

October 6, 2014

**VIA HAND DELIVERY**

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

**RE: Docket 4520 - 2014 Gas Cost Recovery Filing  
Responses to Division Data Requests – Set 1**

Dear Ms. Massaro:

Enclosed please find ten (10) copies of National Grid's<sup>1</sup> responses to the first set of data requests issued by the Rhode Island Division of Public Utilities and Carriers in the above-referenced docket.

Please be advised that pursuant to PUC Rule 1.2(g), the Company is seeking confidential treatment of Attachment DIV 1-1 to Division Data Request 1-1. The Company has also provided a copy of the confidential Attachment DIV 1-1 to the Division and its consultant.

Thank you for your attention to this filing. If you have any questions, please contact me at (401) 784-7288.

Very truly yours,



Jennifer Brooks Hutchinson

Enclosures

cc: Docket 4520 Service List  
Leo Wold, Esq.  
Steve Scialabba  
Bruce Oliver

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

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below. Paper copies of this filing are being hand delivered to the RI Public Utilities Commission and to the RI Division of Public Utilities and Carriers.

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Joanne M. Scanlon

October 6, 2014

Date

**Docket No. 4520 – National Grid – 2014 Annual Gas Cost Recovery Filing (“GCR”) - Service List as of 9/11/14**

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<b>File an original &amp; nine (9) copies w/:</b> Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick RI 02888	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a>	401-780-2107
	<a href="mailto:Patricia.lucarelli@puc.ri.gov">Patricia.lucarelli@puc.ri.gov</a>	
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**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS**  
**RHODE ISLAND PUBLIC UTILITIES COMMISSION**

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**Gas Cost Recovery Filing 2014**  
**Docket No. 4520**

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**NATIONAL GRID'S REQUEST  
FOR PROTECTIVE TREATMENT OF CONFIDENTIAL INFORMATION**

National Grid<sup>1</sup> hereby requests that the Rhode Island Public Utilities Commission (PUC) provide confidential treatment and grant protection from public disclosure of certain confidential and proprietary information submitted in this proceeding, as permitted by PUC Rule 1.2(g) and R.I.G.L. § 38-2-2(4)(B). National Grid also hereby requests that, pending entry of that finding, the PUC preliminarily grant National Grid's request for confidential treatment pursuant to Rule 1.2 (g)(2).

**I. BACKGROUND**

On October 6, 2014, National Grid filed with the PUC its response to the Division of Public Utilities and Carriers' (Division) Data Request 1-1 in this docket. Division Data Request 1-1 requests that the Company identify each capacity exempt FT-1 customer who was transferred to either Transitional Sales Service (TSS) or Default Transportation Service for any billing period subsequent to April 2013. In support of the Company's response, it is providing redacted and un-redacted versions of Attachment DIV 1-1, which identifies the names of those capacity exempt FT-1 customers who were placed on

either Default Transportation Service or TSS during the period April 2013 through August 2014, together with their respective rate classifications. The un-redacted version of Attachment DIV 1-1 contains customer identifying information, which the Company has historically considered as confidential and proprietary to the customer. Therefore, National Grid requests that the Commission give the un-redacted version of Attachment DIV 1-1 confidential treatment. The Company has provided a redacted public version as well as a confidential version of Attachment DIV 1-1 pursuant to Rule 1.2(g)(2).

## **II. LEGAL STANDARD**

The PUC's Rule 1.2(g) 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 PUC falls within one of the designated exceptions to the public records law, the PUC 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)(B) provides that the following types of records shall not be deemed public:

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

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

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

The first prong of the test is satisfied when information is voluntarily provided to the governmental agency and that information is of a kind that would customarily not be released to the public by the person from whom it was obtained. Providence Journal, 774 A.2d at 47.

## **II. BASIS FOR CONFIDENTIALITY**

Customer identifying information has historically been deemed proprietary to each customer, and customers have come to expect that National Grid will maintain this information on a confidential basis. Public disclosure of this information could substantially harm National Grid's customers who have not otherwise consented to the public disclosure of their information. Moreover such disclosure would undermine National Grid's integrity with its customers.

## **III. CONCLUSION**

Accordingly, the Company respectfully requests that the PUC grant protective treatment to the un-redacted version of Attachment DIV 1-1.

**WHEREFORE**, the Company respectfully requests that the PUC grant its Motion for Protective Treatment as stated herein.

Respectfully submitted,

**NATIONAL GRID**

By its attorney,



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Jennifer Brooks Hutchinson, Esq. (RI Bar #6167)  
National Grid  
280 Melrose Street  
Providence, RI 02907  
(401) 784-7288

Dated: October 6, 2014

Division 1-1

Request:

Regarding Re-Billed Capacity-Exempt FT-1 Customers:

Please identify each capacity exempt FT-1 customer who was transferred to either TSS service or Default Service for any billing period subsequent April 2013, and for each customer identified indicated the rates under which the customer was billed in each month subsequent to the transfer.

Response:

Please see Attachment DIV 1-1 which details the rate classifications for those capacity exempt FT-1 customers who were placed on either Default Transportation Service or TSS during the period April 2013 through August 2014.

Pursuant to PUC Rule 1.2(g), the Company is seeking confidential treatment of Attachment DIV 1-1 to this response.



REDACTED

REDACTED

	NAME	Apr-2013	May-2013	Jun-2013	Jul-2013	Aug-2013
1	Billed Rebilled	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1	C&I Large Low Load FT1
2		C&I Large Low Load FT1	C&I Large Low Load FT1	C&I Large Low Load FT1	C&I Large Low Load FT1	C&I Large Low Load FT1
3	Billed Rebilled	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1
4	Billed Rebilled	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1
5	Billed Rebilled	C&I Large High Load FT1	C&I Large High Load FT1	C&I Large High Load FT1	C&I Large High Load FT1	C&I Large High Load FT1
6		Non-Firm Trans XLarge High	Non-Firm Trans XLarge High	Non-Firm Trans XLarge High	Non-Firm Trans XLarge High	Non-Firm Trans XLarge High
7		C&I Large Low Load FT1	C&I Large Low Load FT1	C&I Large Low Load FT1	C&I Large Low Load FT1	C&I Large Low Load FT1
8		C&I Large Low Load FT1	C&I Large Low Load FT1	C&I Large Low Load FT1	C&I Large Low Load FT1	C&I Large Low Load FT1
9		C&I XLarge Low Load FT1	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1
10	Billed Rebilled	C&I XLarge High Load FT1	C&I XLarge High Load FT1	C&I XLarge High Load FT1	C&I XLarge High Load FT1	C&I XLarge High Load FT1
11		Default C&I Large Low Load	TSS	TSS	TSS	TSS

	NAME	Sep-2013	Oct-2013	Nov-2013	Dec-2013	Jan-2014
1	[REDACTED] Billed Rebilled	C&I Large Low Load FT1	C&I Large Low Load FT1	TSS	TSS	TSS
2	[REDACTED]	C&I Large Low Load FT1	C&I Large Low Load FT1	C&I Large Low Load FT1	C&I Large Low Load FT1	C&I Large Low Load FT1
3	[REDACTED] Billed Rebilled	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1	TSS	TSS
4	[REDACTED] Billed Rebilled	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1	TSS
5	[REDACTED] Billed Rebilled	C&I Large High Load FT1	C&I Large High Load FT1	C&I Large High Load FT1	TSS	TSS
6	[REDACTED]	Non-Firm Trans XLarge High	Non-Firm Trans XLarge High	Non-Firm Trans XLarge High	<b>Default C&amp;I XLarge High Load</b>	<b>Default C&amp;I XLarge High Load</b>
7	[REDACTED]	C&I Large Low Load FT1	C&I Large Low Load FT1	C&I Large Low Load FT1	C&I Large Low Load FT1	C&I Large Low Load FT1
8	[REDACTED]	C&I Large Low Load FT1	C&I Large Low Load FT1	C&I Large Low Load FT1	C&I Large Low Load FT1	C&I Large Low Load FT1
9	[REDACTED]	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1	<b>Default C&amp;I XLarge Low Load</b>
10	[REDACTED] Billed Rebilled	C&I XLarge High Load FT1	TSS	TSS	TSS	TSS
11	[REDACTED]	TSS	TSS	TSS	TSS	TSS

REDACTED

NAME	Feb-2014 TSS	Mar-2014 TSS	Apr-2014 Default C&I Large Low Load Cancel Nov 13-Mar 14 TSS and Rebill at Default Rates.	May-2014 Default C&I Large Low Load
1 [REDACTED] Billed Rebilled	C&I Large Low Load FT1	C&I Large Low Load FT1	C&I Large Low Load FT1	C&I Large Low Load FT1
2 [REDACTED]	TSS	TSS	Default C&I XLarge Low Load Cancel Dec 13-Mar 14 TSS and Rebill at Default Rates.	Default C&I XLarge Low Load
3 [REDACTED] Billed Rebilled	TSS	TSS	Default C&I XLarge Low Load	Default C&I XLarge Low Load
4 [REDACTED] Billed Rebilled	Default C&I XLarge Low Load Cancel Jan 14 TSS and Rebill at Default Rates.	Default C&I XLarge Low Load	Default C&I XLarge Low Load	Default C&I XLarge Low Load
5 [REDACTED] Billed Rebilled	TSS	TSS	Default C&I Large High Load Cancel Dec 13-Mar 14 TSS and Rebill at Default Rates.	Default C&I Large High Load
6 [REDACTED]	Default C&I XLarge High Load	Default C&I XLarge High Load	C&I XLarge High Load FT1	C&I XLarge High Load FT1
7 [REDACTED]	C&I Large Low Load FT1	C&I Large Low Load FT1	C&I Large Low Load FT1	Default C&I Large Low Load
8 [REDACTED]	C&I Large Low Load FT1	C&I Large Low Load FT1	C&I Large Low Load FT1	C&I Large Low Load FT1
9 [REDACTED]	Default C&I XLarge Low Load	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1
10 [REDACTED] Billed Rebilled	TSS	TSS	TSS	Default C&I XLarge High Load Cancel Oct 13 TSS and Rebill at Default Rates.
11 [REDACTED]	TSS	TSS	TSS	TSS

	NAME	Jun-2014	Jul-2014	Aug-2014
1	[REDACTED] Billed [REDACTED] Rebilled	Default C&I Large Low Load	Default C&I Large Low Load	Default C&I Large Low Load
2	[REDACTED]	Default C&I Large High Load	Default C&I Large High Load	Default C&I Large High Load
3	[REDACTED] Billed [REDACTED] Rebilled	Default C&I XLarge Low Load	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1
4	[REDACTED] Billed [REDACTED] Rebilled	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1
5	[REDACTED] Billed [REDACTED] Rebilled	Default C&I Large High Load	C&I Large High Load FT1	C&I Large High Load FT1
6	[REDACTED]	C&I XLarge High Load FT1	C&I XLarge High Load FT1	C&I XLarge High Load FT1
7	[REDACTED]	Default C&I Large Low Load	Default C&I Large Low Load	Default C&I Large Low Load
8	[REDACTED]	C&I Large Low Load FT1	C&I Large Low Load FT1	Default C&I Large Low Load
9	[REDACTED]	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1	C&I XLarge Low Load FT1
10	[REDACTED] Billed [REDACTED] Rebilled	C&I XLarge High Load FT1 Cancel Nov 13-April 14 TSS and Rebill at Default Rates.	C&I XLarge High Load FT1	C&I XLarge High Load FT1
11	[REDACTED]	TSS	TSS	Default C&I Large Low Load

Division 1-2

Request:

Please document the manner in which revenues associated with billing adjustments were booked for capacity exempt FT-1 customers who were initially billed on TSS service rates and subsequently re-billed as Default service customers.

Response:

For those customers who were initially billed the TSS surcharge, and subsequently, re-billed the Default Transportation Service (DTS) rate, the Company reduced TSS revenues and increased DTS revenues in the month in which the Company processed the cancellation and re-billing of the accounts. For example, for any cancellation and re-billing processed in April 2014 for a customer who had been billed from November 2013 through March 2014 on TSS, the Company reduced TSS revenues in April 2014 by the TSS revenues billed during the period November 2013 through March 2014 and increased DTS revenues reported in April 2014 by the DTS revenues re-billed for the period November 2013 through March 2014.

Division 1-3

Request:

For each instance in which a TSS service customer was subsequently re-billed as a Default Service customer, please:

- a. Document by month all adjustments made to the Company's GCR deferred gas costs:
  - i. For commodity costs
  - ii. For capacity costs
- b. Document by month the account(s) to which additional gas costs were booked when one or more capacity exempt customers, initially billed under TSS rates, were re-billed under Default Service rates, and explain how and when such adjustments to gas costs were, or will be, reflected in the Company's GCR deferred gas cost balance.

Response:

- a. When the Company re-billed customers under the applicable rate for Default Transportation Service, the Company reflected the additional revenue resulting from the higher rate for Default Transportation Service in the GCR Revenue section of the GCR deferred balance report and not the Supply component of its deferred gas cost. Specifically, the Company reflected the cancellation of TSS revenues on Schedule 3 (GCR Revenues), line 17 of the Company's monthly GCR deferred balance report, and the rebilling of the Default Transportation Service revenues on Schedule 3, line 20. The commodity and capacity costs found on the Supply schedule were not impacted by the cancellation and rebilling of these customers.
- b. Please see Attachment DIV 1-1 which details the month in which the accounts initially billed the TSS surcharge were re-billed on Default Transportation Service rates. All except one account was re-billed during the months of April 2014, May 2014, and June 2014. Since the deferred gas cost balance included in the proposed 2014-2015 GCR factor reflects the actual deferred gas cost balance through July 2014 and all but one customer was re-billed prior to July 2014, the deferred balance includes the revenue associated with the rebilling of the majority of customers under the rates for Default Transportation Service. The Company is in the process of rebilling its last customer that had originally been billed the TSS surcharge.