762	\$1,991,262	\$215,390	\$2,206,651		\$23,881,308
40	December 2012	\$19,525,627	\$2,609,209	\$3,564,325	\$91,840	\$6,265,373	\$2,724,878	\$259,800	\$2,984,679		\$28,775,678
41	Total	\$211,902,758	\$29,765,707	\$46,581,868	\$803,105	\$77,150,680	\$31,544,863	\$5,320,321	\$36,865,183	\$0	\$325,918,622
42	Subtotal Over(Under) Recoveries	\$2,517,252	(\$170,784)	(\$782,553)	(\$83,541)	(\$1,036,878)	\$2,725,151	\$474,847	\$3,199,998	\$0	\$4,680,372
43	Allocated Residential Group Adjustment	\$14,298									\$14,298
44	Allocated Commercial Group Adjustment		(\$3,799)	(\$17,408)	(\$1,858)	(\$23,066)					(\$23,066)
45	Allocated Industrial Group Adjustment						\$12,365	\$2,155	\$14,519	\$0	\$14,519
46	Allocated Residential Group Interest	\$36,117									\$36,117
47	Allocated Commercial Group Interest		(\$2,491)	(\$11,413)	(\$1,218)	(\$15,122)					(\$15,122)
48	Allocated Industrial Group Interest						\$39,055	\$6,805	\$45,860	\$0	\$45,860
49	Total Over(Under) Recovery - \$	\$2,567,667	(\$177,074)	(\$811,374)	(\$86,618)	\$0	\$2,776,571	\$478,908	\$3,260,378	\$0	\$4,752,979
50	Total Over(Under) Recovery - %	1.20%	-0.60%	-1.77%	-12.04%	0.00%	8.07%	8.13%	8.09%	0.00%	1.44%

Line Descriptions:

1-13	per Company records; see also Docket No. 4391, Schedule JAL-2, page 7, column (a), page 12, column (a) and page 16, column (b)	44	adjustment per Docket No. 4391, Schedule JAL-2, page 11, column (e), x (Line 42 ÷ Line 42 Total Commercial Group)
14	sum of Lines 1 through 13	45	adjustment per Docket No. 4391, Schedule JAL-2, page 6, column (e), x (Line 42 ÷ Line 42 Total Industrial Group)
15-27	per Company records; see also Docket No. 4391, Schedule JAL-2, page 7, column (b) and page 12, column (b)	46	interest per Docket No. 4391, Schedule JAL-2, page 16
28	sum of Lines 15 through 27	47	interest per Docket No. 4391, Schedule JAL-2, page 11, x (Line 42 ÷ Line 42 Total Commercial Group)
29-40	per Company records; see also Docket No. 4391, Schedule JAL-2, page 6, column (d), page 11, column (d) and page 16, column (d)	48	interest per Docket No. 4391, Schedule JAL-2, page 6, x (Line 42 ÷ Line 42 Total Industrial Group)
41	sum of Lines 29 through 40	49	sum of Lines 42 through 48
42	Line 14 + Line 28 + Line 41	50	Line 49 ÷ (Line 14 + Line 28)
43	adjustment per Docket No. 4391, Schedule JAL-2, page 16, column (e)		

2012 Standard Offer Service Administrative Cost Over(Under) Recovery by Rate Class

Line No.	A16/A60 - Residential Group	C06	G02	Streetlights	Total Commercial Group	B32/G32	B62/G62/X01	Total Industrial Group	M1	Grand Total	
<u>Standard Offer Service Administrative Cost Revenue</u>											
1	January 2012	\$122,567	\$17,331	\$28,438	\$703	\$46,472	\$22,672	\$5,302	\$27,974	\$197,013	
2	February 2012	\$266,598	\$39,124	\$65,307	\$1,297	\$105,728	\$53,601	\$13,409	\$67,010	\$439,336	
3	March 2012	\$257,872	\$40,073	\$63,784	\$1,226	\$105,083	\$51,193	\$12,860	\$64,053	\$427,008	
4	April 2012	\$248,605	\$40,964	\$65,862	\$4	\$106,830	\$48,892	\$12,848	\$61,740	\$417,175	
5	May 2012	\$224,121	\$37,248	\$55,877	\$944	\$94,069	\$45,389	\$12,738	\$58,127	\$376,317	
6	June 2012	\$259,608	\$40,298	\$66,442	\$831	\$107,572	\$49,477	\$14,092	\$63,569	\$430,749	
7	July 2012	\$356,677	\$46,621	\$72,837	\$948	\$120,407	\$54,708	\$3,273	\$57,980	\$535,064	
8	August 2012	\$414,976	\$52,735	\$77,505	\$954	\$131,194	\$57,326	\$5,214	\$62,541	\$608,711	
9	September 2012	\$354,218	\$48,213	\$73,453	\$1,132	\$122,798	\$55,933	\$4,799	\$60,732	\$537,748	
10	October 2012	\$245,179	\$36,735	\$57,615	\$1,217	\$95,567	\$45,318	\$4,434	\$49,752	\$390,498	
11	November 2012	\$239,460	\$35,393	\$56,767	\$1,349	\$93,508	\$44,615	\$4,826	\$49,441	\$382,409	
12	December 2012	\$295,753	\$41,595	\$56,816	\$1,462	\$99,872	\$46,461	\$4,430	\$50,891	\$446,516	
13	January 2013	\$187,670	\$26,171	\$34,547	\$897	\$61,614	\$28,981	\$100	\$29,081	\$278,365	
14	Total	\$3,473,303	\$502,500	\$775,250	\$12,965	\$1,290,715	\$604,567	\$98,324	\$702,891	\$0	\$5,466,909
<u>Standard Offer Service Administrative Cost Expense</u>											
15	January 2012	\$158,482	\$22,613	\$37,105	\$918	\$60,636	\$31,656	\$7,403	\$39,059	\$0	\$258,177
16	February 2012	\$258,523	\$39,457	\$65,863	\$1,308	\$106,629	\$56,340	\$14,094	\$70,434	\$0	\$435,586
17	March 2012	\$265,857	\$40,724	\$64,819	\$1,246	\$106,789	\$52,164	\$13,103	\$65,267	\$0	\$437,913
18	April 2012	\$247,605	\$37,435	\$60,188	\$3	\$97,626	\$40,474	\$10,637	\$51,111	\$0	\$396,342
19	May 2012	\$231,976	\$36,000	\$54,005	\$913	\$90,917	\$33,469	\$9,393	\$42,862	\$0	\$365,755
20	June 2012	\$265,811	\$38,353	\$63,235	\$791	\$102,379	\$35,699	\$10,167	\$45,866	\$0	\$414,056
21	July 2012	\$309,448	\$39,293	\$61,389	\$799	\$101,481	\$38,788	\$2,320	\$41,108	\$0	\$452,038
22	August 2012	\$328,236	\$40,531	\$59,568	\$733	\$100,832	\$41,068	\$3,736	\$44,803	\$0	\$473,871
23	September 2012	\$290,743	\$37,278	\$56,793	\$876	\$94,947	\$40,369	\$3,463	\$43,832	\$0	\$429,522
24	October 2012	\$234,017	\$31,514	\$49,425	\$1,044	\$81,983	\$36,873	\$3,608	\$40,481	\$0	\$356,481
25	November 2012	\$204,548	\$27,305	\$43,794	\$1,040	\$72,139	\$32,977	\$3,567	\$36,544	\$0	\$313,230
26	December 2012	\$235,210	\$32,398	\$44,254	\$1,138	\$77,790	\$36,176	\$3,449	\$39,625	\$0	\$352,626
27	January 2013	\$103,820	\$15,275	\$20,163	\$523	\$35,961	\$18,548	\$64	\$18,612	\$0	\$158,394
28	Total	\$3,134,275	\$438,174	\$680,602	\$11,334	\$1,130,110	\$494,602	\$85,005	\$579,606	\$0	\$4,843,991
29	Subtotal Over(Under) Recovery	\$339,028	\$64,326	\$94,648	\$1,631	\$160,605	\$109,965	\$13,319	\$123,285	\$0	\$622,918
30	Allocated Adjustment	(\$2,341)	(\$11,477)	(\$16,886)	(\$291)	(\$28,654)	\$5,106	\$619	\$5,725	\$0	(\$25,270)
31	Allocated Interest	\$4,803	\$754	\$1,109	\$19	\$1,883	\$1,642	\$199	\$1,841	\$0	\$8,526
32	Total Over(Under) Recovery - \$	\$341,491	\$53,604	\$78,871	\$1,359	\$133,833	\$116,713	\$14,137	\$130,850	\$0	\$606,174
33	Total Over(Under) Recovery - %	9.8%	10.7%	10.2%	10.5%	10.4%	19.3%	14.4%	18.6%	0.0%	11.1%

Line Descriptions:

- 1-13 Lines 1 through 13 per Company records; see also R.I.P.U.C. Docket No. 4391, Schedule JAL-5, page 1, column (b), page 6, column (b), and page 11, column (b)
- 14 sum of Lines 1 through 13
- 15-27 customer group totals per Company records; see also R.I.P.U.C. Docket No. 4391 Schedule JAL-5, page 1, column (c), page 6, column (c), and page 11, column (c); rate class allocation = [SOS Administrative Cost Revenue per Lines 1 through 13 ÷ customer group total per Lines 1 through 13] x customer group total per Lines 15 through 27
- 28 sum of lines 15 through 27
- 29 Line 14 - Line 28
- 30 customer group totals per R.I.P.U.C. Docket No. 4391 Schedule JAL-5, page 1, column (e), page 6, column (e), and page 11, column (e); rate class allocation = [Line 29 ÷ customer group total per Line 29] x customer group total per Line 30
- 31 customer group totals per R.I.P.U.C. Docket No. 4391 Schedule JAL-5, page 1, page 6, and page 11; rate class allocation = [Line 29 ÷ customer group total per Line 29] x customer group total per Line 31
- 32 Line 29 + Line 30 + Line 31
- 33 Line 32 ÷ Line 14

**2012 Transition Over(Under) Recovery by Rate Class**

Line No.		A16/A60	C06	G02	Streetlights	B32/G32	B62/G62/X01	M1	Grand Total
	<u>Transition Base Revenue</u>								
1	January 2012	(\$12,645)	(\$2,162)	(\$4,840)	(\$331)	(\$7,618)	(\$2,550)	\$5,670	(\$24,475)
2	February 2012	(\$12,692)	(\$2,792)	(\$5,191)	(\$298)	(\$8,071)	(\$2,113)	\$6,991	(\$24,166)
3	March 2012	(\$12,330)	(\$2,342)	(\$5,330)	(\$283)	(\$8,488)	(\$2,382)	\$7,000	(\$24,154)
4	April 2012	\$58,876	\$11,490	\$28,575	\$2,511	\$44,430	\$6,721	\$7,000	\$159,602
5	May 2012	\$157,840	\$32,871	\$74,001	\$3,524	\$128,384	\$34,908	\$7,148	\$438,676
6	June 2012	\$185,729	\$36,956	\$89,493	\$3,123	\$139,668	\$37,761	\$7,099	\$499,829
7	July 2012	\$255,291	\$42,640	\$98,652	\$3,568	\$145,708	\$37,899	\$7,110	\$590,868
8	August 2012	\$296,924	\$48,103	\$105,975	\$3,599	\$156,523	\$45,091	\$7,000	\$663,215
9	September 2012	\$253,660	\$44,300	\$102,507	\$4,274	\$155,092	\$42,503	\$7,000	\$609,336
10	October 2012	\$175,740	\$34,288	\$81,328	\$4,526	\$128,506	\$38,336	\$7,237	\$469,960
11	November 2012	\$171,972	\$33,097	\$79,805	\$4,972	\$127,369	\$37,910	\$7,203	\$462,329
12	December 2012	\$212,473	\$38,281	\$80,330	\$5,405	\$129,351	\$36,024	\$7,080	\$508,943
13	January 2013	\$34,073	\$5,926	\$11,961	\$869	\$19,064	\$4,989	\$1,011	\$77,893
14	Total	\$1,764,911	\$320,655	\$737,267	\$35,461	\$1,149,917	\$315,098	\$84,549	\$4,407,857
	<u>Transition Expense</u>								
15	January 2012	\$93,412	\$15,488	\$34,001	\$2,450	\$57,634	\$18,346	\$9	\$221,340
16	February 2012	\$213,059	\$38,720	\$84,663	\$4,841	\$132,336	\$33,649	\$184	\$507,451
17	March 2012	\$205,679	\$38,476	\$83,979	\$4,579	\$142,447	\$39,150	\$0	\$514,309
18	April 2012	\$189,814	\$37,081	\$86,546	\$4,363	\$137,119	\$36,503	\$0	\$491,426
19	May 2012	\$163,858	\$33,876	\$76,516	\$3,561	\$133,680	\$36,385	\$183	\$448,060
20	June 2012	\$191,484	\$37,836	\$92,029	\$3,162	\$144,455	\$38,042	\$122	\$507,131
21	July 2012	\$264,700	\$43,593	\$100,926	\$3,609	\$151,503	\$37,859	\$136	\$602,324
22	August 2012	\$305,360	\$49,184	\$107,548	\$3,640	\$161,271	\$45,533	\$0	\$672,534
23	September 2012	\$261,438	\$45,317	\$104,415	\$4,325	\$160,772	\$43,140	\$0	\$619,408
24	October 2012	\$180,995	\$34,934	\$82,506	\$4,573	\$132,526	\$38,858	\$293	\$474,685
25	November 2012	\$177,427	\$33,901	\$81,171	\$5,031	\$131,138	\$39,082	\$251	\$468,001
26	December 2012	\$219,484	\$39,477	\$82,095	\$5,469	\$133,948	\$37,716	\$98	\$518,288
27	Total	\$2,466,710	\$447,882	\$1,016,395	\$49,603	\$1,618,829	\$444,262	\$1,276	\$6,044,957
28	Subtotal Over(Under) Recovery	(\$701,799)	(\$127,226)	(\$279,129)	(\$14,143)	(\$468,913)	(\$129,164)	\$83,273	(\$1,637,100)
29	Allocated Adjustment	\$51,721	\$9,376	\$20,571	\$1,042	\$34,558	\$9,519	(\$6,137)	\$120,650
30	Subtotal	(\$650,078)	(\$117,850)	(\$258,558)	(\$13,100)	(\$434,355)	(\$119,645)	\$77,136	(\$1,516,450)
31	Allocated Interest	(\$15,271)	(\$2,768)	(\$6,074)	(\$308)	(\$10,203)	(\$2,811)	\$1,812	(\$35,622)
32	2012 Transition Over(Under) Recovery - \$	(\$665,349)	(\$120,618)	(\$264,632)	(\$13,408)	(\$444,558)	(\$122,455)	\$78,948	(\$1,552,073)
33	2012 Transition Over(Under) Recovery - %	-37.7%	-37.6%	-35.9%	-37.8%	-38.7%	-38.9%	93.4%	-35.2%

Line Descriptions:

1-13	per Company records; see also Docket No. 4391, Schedule JAL-9, page 1, column (b)	29	Adjustment per R.I.P.U.C. Docket No. 4391, Schedule JAL-9, page 1, column (e) x (Line 28 ÷ Line 28 Total)
14	sum of Line 1 through 13	30	Line 28 + Line 29
15-26	per Company records; see also Docket No. 4391, Schedule JAL-9, page 1, column (c)	31	Interest per R.I.P.U.C. Docket No. 4391, Schedule JAL-9, page 1, column (f) x (Line 30 ÷ Line 30 Total)
27	sum of Line 15 through 26	32	Line 30 + Line 31
28	Line 14 - Line 27	33	Line 32 ÷ Line 14

**2012 Transmission Over(Under) Recovery by Rate Class**

Line No.		A-16/A60	C-06	G-02	B-32 / G-32	B-62/ G-62/ X-01	Streetlights	Total
1	2012 Transmission Base Revenue	\$58,331,974	\$10,384,979	\$23,215,155	\$29,849,590	\$7,613,912	\$681,930	\$130,077,541
2	2012 Transmission Uncollectible Factor Revenue Revenue	\$541,421	\$95,732	\$194,595	\$265,260	\$73,348	\$5,891	\$1,176,247
3	2012 Transmission Base and Uncollectible Factor Revenue	\$58,873,395	\$10,480,711	\$23,409,750	\$30,114,851	\$7,687,260	\$687,821	\$131,253,788
4	Allocated 2012 Transmission Over(Under) Recovery - \$	\$3,865,732	(\$161,069)	\$2,089,764	(\$742,284)	\$856,036	(\$131,901)	\$5,776,278
5	Transmission Uncollectible Over(Under) Collection Balance as of Dec 2012	(\$42,885)	(\$8,769)	(\$37,670)	(\$35,279)	(\$2,791)	(\$987)	(\$128,380)
6	Total Over(Under) Recovery	\$3,822,847	(\$169,837)	\$2,052,095	(\$777,563)	\$853,245	(\$132,888)	\$5,647,898
7	Allocated 2012 Transmission Over(Under) Recovery - %	6.5%	-1.6%	8.8%	-2.6%	11.1%	-19.3%	4.3%

Line Descriptions:

- 1 per R.I.P.U.C. Docket No. 4391, Schedule JAL-11, page 2, Line 1
- 2 per R.I.P.U.C. Docket No. 4391, Schedule JAL-14, page 1, Line 2
- 3 Line 1 + Line 2
- 4 per R.I.P.U.C. Docket No. 4391, Schedule JAL-12, page 1, Line 1
- 5 per R.I.P.U.C. Docket No. 4391, Schedule JAL-14, page 1, Line 9
- 6 sum of Lines 4 through 5
- 7 Line 6 ÷ Line 3

The Narragansett Electric Company  
d/b/a National Grid  
Docket Nos. 4315 & 4391  
In re: 2013 Electric Retail Rate Filing &  
2013 Renewable Energy Standard Charge and Reconciliation  
Responses to Commission Data Requests – Set 1  
Issued March 8, 2013

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Commission 1-3

Request:

Please expand the Summary Schedule JLL-1, page 2 to include the Retail Filings for 2011, 2010 and 2009, showing the year over year increase between each year along with a cumulative for the five-year period.

Response:

Please see Attachment 1, page 1 of 1 of Data Request 1-3 for the requested information.

Prepared by or under the supervision of: James L. Loschiavo

Narragansett Electric Company  
 Summary of Transmission Expenses  
 2009 - 2013 Filing Year Trend

The Narragansett Electric Company  
 d/b/a National Grid  
 Docket Nos. 4315 & 4391  
 In re: 2013 Electric Retail Rate Filing &  
 2013 Renewable Energy Standard Charge and Reconciliation  
 Responses to Commission Data Requests - Set 1  
 Data Request 1-3  
 Attachment 1 Page 1 of 1  
 Issued March 8, 2013

Ln#		2009 Retail Filing	2010 Retail Filing	Yr/Yr Incr/(Decr)	2010 Retail Filing	2011 Retail Filing	Yr/Yr Incr/(Decr)	2011 Retail Filing	2012 Retail Filing	Yr/Yr Incr/(Decr)	2012 Retail Filing	2013 Retail Filing	Yr/Yr Incr/(Decr)	Total Five-Year Cumulative
1	NEP Charges													
2	Non-PTF	\$ 25,766,797	\$ 16,027,737	\$ (9,739,060)	\$ 16,027,737	\$ 14,027,205	\$ (2,000,532)	\$ 14,027,205	\$ 24,904,251	\$ 10,877,046	\$ 24,904,251	\$ 27,049,194	\$ 2,144,943	\$ 107,775,184
	Other NEP Charges	964,518	1,272,798	308,280	1,272,798	971,204	(301,594)	971,204	1,021,792	50,588	1,021,792	675,516	(346,276)	4,905,828
3	<b>Subtotal</b>	<b>\$ 26,731,315</b>	<b>\$ 17,300,535</b>	<b>\$ (9,430,780)</b>	<b>\$ 17,300,535</b>	<b>\$ 14,998,409</b>	<b>\$ (2,302,126)</b>	<b>\$ 14,998,409</b>	<b>\$ 25,926,043</b>	<b>\$ 10,927,634</b>	<b>\$ 25,926,043</b>	<b>\$ 27,724,710</b>	<b>\$ 1,798,667</b>	<b>\$ 112,681,012</b>
4	ISO Charges													
5	PTF	\$ 68,462,301	\$ 84,031,125	\$ 15,568,824	\$ 84,031,125	\$ 97,982,045	\$ 13,950,920	\$ 97,982,045	\$ 103,116,744	\$ 5,134,699	\$ 103,116,744	\$ 111,837,544	\$ 8,720,800	\$ 465,429,759
6	Scheduling & Dispatch	1,653,976	1,901,693	247,717	1,901,693	2,318,355	416,662	2,318,355	2,109,417	(208,938)	2,109,417	2,395,542	286,125	10,378,983
7	Load Response	805,440	362,239	(443,201)	362,239	549,062	186,823	549,062	19,049	(530,013)	19,049	-	(19,049)	1,735,790
8	Black Start	650,309	634,464	(15,845)	634,464	748,141	113,677	748,141	639,981	(108,160)	639,981	1,010,391	370,410	3,683,286
9	Reactive Power	3,963,174	1,395,219	(2,567,955)	1,395,219	1,630,779	235,560	1,630,779	1,502,355	(128,424)	1,502,355	1,594,663	92,308	10,086,190
9	<b>Subtotal</b>	<b>\$ 75,535,200</b>	<b>\$ 88,324,740</b>	<b>\$ 12,789,540</b>	<b>\$ 88,324,740</b>	<b>\$ 103,228,382</b>	<b>\$ 14,903,642</b>	<b>\$ 103,228,382</b>	<b>\$ 107,387,546</b>	<b>\$ 4,159,164</b>	<b>\$ 107,387,546</b>	<b>\$ 116,838,140</b>	<b>\$ 9,450,594</b>	<b>\$ 491,314,008</b>
10	ISO Administrative													
11	Sched 1 Scheduling & Dispatch	\$ 1,609,368	\$ 1,665,777	\$ 56,409	\$ 1,665,777	\$ 2,389,862	\$ 724,085	\$ 2,389,862	\$ 2,093,923	\$ (295,939)	\$ 2,093,923	\$ 2,294,981	\$ 201,058	\$ 10,053,911
11	Sched 5 NESCOE	42,440	82,390	39,950	82,390	69,434	(12,956)	69,434	134,716	65,282	134,716	137,305	2,589	466,285
12	<b>Subtotal</b>	<b>\$ 1,651,808</b>	<b>\$ 1,748,167</b>	<b>\$ 96,359</b>	<b>\$ 1,748,167</b>	<b>\$ 2,459,296</b>	<b>\$ 711,129</b>	<b>\$ 2,459,296</b>	<b>\$ 2,228,639</b>	<b>\$ (230,657)</b>	<b>\$ 2,228,639</b>	<b>\$ 2,432,286</b>	<b>\$ 203,647</b>	<b>\$ 10,520,196</b>
13	<b>Total Expenses</b>	<b>\$ 103,918,323</b>	<b>\$ 107,373,442</b>	<b>\$ 3,455,119</b>	<b>\$ 107,373,442</b>	<b>\$ 120,686,087</b>	<b>\$ 13,312,645</b>	<b>\$ 120,686,087</b>	<b>\$ 135,542,228</b>	<b>\$ 14,856,141</b>	<b>\$ 135,542,228</b>	<b>\$ 146,995,136</b>	<b>\$ 11,452,908</b>	<b>\$ 614,515,216</b>

The Narragansett Electric Company  
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Commission 1-4

Request:

Based on National Grid's involvement in the transmission market, what magnitude of increases does the Company project for transmission costs over the next five years?

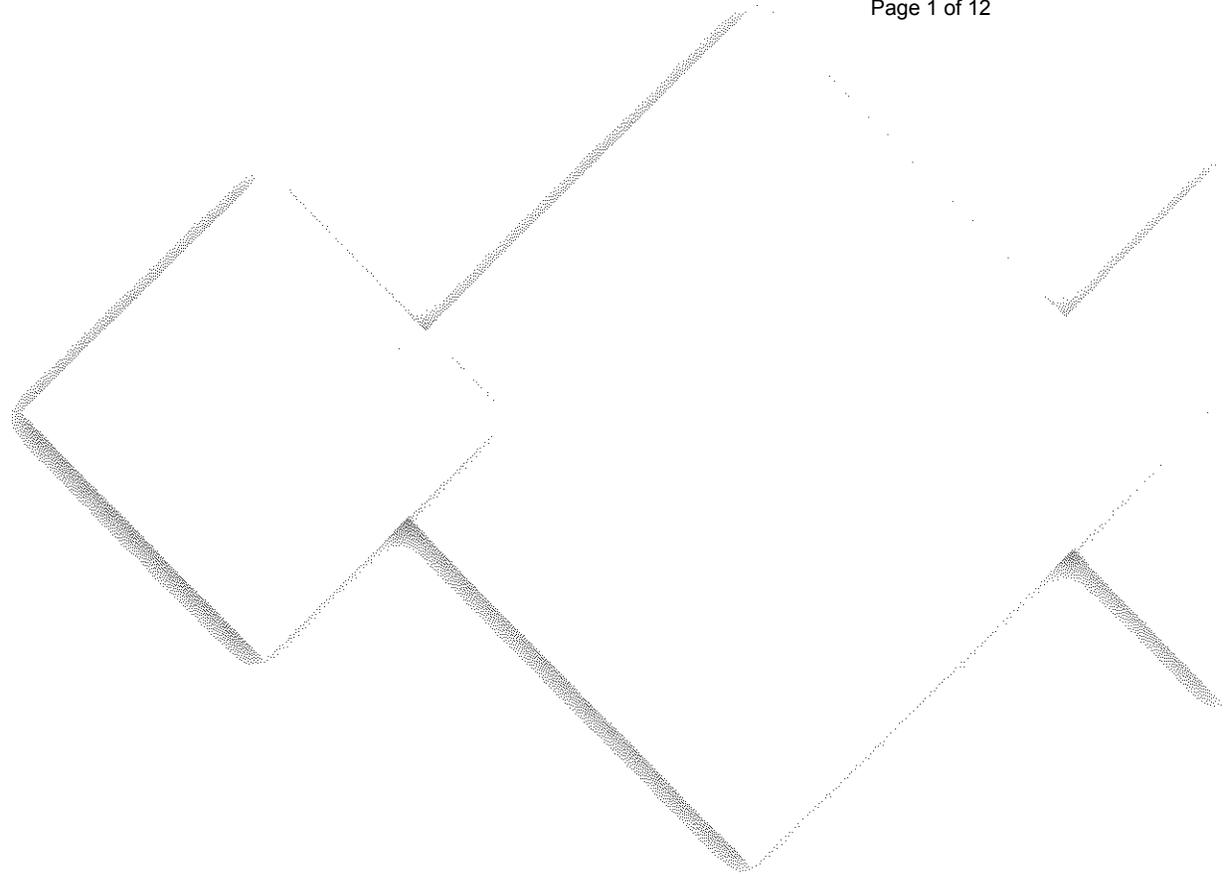
Response:

Please see the Five-Year Regional Network Rate forecast presentation compiled by the Participating Transmission Owners Administrative Committee (PTOAC) Rates Working Group. This presentation was given at the NEPOOL Reliability/Transmission Committee Meeting held on August 13-15, 2012.

Slide #7 of the presentation shows the forecasted rise in the Regional Network Service rate through 2016.

Slides #9-12 show the individual and total Transmission Owners Pooled Transmission Facilities (PTF) in-service dollar projections for calendar years 2013-2016 and resulting forecasted incremental revenue requirements for each of those years.

Prepared by or under the supervision of: James L. Loschiavo



# RNS Rates – Five Year Forecast

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PTO AC - Rates Working Group - Presentation

NEPOOL Reliability Committee / Transmission Committee – Summer Meeting

August 13-15, 2012

## **Presentation Overview**

- **2012 Forecast Comparison - Summary**
- **2012 Forecast Comparison - Detail**
- **2013 – 2016 Forecast - Disclaimer**
- **2013 – 2016 Forecast - Summary**
- **New England RNS Rate Forecast - Summary**
- **Appendix – RNS Rate Forecast Components**
  - **2013 Forecast Components**
  - **2014 Forecast Components**
  - **2015 Forecast Components**
  - **2016 Forecast Components**

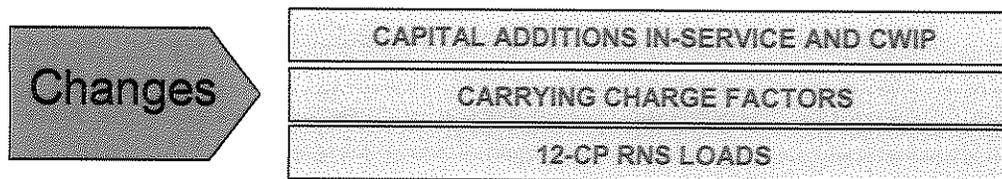
## 2012 Forecast Comparison - Summary

### PTO AC initially estimated \$1,994M of PTF Additions in service and Construction Work In Progress (“CWIP”) for MPRP and NEEWS in 2012

- ◆ This level of projected PTF Additions and CWIP resulted in:
  - Forecasted RNS revenue requirement of \$332M with an estimated RNS Rate Impact of \$15.72/kW-Yr.
    - Based on actual 2010 Carrying Charge Factors & 12CP RNS Load (21,086 MW)

### RNS Rate effective June 1, 2012 includes an estimated \$1,302M of PTF Additions in service and CWIP for MPRP and NEEWS in 2012

- ◆ This level of projected PTF Additions and CWIP results in:
  - Forecasted RNS revenue requirement of \$202M with an estimated RNS Rate Impact of \$10.05/kW-Yr.
    - Based on actual 2011 Carrying Charge Factors & 12CP RNS Load (20,178 MW)



## 2012 Forecast Comparison - Detail

Participating Transmission Owner	2012 Forecast Provided at the 2011 RC/TC Summer Meeting		Actual June 1, 2012 RNS Rate		Variance Impact (\$/kW-Yr)
	2012 Projected PTF Additions (including CWIP) (\$ in Millions)	Forecasted RNS Revenue Requirements (\$ in Millions)	2012 Projected PTF Additions (including CWIP) (\$ in Millions)	Forecasted RNS Revenue Requirements (\$ in Millions)	
BHE	64	11	76	13	\$0.12
CMP	798	134	364	54	(\$3.65)
CTMEEC (a)	-	-	51	2	\$0.08
Highgate	36	6	-	-	(\$0.30)
HG&E	4	1	4	1	\$0.01
NHT	8	2	6	1	(\$0.02)
NGRID	348	55	237	37	(\$0.77)
NSTAR	204	28	88	12	(\$0.73)
NU	383	67	366	61	(\$0.14)
UI	85	17	70	14	(\$0.12)
VT Transco	64	11	40	7	(\$0.15)
<b>Total</b>	<b>1,994</b>	<b>332</b>	<b>1,302</b>	<b>202</b>	
RNS Rate Incremental Impact (\$/kW-Yr)	<b>\$15.72</b>		<b>\$10.05</b>		<b>(\$5.67)</b>

(a) Not a projected PTF addition; current PTF Facility Cost used to calculate additional revenue requirements to establish an initial full calendar year of cost data.

Note: Figures may be off slightly due to rounding.

## 2013 - 2016 Forecast - Disclaimer

*The 2013-2016 forecast herein provides an indicative RNS rate trend; it should be used for illustrative purposes only.*

*The estimated data utilized by the PTO AC to develop this forecast of RNS rates is based upon estimated capital additions provided to the Committee by all the New England Transmission Owners. Estimates for 2013 capital additions will be finalized during the normal course of update to the RNS rate effective June 1, 2013 and will reflect more current information.*

*The PTO AC acknowledges that this 2013-2016 forecast is based on a number of assumptions and variables including, among others, estimated project need, design, scope, labor & materials costs, inflation, site & permitting approvals, transmission in-service dates, estimated carrying charges & coincident peak network loads. It is therefore expected that such estimates and assumptions will change over time as more current data become available.*

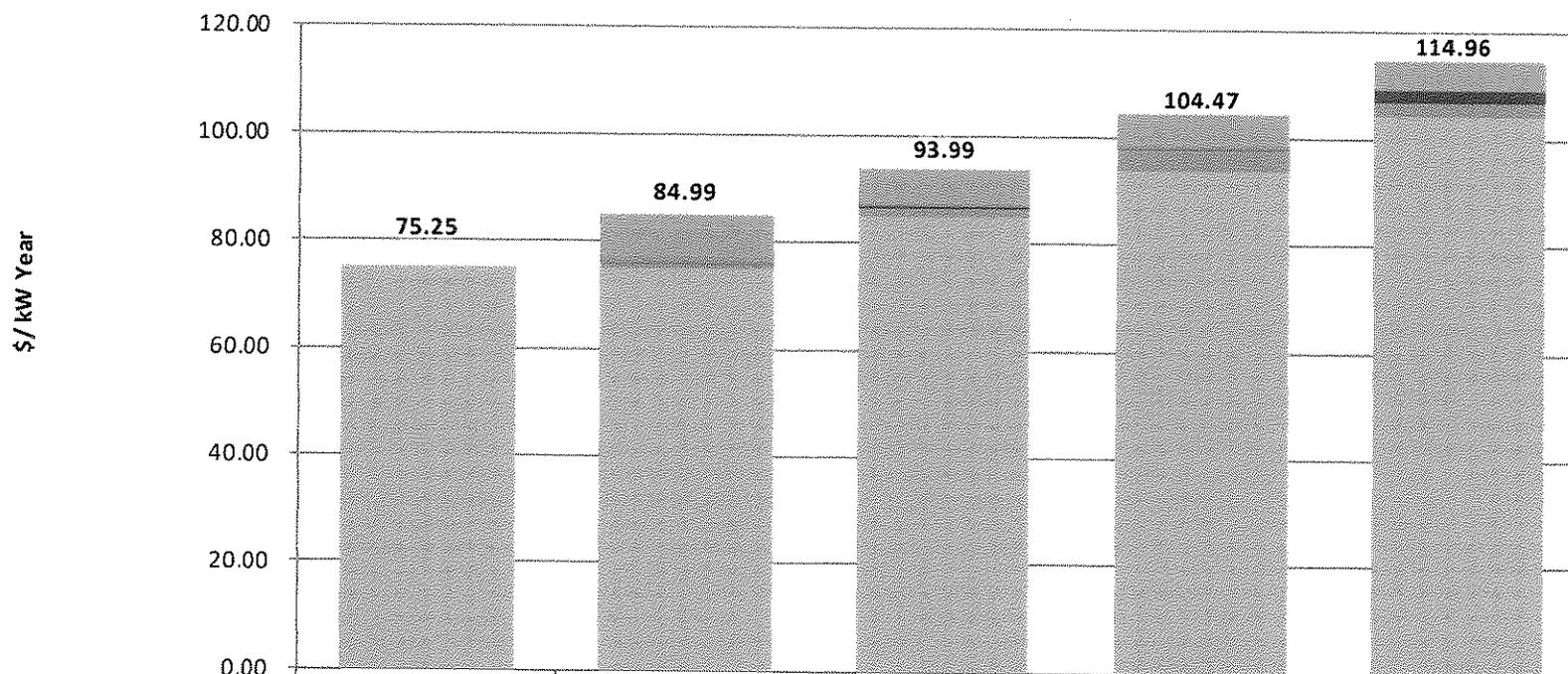
*In addition, the 2013-2016 forecast reflects gross costs and does not include assumptions pertaining to savings (e.g., associated with congestion, unlocked capacity, etc.) or prior year true-up adjustments.*

## 2013 - 2016 Forecast - Summary

	2013	2014	2015	2016
Estimated Additions In-Service and CWIP (\$M)	1,172	1,184	1,330	1,246
Forecasted Revenue Requirement (\$M)	197	182	212	212
Estimated RNS Rate Impact (\$/kW-Yr)	10	9	10	11
Estimated RNS Rate Forecast (\$/kW-Yr)	85	94	104	115
Estimated RNS Rate Forecast (\$/kWh) <i>Assumes a 60% Load Factor</i>	0.016	0.018	0.020	0.022

Forecast is preliminary and for illustrative purposes only. Estimates are consistent with the June 2012 RSP and do not reflect revised ISO forecasts. Figures may be off slightly due to rounding.

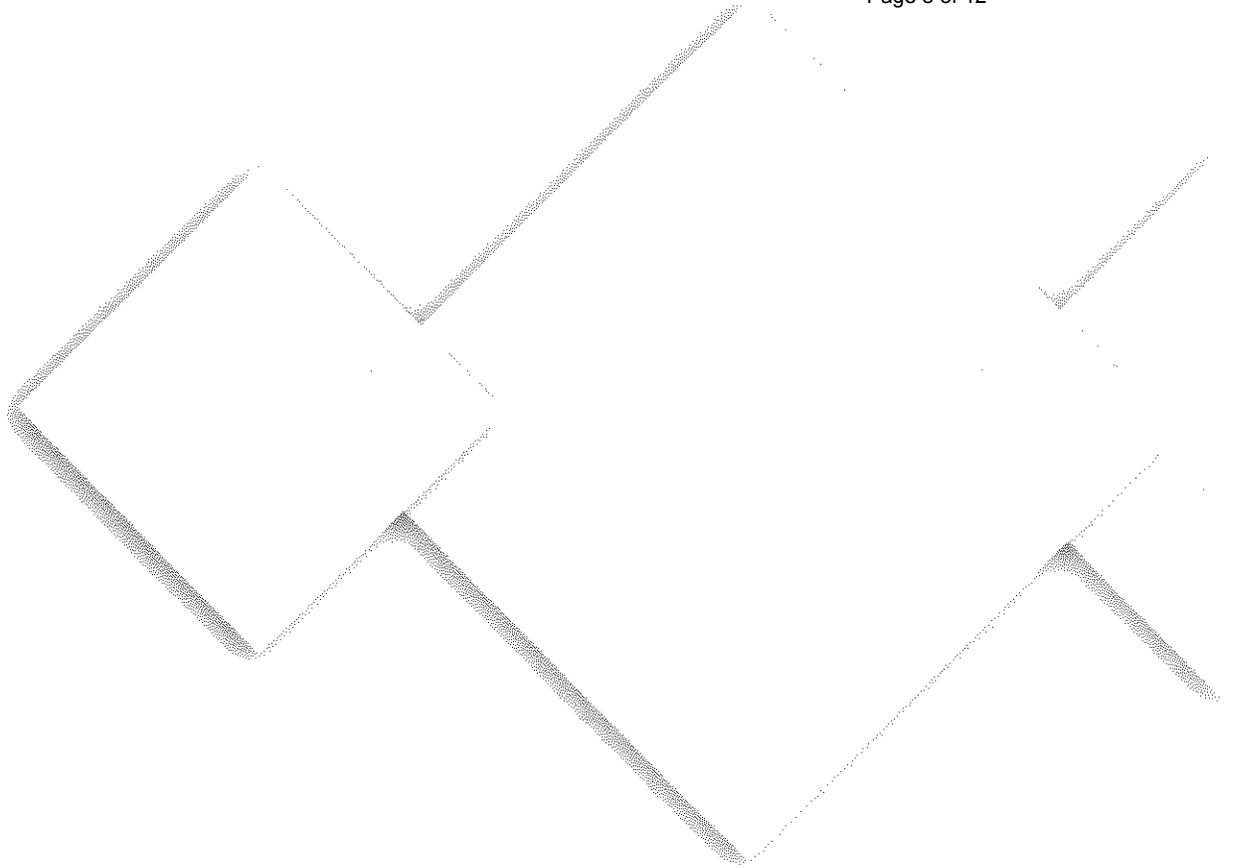
## New England RNS Rate Forecast – Summary



	2012	2013	2014	2015	2016
RSP-Proposed, Planned, UC		12.08	6.71	5.95	7.64
CWIP		(4.36)	(0.17)	(0.44)	(2.13)
RSP- Proposed, Planned, UC (net of CWIP)		7.72	6.53	5.51	5.51
Other PTF		1.48	0.49	0.92	0.35
RSP-Concept		0.00	0.41	0.03	1.86
Future RSP		0.53	1.57	4.02	2.77
Prior Year Rate	75.25	75.25	84.99	93.99	104.47

Total RNS Rate Effective June 1	75.25	84.99	93.99	104.47	114.96
\$/kWh	.014	.016	.018	.020	.022

Forecast is preliminary and for illustrative purposes only. Estimates are consistent with the June 2012 RSP and do not reflect revised ISO forecasts. Figures may be off slightly due to rounding.



## Appendix-

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### RNS Rate Forecast Components

## 2013 Forecast Components

Participating Transmission Owner	2013 Projected PTF Additions (including CWIP) (\$ in Millions)	Forecasted RNS Revenue Requirements (\$ in Millions)	RNS Rate Impact (\$/kW-Yr)	Key Drivers - Major Projects >\$50M
BHE	0	0	0.00	
CMP	225	30	1.50	Maine Power Reliability Project (MPRP)
CTMEEC	2	0	0.00	
HG&E	0	0	0.00	
NHT	4	1	0.04	
NGRID	308	48	2.37	New England East-West Solution (NEEWS), Western MA Study
NSTAR	172	24	1.17	Lower Southeastern MA
NU	393	81	4.03	New England East-West Solution (NEEWS)
UI	36	7	0.35	
VT Transco	32	6	0.28	
<b>Total</b>	<b>1,172</b>	<b>197</b>	<b>9.74</b>	

Forecast is preliminary and for illustrative purposes only. Estimates are consistent with the June 2012 RSP and do not reflect revised ISO forecasts. Figures may be off slightly due to rounding.

## 2014 Forecast Components

Participating Transmission Owner	2014 Projected PTF Additions (including CWIP) (\$ in Millions)	Forecasted RNS Revenue Requirements (\$ in Millions)	RNS Rate Impact (\$/kW-Yr)	Key Drivers - Major Projects >\$50M
BHE	0	0	0.00	
CMP	289	42	2.06	Maine Power Reliability Project (MPRP)
CTMEEC	0	0	0.00	
HG&E	0	0	0.00	
NHT	4	1	0.04	
NGRID	220	34	1.69	New England East-West Solution (NEEWS), Western MA Study
NSTAR	200	27	1.36	
NU	436	72	3.53	New England East-West Solution (NEEWS), NH 10 Year Projects
UI	11	2	0.11	
VT Transco	24	4	0.21	
<b>Total</b>	<b>1,184</b>	<b>182</b>	<b>9.00</b>	

Forecast is preliminary and for illustrative purposes only. Estimates are consistent with the June 2012 RSP and do not reflect revised ISO forecasts. Figures may be off slightly due to rounding.

## 2015 Forecast Components

Participating Transmission Owner	Forecasted RNS Revenue Requirements (\$ in Millions)	Forecasted RNS Revenue Requirements (\$ in Millions)	RNS Rate Impact (\$/kW-Yr)	Key Drivers - Major Projects >\$50M
BHE	0	0	0.00	
CMP	361	53	2.63	Maine Power Reliability Project (MPRP)
CTMEEC	0	0	0.00	
HG&E	0	0	0.00	
NHT	25	5	0.23	
NGRID	270	42	2.07	New England East-West Solution (NEEWS), Western MA Study
NSTAR	162	22	1.10	
NU	435	76	3.72	New England East-West Solution (NEEWS), Manchester Area Solutions, Pittsfield Greenfield Area Solution
UI	52	10	0.51	Pequonnock 115kV Fault Duty Mitigation Phase I, Shelton 115/13.8kV Substation
VT Transco	25	4	0.22	
<b>Total</b>	<b>1,330</b>	<b>212</b>	<b>10.48</b>	

Forecast is preliminary and for illustrative purposes only. Estimates are consistent with the June 2012 RSP and do not reflect revised ISO forecasts. Figures may be off slightly due to rounding.

## 2016 Forecast Components

Participating Transmission Owner	Forecasted RNS Revenue Requirements (\$ in Millions)	Forecasted RNS Revenue Requirements (\$ in Millions)	RNS Rate Impact (\$/kW-Yr)	Key Drivers - Major Projects >\$50M
BHE	0	0	0.00	
CMP	177	27	1.32	Maine Yankee-Suroweic
CTMEEC	0	0	0.00	
HG&E	0	0	0.00	
NHT	0	0	0.00	
NGRID	306	49	2.44	New England East-West Solution (NEEWS), Western MA Study
NSTAR	199	27	1.35	Woburn to North Cambridge 345 kV
NU	181	39	1.92	New England East-West Solution (NEEWS), Central CT Greater Hartford Solution
UI	105	21	1.04	Pequonnock 115kV Fault Duty Mitigation Phase II
VT Transco	278	49	2.42	West Rutland to Ascutney
<b>Total</b>	<b>1,246</b>	<b>212</b>	<b>10.49</b>	

Forecast is preliminary and for illustrative purposes only. Estimates are consistent with the June 2012 RSP and do not reflect revised ISO forecasts. Figures may be off slightly due to rounding.

The Narragansett Electric Company  
d/b/a National Grid  
Docket Nos. 4315 & 4391  
In re: 2013 Electric Retail Rate Filing &  
2013 Renewable Energy Standard Charge and Reconciliation  
Responses to Commission Data Requests – Set 1  
Issued March 8, 2013

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Commission 1-5

Request:

In what year does National Grid expect Transition Charges to cease? Please explain.

Response:

It is currently anticipated that the Transition Charges related to National Grid's former wholesale electric generation operations will cease in the year 2020 as shown on Schedule 1, Page 1 of its December 3, 2012 filings for the Reconciliation of Contract Termination Charge to Narragansett Electric and Reconciliation of Contract Termination Charge to Blackstone Valley Electric and Newport Electric. This is the year in which the last of National Grid's power supply contracts will terminate. The Transition Charge is scheduled to decrease over time through 2020 as various power supply contracts expire. However, the Transition Charges could continue beyond 2020 for generation-related environmental remediation costs or costs associated with spent nuclear fuel of the decommissioned Yankee nuclear power stations, if any such costs are incurred during or after 2020.

Prepared by or under the supervision of: William R. Richer

The Narragansett Electric Company  
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**Redacted**  
Commission 1-6

Request:

Please provide the total Renewable Energy Certificate costs and Alternative Compliance Payment costs for Compliance Years 2010, 2011 and 2012 (actual and estimated for 2012) along with a total.

Response:

The table below shows the Company's Renewable Energy Certificate ("REC") costs and Alternative Compliance Payment ("ACP") costs associated with the Rhode Island Renewable Energy Standard ("RES") for Compliance Years 2010, 2011 and 2012.

<b>The Narragansett Electric Company</b>					
<b>Rhode Island Renewable Energy Standard (RES) Costs</b>					
<b>RI RES Compliance Year</b>	<b>TOTAL RI RES REC Costs</b>	<b>RI RES "New" REC Costs</b>	<b>RI RES "Existing" REC Costs</b>	<b>ACP Costs</b>	<b>Actual or Estimated</b>
2010	\$ 2,096,152.00	\$ 2,045,934.00	\$ 50,218.00	\$ -	Actual
2011	\$ 8,426,723.92	\$ 3,850,731.20	\$ 48,020.45	\$ 4,527,972.27	Actual

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

The Narragansett Electric Company  
d/b/a National Grid  
Docket Nos. 4315 & 4391  
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**Redacted**  
Commission 1-7

Request:

Does National Grid expect to have to make any Alternative Compliance Payments for Compliance Year 2012?

Response:

At this time, National Grid [REDACTED] Alternative Compliance Payments for the 2012 Compliance Year based on the Company's current estimate of its 2012 load obligations and 2012 Renewable Energy Certificates purchased and under contract with suppliers.

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