

January 14, 2022

**VIA ELECTRONIC MAIL**

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

**RE: Docket 5080 – System Reliability Procurement 2021-2023 Three-Year Plan Responses to Data Requests – PUC Set 1**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a National Grid (“National Grid” or the “Company”), enclosed is the electronic version of the Company’s responses to the Public Utilities Commission’s First Set of Data Requests in the above-referenced matter.<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

Enclosures

cc: Docket 5080 Service List  
Jon Hagopian, Esq.  
John Bell, Division

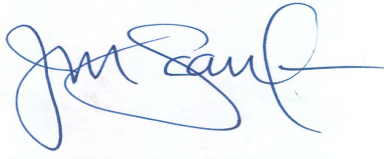
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<sup>1</sup> Per a communication from Commission counsel on October 4, 2021, the Company is submitting an electronic version of this filing followed by six (6) hard copies filed with the Clerk within 24 hours of the electronic filing.

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.

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.



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Joanne M. Scanlon

January 14, 2022  
Date

**Docket No. 5080 - National Grid – System Reliability Procurement 2021-2023 Plan**  
**Service list updated 4/1/2021**

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PUC 1-1

Request:

Regarding the Screening Criteria for the gas system:

- a. Can National Grid provide a more specific definition of “critical reliability” used in the screen. For example, a more physical description related to system conditions, physical characteristics, service interruption, etc.
- b. Unlike the Screening Criteria for the electric system, asset condition is not a proposed screen for gas system projects. At the November 30, 2021 Technical Session, it was unclear if National Grid had meant to imply projects related to asset condition would automatically screen out of review for alternatives. Please confirm National Grid’s intent regarding projects related to asset condition.

Response:

- a. National Grid utilizes Synergi network analysis modeling software to perform various analyses necessary for distribution system operations (e.g., regulator pressure settings, LNG requirements) and capital planning. For capital reliability planning, National Grid identifies asset investments that ensure continued safe and reliable operation of the gas system in meeting forecasted customer requirements. For asset replacement investments, the project scope is reviewed in the system model to assess immediate, local, and system-wide reliability impacts to the gas network. If the system model determines there is a negative impact (e.g., design peak hour system pressures decrease close to or near system minimum pressures or creates a system constraint) to system reliability locally or system-wide, scope changes will be recommended.

For the purposes of Non-Pipeline Alternatives (NPAs), “critical reliability” refers to a project or part of a project that provides system-wide reliability benefits, in addition to local system benefits. As the Company continues to develop the NPA framework, we will continue to refine how “critical reliability” is integrated into Gas System Planning.

- b. Assuming such projects meet the NPA Screening Criteria, National Grid will not exclude projects for NPA analysis based on asset condition.

PUC 1-2

Request:

Regarding gas system projects:

- a. Please provide a table for each round of evaluation depicted in Figure 1 (page 16) of the Year End Report that show what categories in Table 7 (page 17) of the Year End Report are formally considered.
- b. Please add a column for the table provided in response to part *a* that indicates whether the category is formally given a point-system score.
- c. Please add a column to the table that indicates which team members contribute to the evaluation of each category—for example, which team members contribute to a formal scoring within a round.
- d. Please add a column depicting the maximum scores for each category.
- e. For each round of evaluation, please indicate if a formal qualitative and/or quantitative minimum threshold must be met for a project to move to the next round, and what that minimum threshold is (currently).

Response:

Please see the Excel version of Attachment PUC 1-2 for detailed response to PUC 1-2.

- a. The categories for evaluation are stated in column B of the tabs 'Summary', 'Go No-Go Round 1', 'Scorecard – Round 2', 'Scorecard – Round 3', 'Scorecard – Round 4', and 'Scorecard – Round 5'. Some project requirements are evaluated in a preliminary fashion in Round 1 to establish a "Go" or "No-Go" rating (with a Pass/Fail rating system based on critical project requirements), as detailed in the tab 'Go No-Go Round 1'.
- b. Whether a category is formally given a point-system score is indicated in column C of the tabs 'Scorecard – Round 2', 'Scorecard – Round 3', 'Scorecard – Round 4', and 'Scorecard – Round 5', with the point-system detailed in the tab headers. For Round 1, as detailed in the tab 'Go No-Go Round 1', the evaluation is a Yes/No response to each question which results in a Pass/Fail rating.
- c. The teams that contribute to the evaluation of each category are detailed in column D of the tabs 'Scorecard – Round 2', 'Scorecard – Round 3', 'Scorecard – Round 4', and 'Scorecard – Round 5'.

PUC 1-2, page 2

- d. The maximum score for each category for Round 2 onwards is detailed in column E of the tabs 'Scorecard – Round 2', 'Scorecard – Round 3', 'Scorecard – Round 4', and 'Scorecard – Round 5'. Teams assign a maximum score of 5 for each category, as detailed in the point-system score in the tab headers of the tabs 'Scorecard – Round 2', 'Scorecard – Round 3', 'Scorecard – Round 4', and 'Scorecard – Round 5'. For project requirements that are preliminarily evaluated in Round 1, as detailed in the tab 'Go No-Go Round 1', each is assigned a "Yes" or "No" response, which determines if the proposal will pass or fail, respectively, "Go" or "No-Go", respectively, for proceeding through the rest of the NPWA evaluation. If a proposal receives a "Fail" rating in any category, it will not proceed on to future rounds.
- e. The minimum threshold is a combination of quantitative and qualitative assessment. Generally and quantitatively, the Company prefers to have the requirements of each category at least be met (i.e., at least a score of 3 for each category) through each round of the evaluation process. However, the Company will qualitatively allow proposals to proceed through evaluation rounds if some categories for a proposal receive a score below 3 while other categories for that same proposal receive scores higher than 3 and therefore show potential for a viable solution. This allows the opportunity for the Company to request further information from a bidder and request clarifications be made to the initial proposal through the evaluation process. At the end of evaluation, the Company does expect proposals to meet all requirements (i.e., at least a score of 3) for every category.

The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 5080  
In Re: System Reliability Procurement 2021-2021 Three-Year Plan  
Responses to the Commission's First Set of Data Requests  
Issued on December 16, 2021

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Attachment PUC 1-2

The Company has provided the Excel version of Attachment PUC 1-2.

PUC 1-3

Request:

Please provide the same as PUC 1-2, but regarding electric system projects.

Response:

Please see the Excel version of Attachment PUC 1-3 for detailed response to PUC 1-3. The categories for evaluation are stated in column B of the tabs 'Summary', 'Go No-Go Round 1', 'Scorecard – Round 2', 'Scorecard – Round 3', and 'Scorecard – Round 4'. Some project requirements are evaluated in a preliminary fashion in Round 1 to establish a "Go" or "No-Go" rating (with a Pass/Fail rating system based on critical project requirements), as detailed in the tab 'Go No-Go Round 1'. Note that the "Offer Price" category in Round 2 entails an assessment of cost-effectiveness, while the "Offer Price" category of Rounds 3 and 4 entails a deeper economic analysis including estimated interconnection and contract costs in addition to an iterated cost-effective analysis.

Whether a category is formally given a point-system score is indicated in column C of the tabs 'Scorecard – Round 2', 'Scorecard – Round 3', and 'Scorecard – Round 4', with the point-system detailed in the tab headers. For Round 1, as detailed in the tab 'Go No-Go Round 1', the evaluation is a Yes/No response to each question which results in a Pass/Fail rating.

The teams that contribute to the evaluation of each category are detailed in column D of the tabs 'Scorecard – Round 2', 'Scorecard – Round 3', and 'Scorecard – Round 4'.

The maximum score for each category for Round 2 onwards is detailed in column E of the tabs 'Scorecard – Round 2', 'Scorecard – Round 3', and 'Scorecard – Round 4'. Teams assign a maximum score of 5 for each category, as detailed in the point-system score in the tab headers of the tabs 'Scorecard – Round 2', 'Scorecard – Round 3', and 'Scorecard – Round 4'. For project requirements that are preliminarily evaluated in Round 1, as detailed in the tab 'Go No-Go Round 1', each is assigned a "Yes" or "No" response, which determines if the proposal will pass or fail, respectively, "Go" or "No-Go", respectively, for proceeding through the rest of the NWA evaluation. If a proposal receives a "Fail" rating in any category, it will not proceed on to future rounds.

The minimum threshold is a combination of quantitative and qualitative assessment. Generally and quantitatively, the Company prefers to have the requirements of each category at least be met (i.e., at least a score of 3 for each category) through each round of the evaluation process. However, the Company will qualitatively allow proposals to proceed through evaluation rounds if some categories for a proposal receive a score below 3 while other categories for that same



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PUC 1-3, page 2

proposal receive scores higher than 3 and therefore show potential for a viable solution. This allows the opportunity for the Company to request further information from a bidder and request clarifications be made to the initial proposal through the evaluation process. At the end of evaluation, the Company does expect proposals to meet all requirements (i.e., at least a score of 3) for every category.

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Attachment PUC 1-3

The Company has provided the Excel version of Attachment PUC 1-3.

PUC 1-4

Request:

With regard to the responses in PUC 1-2 and 1-3, if there are any of the following differences between electric and gas system project evaluation, please explain why:

- a. different categories are reviewed in different rounds;
- b. different team members contribute to different evaluation categories;
- c. different maximum scores are used for the same categories;
- d. different minimum thresholds are used for the same rounds.

Response:

- a. Different categories are reviewed in different rounds between Non-Wires Alternatives (NWA) proposal evaluations for the electric system and Non-Pipeline Alternatives (NPA) proposal evaluations for the gas system generally because of differences in system technologies between the gas and electric business units and differences between NWA and NPA process and program maturity. NPA accounts for an additional round dedicated to evaluating Customer Acceptance (i.e., NPA bid evaluation Round 4) while NWA does not account for Customer Acceptance for electric system solutions. This difference is due to the current technology gap: for the electric system the Company considers electric-to-electric solutions with NWA solutions while for the gas system the Company considers gas-to-alternate energy sources with most NPA solutions, such as with electrification solutions, to address system constraints. Such a change in energy source that may result from NPA solution implementation has a greater impact on cross-utility systems, end-use technologies, and customers in comparison to implementation of NWA solutions. NPA specifically separates Cost-Effectiveness into its own category for evaluation while NWA lumps the evaluation of cost-effectiveness, and still accounts for it, under the cost-related umbrella of Offer Price; there is no effective difference here in practice. Most importantly, NWA iteratively evaluates each of its categories in every round while NPA evaluates specific categories in each round; this difference is because the NPA program is in the early stages of development and the NPA team is still gathering knowledge and experience with regard to technologies applicable to the NPA scenario and their corresponding economic and financial impacts when applied to reduce, remove, or defer an infrastructure investment.

PUC 1-4, page 2

- b. Different team members contribute to different evaluation categories between NWA and NPA proposal evaluations because NPA intends to leverage expertise of Energy Efficiency, Demand Response, Electrification and other subject matter experts (SMEs) given that the NPA program is in the early stages of development and the NPA team does not yet have the appropriate level of expertise in comparison to the NWA team. Additionally, the NWA team typically does not need to draw on the experience of certain teams, such as Electrification, given technology differences between the gas and electric systems, namely that with NWA the Company considers electric-to-electric solutions as opposed to the gas-to-electric or to alternate energy source conversion with NPA solutions.
- c. The Company utilizes the same point-score system and therefore maximum scores for both NWA and NPA proposal evaluations.
- d. The Company utilizes the same minimum threshold approach for each evaluation round for both NWA and NPA proposal evaluations.