

October 23, 2015

VIA HAND DELIVERY & ELECTRONIC MAIL

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

**RE: Docket 4576 - 2015 Gas Cost Recovery Filing
Responses to Division Data Requests – Set 6**

Dear Ms. Massaro:

On behalf of National Grid¹, I have enclosed ten (10) copies of the Company's responses to the six set of data requests issued by the Division of Public Utilities and Carriers on October 21, 2015 in the above-referenced docket.

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

Sincerely,



Jennifer Brooks Hutchinson

Enclosures

cc: Docket 4576 Service List
Leo Wold, Esq.
Steve Scialabba, Division
Bruce Oliver, Division

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

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 Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



Joanne M. Scanlon

October 23, 2015
Date

Docket No. 4576 – National Grid – 2015 Annual Gas Cost Recovery Filing (“GCR”) - Service List as of 9/18/15

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Division 6-1

Request:

Item 3 on page 4 of the Company's Rebuttal Comments indicates that information regarding the treatment of Capacity Exempt customers can be found under Tab 2015Q2-RI-Volume in the Excel file provided as Attachment DIV 3-1. With respect to that response please verify the following:

- (a) The referenced information for Capacity Exempt customers was included in "hidden" cells in the Tab 2015Q2-RI-Volume information.
- (b) The information in Tab 2015Q2-RI-Volume includes volumes for Capacity Exempt customers are included in Total C&I Transportation volumes for medium, large, and extra class C&I rate classifications.
- (c) Nothing in Attachment DIV 3-1 documents the derivation of Design Day requirements by rate classification or enables the viewer of the referenced Attachment DIV 3-1 to determine whether or to what extent Design Day demands for Capacity Exempt customers were included in the Company's forecasted Design Day requirements.

Response:

- (a) In Attachment DIV 3-1, tab '2015-Q2-RI-Volume, the hidden columns contained the retail data by internal Company rate code. The non-hidden columns were aligned to match the rate groupings used within the Company's GCR filing. The Company chose to hide Columns D-AW to minimize confusion. Table 1 below lists the individual columns of data for the various capacity-exempt customers and the rate group to which they belong.

<u>Column</u>	<u>Capacity-Exempt Data</u>
AQ	C&I Medium Transportation
AR	C&I Low Lg Transportation
AS	C&I Low XL Transportation
AT	C&I High Lg Transportation
AU	C&I High XL Transportation

Table 1

Division 6-1, page 2

- (b) Yes. Capacity-exempt customer data is blended in with the capacity-eligible Customer Choice data as "Transportation" under the Company's rate groupings (Attachment DIV 3-1, tab '2015-Q2-RI-Volume, columns AW-BK). The Company's response to (a) above identifies the rate groups which contain capacity-exempt customer data. Only the internal rate code data for non-firm customers are excluded in the Company's filing.
- (c) Attachment DIV 3-1 provided retail forecast data. The Company documented its methodology for the derivation the design day in prose in its response to DIV 1-3 (f). The Company has not provided the design day requirement by rate classification because it is not needed to derive the proposed GCR factor¹. The Company does compute the design sales requirements for the winter season (November through March) by rate classification and uses this information to derive the allocator used to assign the fixed gas cost to the high load and low load sectors. Please see testimony of Ms. Leary (pages 7 through 8) and Attachment AEL-1 pages 12-15 for description of the derivation of the winter season design usage.

¹ The Company does derive a design day sendout by rate class in deriving the Capacity Allocator Percentages in Attachment AEL-6.

Division 6-2

Request:

Please verify that:

- a. National Grid has included requirements associated with the anticipated migration of Capacity Exempt customers to default service in its forecast of supply requirements for Massachusetts;
- b. In Massachusetts the Company reclassifies Capacity Exempt customers who migrate to default service as "capacity-eligible" and makes them part of the Company's planning load thereafter.

Response:

- a. National Grid did not include the requirements associated with the anticipated migration of Capacity Exempt customers to default service in its forecast of supply requirements for Massachusetts prior to receiving approval in docket MA DPU 14-111 whereby the DPU approved the planning for a certain level of capacity exempt load for the winter of 2014/15. Following that approval, the Company then included a portion of the Company's Massachusetts capacity exempt load in its forecast of supply requirements which, based on its best judgment, it believed would return to capacity-eligible service. The Company did include that amount which it believed would return in the planning years 2014/15 and 2015/16 for Massachusetts in the Company's petition for approval of the NED capacity. Additionally, in approving the Company's request to procure resources for returning capacity-exempt customers for the winter of 2015/16, the Massachusetts Department of Public Utilities also instructed each Massachusetts LDC to "to incorporate a forecast of reverse migration in all future forecast and supply filings."
- b. Yes. Once the customer is approved to receive sales service from the Company, the customer becomes capacity eligible and is therefore part of the Company's planning load going forward.