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September 21, 2022

Mark D. Marini, Secretary Department of Public Utilities One South Station, 5<sup>th</sup> Floor Boston, MA 02110

#### Re: <u>Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid;</u> D.P.U. 22-BSF-D3

Dear Secretary Marini:

On behalf of Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid ("National Grid" or "the Company"), I am submitting National Grid's Basic Service filing for the periods November 1, 2022 through April 30, 2023 for the residential and commercial customer groups. This filing includes the results of National Grid's most recent solicitation for Basic Service and proposed retail rates for the Basic Service pricing options resulting from the solicitation. The Explanatory Statement to the Basic Service filing provides: (1) a summary of the contents of Attachments 1 through 7 submitted in support of the Company's Basic Service filing for the periods November 1, 2022 through April 30, 2022 for the residential and commercial customer groups; (2) an overview of the Competitive Procurement Process; (3) an overview of the costs associated with the Renewable Energy Portfolio Standard – Class I, Renewable Energy Portfolio Standard – Class II, Alternative Energy Portfolio Standard, Clean Energy Standard, and Clean Peak Energy Portfolio Standard; and (4) the contracts entered into with suppliers.

National Grid respectfully requests that the Department of Public Utilities (the "Department") approve the results of National Grid's solicitation for Basic Service set forth in Attachment 2 of the Basic Service filing within five (5) business days. Attachment 2 contains National Grid's calculation of the proposed base Basic Service rates at the retail meter for the sixmonth fixed price option and variable pricing option for the residential and commercial customer groups. All proposed base fixed and variable Basic Service rates include the recovery of estimated Generation Information System ("GIS") Costs, assessed to National Grid, on a prospective basis. These rates do not include the currently-effective Basic Service Administrative Cost Adjustment Factors ("BSACFs") and the currently-effective Smart Grid Customer Cost Adjustment Factors ("SGCCAFs").

National Grid recognizes that there are numerous macro-economic issues impacting customers today and that the proposed Basic Service rates are significantly higher than those

currently in effect as well as those approved by the Department for the period November 1, 2021 through April 30, 2022. The Company also understands the impact this increased financial burden can have on our customers and communities. Consistent with the Company's Tariff for Basic Service, the proposed base Basic Service rates reflect the actual cost of electricity that National Grid purchases from the wholesale market as well as an estimate of the cost to comply with the various Massachusetts renewable energy standards requirements. National Grid does not include a mark-up or profit on the costs associated with providing Basic Service.

I am also enclosing a motion for confidential treatment of the following: (1) National Grid's analysis of the Basic Service bids (Attachment 5); (2) unredacted versions of Transaction Confirmations (Attachment 6); and (3) Attachment 7, which contains further analyses requested by the Department in Excel Format. I am providing these documents directly to Hearing Officer Patrick Houghton under seal, with the understanding that these materials will be held in confidence in the Department's offices and will not be distributed publicly unless the Department denies the Company's motion.

The suppliers' Transaction Confirmations are conditioned on the Department's approval of the results of National Grid's solicitation within five (5) business days of the date of this filing. Accordingly, National Grid respectfully requests the Department's approval of the results of National Grid's solicitation for Basic Service set forth in Attachment 2 on or before September 28, 2022.

Thank you for your attention to this matter.

Very truly yours,

John K. Halib

John K. Habib, Esq.

cc: Patrick M. Houghton, Hearing Officer
Emily Luksha, Electric Power Division Director
Nathan Forster, Chief, Energy and Telecommunications Division
Jacqueline Birhle, Office of the Attorney General
Brooke Skulley, Assistant General Counsel and Director, National Grid

# THE COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF PUBLIC UTILITIES

Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid Basic Service Filing

D.P.U. 22-BSF-D3

## **APPEARANCE OF COUNSEL**

In the above-entitled proceeding, I hereby appear for and on behalf of Massachusetts

Electric Company and Nantucket Electric Company d/b/a National Grid.

Respectfully submitted,

John K. Halib

John K. Habib, Esq. Keegan Werlin LLP 99 High Street, Ste. 2900 Boston, MA 02110 Phone: (617) 951-1400 Email: jhabib@keeganwerlin.com

Dated: September 21, 2022

# THE COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF PUBLIC UTILITIES

Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid Basic Service Filing

D.P.U. 22-BSF-D3

### **APPEARANCE OF COUNSEL**

In the above-entitled proceeding, I hereby appear for and on behalf of Massachusetts

Electric Company and Nantucket Electric Company d/b/a National Grid.

Respectfully submitted,

BrookedShulley

Brooke Skulley Assistant General Counsel and Director National Grid 40 Sylvan Road Waltham, MA 02451 Phone: (781) 907-1846 brooke.skulley@nationalgrid.com

Dated: September 21, 2022

#### THE COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF PUBLIC UTILITIES

Massachusetts Electric Company and Nantucket)Electric Company d/b/a National Grid Basic)Service Filing)

**D.P.U. 22-BSF-D3** 

#### **MOTION FOR PROTECTIVE TREATMENT**

Now comes Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid (together "National Grid" or "Company") and hereby requests that the Department of Public Utilities (the "Department") grant protection from public disclosure certain confidential, sensitive and proprietary information in accordance with G.L. c. 25, § 5D. In support of this Motion, National Grid states the following:

1. As part of the Company's Basic Service Filing, it is submitting: (1) the analysis of basic service bids that the Company received in response to its Request for Power Supply Proposal ("RFP") requesting bids for its basic service load for the periods November 1, 2022 through April 30, 2023 for residential and commercial Basic Service customers ("Service Period"); (2) the contracts between National Grid and its electric suppliers for the Service Period, which consists of Transaction Confirmations of previously executed Master Power Agreements (collectively "Supply Contracts"); and (3) an Excel file containing analyses of basic service bids, bid premium estimates and RPS/APS compliance cost information (collectively, "Attachments"). This information is provided in Confidential Attachments 5, 6 and 7, respectively, to the Company's filing and contains information that the Company considers confidential, sensitive, and proprietary in accordance with G.L. c. 25, § 5D.

2. The Company requests that the Department grant protection from public disclosure for the confidential information set forth in Attachments 5, 6, and 7 of the Company's filing. The Company has redacted the confidential portions of the Attachments from the public version of this filing and has provided one hard copy of the confidential materials directly to the Department's Hearing Officer, under seal, on the premise that these materials will be held in confidence in the Department's offices and will not be distributed publicly unless the Department denies this Motion.

3. The Department may protect information from public disclosure pursuant to G.L. c. 25, § 5D to the extent that the information is: 1) a trade secret; 2) confidential; 3) competitively sensitive; or 4) proprietary. National Grid submits that the analysis of basic service bids and data contained in the rankings constitutes sensitive proprietary information. Protecting this information from public disclosure is in the public interest because disclosure would make public all of the competitive bids received in the RFP process. Although participants understood that the resulting rates would be tied to National Grid's supply contract prices, the disclosure of all of the competing bids could have adverse competitive effects on future bids for basic service, not only for National Grid, but also for other utilities in the Commonwealth that will need to seek bids for basic service.

Similarly, the exact terms under which National Grid agreed to purchase basic service supply needs for the Service Period are sensitive proprietary information. The disclosure of the supply contracts could have adverse competitive effects on future bids and contracts for basic service, not only for National Grid, but also for other utilities in the Commonwealth that will need to seek bids and enter into contracts for basic service. Additionally, should information regarding the Company's RPS and APS costs be made available to the public, the Company could be placed at a competitive disadvantage in future competitive solicitations for RECs since participating suppliers would have information on which to base any future prices for RECs. Moreover, disclosure of such information could have adverse competitive effects on future competitive solicitations, not only for National Grid but also for other utilities in the state that will need to seek RECs and enter into contracts for their purchase. This information is also subject to Confidentiality Agreements the Company has with the various suppliers.

4. The Department has recognized that this information is information that the companies and bidders treat as confidential and is proprietary and competitively sensitive. See <u>e.g.</u>, <u>Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid</u>, D.P.U. 18-BSF-D3, D.PU. 19-BSF-D3, D.P.U. 20-BSF-D3 and D.P.U. 21-BSF-D3.

5. With regard to the protection from disclosure of confidential bid, pricing, and contract information at issue here it is entitled to one year of protection from the date of this motion, and information regarding the number of bidders is entitled to indefinite protection.

WHEREFORE, for the reasons set forth in this Motion, National Grid respectfully requests that the Department grant protective treatment to the information contained in Attachments 5, 6, and 7, as described above.

Respectfully submitted,

MASSACHUSETTS ELECTRIC COMPANY NANTUCKET ELECTRIC COMPANY d/b/a NATIONAL GRID

By their attorney,

BrookedShulley

Brooke Skulley Assistant General Counsel and Director National Grid 40 Sylvan Road Waltham, MA 02451 brooke.skulley@nationalgrid.com

Dated: September 21, 2022

### THE COMMONWEALTH OF MASSACHUSETTS

#### **DEPARTMENT OF PUBLIC UTILITIES**

Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid Basic Service Filing

D.P.U. 22-BSF-D3

#### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused to be served the foregoing documents in the above-referenced docket upon all parties of record in this proceeding in accordance with the requirements of 220 C.M.R. 1.05 (Department's Rules of Practice and Procedure), by E-Filing.

Respectfully submitted,

Brooke & Shulley

Brooke Skulley Assistant General Counsel and Director National Grid 40 Sylvan Road Waltham, MA 02451 Phone: (781) 907-1846 Email: brooke.skulley@nationalgrid.com

Date: September 21, 2022