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August 24, 2016

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

**Re: *The Narragansett Electric Co. d/b/a
National Grid - Docket 4627***

Dear Ms. Massaro:

Enclosed please find an original and nine (9) copies of the following:

1. NextEra Energy Resources, LLC's Response to the Division of Public Utilities and Carriers Data Responses (First Set).
2. NextEra Energy Resources, LLC's Motion For Protective Treatment of Confidential Information.

Please be advised that NextEra Energy Resources, LLC is seeking protective treatment of attachments to Division Data Requests 1-3, 4 (a), 6, 8, 9, 10 and 11, as permitted by Commission Rule 1.2(g) and by RIGL §38-2-2(4)(B), (E) and (K). Also enclosed, you will find one (1) sealed copy of the confidential attachments to Division Data Requests 1-3, 4 (a), 6, 8, 9, 10 and 11 on a thumb drive.

Please note that an electronic version of United Water's response to the Division's Fourth Set of Data Requests has been sent to the service list. However, the electronic version of the attachments to Division Data Requests 1-3, 4 (a), 6, 8, 9, 10 and 11 have not been provided pending a decision on the Motion For Protective Treatment Of Confidential Information.

Thank you for your attention to this matter. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph A. Keough, Jr.", written in a cursive style.

Joseph A. Keough, Jr.

JAK/kf

Enclosures

cc: Docket 4627 Service List (*via electronic mail*)

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

IN RE: THE NARRAGANSETT ELECTRIC :
COMPANY D/B/A NATIONAL GRID REQUEST :
FOR APPROVAL OF A GAS CAPACITY CONTRACT : **DOCKET NO. 4627**
AND COST RECOVERY PURSUANT TO :
R.I. GEN. LAWS § 39-31-1 TO 9 :

**NEXTERA ENERGY RESOURCES, LLC’S MOTION FOR PROTECTIVE TREATMENT OF
CONFIDENTIAL INFORMATION**

I. INTRODUCTION

NextEra Energy Resources, LLC (“NEER”) respectfully requests that the Rhode Island Public Utilities Commission (“Commission”) provide confidential treatment to, and grant protection from public disclosure of, certain confidential and sensitive information. NEER makes this request pursuant to Commission Rule 1.2(g) and the Rhode Island Access to Public Records Act (“APRA”), RIGL §38-2-2 (4)(B), (E) and (K). NEER also requests that the Commission preliminarily grant its request for confidential and protective treatment pursuant to Rule 1.2(g)(2).

II. FACTS

On August 24, 2016, NEER filed a partial response to the First Set of Data Requests issued by the Division of Public Utilities and Carriers (“Division”). The attachments to NEER’s responses to Division Data Requests 1-3, 4 (a), 6, 8, 9, 10 and 11 contain information that NEER claims is confidential pursuant to APRA. As part of NEER’s response, it submitted one (1) sealed copy of the attachments to Division Data Requests 1-3, 4 (a), 6, 8, 9, 10 and 11 to the Commission as permitted by Commission Rule 1.2(g) and by RIGL §38-2-2(4)(B), (E) and (K). In addition, NEER will provide a confidential copy

of these attachments to parties willing to enter into a Non-Disclosure Agreement with NEER pending a determination of NEER's motion.

III. LEGAL STANDARD

Commission Rule 1.2(g) provides that access to a public record shall be granted in accordance with APRA. Under APRA, all documents and materials submitted in connection with the transaction of official business by an agency are deemed to be a "public record", unless the information set forth in the documents and materials falls within one of the enumerated exceptions identified in RIGL §38-2-2(4). As such, the Commission has the authority under the APRA to protect such information from public disclosure and deem it to be confidential if it falls within one of the specific exceptions to APRA. A review of RIGL §38-2-2(4)(B), (E) and (K) indicate that the following records are not deemed to be public:

"(B) Trade secrets and commercial or financial information obtained from a person, firm, or corporation that is of a privileged or confidential nature.

(E) Any records which would not be available by law or rule of court to an opposing party in litigation.

(K) Preliminary drafts, notes, impressions, memoranda, working papers, and work products; provided, however, any documents submitted at a public meeting of a public body shall be deemed public."

In making a confidentiality determination, the Rhode Island Supreme Court set forth a two-prong test. The first prong assesses whether the information was provided voluntarily to a governmental agency. Providence Journal Company v. Convention Center Authority, 774 A.2d 40 (R.I. 2001).Id. at 47. If the answer to this first question is in the affirmative, then the next 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.*

Furthermore, the Supreme Court has held that agencies making determinations as to the disclosure of information under the APRA may apply the balancing test established in *Providence Journal v. Cane*, 577 A.2d 661, (RI 1990). Under this test, the Commission may protect information from public disclosure if the benefit of such protection outweighs the public interest inherent in disclosure.

IV. BASIS FOR CONFIDENTIALITY

NEER request for Confidential Treatment of its attachments to Division Data Requests 1-3, 4 (a), 6, 8, 9, 10 and 11, all of which were prepared by NEER’s expert in this matter, Compass Lexecon, based on the following:

- The attachments to Division 1-9 and 1-10 are derived from information provided by the Narragansett Electric Company d/b/a National Grid (“National Grid”), which it marked as “Highly Sensitive Confidential Information.” Although the Commission has not recognized the distinction of “Highly Sensitive Confidential” per se, it has preliminarily approved the designation of this material as “Confidential” pursuant to APRA and the Commission’s Rules. This information should continue to be treated as confidential pending the Commission’s final ruling on confidentiality.
- The attachments to Division 1-4 (a), 6, 8, 11 (a) and 11 (c), contain Compass Lexecon’s proprietary modeling and resulting information. This modeling and information is confidential, business, trade and financial information that is

proprietary and competitively sensitive. Further, it constitutes memoranda, working papers, and work product that would not ordinarily be available to an opposing party in litigation.

- The attachments to Division 1-3, 9, 10, and 11 (a), (b), (d) and (e) contain some data used by Compass Lexecon as inputs in its modeling of National Grid's proposal, which it obtained from third parties. The terms of Compass Lexecon's license agreements with these third party data providers prohibits the public release of the data. The data can only be disclosed to parties subject to the execution of a non-disclosure agreement that prohibits use and public dissemination of these data. Thus, this data is confidential, business, trade and financial information that is proprietary and competitively sensitive. Further, it work product that would not ordinarily be available to an opposing party in litigation.

V. CONCLUSION

For the reasons set forth herein, NextEra Energy Resources, LLC hereby requests that the Rhode Island Public Utilities Commission grant the relief sought herein and grant protective and confidential treatment to the information identified.

NEXTERA ENERGY RESOURCES, LLC
By its attorney,



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CERTIFICATION

I hereby certify that on August 24, 2016, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Luly Massaro, Commission Clerk, by electronic mail and regular mail.

Name & Company	E-mail	Phone
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Interested Persons		
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NEER-DPUC-1-3

Request:

Please provide the GCPM inputs and price curves that Mssrs. Kalt and Cavicchi used to model the natural gas infrastructure facilities with and without the ANE project, including but not limited to the existing LNG import facilities in New England. Please provide the price curves in a live excel spreadsheet.

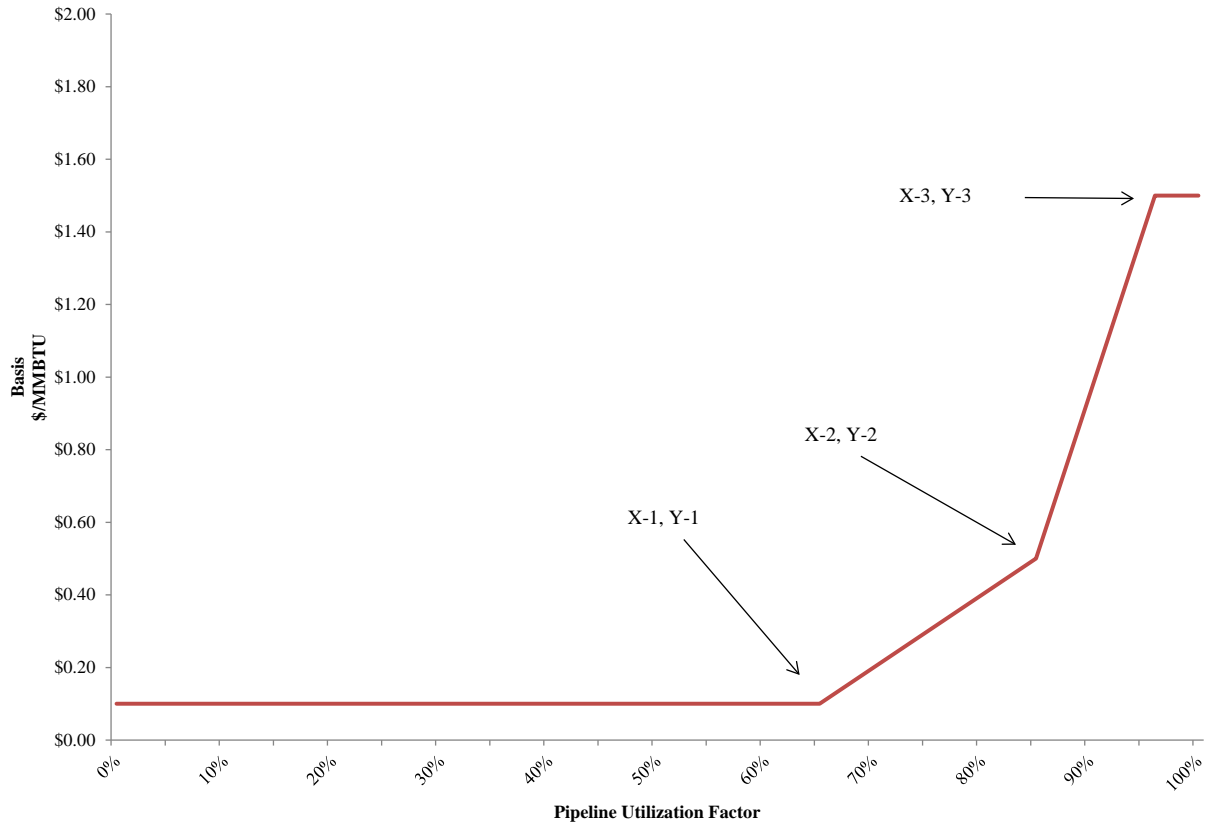
Response:

See Attachment DPUC 4627 1-3(CONFIDENTIAL) which provides those price curves for New England relevant for estimating Algonquin modeled market gas prices with and without the ANE project. Each row in this attachment represents an estimated pipeline price curve for a particular segment of pipeline that establishes prices in the modeling for the month indicated. If the reported value for the "Month" variable is "0" then this indicates the curve is used for any months not otherwise defined in these data. Each "X" number represents a pipeline utilization rate and each corresponding "Y" value represents a transportation cost on that segment at that utilization rate. Transportation cost increases linearly with utilization from point to point. All years of our modeling use the curves provided in Attachment DPUC 4627 1-3(CONFIDENTIAL). See below for a visual example of one curve for a hypothetical segment in a month.

Note that the pipeline segment gas price relationships provided in Attachment DPUC 4627 1-3(CONFIDENTIAL) are those that establish the estimated gas prices in the modeled market analysis (our high gas price sensitivity).

See Response DPUC 4627-1-7 for a description of the modeling of the price used for LNG in our modeling.

Example of Pipeline Basis Curve



NEER-DPUC-1-4

Request:

On page 33, it states that "The main difference between our modeling and that used by Black & Veatch is that we adopt different input fossil fuel prices (e.g., using actual futures market prices for gas in our Futures Market Forecasts Case) and do not artificially constrain LNG imports."

- a) Please list all fossil fuel products for which a difference exists in input fossil fuel prices between Mssrs Kalt and Cavicchi and B&V.
- b) Please provide the forecast of prices for each such fossil fuel product that was used by Mssrs Kalt and Cavicchi in their analysis of ANE. Provide these forecasted prices in a live excel spreadsheet in as much detail as possible (i.e., monthly, etc.).
- c) Please provide the basis and all supporting documentation for how these forecasts were determined.
- d) Please provide all forecasts of such fossil fuel prices prepared or used by Mssrs Kalt and Cavicchi in the last three years, and the basis for them.
- e) Please describe in detail the artificial LNG imports constraints that Mssrs Kalt and Cavicchi believe that B&V has assumed. Also describe in detail how Mssrs Kalt and Cavicchi believe LNG imports should be modeled.

Response:

- a) New England natural gas, residual fuel oil, ultra-low sulfur transportation diesel fuel oil and liquefied natural gas.
- b) See Attachment DPUC 1-4(a)(CONFIDENTIAL). Note that the oil prices were doubled for the high oil price sensitivity analysis.
- c) See Response to DPUC 1-7. The fossil fuel forecasts for fuels other than LNG were based on futures market data with escalation per a U.S. Energy Information Agency escalator and gas market modeling results derived using GPCM. See Direct testimony of Professor Kalt and Mr. Cavicchi (MA DPU docket 16-05 Exhibit NEER-JPK/AJC-1) at 32:16-33:1 and 37:2-39:15.
- d) Compass Lexecon routinely uses gas futures-based projections in confidential commercial analyses of proposed infrastructure and similar projects. In the context of testimony, utilizing futures prices over available periods extended through use of long-range governmental inflation projections has been employed in numerous matters. Most recently (within last 3 years), an example from a non-confidential and otherwise not-sealed matter is: Before the Public Utilities Commission of Ohio, In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company for Authority to Provide for a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan, Case No. 14-1297-

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EL-SSO. In addition, natural gas futures were used by Professor Kalt in an Arbitration under the Convention on the Settlement of Investment Disputes Between States and Nationals of Other States and the Treaty Between the United States of America and the Republic of Ecuador Concerning the Encouragement and Reciprocal Protection of Investment, ICSID No. ARB/06/11 (See publicly available excerpt of decision Attachment DPUC 4627 1-4(b)).

- e) Please see MA DPU docket 16-05 Exhibit NEER-JPK/AJC-1 at 93:1-101:8.

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NEER-DPUC-1-5

Request:

Please provide a live excel spreadsheet containing the forecast of the electric peak load and annual energy consumptions in NE used by Mssrs Kalt and Cavicchi in their analysis of the ANE project. Describe the basis for this forecast and provide all supporting documentation.

Response:

Please see Attachment DPUC 1-5. The basis of this forecast is ISO-New England's 2015 CELT Report which contains ISO-NE's 2015-2024 Forecast Report of Capacity, Energy, Loads and Transmission.

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NEER-DPUC-1-6

Request:

Please provide a live excel spreadsheet containing the forecast of the natural gas consumption in NE used by Mssrs Kalt and Cavicchi in their analysis of the ANE project. Describe the basis for this forecast and provide all supporting documentation.

Response:

Please see Attachment DPUC 1-6(CONFIDENTIAL). Retail natural gas consumption is based upon the forecast developed by ICF and reported in MA DPU Docket 15-181 Exhibit EVER-KRP-3. Gas fired power plant consumption was an output of the Promod dispatch analysis.

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NEER-DPUC-1-7

Request:

Please provide a live excel spreadsheet containing the forecast of the LNG prices and supply availability used by Msrs Kalt and Cavicchi in their analysis of the ANE project. Describe the basis for this forecast and provide all supporting documentation.

Response:

Please see Attachment DPUC 4627 1-4(a)(CONFIDENTIAL). The underlying basis for the price of the gas commodity is Chenier Energy's summary of terms for its Corpus Christi Liquefaction Supply and Purchase Agreements. Chenier Energy's March 16 presentation at the Morgan Stanley MLP/Diversified Natural Gas, Utilities & Clean Tech Conference 2016 identifies the cost of LNG at the terminal as 115% of the price of natural gas at Henry Hub plus a fixed fee of \$3.50 per MMBtu. This was considered the price of the commodity FOB (Free on Board, meaning the price at the point at which LNG is loaded onto a ship for shipping to the point of sale) at a generic liquefaction facility for Atlantic Basin LNG trade. The FOB price is then adjusted for delivery to New England from a generic Atlantic-basin liquefaction facility based on contemporary estimates of shipping and transportation costs. The analysis does not assume the LNG is shipped from a Gulf Coast facility and, therefore, Jones Act costs are not considered.

As we explain in our MA DPU docket 16-05 direct testimony at 35:3-4 and Figures 9-10, we assume that LNG facilities can be utilized to import natural gas consistent with their rated capacities. Evidence in the form of actual use of the LNG facilities has been provided by ISO-NE (See Callan, William, ISO New England, Winter 2014/15 Review, Electric/Gas Operations Committee (EGOC) Teleconference, June 29, 2015 ("ISO-NE Winter 2014/15 Review"), at 15, accessed May 20, 2016 at: http://www.iso-ne.com/static-assets/documents/2015/06/winter_2014_15_review.pdf) and MA DPU docket 16-05 direct testimony of Mr. Morrisette, Exh.VCM-1, at page 6, lines 6-8 and Figure 2.

NEER-DPUC-1-8

Request:

On page 42, it states that "Based on our modeling of price effects in wholesale electric energy markets, we estimate that National Grid's proposal would be expected to push up capacity prices in the Forward Capacity Market by \$1.40-\$2.70/kW-Yr over the term of the proposal." Please provide all work papers, assumptions, calculations, and supporting documentation that were used in analyzing the impact of lower energy prices on capacity markets and determining the \$1.40-\$2.70/kW-Yr range.

Response:

Please see Attachment DPUC 4627-1-8(CONFIDENTIAL). The capacity market cost increase is estimated by first calculating the three-year historical average January-February combined cycle margins using data reported in the ISO-NE 2015 Net-Cone study. We then assume that the average percentage gas price reduction in the months of January and February obtained from the modeling analysis will result in reduced energy market margins for the net-CONE combined cycle unit. We then multiply the average margin by the percentage reduction by two (impact is assumed for two months) and finally by the estimated ISO-NE installed capacity (excluding renewable resources and imports, see Attachment DPUC 4627-1-11(b)(CONFIDENTIAL)). A cost impact is calculated for each year beginning in the year 2023.

Attachment DPUC 4627-1-8(CONFIDENTIAL) contains a set of input data (natural gas prices for Algonquin Citygates and Henry Hub with and without the presence of ANE), SAS code that uses the input data to calculate the reductions in energy market margins, and finally an output data set where annual capacity market costs are calculated with capacity data used in the modeling and average margin data for January and February (from ISONE's Net-CONE study).

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NEER-DPUC-1-9

Request:

Please provide a live excel spreadsheet showing the underlying calculations that resulted in the values in Table 2 on page 48 in as much detail as is available.

Response:

Please see Attachment DPUC 4627-1-9(HSCI).

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NEER-DPUC-1-10

Request:

Please provide a version of Table 2 on page 48 that uses changes in LSE costs, instead of changes in production costs.

Response:

Please see Attachment DPUC 4627-1-10(HSCI). Note that the results presented in Attachment DPUC 4627-1-10 (HSCI) rely on an incorrect application of benefit and cost discount rates and cannot be relied upon to reach conclusions regarding the costs and benefits of National Grid's ANE proposal.

CASE: Futures Market Forecasts

	Benefits	Estimated Costs
Electric Energy	\$3,838	
Pipeline Cost		-\$3,146
Total Present Value	\$3,838	-\$3,146
Total Net Present Value		\$692

REDACTED

CASE: Modeled Market Forecasts

	Benefits	Estimated Costs
Electric Energy	\$6,140	
Pipeline Cost		-\$3,146
Total Present Value	\$6,140	-\$3,146
Total Net Present Value		\$2,994

Note:

1) Energy market benefits, construction costs, operational costs, and capacity market costs discounted at 8% weighted average cost of capital approved by ISO-NE for Net Cost of New Entry analysis. See Testimony of Dr. Samuel A. Newell and Mr. Christopher D. Ungate on Behalf of ISO New England Inc. Regarding the Net Cost of New Entry for the Forward Capacity Market Demand Curve, Federal Energy Regulatory Commission Docket No. ER14-1639-000, April 1, 2014

Source: Eversource and Compass Lexecon Analysis

NEER-DPUC-1-11

Request:

Please provide excel, spreadsheets that contain the following information as it was used or produced by Mssrs. Kalt and Cavicchi in their evaluation of the ANE project.

- a. New England electric demand forecast (peak, energy) by zone
- b. New England generating units
 - i. List individual capacity for each generating unit by year and by zone
 - ii. Assumed retirements
 - iii. Assumed additions to meet RPS
 - iv. Assumed additions to meet reliability requirements
- c. Fuel prices (in as much detail as available; i.e., monthly or yearly)
 - i. Natural gas
 - ii. Distillate oil
 - iii. Residual oil
 - iv. LNG
 - v. Crude
- d. Allowance prices
 - i. NOX
 - ii. SOX
 - iii. CO2
- e. New England external import/ export limits and export/import assumptions
- f. New England internal transfer limits
- g. Natural gas demand forecast/ curves by year and by region/ zone
- h. Natural gas supply forecast/ curves with prices by year and by region / zone
- i. LNG prices by year and by region / zone
- j. LNG availability by year and by region/ zone

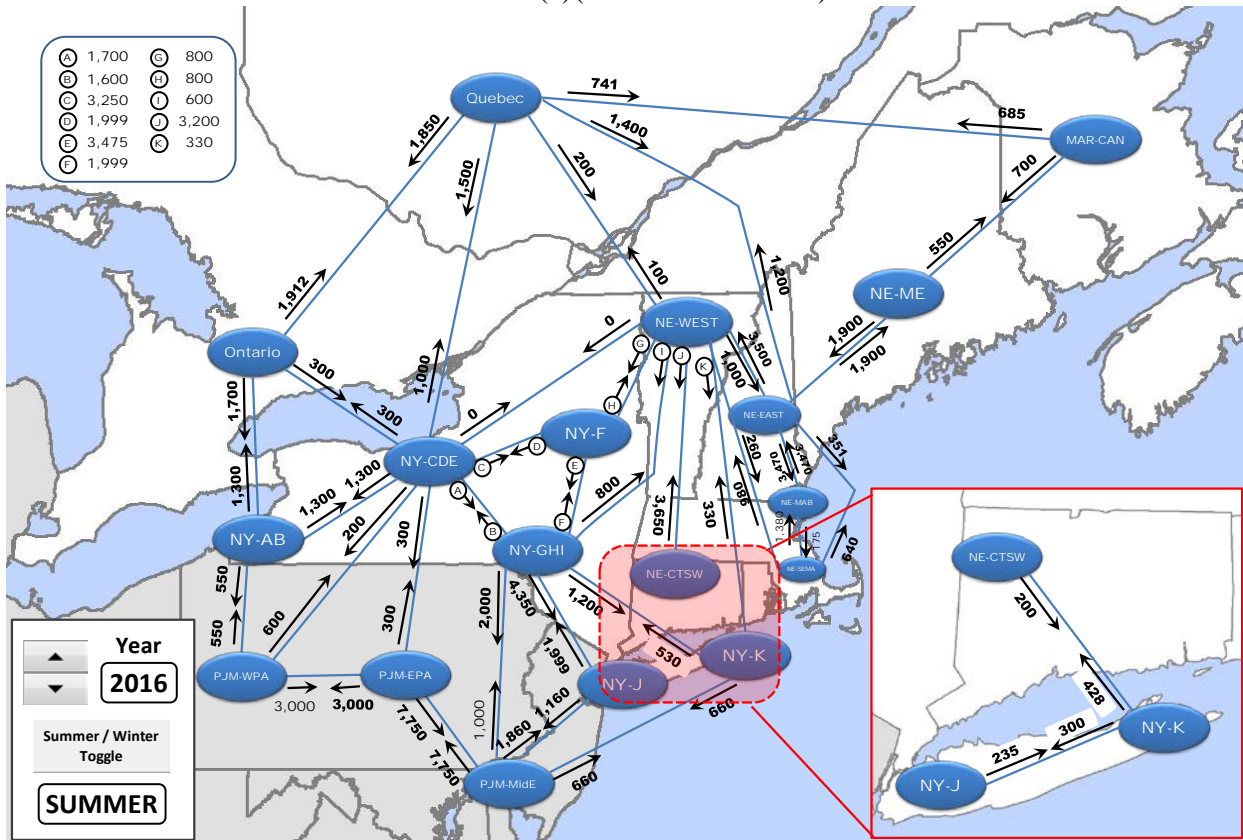
Response:

- a. See Attachment DPUC 4627 1-11(a)(CONFIDENTIAL) for hourly load by zone and NE monthly load.
- b. See Attachment DPUC 4627 1-11(b)(CONFIDENTIAL). Note that there are no generation additions to meet reliability requirements beyond those that have already cleared in ISO-NE's forward capacity market auctions.
- c. See Attachment DPUC 4627 1-4(a)(CONFIDENTIAL) for prices of Distillate Oil, Residual Oil, and LNG. See Attachment DPUC 4627 1-11(c)(CONFIDENTIAL) for Natural

Gas prices as forecast for both our Modeled Market and our Futures Market modeling with both ANE off and ANE On. In Attachment DPUC 4627 1-11(c)(CONFIDENTIAL) Henry Hub price data is labeled with the fuel code "NG Louisiana," TETCO-M3 is labeled with the fuel code "NG MidAtl-E," and the Algonquin Citygates price data is labeled with the fuel code "NG ISO-NE S." We did not use crude prices as an input to our modeling or produce crude prices as an output of our modeling.

d. See Attachment DPUC 4627 1-11(d)(CONFIDENTIAL).

e. See Attachment DPUC 4627 1-11(e)(CONFIDENTIAL).



Exports and imports are assumed to occur when power is available to flow between modeling regions based on relative regional prices.

f. See response to e.

Note: that for the following four subsections we provide those data that are relevant for our analysis of the costs and benefits of the ANE proposal. We assume sufficient natural gas is available for delivery into New England up to the physical capacity of the pipeline transportation system into New England. We also assume that LNG will be available to New England at the prices used for LNG in our analysis (see response to 1-7).

g. See Attachment DPUC 4627 1-6(CONFIDENTIAL).

h. See Attachment DPUC 4627 1-3(CONFIDENTIAL). See also note above.

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- i. See Attachment DPUC 4627 1-4(a)(CONFIDENTIAL).
- j. See note above

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CERTIFICATION

I hereby certify that on August 24, 2016, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Luly Massaro, Commission Clerk, by electronic mail and regular mail.

Name & Company	E-mail	Phone
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