

June 1, 2021

VIA ELECTRONIC MAIL

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

**RE: Docket 4770 – Electric Earnings Sharing Mechanism
Earnings Report - Twelve Months Ended December 31, 2020
Responses to PUC Data Requests – Set 1**

Dear Ms. Massaro:

On behalf of National Grid¹ I have enclosed an electronic version of the Company's responses to the Public Utilities Commission's First Set of Data Requests in the above-referenced matter.²

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

Very truly yours,



Jennifer Brooks Hutchinson

Enclosure

cc: Docket 4770 Service List
John Bell, Division
Tiffany Parenteau, Esq.
Leo Wold, Esq.

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

² Per Commission counsel's update on October 2, 2020, concerning the COVID-19 emergency period, the Company is submitting an electronic version of this filing. The Company will provide the Commission Clerk with five (5) hard copies and, if needed, additional hard copies of the enclosures upon request.

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4770
In Re: Electric Earnings Reports
Twelve Months Ended December 31, 2020
Responses to Commission's First Set of Data Requests
Issued on May 11, 2021

PUC 1-1

Request:

Please confirm and explain how the 2020 earnings report treats the Block Island Transmission System surcharge (BITS) and associated imputed costs and revenues.

Response:

Please refer to the income statement included in the calendar year (CY) 2020 Electric Distribution earnings report on Page 3. In Column (c), the Company has excluded the revenue (Line 7) received through the BITS surcharge and actual costs (Lines 9, 10, 12 and 16) directly incurred on BITS assets from its calculation of distribution net operating income.

The BITS-associated imputed costs were not utilized in the calculation of CY 2020 earnings. This calculation is consistent with the treatment in the response to PUC 4-22 in Docket 4770 (issued on October 30, 2020) and the response to PUC 1-9 in Docket 5127 (issued on February 19, 2021).

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4770
In Re: Electric Earnings Reports
Twelve Months Ended December 31, 2020
Responses to Commission's First Set of Data Requests
Issued on May 11, 2021

PUC 1-2

Request:

If the treatment of the BITS costs and revenues in the 2020 earnings report is different than the way the costs and revenues were treated in the initial earnings report that was filed for 2019 on May 6, 2020, please provide an alternative hypothetical calculation and report which treats BITS surcharge and associated imputed costs and revenues in the same manner as the Company treated the these imputed costs and revenues in its initial earnings report filed for calendar year 2019 on May 6, 2020.

Response:

Refer to Attachment PUC 1-2 for the alternative hypothetical calculation and report which treats BITS surcharge and associated imputed costs and revenues in the same manner as the Company treated the imputed costs and revenues in its initial earnings report filed for calendar year 2019 on May 6, 2020.

The Company would note, as stated previously in this docket, that this alternative hypothetical earnings calculation is not consistent with the electric distribution revenue requirement upon which current distribution base rates were established in Docket 4770 where the actual BITS related rate base, revenue and expenses were excluded from the Company's distribution cost of service.

The Narragansett Electric Company
Return on Rate Base - Hypothetical imputed BITS costs
Return on Common Equity
Twelve Months Ended December 31, 2020

| Line No. | | Twelve Months Ending December 31, 2020 | | | |
|----------|--|--|---|----------|---------------|
| | | Base Earnings | Actual Earnings | Allowed | Ceiling |
| 1 | | | | | |
| 2 | | 1/ | 2/ | 3/ | 3/ |
| 3 | Return on Distribution Rate Base | 8.55% | 9.01% | 6.97% | 6.97% |
| 4 | | | | | |
| 5 | Return on Distribution Common Equity | 12.31% | 13.28% | 9.275% | 9.275% |
| 6 | | | | | |
| 7 | 1/ Excludes incentives and penalties detailed at Page 2, Lines 3 through 8 | | | | |
| 8 | 2/ Includes incentives detailed at Page 2 | | | | |
| 9 | 3/ Allowed Return and Ceiling, presented below. | | | | |
| 10 | | | ----- Per Amended Settlement Agreement in Docket 4770 ----- | | |
| 11 | | | Allowed | Ceiling | |
| 12 | | | Cost | Weighted | Cost |
| 13 | | Total | Rate | Cost | Rate |
| 14 | | | | | |
| 15 | Short Term Debt | 0.60% | 1.76% | 0.01% | 1.76% |
| 16 | Long Term Debt | 48.35% | 4.62% | 2.23% | 4.62% |
| 17 | Preferred Stock | 0.10% | 4.50% | 0.00% | 4.50% |
| 18 | Common Equity | 50.95% | 9.275% | 4.73% | 9.275% |
| 19 | | 100.00% | | 6.97% | 6.97% |
| 20 | | | | | |
| 21 | | | | | |
| 22 | | | ----- EARNED ----- | | |
| 23 | | | Cost | Weighted | Pre-Tax |
| 24 | | Amount | Rate | Cost | Weighted Cost |
| 25 | | Total | | | Taxes |
| 26 | Short Term Debt | \$5,547,728 | 0.60% | 1.76% | 0.01% |
| 27 | Long Term Debt | \$447,054,385 | 48.35% | 4.62% | 2.23% |
| 28 | Preferred Stock | \$924,621 | 0.10% | 4.50% | 0.00% |
| 29 | Common Equity | \$471,094,538 | 50.95% | 12.31% | 6.27% |
| 30 | 5-Quarter Average Distribution Rate Base as of Dec 31, 2020 | \$924,621,273 4/ | 100.00% | 8.52% | 1.41% 5/ |
| 31 | | | | | 9.93% |

32 4/ Page 4 of 7, Line 38, Column (f)
33 5/ includes adj. for Flowthrough Items below

**PREFERRED STOCK EARNINGS, INTEREST EXPENSE,
AND FEDERAL INCOME TAX
CALCULATED USING IMPUTED CAPITAL STRUCTURE**

| | | | | | \$000s |
|----|------------------------------------|---|---|-----------|------------|
| 41 | PREF. STOCK: | \$924,621,273 | X | 0.00% (a) | = \$42 |
| 42 | INTEREST: | \$924,621,273 | X | 2.24% (b) | = \$20,712 |
| 43 | | | | | |
| 44 | FIT: | \$924,621,273 | X | 1.67% (c) | = \$15,432 |
| 45 | Plus: Flowthrough Items | | | (d) | (\$2,347) |
| 46 | Total Federal Income Taxes ("FIT") | | | | \$13,085 |
| 47 | | | | | |
| 48 | (a) | From Line 28, Column "Weighted Cost" | | | |
| 49 | (b) | Sum of Lines 26 and 27, Column "Weighted Cost". | | | |
| 50 | (c) | (0.00% + 6.27%) / 79% - (0.00% + 6.27%) | | | |
| 51 | (d) | Flowthrough Items (tax effected) | | | |
| 52 | | Investment Tax Credit ("ITC") Amortization | | | \$0 |
| 53 | | ITC Basis Reduction Depreciation | | | \$0 |
| 54 | | AFUDC Equity Depreciation | | | \$77 |
| 55 | | Unfunded Amortization | | | \$650 |
| 56 | | Amortization of Federal Rate Change | | | (\$3,074) |
| 57 | | | | | |
| 58 | | | | | (\$2,347) |

THE NARRAGANSETT ELECTRIC COMPANY
Return on Equity Calculation - Hypothetical imputed BITS costs
Return on Rate Base Calculation
Twelve Months Ended December 31, 2020
(\$000s)

| <u>Line No.</u> | | <u>Return on Equity</u> | | | <u>Return on Rate Base</u> | | | |
|-----------------|---|-------------------------|---------------------|------------------------|----------------------------|---------------------|------------------------|--------|
| | | <u>Base Earnings</u> | <u>Basis Points</u> | <u>Actual Earnings</u> | <u>Base Earnings</u> | <u>Basis Points</u> | <u>Actual Earnings</u> | |
| | | <u>(a)</u> | <u>(b)</u> | <u>(c)</u> | <u>(d)</u> | <u>(e)</u> | <u>(f)</u> | |
| 1 | Distribution Operating Income Before Taxes | \$97,613 | | \$97,613 | \$97,613 | | \$97,613 | 1/ |
| 2 | Adjustments: | | | | | | | |
| 3 | Service Quality ("SQ") Penalties Accrued | \$0 | 0.00% | | \$0 | 0.00% | | 2/, 3/ |
| 4 | Energy Efficiency Program Incentive | (\$2,496) | -0.53% | | (\$2,496) | -0.27% | | 3/ |
| 5 | System Reliability Procurement Incentives | \$0 | 0.00% | | \$0 | 0.00% | | 3/ |
| 6 | LTCRER Incentive | (\$2,447) | -0.52% | | (\$2,447) | -0.26% | | 3/ |
| 7 | RE Growth Remuneration | (\$460) | -0.10% | | (\$460) | -0.05% | | 3/ |
| 8 | Performance Incentive Mechanism Incentives | (\$362) | -0.08% | | \$0 | 0.00% | | 3/ |
| 9 | | | | | | | | |
| 10 | Adjusted Distribution Operating Income Before Taxes | \$91,848 | | \$97,613 | \$92,211 | | \$97,613 | 4/ |
| 11 | Interest Charges | \$20,712 | | \$20,712 | \$20,712 | | \$20,712 | 5/ |
| 12 | Income Taxes @ 21% net of flowthrough | \$13,085 | -0.26% | \$14,295 | \$13,161 | -0.12% | \$14,295 | 6/ |
| 13 | | | | | | | | |
| 14 | Net Income | \$58,052 | | \$62,606 | \$79,050 | | \$83,318 | 7/ |
| 15 | | | | | | | | |
| 16 | Less: Preferred Stock Requirements | \$42 | | \$42 | \$42 | | \$42 | 5/ |
| 17 | Earnings Available for Common | \$58,011 | | \$62,565 | \$79,050 | | \$83,318 | 8/ |
| 18 | | | | | | | | |
| 19 | Average Common Equity - 5-Quarter Average | \$471,095 | | \$471,095 | \$924,621 | | \$924,621 | 9/ |
| 20 | | | | | | | | |
| 21 | Rate of Return on Adjusted Average Common Equity | 12.31% | | 13.28% | 8.55% | | 9.01% | 10/ |

Notes

- 1/ Page 3 of 7 Line 27
- 2/ Effective Dec. 2005, SQ penalties booked below the line.
- 3/ Column (b) = column (a) ÷ Line 19 (a). Column (e) = column (d) ÷ Line 19 (d)
- 4/ Sum of Lines 1 thru 8
- 5/ Calculated using imputed capital structure and cost rates; see Page 1 of 7, Lines 42, 41, 29, and 30
- 6/ Page 1 of 7, Line 46
- 7/ Column (a) & (c): Line 10 - Line 11 - Line 12. Column (d) & (f): Line 10 - Line 12
- 8/ Line 14 - Line 16
- 9/ Calculated using imputed capital structure and cost rates; see Page 1 of 7, Line 29, and Line 30
- 10/ Line 17 ÷ Line 19

THE NARRAGANSETT ELECTRIC COMPANY
Income Statement - Hypothetical imputed BITS costs
Twelve Months Ended December 31, 2020
(\$000s)

| Line No. | Total Electric Business | Less: Integrated Facilities Agreement (IFA) Amounts Billed to New England Power Co. | Less: Actual Block Island Transmission System Credits and Expenses | Add: Other Adjustments | Electric Distribution Amount Per Schedules | |
|----------|---|---|--|------------------------|--|-----------------------|
| | | (a) | (b) | (c) | (d) | (e) = (a)-(b)-(c)+(d) |
| 1 | Revenue - Sales of Electricity | \$345,203 | | | \$345,203 | |
| 2 | Other Revenue | \$758,105 | | \$1,764 | \$759,869 | |
| 3 | Total Revenue | \$1,103,308 | | | \$1,105,072 | |
| 4 | Operating Expenses: | | | | | |
| 5 | Purchased Power | \$380,505 | | | \$380,505 | |
| 6 | Transmission Wheeling | \$219,880 | | | \$219,880 | |
| 7 | Transmission Wheeling - IFA and BITS Credit | (\$156,228) | (\$138,857) | (\$17,370) | \$0 | |
| 8 | Uncollectible Expense | \$37,243 | | (\$28,405) | \$8,838 | |
| 9 | Genl & Admin. O&M | \$136,830 | \$22,592 | \$5,167 | \$109,071 | |
| 10 | All Other Operation & Maintenance ("O&M") expen | \$164,050 | \$8,238 | \$2,658 | (\$887) | \$152,266 |
| 11 | Company Share of Earned Savings | \$0 | | | \$0 | |
| 12 | Depreciation | \$84,444 | \$24,044 | \$3,313 | \$57,088 | |
| 13 | Amortization of Loss on Reacquired Debt | \$771 | \$62 | \$8 | (\$569) | \$133 |
| 14 | Amortization - Other | \$845 | | | | \$845 |
| 15 | Gross Earnings Tax | \$42,662 | | | | \$42,662 |
| 16 | Municipal Tax | \$49,280 | \$16,522 | \$1,996 | | \$30,762 |
| 17 | Other Non-Income taxes | \$5,949 | \$757 | | | \$5,192 |
| 18 | Current and Deferred Income Taxes | \$54,116 | | | (\$54,116) | \$0 |
| 19 | Regulatory Debits | \$0 | | | | \$0 |
| 20 | Accretion Expense | \$0 | | | \$0 | \$0 |
| 21 | Amortization of ITC | (\$0) | (\$2) | (\$0) | | \$2 |
| 22 | Interest on Customer Deposits | \$216 | | | | \$216 |
| 23 | Donations | \$0 | | | \$0 | \$0 |
| 24 | Total Operating Expenses | \$1,020,563 | (\$66,644) | (\$4,230) | (\$83,977) | \$1,007,460 |
| 25 | | | | | | |
| 26 | Net Operating Income | \$82,745 | | | | |
| 27 | Distribution Operating Income Before Taxes | | | | | \$97,613 |

Notes

- 1/ In December 2019, the Renewable Energy Growth (REG) Performance Based Incentive (PBI) credits to solar customers were not recorded until January 2020. No such timing issue in December 2020. The timing differences need to be adjusted.
- | | |
|---|-------------|
| Add: Dec 2019 REG PBI Payment recorded in Jan 2020 | \$1,764,051 |
| Less: Dec 2020 REG PBI Payment recorded in Jan 2021 | \$0 |
| Total Revenue Normalization Adjustment | \$1,764,051 |
- 2/ Adjustment to all Other Operation & Maintenance expense
- | | |
|---|-------------|
| Variable Pay | (\$512,818) |
| Sales expense | (\$258,524) |
| Amortization of Service Company EDIT not charged to NECO Electric | (\$115,905) |
| Total Adjustment | (\$887,246) |
- 3/ Below the line items brought above the line for ratemaking.

THE NARRAGANSETT ELECTRIC COMPANY
Rate Base - Electric Distribution - Hypothetical imputed BITS costs
Five Quarter Average

| Line No. | Description | (a) December 2019 | (b) March 2020 | (c) June 2020 | (d) September 2020 | (e) December 2020 | (f) 5-Quarter Average |
|----------|--|-------------------------|----------------------|---------------------|--------------------------|-------------------------|--------------------------|
| 1 | Utility Plant in Service | \$ 1,754,536,149 | \$ 1,786,263,603 | \$ 1,805,634,575 | \$ 1,823,924,960 | \$ 1,853,918,047 | \$ 1,804,855,467 |
| 2 | IFA allocated Plant | - | - | - | - | - | - |
| 3 | Block Island Transmission System (BITS) Assets | - | - | - | - | - | - |
| 4 | Total Distribution Plant | \$ 1,754,536,149 | \$ 1,786,263,603 | \$ 1,805,634,575 | \$ 1,823,924,960 | \$ 1,853,918,047 | \$ 1,804,855,467 |
| 5 | | | | | | | |
| 6 | | | | | | | |
| 7 | Property Held for Future Use | 2,496,042 | 2,496,042 | 2,496,042 | 2,496,042 | 2,496,042 | \$ 2,496,042 |
| 8 | Less: Contribution in Aid of Construction | 629,316 | 447,216 | 629,316 | 409,716 | 447,216 | 512,556 |
| 9 | Less: Accumulated Depreciation | 721,426,094 | 723,042,537 | 731,538,027 | 736,857,451 | 739,767,883 | 730,526,398 |
| 10 | Less: IFA allocated Depreciation | - | - | - | - | - | - |
| 11 | Less: Block Island Transmission System (BITS) Depreciation | - | - | - | - | - | - |
| 12 | Total Accumulated Depreciation | 721,426,094 | 723,042,537 | 731,538,027 | 736,857,451 | 739,767,883 | 730,526,398 |
| 13 | | | | | | | |
| 14 | Net Plant in Service | \$ 1,034,976,781 | \$ 1,065,269,892 | \$ 1,075,963,275 | \$ 1,089,153,836 | \$ 1,116,198,990 | \$ 1,076,312,555 |
| 15 | | | | | | | |
| 16 | Plus: | | | | | | |
| 17 | Materials and Supplies | \$ 3,358,250 | \$ 2,470,664 | \$ 4,486,593 | \$ 1,537,608 | \$ 1,242,479 | \$ 2,619,119 |
| 18 | Prepayments | 74,791 | 1,446,617 | 3,368,222 | 1,743,528 | 1,815,446 | 1,689,721 |
| 19 | Loss on Reacquired Debt | 1,578,604 | 1,544,565 | 1,516,652 | 1,489,970 | 1,446,046 | 1,515,168 |
| 20 | Cash Working Capital | 17,922,078 | 17,922,078 | 17,922,078 | 17,922,078 | 17,922,078 | 17,922,078 |
| 21 | Cash Working Capital - Commodity & Gross Receipts Tax | 40,289,969 | 43,982,259 | 43,982,259 | 43,982,259 | 43,982,259 | 43,243,801 |
| 22 | Unamortized Interest Rate Lock | 1,945,053 | 1,920,550 | 1,896,047 | 1,871,544 | 1,847,041 | 1,896,047 |
| 23 | Unamortized Debt Issuance Costs (\$550M) | 820,383 | 798,326 | 788,327 | 778,327 | 768,327 | 790,738 |
| 24 | Unamortized Debt Issuance Costs (\$250M 2012) | 835,842 | 754,585 | 746,263 | 737,940 | 729,618 | 760,849 |
| 25 | Unamortized Debt Issuance Costs (\$350M 2018) | 526,372 | 600,919 | 582,891 | 564,864 | 546,836 | 564,376 |
| 26 | Unamortized Debt Issuance Costs (\$600M 2020) | - | - | 1,056,462 | 1,029,286 | 1,002,109 | 617,571 |
| 27 | | | | | | | |
| 28 | Subtotal | \$ 67,351,342 | \$ 71,440,563 | \$ 76,345,794 | \$ 71,657,403 | \$ 71,302,239 | \$ 71,619,468 |
| 29 | | | | | | | |
| 30 | Less: | | | | | | |
| 31 | Accumulated Deferred Federal Income Taxes ("FIT") | \$ 210,167,705 | \$ 202,803,414 | \$ 215,223,121 | \$ 216,877,909 | \$ 219,694,430 | \$ 212,953,316 |
| 32 | Block Island Transmission System (BITS) ADIT | - | (0) | - | - | - | (0) |
| 33 | Accumulated Deferred FIT on Loss on Reacquired Debt | 331,507 | 324,359 | 318,497 | 312,894 | 303,670 | 318,185 |
| 34 | Customer Deposits | 10,253,679 | 9,727,673 | 10,573,489 | 9,641,757 | 9,999,649 | 10,039,249 |
| 35 | | | | | | | |
| 36 | Subtotal | \$ 220,752,891 | \$ 212,855,446 | \$ 226,115,106 | \$ 226,832,559 | \$ 229,997,748 | \$ 223,310,750 |
| 37 | | | | | | | |
| 38 | Rate Base | \$ 881,575,232 | \$ 923,855,009 | \$ 926,193,962 | \$ 933,978,679 | \$ 957,503,482 | \$ 924,621,273 |

Line Notes

38 Line 14 + Line 28 - Line 36

THE NARRAGANSETT ELECTRIC COMPANY
Rate Base - Integrated Facilities Agreement (IFA) and Block Island Transmission System (BITS) - Hypothetical imputed BITS costs
Five Quarter Average

| Line No. | Description | (a) December 2019 | (b) March 2020 | (c) June 2020 | (d) September 2020 | (e) December 2020 | (f) 5-Quarter Average |
|----------|--|----------------------|-------------------|------------------|-----------------------|----------------------|--------------------------|
| 1 | Utility Plant in Service | \$ 929,607,048 | \$ 938,232,861 | \$ 943,177,517 | \$ 944,366,192 | \$ 982,754,493 | \$ 947,627,622 |
| 2 | IFA allocated Plant | 6,693,216 | 6,367,947 | 6,366,314 | 6,382,786 | 7,204,993 | 6,603,051 |
| 3 | Block Island Transmission System (BITS) Assets | 115,340,155 | 115,491,785 | 115,645,429 | 115,702,598 | 115,727,667 | 115,581,527 |
| 4 | Total Transmission Plant | \$ 1,051,640,420 | \$ 1,060,092,593 | \$ 1,065,189,260 | \$ 1,066,451,576 | \$ 1,105,687,152 | \$ 1,069,812,200 |
| 5 | | | | | | | |
| 6 | Property Held for Future Use | 12,532,019 | \$12,532,019 | \$12,532,019 | \$12,532,019 | \$12,532,019 | 12,532,019 |
| 7 | Less: Contribution in Aid of Construction | | | | | | |
| 9 | Less: Accumulated Depreciation | 136,364,673 | 142,213,131 | 146,205,432 | 154,401,286 | 160,614,354 | 147,959,775 |
| 10 | Less: IFA allocated Depreciation | 1,528,837 | 1,478,982 | 1,512,283 | 1,551,941 | 1,590,588 | 1,532,526 |
| 11 | Less: Block Island Transmission System (BITS) Depreciation | 7,404,134 | 8,599,936 | 9,327,185 | 10,054,695 | 10,782,481 | 9,233,686 |
| 12 | Total Accumulated Depreciation | 145,297,644 | 152,292,050 | 157,044,900 | 166,007,922 | 172,987,422 | 158,725,988 |
| 13 | | | | | | | |
| 14 | Net Plant in Service | \$ 918,874,795 | \$ 920,332,563 | \$ 920,676,378 | \$ 912,975,672 | \$ 945,231,749 | \$ 923,618,231 |
| 15 | | | | | | | |
| 16 | Plus: | | | | | | |
| 17 | Materials and Supplies | \$ 2,888,603 | \$ 2,577,422 | \$ 2,671,012 | \$ 2,501,255 | \$ 2,642,285 | \$ 2,656,116 |
| 18 | Prepayments | 37,672 | 733,336 | 307,495 | 872,026 | 932,732 | 576,652 |
| 19 | Loss on Reacquired Debt | 795,140 | 782,990 | 764,714 | 745,208 | 742,943 | 766,199 |
| 20 | Cash Working Capital | 3,735,588 | 3,714,801 | 3,390,619 | 3,538,884 | 2,724,192 | 3,420,817 |
| 21 | Cash Working Capital - Commodity & Gross Receipts Tax | - | - | - | - | - | - |
| 22 | Unamortized Interest Rate Lock | 1,203,771 | \$1,188,607 | \$1,173,442 | \$1,158,278 | \$1,143,114 | 1,173,442 |
| 23 | Unamortized Debt Issuance Costs (\$550M) | 507,719 | \$494,068 | \$487,880 | \$481,691 | \$475,503 | 489,372 |
| 24 | Unamortized Debt Issuance Costs (\$250M 2012) | 517,287 | \$466,999 | \$461,848 | \$456,697 | \$451,547 | 470,875 |
| 25 | Unamortized Debt Issuance Costs (\$350M 2018) | 440,970 | \$503,422 | \$488,319 | \$473,216 | \$458,114 | 472,808 |
| 26 | Unamortized Debt Issuance Costs (\$600M 2020) | - | - | \$885,054 | \$862,287 | \$839,520 | 517,372 |
| 27 | | | | | | | |
| 28 | Subtotal | \$ 10,126,749 | \$ 10,461,644 | \$ 10,630,384 | \$ 11,089,543 | \$ 10,409,948 | \$ 10,543,654 |
| 29 | | | | | | | |
| 30 | Less: | | | | | | |
| 31 | Accumulated Deferred Federal Income Taxes ("FIT") | \$ 140,291,084 | \$ 151,254,113 | \$ 136,938,646 | \$ 133,244,227 | \$ 133,491,140 | \$ 139,043,842 |
| 32 | Block Island Transmission System (BITS) ADIT | 21,894,733 | 21,996,425 | 22,021,925 | 22,047,426 | 22,072,927 | 22,006,687 |
| 33 | Accumulated Deferred FIT on Loss on Reacquired Debt | 166,979 | 164,428 | 160,590 | 156,494 | 156,018 | 160,902 |
| 34 | Customer Deposits | - | - | - | - | - | - |
| 35 | | | | | | | |
| 36 | Subtotal | \$ 162,352,797 | \$ 173,414,965 | \$ 159,121,161 | \$ 155,448,147 | \$ 155,720,084 | \$ 161,211,431 |
| 37 | | | | | | | |
| 38 | Rate Base | \$ 766,648,748 | \$ 757,379,241 | \$ 772,185,601 | \$ 768,617,068 | \$ 799,921,612 | \$ 772,950,454 |

Line Notes

38 Line 14 + Line 28 - Line 36

THE NARRAGANSETT ELECTRIC COMPANY
Rate Base - Electric Total Distribution, IFA and BITS - Hypothetical imputed BITS costs
Five Quarter Average

| Line No. | Description | (a) December 2019 | (b) March 2020 | (c) June 2020 | (d) September 2020 | (e) December 2020 | (f) 5-Quarter Average |
|----------|--|-------------------------|----------------------|---------------------|--------------------------|-------------------------|-----------------------------|
| 1 | Utility Plant in Service | \$ 2,684,143,197 | \$ 2,724,496,464 | \$ 2,748,812,092 | \$ 2,768,291,152 | \$ 2,836,672,540 | \$ 2,752,483,089 |
| 2 | IFA allocated Plant | 6,693,216 | 6,367,947 | 6,366,314 | 6,382,786 | 7,204,993 | 6,603,051 |
| 3 | Block Island Transmission System (BITS) Assets | 115,340,155 | 115,491,785 | 115,645,429 | 115,702,598 | 115,727,667 | 115,581,527 |
| 4 | Total Utility Plant in Service | \$ 2,806,176,569 | \$ 2,846,356,196 | \$ 2,870,823,835 | \$ 2,890,376,536 | \$ 2,959,605,199 | \$ 2,874,667,667 |
| 5 | | | | | | | |
| 6 | | | | | | | |
| 7 | Property Held for Future Use | \$ 15,028,061 | \$ 15,028,061 | \$ 15,028,061 | \$ 15,028,061 | \$ 15,028,061 | \$ 15,028,061 |
| 8 | Less: Contribution in Aid of Construction | 629,316 | 447,216 | 629,316 | 409,716 | 447,216 | 512,556 |
| 9 | Less: Accumulated Depreciation | 857,790,767 | 865,255,668 | 877,743,459 | 891,258,737 | 900,382,237 | 878,486,174 |
| 10 | Less: IFA allocated Depreciation | 1,528,837 | 1,478,982 | 1,512,283 | 1,551,941 | 1,590,588 | 1,532,526 |
| 11 | Less: Block Island Transmission System (BITS) Depreciation | 7,404,134 | 8,599,936 | 9,327,185 | 10,054,695 | 10,782,481 | 9,233,686 |
| 12 | Total Accumulated Depreciation | 866,723,738 | 875,334,587 | 888,582,927 | 902,865,373 | 912,755,305 | 889,252,386 |
| 13 | | | | | | | |
| 14 | Net Plant in Service | \$ 1,953,851,576 | \$ 1,985,602,454 | \$ 1,996,639,653 | \$ 2,002,129,508 | \$ 2,061,430,739 | \$ 1,999,930,786 |
| 15 | | | | | | | |
| 16 | Plus: | | | | | | |
| 17 | Materials and Supplies | \$ 6,246,853 | \$ 5,048,086 | \$ 7,157,606 | \$ 4,038,863 | \$ 3,884,764 | \$ 5,275,234 |
| 18 | Prepayments | 112,463 | 2,179,953 | 3,675,717 | 2,615,554 | 2,748,178 | 2,266,373 |
| 19 | Loss on Reacquired Debt | 2,373,744 | 2,327,555 | 2,281,366 | 2,235,178 | 2,188,989 | 2,281,366 |
| 20 | Cash Working Capital | 21,657,666 | 21,636,879 | 21,312,697 | 21,460,962 | 20,646,270 | 21,342,895 |
| 21 | Cash Working Capital - Commodity & Gross Receipts Tax | 40,289,969 | 43,982,259 | 43,982,259 | 43,982,259 | 43,982,259 | 43,243,801 |
| 22 | Unamortized Interest Rate Lock | 3,148,824 | 3,109,157 | 3,069,490 | 3,029,822 | 2,990,155 | 3,069,490 |
| 23 | Unamortized Debt Issuance Costs (\$550M) | 1,328,103 | 1,292,395 | 1,276,207 | 1,260,018 | 1,243,829 | 1,280,110 |
| 24 | Unamortized Debt Issuance Costs (\$250M 2012) | 1,353,129 | 1,221,584 | 1,208,111 | 1,194,637 | 1,181,164 | 1,231,725 |
| 25 | Unamortized Debt Issuance Costs (\$350M 2018) | 967,342 | 1,104,340 | 1,071,210 | 1,038,080 | 1,004,950 | 1,037,184 |
| 26 | Unamortized Debt Issuance Costs (\$600M 2020) | - | - | 1,941,516 | 1,891,573 | 1,841,629 | 1,134,944 |
| 27 | | | | | | | |
| 28 | Subtotal | \$ 77,478,092 | \$ 81,902,208 | \$ 86,976,178 | \$ 82,746,946 | \$ 81,712,187 | \$ 82,163,124 |
| 29 | | | | | | | |
| 30 | Less: | | | | | | |
| 31 | Accumulated Deferred Federal Income Taxes (FIT) | \$ 350,458,789 | \$ 354,057,527 | \$ 352,161,766 | \$ 350,122,136 | \$ 353,185,569 | \$ 351,997,157 |
| 32 | Block Island Transmission System (BITS) ADIT | 21,894,733 | 21,996,425 | 22,021,925 | 22,047,426 | 22,072,927 | 22,006,687 |
| 33 | Accumulated Deferred FIT on Loss on Reacquired Debt | 498,486 | 488,787 | 479,087 | 469,387 | 459,688 | 479,087 |
| 34 | Customer Deposits | 10,253,679 | 9,727,673 | 10,573,489 | 9,641,757 | 9,999,649 | 10,039,249 |
| 35 | | | | | | | |
| 36 | Subtotal | \$ 383,105,688 | \$ 386,270,411 | \$ 385,236,267 | \$ 382,280,706 | \$ 385,717,832 | \$ 384,522,181 |
| 37 | | | | | | | |
| 38 | Rate Base | \$ 1,648,223,980 | \$ 1,681,234,251 | \$ 1,698,379,564 | \$ 1,702,595,748 | \$ 1,757,425,094 | \$ 1,697,571,727 |

Line Notes

38 Line 14 + Line 28 - Line 36

THE NARRAGANSETT ELECTRIC COMPANY
Calculation of Excess Earnings for Twelve months ended December 31, 2020 - Hypothetical imputed BITS costs
(\$000)

| <u>Line</u> | | | | | |
|-------------|---|-----------|-----|------------------|------------------|
| 1 | Base Distribution Earnings Available for Common | \$58,011 | (a) | | |
| 2 | | | | | |
| 3 | | | | | |
| 4 | Actual Average Common Equity | \$471,095 | (a) | | |
| 5 | | | | | |
| 6 | | | | | Customer |
| 7 | Average Annual Return | | | <u>12.3100%</u> | (b) <u>Share</u> |
| 8 | | | | | |
| 9 | ROE in 50%/50% Bandwith (>9.275%, <10.275%) | | | 1.0000% * 50.00% | = 0.5000% |
| 10 | ROE in 75%/25% Bandwith (>10.275%) | | | 2.0350% * 75.00% | = <u>1.5263%</u> |
| 11 | | | | | |
| 12 | Total Customer ROE Sharing | | | | 2.0263% |
| 13 | Actual Average Common Equity | | | | <u>\$471,095</u> |
| 14 | | | | | |
| 15 | Actual Annual Customer Shared Earnings | | | | \$9,546 |
| 16 | Tax Gross-up | | | | <u>/ 79.00%</u> |
| 17 | | | | | |
| 18 | Annual Customer Shared Earnings - Pre-tax | | | | \$12,084 |
| 19 | | | | | |
| 20 | Total Customer Shared Earnings for the twelve months ending December 31, 2020 | | | | <u>\$12,084</u> |

Notes

- (a) From Page 2 of 7 Line 17 and Line 19
(b) Line 1 divided by Line 4; equals Page 2 of 7 Line 21

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4770
In Re: Electric Earnings Reports
Twelve Months Ended December 31, 2020
Responses to Commission's First Set of Data Requests
Issued on May 11, 2021

PUC 1-3

Request:

Referring to line 10, column e, why did O&M expenses decrease by over \$27 million from \$182,622 in 2019 to \$154,924 in 2020 (contributing to the increase in the Base Earnings return on equity from 7.96% to 10.74%). Please provide a schedule comparing the relevant categories of O&M expenses that materially decreased from 2019 to 2020.

Response:

Refer to the table below for the O&M expense categories that materially decreased from CY 2019 to CY 2020:

**Major Decrease in Operation and Maintenance Expenses
Twelve Months Calendar 2020 vs Calendar 2019**
(\$ millions)

| | Category | CY 2020 | CY 2019 | Decrease |
|---|---|---------|---------|-------------|
| | | (a) | (b) | (c)=(a)-(b) |
| 1 | Energy Efficiency | \$88.1 | \$109.4 | (\$21.3) |
| 2 | Non-deferrable Storms and Amortization of Storm Fund Deferral | \$31.8 | \$35.5 | (\$3.7) |
| 3 | IFA Annual True-up | (\$3.1) | \$2.9 | (\$6.0) |
| 4 | Total | \$116.8 | \$147.8 | (\$31.0) |

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4770
In Re: Electric Earnings Reports
Twelve Months Ended December 31, 2020
Responses to Commission's First Set of Data Requests
Issued on May 11, 2021

PUC 1-4

Request:

Please indicate what return on equity the Company will be reporting to investors for its Rhode Island "distribution business" for fiscal year 2021.

Response:

As stated on page 34 of National Grid plc's "2020/21 Full Year Results Statement," found at: <https://www.nationalgrid.com/document/141786/download>, the return on equity the Company reported to investors for its Rhode Island "distribution business" for fiscal year 2021 was 10.0%.

As shown on Line 21 (c) of the return on equity calculation in the calendar year (CY) 2020 Electric Distribution earnings report on Page 2, the Actual Return on Equity is 11.71% which is 171 basis points higher than 10.0% above. Please refer to Attachment PUC 1-4 which reconciles Actual Earnings in calendar year 2020 to the return on equity the Company reported in its 2020/21 Full Year Results Statement referenced above. Reconciling items that are not solely attributable to timing differences in reporting periods are noted as "non-timing".

The largest reconciling items between CY 2020 and FY 2021 earnings are uncollectible expense inclusion difference of (\$4.9) million, net income related to BITS investments of \$5.6 million and the difference in Integrated Facilities Agreement (IFA) exclusion of (\$8.6) million.

The total is negative \$7.9 million which represents approximately negative 168 basis points of return on equity. Since March 2020, the Company has experienced significantly increased cost of customer accounts receivable that it will be unable to collect as a result of the COVID-19 pandemic and the executive orders and PUC orders restricting the Company's collection activities. As a result, the write offs related to customer termination are lower than usual. The \$(4.9) million adjustment for uncollectible expense represents the variance between the bad debt write offs included in the Actual Earnings in CY 2020 and the bad debt expense included in the ROE reported to investors for FY 2021. The Company's revenue requirement on BITS investments is ultimately recovered from Narragansett Electric's retail customers through FERC-regulated transmission rates, and therefore, is excluded from the calculation of RIPUC-regulated electric distribution earnings. However, for management reporting purposes, the portion of BITS-related net income attributable to the recovery of operating expenses is recorded as distribution earnings, as the Company considers BITS assets to be distribution assets. The difference in IFA exclusion is primarily due to the difference in Transmission-related expenses allocated through the IFA compared to A&G expense recorded to the Transmission business for management reporting purposes.

THE NARRAGANSETT ELECTRIC COMPANY
Return on Electric Distribution Common Equity Reconciliation
Regulated Earnings for the twelve months ended Dec 31, 2020 and
Financial Earnings for the twelve months ended Mar 31, 2021

| | Description | Reference | CY 2020/ FY 2021 | |
|--------------------------------|--|--------------------------------|---------------------|---------------------------|
| Earnings Reconciliation | | | | |
| 1 | Base Earnings Available for Common per ESM at Dec 31 | | \$50.6 | |
| 2 | Incentive revenue | | \$5.8 | |
| 3 | Income tax on incentive revenue | | (\$1.2) | |
| 4 | Actual Earnings Available for Common per ESM at Dec 31 | Sum of Line 1 through Line 3 | \$55.2 | |
| 5 | | | | |
| 6 | Reconciling Items: | | | |
| 7 | Additional RDM Revenue included in Finance ROE Jan thru Mar | | \$0.7 | timing |
| 8 | Excess ADIT amortization excluded from Finance ROE | | \$3.2 | non-timing |
| 9 | Bad debt expense included in Finance ROE versus net write-offs included in ESM | | (\$4.9) | non-timing |
| 10 | Net Income from BITS included in Finance ROE | | \$5.6 | non-timing |
| 11 | Difference between IFA exclusion in ESM and Transmission business segment in Finance ROE | | (\$8.6) | non-timing |
| 12 | Variable pay and Sales expense included in ROE versus excluded from ESM | | (\$0.8) | non-timing |
| 13 | Additional Income Taxes Computed for Finance ROE | | (\$0.2) | imputed/flowthrough |
| 14 | Other Differences due to different period coverage | | (\$3.0) | timing |
| 15 | Earnings Available for Common per ROE at March 31 | Sum of Line 4 through Line 14 | \$47.2 | |
| 16 | | | | |
| 17 | Rate Base Reconciliation | | | |
| 18 | Rate Base at Dec 31 per ESM | | \$957.5 | |
| 19 | Reconciling Items: | | | |
| 20 | Net Plant Additions in 3 months (Jan-March) | | \$23.7 | timing |
| 21 | Difference on Prepays and Inventory | | (\$2.7) | timing |
| 22 | Difference on Commodity CWC | | (\$2.1) | timing |
| | | | | non-timing (BITS); timing |
| 23 | Difference on ADIT (due to BITS) | | (\$30.8) | (all other) |
| 24 | Difference on Customer Deposit & Unamortized items | | \$4.0 | timing |
| 25 | | | | |
| 26 | Rate Base at March 31 per ROE | Sum of Line 18 through Line 24 | \$949.6 | |
| 27 | | | | |
| 28 | Rate Base at March 31 PY per ROE | | \$895.0 | |
| 29 | | | | |
| 30 | Average Rate Base | | | |
| 31 | Per ESM (five-quarter average) | Per ESM | \$924.6 | |
| 32 | Per ROE (year over year average) | Average of Line 26 and Line 28 | \$922.3 | |
| 33 | | | | |
| 34 | Average Equity Rate Base | | | |
| 35 | Per ESM | Line 31 * 50.95% | \$471.1 | |
| 36 | Per ROE | Line 32 * 51% | \$469.9 | |
| 37 | | | | |
| 38 | Return (Actual Earnings) | | | |
| 39 | Per ESM | Line 4 ÷ Line 35 | 11.71% | |
| 40 | Per ROE | Line 15 ÷ Line 36 | 10.0% | |

Notes

ESM = CY 2020 annual distribution earnings report to RIPUC
ROE = earnings reported in FY 2021 NG plc Annual Report

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.

The 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

June 1, 2021
Date

**National Grid Docket No. 4770 (Rate Application) & Docket No. 4780 (PST)
Combined Service list updated 4/1/2021**

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