

December 23, 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 2**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a National Grid (“National Grid” or the “Company”), enclosed please find the Company’s responses to Public Utilities Commission’s Second Set of Data Requests in the above-referenced docket.<sup>1</sup>

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

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<sup>1</sup> 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

December 23, 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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The Narragansett Electric Company  
d/b/a National Grid  
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PUC 2-1

Request:

PUC 1-7 asked the Company to itemize the expense items to provide certain customer information "at any time following" approval of a Municipal Aggregator by the Commission.

- a. In this response, please quantify the expense.
- b. In its data responses, Colonial suggested it would seek the information four times per year. Please quantify the expense (if it is simply [4 x (response to a)], just say so).

Response:

- a) The expense for providing this data would be at a rate for a billing operations analyst of approximately \$100 per hour. As indicated in PUC 1-7, the expense for this data varies depending upon the number of accounts in the municipality. For example, in a small 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 edits and email it 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 to process the data from the Company's mainframe, review it, and make necessary edits and email it via Egress. Additionally, the time it takes to pull data from the mainframe varies, depending upon the size of the file, time of month and the time of day.
- b) The expense for providing this data four times a year is simply multiplying this amount by four times. For example:
  - a. A small municipality such as Millville takes approximately 45 minutes: 45 minutes times 4 equals 180 minutes or 3 hours per year.
  - b. A large municipality such as Worcester takes approximately 3 hours: 3 hours times 4 equals 12 hours per year.

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PUC 2-2

Request:

In its response to PUC 1-9, the Company objects to Colonial Power's proposal to require National Grid's EDI provider to direct the same daily EDI file to two different entities for business reasons, but also on a cost basis. Please quantify the incremental cost National Grid would incur to provide the information to a municipal aggregator as well as to the supplier (a) once annually; (b) four times per year; and (c) one time prior to the expiration of the municipal aggregation plan. Please itemize the costs and total them.

Response:

As an initial matter, National Grid reiterates its objection to Colonial Power Group's proposal to require National Grid's EDI provider to direct the same daily EDI file to two different entities. The onus to police data for accuracy is between an Aggregator and Supplier and such terms should be provided for in a fully executed agreement between the Aggregator and Supplier. The Company does not believe providing this data to Aggregators adds value to the RFP process or provides value to municipal aggregation customers.

From a data sharing perspective, the Company notes that the EDI data within the EDI files requested by Colonial Power is currently treated (in Massachusetts) as being solely the Supplier's data and the Company does not share this data with Aggregators or any other entity. If the Company were to provide the EDI files to two entities, additional data security concerns may arise.

There are two components to the estimated cost as both the Company and the Company's EDI vendor must configure their systems to allow for the transaction to take place. The Company estimates that it would take approximately 256 hours to set up the billing system to provide this data to Aggregators. At a charge of \$100/hour, the estimated cost for the Company's portion is \$25,600. In addition, the Company's EDI vendor's estimated cost is \$99,000 to configure its system. As with any programming project, the full scope of the project may not be known until work commences. Accordingly, the estimates are subject to change.

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PUC 2-2, page 2

Please note that the frequency of providing the data (i.e. once annually, four times per year, or one time prior to the expiration of a municipal aggregation plan) is not a primary cost driver. The primary cost drivers are the system configurations as explained in the paragraph above. Additionally, there are incremental costs around setting up each municipal aggregation. It will not be as much as the initial configurations, but employee resources will be utilized meaning that time is taken away from other job duties that are more aligned with customer interests as opposed to the interests of aggregators.

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PUC 2-3

Request:

The proposed terms and conditions contemplate National Grid providing municipal aggregators with customer data that would allow the customer to be enrolled in the municipal aggregation to receive supply from the municipality's chosen competitive energy supplier. Currently, a competitive energy supplier (nonregulated power producer) only has access to that information once the customer affirmatively chooses to enroll with that supplier. When will the municipality's chosen supplier receive the customer specific data to enroll the customers who do not opt out? Do suppliers have access to the information prior to being chosen by the municipality to serve the municipal aggregation?

Response:

The municipality's chosen supplier (nonregulated power producer) would be provided with the customer-specific data required to enroll eligible customers once an electric service agreement is executed between the municipality and the supplier and provided to the Company. The electric service agreement would be the agreement between the municipality and the chosen competitive supplier to provide electric supply to the municipality. The opt-out process is typically managed by the competitive supplier using the initial set of customer-specific data described in Section 4B of the Company's proposed Terms and Conditions for Municipal Aggregators:

“Upon the RIPUC's approval of a Municipal Aggregator and its retail load aggregation plan pursuant to R.I. Gen. Laws § 39-3-1-2, the Company shall provide the customer enrollment information to the Municipal Aggregator in an electronic format (to be determined by the Company) that will include the primary customer name, first four characters of the last name (required for EDI enrollment purposes) account number (required purposes), service address, mailing address for solicitation purposes, distribution rate, and generation indicator (Last Resort Service or competitive supply.”

Once the opt-out process is complete, the competitive supplier would remove the customers that opted out of the municipal aggregation from the customer-specific list provided by National Grid and then use this list to submit enrollments. National Grid would not participate in the opt-out process.

Competitive suppliers would not have access to customer-specific information prior to being chosen by the municipality to serve the municipal aggregation.