

April 15, 2020

VIA ELECTRONIC MAIL

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

RE: Docket 4999 - The Narragansett Electric Company d/b/a National Grid's Request for Interpretation of RIPUC NG-Gas No. 101 Regarding International Packaging Corporation's Request to Convert Capacity Exempt Load to Capacity Assigned Load
Responses to PUC Data Requests – Set 2

Dear Ms. Massaro:

I have enclosed ten (10) copies of National Grid's¹ responses to the second set of data requests issued by the Public Utilities Commission (PUC) in the above-referenced docket.

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

Very truly yours,



Jennifer Brooks Hutchinson

Enclosure

cc: Docket 4999 Service List
Leo Wold, Esq.
John Bell, Division
Al Mancini, Division

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

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

April 15, 2020
Date

**Docket No. 4999 – Narragansett Electric Co. d/b/a National Grid (Gas)
Petition for Declaratory Judgment - Service List 1/16/2020**

Name/Address	E-mail Distribution	Phone
Narragansett Electric Co. Adam M. Ramos, Esq. Hinckley, Allen & Snyder 100 Westminster St., Suite 1500 Providence, RI 02903	aramos@haslaw.com ;	
	cwhaley@hinckleyallen.com ;	
Jennifer Brooks Hutchinson, Esq. National Grid	Jennifer.Hutchinson@nationalgrid.com ;	781-907-2121
	Celia.Obrien@nationalgrid.com ;	
	Joanne.scanlon@nationalgrid.com ;	
Division of Public Utilities & Carriers Leo Wold, Esq.	Leo.Wold@dpuc.ri.gov ;	401-780-2130
	Al.mancini@dpuc.ri.gov ;	
	John.bell@dpuc.ri.gov ;	
	Jonathan.Schrag@dpuc.ri.gov ;	
	dmacrae@riag.ri.gov ;	
MFolcarelli@riag.ri.gov ;		
International Packaging Corp. Robert M. Duffy, Esq. Duffy & Sweeney, Ltd. 321 South Main Street, Suite 400 Providence, RI 02903	Rduffy@duffysweeney.com ;	401—455-0700
File an original & nine (9) copies w/: Luly E. Massaro, Commission Clerk Margaret Hogan, Commission Counsel Public Utilities Commission 89 Jefferson Blvd. Warwick RI 02888	Luly.massaro@puc.ri.gov ;	401-780-2107
	Margaret.hogan@puc.ri.gov ;	
	Cynthia.WilsonFrias@puc.ri.gov ;	
	Sharon.ColbyCamara@puc.ri.gov ;	
	Todd.bianco@puc.ri.gov ;	
	Alan.nault@puc.ri.gov ;	

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4999
In Re: Request for Interpretation of RIPUC NG-Gas No. 101
Regarding International Packaging Corporation's (InterPak) Request to
Convert Capacity Exempt Load to Capacity Assigned Load
Responses to the Commission's Second Set of Data Requests
Issued on April 2, 2020

PUC 2-1

Request:

Data Request PUC 1-1 asked the Company the following:

“In National Grid’s answer to the Division 1-1, the Company stated that it had advised InterPak as to the need for a “sophisticated and nuanced analysis” to determine if the Company is able to fulfill Interpak’s request to terminate the Capacity Exempt Account and increase the load serviced by the Capacity Assigned Account.

- a) Please describe what actions are required for a “sophisticated and nuanced analysis” of InterPak’s request, including the estimated timeframe for completion.
- b) Please describe that steps the Company has taken to undertake the “sophisticated and nuanced analysis.”

The Company’s response to PUC 1-1, directed the Commission to the Company’s response to PUC 1-6.

The Company’s answer to PUC 1-6 then directed the Commission to the Company’s answer in PUC 1-2.

Nowhere in the Company’s answer to PUC 1-2 does it answer the question asked in PUC 1-1. Please answer, *with specificity*, the question asked in PUC 1-2, without advising the Commission to look elsewhere for the answer.

Response:

The Narragansett Electric Company d/b/a National Grid’s (the Company) response to data request PUC 1-1 stated: “Please see the Company’s response to Division 1-6[,]” which the Company submitted on January 30, 2020. The Company did not intend to direct the Rhode Island Public Utilities Commission (PUC) to the Company’s response to PUC 1-6. The Company’s response to data request Division 1-6 contains a detailed description of the sophisticated and nuanced analysis the Company performed in response to International Packaging Corporation’s request. For the PUC’s ease of review, the Company has attached the response to data request Division 1-6 as Attachment PUC 2-1.

The Narragansett Electric Company

d/b/a National Grid

RIPUC Docket No. 4999

In Re: Request for Interpretation of RIPUC NG-Gas No. 101
Regarding International Packaging Corporation's (InterPak) Request to
Convert Capacity Exempt Load to Capacity Assigned Load
Responses to the Division's First Set of Data Requests
Issued on January 9, 2020

Division 1-6

Request:

Provide the Company's "analysis" of whether it has sufficient pipeline capacity to serve InterPak's newly requested load as averred in Paragraph No. 12 of the Petition. If the Company's "analysis" is not yet complete, identify when the Company anticipates completion of its analysis, and provide the "analysis" when it is complete.

Response:

To analyze whether InterPak could increase the load served by its Capacity Assigned account at 543 Mineral Spring Avenue to take on the load currently served through its Capacity Exempt account at 517 Mineral Spring Avenue, The Narragansett Electric Company d/b/a National Grid (the Company) first looked at its distribution system model. The Company uses the Synergi model to determine which take station(s) supply the load. Mineral Spring Avenue has a 12-inch cast iron low pressure (LP) main and a 4-inch bare steel 60 psig main. Initially, the Synergi model indicated that the Company served InterPak's Capacity Exempt load at 517 Mineral Spring Avenue from the LP main, whereas the Capacity Assigned load at 543 Mineral Spring Avenue received service from the 60 psig main. Upon further review, the Company determined that both loads are provided service from the 60 psig main. The Company's Dey Street take station is the primary feed to the 60 psig main. The Company determined, therefore, that the Dey Street take station supplies the majority of InterPak's design peak hour load.

For the second part of its analysis, the Company had to update the peak hour take station shortfall/surplus table to include the forecasted information for the 2020/21 winter, as the customer request included a September 2020 in-service date. Table 1 below shows the current forecasted peak hour take station shortfall/surplus, including the existing Interpak Capacity Exempt and Capacity Assigned accounts.

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4999

In Re: Request for Interpretation of RIPUC NG-Gas No. 101
Regarding International Packaging Corporation's (InterPak) Request to
Convert Capacity Exempt Load to Capacity Assigned Load
Responses to the Division's First Set of Data Requests
Issued on January 9, 2020

Division 1-6, page 2

Table 1

Pipeline/LNG	Lateral	Take Station	Meter No.	2020/21			2021/22		
				Total Supply Deliveries Company & Marketers (Dth/hr)	Total Firm Peak Hour Model Flow (DTH/hr)	Total Firm Peak Hour Balance (-) = Shortfall (+) = Surplus (DTH/hr)	Total Supply Deliveries Company & Marketers (Dth/hr)	Total Firm Peak Hour Model Flow (DTH/hr)	Total Firm Peak Hour Balance (-) = Shortfall (+) = Surplus (DTH/hr)
AGT	G	Barrington	00064	0	0	0	0	0	0
AGT	G	Warren	00012	811	771	40	811	772	39
AGT		Burrillville	00044	0	29	-29	0	29	-29
AGT	G	Crary St	00842	0	3,598	-3,598	0	3,614	-3,614
AGT	G	Dey St	00004	5,471	2,131	3,340	5,477	2,147	3,329
AGT	G	Cumberland	00083	42	49	-8	42	49	-8
AGT	G	Portsmouth	00013	1,045	779	266	1,045	779	266
AGT	G	Tiverton	00033	56	67	-11	56	67	-12
AGT	G	E Providence	00010	1,698	1,190	507	1,698	1,214	483
AGT	E	Westerly	00008	144	129	15	144	129	15
AGT		Montville	00059	208	221	-13	208	224	-15
TGP	Cranston	Cranston	420750	3,524	2,309	1,215	3,533	2,429	1,104
TGP	Cranston	Lincoln	420758	1,283	1,377	-94	1,283	1,398	-115
TGP	Cranston	Smithfield	420910	450	1,625	-1,175	450	1,632	-1,182
TGP		Cumberland	420135	1,343	1,343	0	1,343	1,343	0
PORTABLE LNG		Portsmouth		650	392	258	650	392	258
LNG		Exeter		1,000	1,000	0	1,000	1,000	0
LNG (incl. KLNG)		Providence		3,958	3,958	0	3,958	3,958	0
PORTABLE LNG		Cumberland		750	750	0	750	750	0
Total:				22,434	21,719	715	22,448	21,929	519

Table 2 below reflects the updated peak hour take station shortfall/surplus assuming Interpak's Capacity Exempt account becomes Capacity Assigned. The results of the review show that the Total Firm Peak Model Hour Flow remains the same, as the customer request is not adding load. The Total Supply Deliveries (Company and Marketers), however, decreases as Marketer deliveries are reduced by the portion of the Customer's load that the Company would plan for and provide from its portfolio¹. In this instance, the Company's surplus is sufficient to serve the load of the Capacity Exempt account previously served by a Marketer.

¹ For FT-1 Capacity Assigned customers, the Company is responsible for planning for the pipeline only portion of the customer's forecasted peak day load, and the Marketer is responsible for the storage and peaking portion of the customer's forecasted peak day load. The current pipeline/storage and peaking split is 56%/44%.

Prepared by or under the supervision of:
Elizabeth D. Arangio, Faye Brown, and Anthony P. Taddeo

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4999

In Re: Request for Interpretation of RIPUC NG-Gas No. 101
Regarding International Packaging Corporation's (InterPak) Request to
Convert Capacity Exempt Load to Capacity Assigned Load
Responses to the Division's First Set of Data Requests
Issued on January 9, 2020

Division 1-6, page 3

Table 2

Pipeline/LNG	Lateral	Take Station	Meter No.	2020/21			2021/22		
				Total Supply Deliveries Company & Marketers (Dth/hr)	Total Firm Peak Hour Model Flow (DTH/hr)	Total Firm Peak Hour Balance (-) = Shortfall (+) = Surplus (DTH/hr)	Total Supply Deliveries Company & Marketers (Dth/hr)	Total Firm Peak Hour Model Flow (DTH/hr)	Total Firm Peak Hour Balance (-) = Shortfall (+) = Surplus (DTH/hr)
AGT	G	Barrington	00064	0	0	0	0	0	0
AGT	G	Warren	00012	811	771	40	811	772	39
AGT		Burrillville	00044	0	29	-29	0	29	-29
AGT	G	Crary St	00842	0	3,598	-3,598	0	3,614	-3,614
AGT	G	Dey St	00004	5,469	2,131	3,338	5,475	2,147	3,327
AGT	G	Cumberland	00083	42	49	-8	42	49	-8
AGT	G	Portsmouth	00013	1,045	1,045	0	1,045	1,045	0
AGT	G	Tiverton	00033	56	67	-11	56	67	-12
AGT	G	E Providence	00010	1,698	1,190	507	1,698	1,214	483
AGT	E	Westerly	00008	144	129	15	144	129	15
AGT		Montville	00059	208	221	-13	208	224	-15
TGP	Cranston	Cranston	420750	3,521	2,309	1,212	3,529	2,429	1,100
TGP	Cranston	Lincoln	420758	1,283	1,377	-94	1,283	1,398	-115
TGP	Cranston	Smithfield	420910	450	1,625	-1,175	450	1,632	-1,182
TGP		Cumberland	420135	1,343	1,343	0	1,343	1,343	0
PORTABLE LNG		Portsmouth		650	126	524	650	126	524
LNG		Exeter		1,000	1,000	0	1,000	1,000	0
LNG (incl. KLNG)		Providence		3,958	3,958	0	3,958	3,958	0
PORTABLE LNG		Cumberland		750	750	0	750	750	0
			Total:	22,429	21,719	709	22,443	21,929	514

Prepared by or under the supervision of:
Elizabeth D. Arangio, Faye Brown, and Anthony P. Taddeo

In Re: Request for Interpretation of RIPUC NG-Gas No. 101
Regarding International Packaging Corporation's (InterPak) Request to
Convert Capacity Exempt Load to Capacity Assigned Load
Responses to the Commission's Second Set of Data Requests
Issued on April 2, 2020

PUC 2-2

Request:

PUC 1-5 was issued and answered as follows:

Request: In the event that Interpak were to sell its business to a third-party purchaser, what options would the new purchaser have, in the Company's opinion, for gas service?

Response: The Narragansett Electric Company d/b/a National Grid (the Company) interprets RIPUC NGGas No. 101 (the Gas Tariff) to require that a capacity exemption is tied to the premises (or location) where the Company is providing capacity exempt gas distribution service. Accordingly, if International Packing Corporation (Interpak) were to sell its business, the capacity exemption that applies to the account serving 517 Mineral Spring Avenue in Pawtucket, Rhode Island (as well as any other capacity exempt account locations Interpak owns) would remain capacity exempt and subject to all the provisions that pertain to capacity exempt accounts under the Gas Tariff. Similarly, any purchaser also would be able to take over control of all Interpak's non-capacity exempt accounts (including the capacity assigned account providing gas distribution service at 543 Mineral Spring Avenue in Pawtucket, Rhode Island) and would have all the rights and responsibilities applicable to such accounts under the Gas Tariff. A purchaser's options for gas service, therefore would be the same as the options that Interpak currently has as the owner of those accounts.

- a) Assume that a third-party purchaser of Interpak's building, had no functional need for gas service at the capacity exempt service located at 517 Mineral Spring Avenue. Does the Company take the position that a third-party purchaser would be required to maintain the capacity exempt service? If yes, please direct the Commission to the provision(s) of the Gas Tariff upon which the Company relies in making this determination.
- b) Alternatively, assume that a third-party purchaser of Interpak's building, had no functional need for gas service at the capacity assigned service located at 543 Mineral Spring Avenue. Does the Company take the position that a third-party purchaser would be required to maintain the capacity assigned service? If yes, please direct the Commission to the provision(s) of the Gas Tariff upon which the Company relies in making this determination.

See response starts on page 2

In Re: Request for Interpretation of RIPUC NG-Gas No. 101
Regarding International Packaging Corporation's (InterPak) Request to
Convert Capacity Exempt Load to Capacity Assigned Load
Responses to the Commission's Second Set of Data Requests
Issued on April 2, 2020

PUC 2-2, page 2

Response:

2-2 a) If a third-party purchaser of Interpak's building had no functional need for gas service at the capacity exempt service located at 517 Mineral Spring Avenue, the purchaser (or Interpak) would request an account shut off. This, in effect, closes the account; however, the gas service line to the building would remain intact and the service location would remain designated as capacity exempt.

The capacity exempt status is tied to the service at the specific location or premises, not the account. *See* RIPUC NG-GAS 101, Section 1, General Rules and Regulations, Schedule B, Sheet 1, Tenth Revision, Definitions. The tariff defines a "Capacity Exempt Customer" as "[a]ny Customer who is the customer of record *at a location* having a Capacity Exemption." (emphasis added.) This section defines "Capacity Exemption" as "[a] *location having Gas Usage* that is not subject to a mandatory pipeline capacity assignment from the Company." (emphasis added.) This definition also clarifies which customers can be capacity exempt. It states,

Customers are capacity exempt if they (1) elected to retain their Capacity Exemption at a specific location as part of the 1999 revisions to the Company's Business Choice program in Docket RIPUC 2902, (2) receive delivery service on the Company's Non-Firm Sales or Non-Firm Transportation rate schedules, or (3) elected capacity exemption as a New Customer in accordance with Section 6, Transportation Terms and Conditions, Schedule C, Part 1.07.1.

In addition, Section 1.07.1 describes capacity exemption for New Firm Loads. It states, "New Customers requesting firm service that are classified as Large or Extra-Large and electing FT-1 transportation service will not be required to take assignment of the Company's capacity resources . . . and must notify the Company in writing of its intent to be Capacity Exempt." A "New Customer" is defined as "[a] Customer taking a supply of gas at a new Point of Delivery that has not been previously served by the Company."

Accordingly, the tariff explicitly requires that capacity exemption (and capacity assignment as the case may be) follows the premises, not the customer. In other words a new customer can choose to be capacity exempt only if they are moving

In Re: Request for Interpretation of RIPUC NG-Gas No. 101
Regarding International Packaging Corporation's (InterPak) Request to
Convert Capacity Exempt Load to Capacity Assigned Load
Responses to the Commission's Second Set of Data Requests
Issued on April 2, 2020

PUC 2-2, page 3

into a new premises or location, which has never been served by the Company. A new account at an existing premises cannot choose to be capacity exempt, or capacity assigned.

For these reasons, in the fact pattern described in the request to part a), above, the next customer to request a new account at this address would remain as capacity exempt.

2-2 b) If a third-party purchaser of Interpak's building had no functional need for gas service at the capacity assigned service located at 543 Mineral Spring Avenue, the purchaser (or Interpak) would request an account shut off. This, in effect, closes the account; however, the gas service line to the building would remain designated as a capacity assigned location not eligible for a capacity exemption.

For the same reasons as described in the response to 2-2- a), above, the capacity assigned status is tied to the service at the specific premises or location, not the account. Please see the response to 2-2 a), above, for the specific tariff references governing the account status. In the fact pattern described in the request to part b), above, the next customer to request a new account at this address would remain as capacity assigned.

The Narragansett Electric Company

d/b/a National Grid

RIPUC Docket No. 4999

In Re: Request for Interpretation of RIPUC NG-Gas No. 101
Regarding International Packaging Corporation's (InterPak) Request to
Convert Capacity Exempt Load to Capacity Assigned Load
Responses to the Commission's Second Set of Data Requests
Issued on April 2, 2020

PUC 2-3

Request:

If Interpak had proceeded by only requesting an increase in load to its Capacity Assigned Account, without referencing a desire to eventually terminate its Capacity Exempt Account, what steps would National Grid have taken to respond to this request?

Response:

International Packaging Corporation (InterPak) did not reference "a desire to eventually terminate its Capacity Exempt Account." Rather, The Narragansett Electric Company d/b/a National Grid (the Company) understood through conversations with Interpak that an increase in load on the Capacity Assigned Account would be related to a decrease in load from the Capacity Exempt Account due to a reconfiguration of equipment within their facilities, and not due to an overall increase in consumption across the facilities. If InterPak had sought only to increase the load to its Capacity Assigned Account, then the Company would have analyzed its ability to fulfill that request and performed the capacity analysis, which would have assumed the continued delivery of the existing load to the Capacity Exempt Account.