

November 13, 2020

VIA ELECTRONIC MAIL

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

RE: Docket No. 5058 – National Grid’s Proposed Terms and Conditions for Municipal Aggregators
Responses to PUC Data Requests – Set 1

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a National Grid (“National Grid” or the “Company”), enclosed¹, please find the Company’s responses to the Public Utilities Commission’s (“Commission’s”) First Set of Data Requests in the above-referenced docket. Please note that responses to the following data requests are not included in this filing as the Company requested and received an extension through November 18, 2020: 1-5 and 1-6.

Thank you for your attention to this filing. If you have any questions or concerns, please do not hesitate to contact me at 401-784-4263.

Sincerely,



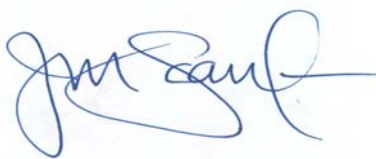
Andrew S. Marcaccio

cc: Docket 5058 Service List

¹ 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 followed by five hard copies filed with the Clerk within 24 hours of the electronic filing.

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.



Joanne M. Scanlon

November 13, 2020

Date

Docket No. 5058 – National Grid’s Proposed Terms & Conditions for Municipal Aggregators

Docket No. 5059 – National Grid’s Proposed Change to Existing Terms & Conditions for NPPs

Service Lists updated 10/2/2020

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| | | |
|--|--|--|
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The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 5058
In Re: National Grid's Application to Add
Terms and Conditions for Municipal Aggregators
Responses to the Commission's First Set of Data Requests
Issued on October 28, 2020

PUC 1-1

Request:

Please provide an explanation of the process (with timeline, if possible) of how the transfer of customer data from National Grid to a Nonregulated Power Producer happens under RIPUC No. 1191.

Response:

Data is transferred between a Nonregulated Power Producer and the Company via electronic data interchange (EDI).

To utilize EDI, a Nonregulated Power Producer must have possession of the customer's account number. For customers generally enrolled (non-aggregation) with a Nonregulated Power Producer, the Nonregulated Power Producer obtains the account number from the customer. In accordance with Section 2.5 of the Nonregulated Power Producer Terms and Conditions, the Company presumes that by possessing the account number and initiating a transaction via EDI, the Nonregulated Power Producer has obtained the requisite customer consent to proceed with that EDI transaction. National Grid does not provide any customer-specific data via EDI to a Supplier. The transfer of data via EDI is processed daily. There is a 1:00 p.m. cutoff for being included in the evening batch process. The response times are listed for each transaction if received by 1:00 p.m.

Please see the below Table for data that is accessible to Nonregulated Power Producers under RIPUC No. 1191:

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PUC 1-1, page 2

| Transaction | Length of Time for Response |
|---------------------------------------|--|
| EDI 814 Enrollment/Drop/Reinstatement | Accept or Reject response sent by 9:00 p.m. the next day |
| EDI 814 Change | Will be sent by 9:00 p.m. on day after the account level change has been processed in billing system. |
| EDI 814 Move | Sent by Utility to notify Supplier of a customer move within service territory. Will be sent by 9:00 p.m. on day after change has been made in billing system. |
| EDI 814 Historical Usage (HU) Request | The 867 HU response will be sent by 9:20 p.m. the next day. |
| EDI 867 HU Response | Contains 12 months of usage (or as much is available). |
| EDI 810 Monthly Usage (MU) | Contains the most recent validated monthly usage, which will be used to calculate Supplier Charges that will be included on Consolidated bill. Will be sent by 3:20 a.m. of the day following the validation of meter read. |
| EDI 820 Invoice Advise | Contains the amount of the Supplier Charges that will be remitted to the Supplier as per the executed Billing Services Agreement. Will be sent by 4:00 a.m. of the day following the completion of billing process. |

In addition to the above, Nonregulated Power Producers may request a non-residential customer list as indicated in RIPUC 1191, Section 2.6. Nonregulated Power Producers must execute a Non-Disclosure agreement with the Company to be added to the contact list of NPPs that are approved to receive access to the Company's Customer Lists. The Customer Lists are updated quarterly and are provided to NPPs via an FTP site. The Company's Billing Operations department uploads the updated lists to the FTP site. The login credentials are also updated quarterly and provided to NPPs when the lists are updated.

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PUC 1-2

Request:

Please provide an explanation of the process, with timeline, of how the transfer of customer data from National Grid to a Municipal Aggregator would happen under the proposed Terms and Conditions.

Response:

Prior to Approval by the Public Utilities Commission (PUC) of a Municipal Aggregation Plan

When the Company receives a letter from a duly designated officer of a municipality, the Company will provide twelve month's aggregated consumption usage information to the Municipal Aggregator to facilitate the formation of a Municipal Aggregation Plan. This is the only piece of data that is provided to a Municipal Aggregator until the Municipal Aggregation Plan is approved by the PUC. This data would typically be provided within three business days via email, using Egress Switch. Egress Switch is email encryption software used to securely share confidential information by email and send and receive large files. We also note that the Company uses Egress Switch to file confidential attachments with the PUC.

After Approval by the PUC of a Municipal Aggregation Plan

Once an order is issued by the PUC approving a Municipal Aggregation Plan, eligible customer-specific data would be provided to the Municipal Aggregator and/or the Nonregulated Power Producer (if one is procured at this time). The customer-specific data is provided so that the Municipal Aggregator/Nonregulated Power Producer can effectuate the Municipal Aggregation Plan and the provisions of R.I. Gen. Laws § 39-3-1.2. For example, the customer name and mailing address allows the Municipal Aggregator/Nonregulated Power Producer to mail the required education materials including the customer opt-out cards.

The customer data provided by the Company to the Municipal Aggregator (and, once selected, Nonregulated Power Producer) would include the following fields:

As in the Proposed Terms and Conditions for Municipal Aggregators as filed:
primary customer name, first four characters of last name (required for electronic data interchange (EDI) enrollment purposes), account number (required for EDI enrollment purposes), service address, mailing address, distribution rate, as well as generation indicated if requested (last resort service or competitive supplier).

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Additional information to be provided (the Company anticipates updating the language to the Proposed Terms and Conditions for Municipal Aggregators):
Billing Cycle, ICAP Tag, Rate Description, County Code.

This data would be typically provided within 3 business days and sent via email, using Egress Switch.

After Implementation of a Municipal Aggregation Plan

Once a Municipal Aggregation Plan is implemented, Nonregulated Power Producers would utilize EDI. As mentioned in the Company's response to PUC 1-1, data is transferred between a Nonregulated Power Producer and the Company via EDI. EDI transactions would be executed in the same manner regardless of whether the Nonregulated Power Producer is providing commodity through a Municipal Aggregation Plan or is serving as an ordinary supplier. For customers being supplied as part of an approved Municipal Aggregation Plan, the Nonregulated Power Producer obtains the account number from the Company (as explained in the paragraph above).

To facilitate the ongoing Municipal Aggregation, newly eligible customer data would be permitted to be requested by the Municipal Aggregator/Nonregulated Power Producer on a monthly basis. This would be the same customer specific data as described above. This data would typically be provided within 3 business days and sent via email, using Egress Switch.

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PUC 1-2, page 3

Please see the below Table for data that would be shared via email by using Egress Switch:

| When Data is Provided | Transaction | Length of Time for Response |
|-----------------------|---|-----------------------------|
| Prior to enrollment | 12 Months Aggregated Data by Rate Class | 3-5 Business Days |
| Order Issued | Customer Name | 3-5 Business Days |
| Order Issued | Name Key for Enrollment ¹ | 3-5 Business Days |
| Order Issued | Account Number | 3-5 Business Days |
| Order Issued | Service Address | 3-5 Business Days |
| Order Issued | Mailing Address | 3-5 Business Days |
| Order Issued | Generation Indicator | 3-5 Business Days |
| Order Issued | Rate | 3-5 Business Days |
| Order Issued | Billing Cycle | 3-5 Business Days |
| Order Issued | ICAP Tag | 3-5 Business Days |
| Order Issued | Rate Description | 3-5 Business Days |
| Order Issued | County Code | 3-5 Business Days |

¹ Residential Customer: First four characters of the residential customer's last name
Commercial Customer: First four characters of the commercial customer's company name

Please see the Table below for data that would be accessible to Nonregulated Power Producers performing under a Municipal Aggregation Plan via EDI (the same for Nonregulated Power Producers performing under RIPUC No. 1191):

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PUC 1-2, page 4

| Transaction | Length of Time for Response |
|---------------------------------------|--|
| EDI 814 Enrollment/Drop/Reinstatement | Accept or Reject response sent by 9:00 p.m. the next day |
| EDI 814 Change | Will be sent by 9:00 p.m. on day after the account level change has been processed in billing system. |
| EDI 814 Move | Sent by Utility to notify Supplier of a customer move within service territory. Will be sent by 9:00 p.m. on day after change has been made in billing system. |
| EDI 814 Historical Usage (HU) Request | The 867 HU response will be sent by 9:20 p.m. the next day. |
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| EDI 810 Monthly Usage (MU) | Contains the most recent validated monthly usage, which will be used to calculate Supplier Charges that will be included on Consolidated bill. Will be sent by 3:20 a.m. of the day following the validation of meter read. |
| EDI 820 Invoice Advise | Contains the amount of the Supplier Charges that will be remitted to the Supplier as per the executed Billing Services Agreement. Will be sent by 4:00 a.m. of the day following the completion of billing process. |

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PUC 1-3

Request:

Please explain the differences between the availability of customer data from National Grid to a Municipal Aggregator or supplier under the Municipal Aggregation Terms and Conditions versus the Nonregulated Power Producer Terms and Conditions.

Response:

The availability of necessary data for Nonregulated Power Producers (NPPs) to bill customers, whether participating in a municipal aggregation or not, is readily and automatically obtainable as it is extracted directly from the Company's billing system and transferred to Nonregulated Power Producers or their agents using electronic data interchange (EDI).

As indicated in the Company's response to PUC 1-1, under the Nonregulated Power Producer Terms and Conditions, NPPs must have customer consent to access customer information and the Company presumes consent if the NPP has the customer account number. The only exception to customer consent under the Nonregulated Power Producer Terms and Conditions is the non-residential customer list. However, customers have the right to opt out of being listed on the non-residential customer list.

Unlike the NPP Terms and Conditions, the proposed Municipal Aggregation Terms and Conditions would permit and direct the Company to provide Municipal Aggregators and NPPs who are participating in an approved Municipal Aggregation Plan with customer data without customer consent. As indicated in the Company's response to PUC 1-2, the customer data is provided so that the Municipal Aggregator can effectuate the Municipal Aggregation Plan and the provisions of R.I. Gen. Laws § 39-3-1.2.

Like the data exchanged through EDI, the data in connection with municipal aggregation is pulled from the Company's billing system. However, the process differs from there, as the Company utilizes a program, using specific fields to request required data and then the data is processed by the Company's Information Support Team. This data is readily available; however, this process takes longer than EDI. Please refer to the Company's response to PUC 1-2 for a list of the information provided in connection with municipal aggregations.

PUC 1-4

Request:

Under the current RIPUC No. 1191, please explain whose customer data (and which of that data) is made available to Nonregulated Power Producers without the customer's explicit consent.

Response:

With the exception of a non-residential customer list which is provided in accordance with Section 2.6 of the Nonregulated Power Producer Terms and Conditions (see the Company's response to PUC 1-1), no customer data is made available to Nonregulated Power Producers (NPPs) without the customer's explicit consent.

In accordance with Section 2.5 of the Nonregulated Power Producer Terms and Conditions, it is the responsibility of the NPP to obtain the customer's explicit consent. The Company presumes the NPP has gained the requisite consent when the NPP uses the customer account number and initiates an EDI transaction.

For reference, as currently worded and as proposed, Section 2.5 of the Nonregulated Power Producer Terms and Conditions reads as follows:

2.5 Release of Customer Information

It is recognized that from time to time Suppliers may request information about customers. Suppliers seeking information about Customers will be instructed to obtain a written consent from a Customer before Narragansett will disclose any such information, consistent with the procedures set forth below. Upon a Supplier obtaining written consent, Narragansett shall be required to provide twelve months of a Customer's historic usage data to the Supplier.

The written consent should include a statement substantially the same as the following:

“[CUSTOMER] authorizes [NAME OF Supplier] to obtain twelve months' of historical usage data from Narragansett Electric.”

The written consent should include a statement substantially the same as the following: “[CUSTOMER] authorizes [NAME OF Supplier] to obtain twelve months' of historical usage data from Narragansett Electric.” The written consent

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must be signed by the Customer and include the account number(s) that are authorized for release. If the Customer is a company, it must be signed by an officer on behalf of the company. The Supplier shall be required to keep the consent form on file and produce it upon request. The Supplier will submit to Narragansett, using the EDI transactions, an Historical Usage Transaction containing the customer account number and first four characters of the Customer's name. Once Narragansett receives this transaction, Narragansett presumes that the Supplier has obtained appropriate authorization and will send the usage information to the supplier via EDI. Narragansett reserves the right to provide standard billing information directly to the Customer, who in such case will have the discretion to provide it to the Supplier. In such case, Narragansett will inform the Supplier that the data has been delivered to the Customer and may be obtained directly from the Customer.

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PUC 1-7

Request:

At the Technical Session held on October 15, 2020, National Grid's representatives indicated that Colonial Power's proposal to amend Section 4B of the proposed terms and conditions to require National Grid to provide certain customer information "at any time following" approval of a Municipal Aggregator by the Commission would be burdensome, more costly, and prompt the Company to seek cost recovery.

- a. Please explain how the information is compiled.
- b. Please itemize the expense items to provide the information.

Response:

- a. The information for the request described in Section 4B of the Proposed Terms and Conditions are compiled by the process as described in the Company's response to PUC 1-2. Once the raw data is retrieved from the billing system mainframe, the reports are reviewed and scrubbed for accuracy by of a billing operations analyst assigned to work on municipal aggregations.
- b. The expense items to provide this information varies from municipality to municipality. Colonial Power Group is requesting "no less than twelve months of most recent monthly kWh customer consumption usage". This report is a lengthy report that takes time of a billing operations analyst assigned to work on municipal aggregations to review to ensure accuracy. The amount of time spent assembling the data and then manually reviewing the data varies depending on the size of the municipality. For example, based on National Grids experience with municipal aggregations in Massachusetts, in a municipality such as Millville, MA with only 697 enrolled accounts, this process may take as little as 30 to 45 minutes to process the data from the Company's mainframe, review it, make necessary corrections and email via Egress. With a municipality as large as Worcester, MA with over 45,000 enrolled accounts, this same process may take 2 to 3 hours. The time it takes to pull data from the mainframe differs as well, depending upon the size of the file, time of month and the time of day.

To provide this data at "at any time following" approval of a Municipal Aggregation by the Commission is timely and burdensome.

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PUC 1-8

Request:

At the Technical Session held on October 15, 2020, National Grid's representatives agreed that the information Good Energy was seeking as proposed amendments to Section 4B and as new Section 4C would be necessary to a municipal aggregator, but that it is a new requirement and the Company may seek new fees.

- a. Please explain how the information is compiled.
- b. Please itemize the expense items to provide the information.

Response:

- a. How the information is compiled to satisfy the proposed amendments by Good Energy to Section 4B is described in the response to PUC 1-7. The information as described in Good Energy's proposed amendments for Section 4C is pulled from our system by using a query in the Company's mainframe to obtain the actively enrolled accounts for a specific municipal aggregation.
- b. The types of work and expense to satisfy the proposed amendments by Good Energy to Section 4B is described in the response to PUC 1-7. The information described in Good Energy's proposed amendments for Section 4C takes approximately 30 minutes to process, manually review and email using Egress to the Aggregator, but can vary depending on the size of the municipality for which information is requested.

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PUC 1-9

Request:

At the Technical Session held on October 15, 2020, National Grid's representatives raised some concerns with Colonial Power's suggested addition to number 11 on page 5 of 16. Please provide the explanation in writing.

Response:

Colonial Power Group recommends amending the language of this section to include providing duplicate electronic data interchange (EDI) transactions to Municipal Aggregators/Suppliers *or duplicate records to both if requested by Municipal Aggregator or its agent*. This request is unfitting as it would require National Grid's EDI provider to direct the same daily EDI file to two different entities. This process would undoubtedly require an expense to the Company. The Supplier and the Aggregator have a business relationship as well as an executed Electric Service Agreement. National Grid should not be required to take action to bear the responsibility to ensure that the Aggregator receives the correct data from the active Supplier in order for the Aggregator to confirm that their financial agreement is satisfied. The burden to provide a duplicate daily EDI file to the Aggregator, so that the Aggregator can confirm the Supplier's data, is clearly the responsibility of the Supplier rather than the utility.