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November 1, 2019

## VIA HAND DELIVERY & ELECTRONIC MAIL

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

**RE: Docket 4610 – The Narragansett Electric Company d/b/a National Grid  
Electric Environmental Response Cost Report  
Fiscal Year 2019**

Dear Ms. Massaro:

In accordance with National Grid's<sup>1</sup> Environmental Response Fund Tariff, RIPUC No. 2173, Sheet 2, subparagraph (C), enclosed for filing with the Public Utilities Commission (PUC) are ten (10) copies of the Company's Environmental Response Cost Report for its electric operations for the period April 1, 2018 through March 31, 2019 (Fiscal Year 2019) in the above-referenced docket.

Thank you for your attention to this filing. If you have any questions, please contact me at (401) 709-3337.

Sincerely,



Leticia C. Pimentel

### Enclosures

cc: Docket 4610 Service List  
John Bell, Division  
Leo Wold, Division  
Christy Hetherington, Esq.

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<sup>1</sup> 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.



Brittny Keophoxay

November 1, 2019

Date

**Docket No. 4610 – National Grid – Electric Environmental Response Fund  
Service List as of 1/9/2019**

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<b>File an original &amp; nine (9) copies w/:</b> Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick RI 02888	<a href="mailto:MFolcarelli@riag.ri.gov">MFolcarelli@riag.ri.gov</a> ;	401-780-2107
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**THE NARRAGANSETT  
ELECTRIC COMPANY**  
d/b/a National Grid

**ENVIRONMENTAL RESPONSE  
COST REPORT  
FOR THE PERIOD  
APRIL 1, 2018 THROUGH  
MARCH 31, 2019**

**Docket No. 4610**

**Submitted to:**

**Rhode Island Public Utilities  
Commission**

**Submitted by:**

**nationalgrid**

## **EXECUTIVE SUMMARY**

This document contains the Environmental Response Fund (Fund) Report for The Narragansett Electric Company d/b/a National Grid (Company) for the period April 1, 2018 through March 31, 2019 (fiscal year 2019). This report is filed in accordance with RIPUC No. 2173, Sheet 2, subparagraph (C).

Section I contains a monthly summary of contributions to the Fund and payments from the Fund to calculate the Fund balance for fiscal year 2019, including interest at the customer deposit rate.

Section II contains a summary of payments by expense type, as well as a breakdown of expenses for each environmental site listed in RIPUC No. 2173, Sheets 2-3, subparagraph (D).

Section III includes Attachments 1 and 2 to this document. Attachment 1 contains additional detail regarding contractor costs associated with the various environmental sites during fiscal year 2019. Attachment 2 contains additional detail regarding consultant costs associated with the various environmental sites during fiscal year 2019.

Backup data for each environmental site such as invoices, purchase orders, and requests for checks are available for review upon request.

RHODE ISLAND PUBLIC UTILITIES COMMISSION  
ENVIRONMENTAL RESPONSE COST REPORT  
APRIL 1, 2018 THROUGH MARCH 31, 2019

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SECTION I

THE NARRAGANSETT ELECTRIC COMPANY

ENVIRONMENTAL RESPONSE COSTS

APRIL 1, 2018 THROUGH MARCH 31, 2019

ENVIRONMENTAL RESPONSE FUND AND RELATED INTEREST CALCULATION

The Narragansett Electric Company (co49) 5360  
Environmental Response Fund and Related Interest Calculation

04/01/2018 to 03/31/2019

<u>Period</u>	<u>Beginning Balance (BB)</u>	<u>Contributions (1)</u>	<u>Payments</u>	<u>Ending Balance</u>	<u>Interest Base (2)</u>	<u>Interest Rate (3)</u>	<u>Interest</u>	<u>Fund Balance (4)</u>	<u>Cumulative Fund Balance</u>
April-18	\$12,784,289	256,500	93,679	\$12,947,110	\$12,865,699	2.33%	\$24,981	\$12,947,110	\$12,972,091
May-18	\$12,947,110	256,500	86,725	\$13,116,884	\$13,031,997	2.33%	\$25,304	\$13,116,884	\$13,167,169
June-18	\$13,116,884	256,500	125,676	\$13,247,708	\$13,182,296	2.33%	\$25,596	\$13,247,708	\$13,323,589
July-18	\$13,247,708	256,500	90,968	\$13,413,240	\$13,330,474	2.33%	\$25,883	\$13,413,240	\$13,515,004
August-18	\$13,413,240	343,865	129,345	\$13,627,760	\$13,520,500	2.33%	\$26,252	\$13,627,760	\$13,755,776
September-18	\$13,627,760	256,500	81,674	\$13,802,586	\$13,715,173	2.33%	\$26,630	\$13,802,586	\$13,957,232
October-18	\$13,802,586	256,500	89,444	\$13,969,642	\$13,886,114	2.33%	\$26,962	\$13,969,642	\$14,151,250
November-18	\$13,969,642	256,500	100,755	\$14,125,387	\$14,047,514	2.33%	\$27,276	\$14,125,387	\$14,334,271
December-18	\$14,125,387	273,383	137,779	\$14,260,991	\$14,193,189	2.33%	\$27,558	\$14,260,991	\$14,497,433
January-19	\$14,260,991	1,066,500	89,810	\$15,237,681	\$14,749,336	2.33%	\$28,638	\$15,237,681	\$15,502,761
February-19	\$15,237,681	256,500	202,954	\$15,291,227	\$15,264,454	2.33%	\$29,638	\$15,291,227	\$15,585,945
March-19	\$15,291,227	256,500	158,030	\$15,389,696	\$15,340,461	2.91%	\$37,201	\$15,389,696	\$15,721,615
		\$3,992,248	1,386,841		Fund balance plus current year interest		\$331,919	\$15,721,615	

(1) Reflects the annual contributions of \$3.078 million pursuant to Commission Order 17354, issued January 29,2003 in Docket 2930.

(2) Interest Base reflects a simple average of the beginning and ending balances.

(3) The interest rate and associated interest calculation are based upon the methodology for calculating interest on customer deposits. Interest is compounded annually and is credited only in months with a positive fund balance. The interest rate changed from 2.33% to 2.91% effective March 1, 2019.

(4) Positive fund balance indicates overfunded situation; negative fund balance indicates underfunded situation.

Narragansett Electric Company - co49 / 5360  
 Environmental Response Fund Receipts  
 Fiscal Year 2019

	<u>Monthly Contribution</u> (1)	<u>Insurance Settlement</u>	<u>Totals</u>
April 2018	256,500		256,500
May 2018	256,500		256,500
June 2018	256,500		256,500
July 2018	256,500		256,500
August 2018	256,500	87,365 (2)	343,865
September 2018	256,500		256,500
October 2018	256,500		256,500
November 2018	256,500		256,500
December 2018	256,500	16,883 (3)	273,383
January 2019	256,500	810,000 (4)	1,066,500
February 2019	256,500		256,500
March 2019	256,500		256,500
	<u>3,078,000</u>	<u>914,248</u>	<u>3,992,248</u>

The annual contribution for Narragansett was set based on previous rate orders and does not get adjusted.

(1) Reflects the annual contributions of \$3.078 million pursuant to Commission Order 17354, issued January 29,2003 in Docket 2930.

(2) Related to payment received from Home Insurance Company.

(3) Related to payment received from Armour Risk Management.

(4) Related to payment received from London Market Insurer.



SECTION II

THE NARRAGANSETT ELECTRIC COMPANY

ENVIRONMENTAL RESPONSE COSTS

APRIL 1, 2018 THROUGH MARCH 31, 2019

MGP AND OTHER ENVIRONMENTAL SITES COST SUMMARY

**Section II.**  
**Site Specific Expenses**  
**April 1, 2018 through March 31, 2019**  
**(Fiscal Year 2019)**

**A. Washington Street, Bristol**

This is the site of a former manufactured gas plant located at the corner of Hope and Washington Street in Bristol, Rhode Island. The plant was constructed in 1855 and operated until approximately 1903 before moving operations to a plant on Thames Street in Bristol. The site is approximately 4 acres and is now the front lawn of the Guiteras Middle School. An engineered cap was placed on the site and it is monitored annually. Activities performed in fiscal year 2019 included annual groundwater sampling, inspection of the engineered cap, and preparation of regulatory submittals.

	Payments During this Period <sup>1</sup>	Payments to date
1 Consulting Costs	\$16,928	\$437,127
2 Construction/Disposal/Removal Costs	\$328	\$279,414
3 DEM/EPA Oversight Costs	\$253	\$2,620
4 Property Purchases/Settlements/Legal	\$1,813	\$13,757
5 Other Costs		
Project Management	\$5,089	\$66,678
Water Bill Payment for 15 Bay St.	\$0	\$3,270
Permit Application Fees	\$0	\$1,750
Miscellaneous	\$0	\$486
RI General Treasurer Reimbursement	\$0	\$604
Total	\$24,411	\$805,706

1. Includes \$109.69 from a legal invoice that will be transferred to the Real Estate department in FY20. The credit will be reflected in the FY20 report for this site.

**Section II.**  
**Site Specific Expenses**  
**April 1, 2018 through March 31, 2019**  
**(Fiscal Year 2019)**

**B. Thames Street, Bristol**

This is the site of a former manufactured gas plant located on Thames Street in Bristol, Rhode Island. The former gas plant is now a part of the parking lot and pool area of a residential condominium development (completed by others). During development, the condominium developer remediated the upland portion of the former gas plant via the construction of a containment wall and cap. The Company negotiated a settlement with the developer in which the Company reimbursed the developer for costs associated with the Rhode Island Department of Environmental Management (RIDEM)-required upland environmental remediation and secured an Environmental Land Usage Restriction (ELUR) and easement on the property. The settlement did not address impacted sediments off-shore of the condominium development. In fiscal year 2019, the Company performed the RIDEM-required annual inspection of the engineered cap for the ELUR.

	Payments During this Period	Payments to date
1 Consulting Costs	\$1,053	\$1,162,469
2 Construction/Disposal/Removal Costs	\$0	\$36,877
3 DEM/EPA Oversight Costs	\$0	\$20,824
4 Property Purchases/Settlements/Legal	\$0	\$3,020,491
5 Other Costs		
Shellfish Transplant	\$0	\$858
Project Management	\$420	\$66,864
Miscellaneous	\$0	\$513
RI General Treasurer reimbursement	\$0	\$5,962
Total	\$1,473	\$4,314,858

**Section II.**  
**Site Specific Expenses**  
**April 1, 2018 through March 31, 2019**  
**(Fiscal Year 2019)**

**C. Main Street, Warren**

This is the site of a former manufactured gas plant which began operation in the early 1930s. The property consists of approximately 1.38 acres which was most recently used as a Company service center. The Company completed site investigation activities and the Rhode Island Department of Environmental Management-approved remedy consisted of installation of an engineered cap. In fiscal year 2019, work at the site included preparation of regulatory submittals, installation of an engineered cap and recording the Environmental Land Usage Restriction for the site.

		Payments During this Period <sup>1,2</sup>	Payments to date
1	Consulting Costs	\$4,041	\$142,228
2	Construction/Disposal/Removal Costs	\$2,500	\$162,042
3	DEM/EPA Oversight Costs	\$169	\$486
4	Property Purchases/Settlements/Legal	\$5,119	\$39,727
5	Other Costs		
	Fence Installation	\$0	\$21,387
	Project Management	\$2,983	\$53,882
	RI General Treasurer Reimbursement	\$0	\$1,276
	<b>Total</b>	<b>\$14,812</b>	<b>\$421,028</b>

1. Includes \$146.26 from a legal invoice that will be transferred to the Washington Street, Bristol site in FY20. The credit will be reflected in the FY20 report for this site and the charge will be applied to the Washington Street, Bristol site.

2. Includes \$4,972.84 from a legal invoice that will be transferred to the Real Estate department in FY20. The credit will be reflected in the FY20 report for this site.

**Section II.**  
**Site Specific Expenses**  
**April 1, 2018 through March 31, 2019**  
**(Fiscal Year 2019)**

**D. Canal Street, Westerly**

This site is the location of a former manufactured gas plant which ceased operation in the 1950s or early 1960s. The property is currently vacant since all structures were razed in advance of remedial activities. In fiscal year 2008, the Company and the Town of Westerly entered into an Environmental Land Usage Restriction and Grant of Easement Agreement regarding the Noyes Avenue Wellhead located in Stonington, Connecticut. This agreement provides that no groundwater shall be pumped from the Noyes Avenue Wellhead for use as potable water without the Company's approval. In fiscal year 2019, activities performed included a non-aqueous phase liquid and groundwater gauging event and preparation of regulatory submittals for the proposed remedy implementation.

	Payments During this Period	Payments to date
1 Consulting Costs	\$2,114	\$836,906
2 Construction/Disposal/Removal Costs	\$702	\$119,962
3 DEM/EPA Oversight Costs	\$0	\$7,424
4 Property Purchases/Settlements/Legal	\$987	\$1,321,902
5 Other Costs		
Project Management	\$7,153	\$101,530
Lab Analysis Fees	\$0	\$150
PGC Reimbursement	\$0	-\$53,239
RI General Treasurer Reimbursement	\$0	\$950
Total	\$10,956	\$2,335,585

**Section II.**  
**Site Specific Expenses**  
**April 1, 2018 through March 31, 2019**  
**(Fiscal Year 2019)**

**E. Industrial Drive, Westerly**

This property was previously utilized as the location of an above-ground gas storage holder for gas produced at the Canal Street manufactured gas plant. During fiscal year 2019, the Company performed the Rhode Island Department of Environmental Management-required annual inspection of the engineered cap for the Environmental Land Usage Restriction.

	Payments During this Period <sup>1</sup>	Payments to date
1 Consulting Costs	\$910	\$258,813
2 Construction/Disposal/Removal Costs	\$0	\$369,431
3 DEM/EPA Oversight Costs	\$84	\$4,317
4 Property Purchases/Settlements/Legal	\$768	\$38,905
5 Other Costs	\$764	\$80,401
Total	\$2,526	\$751,867

1. Includes \$438.78 from a legal invoice that will be transferred to Canal Street, Westerly in FY20. The credit will be reflected in the FY20 report for this site and the charge will be applied to Canal Street, Westerly.

**Section II.**  
**Site Specific Expenses**  
**April 1, 2018 through March 31, 2019**  
**(Fiscal Year 2019)**

**F. Tidewater Street, Pawtucket**

This site is the location of a former manufactured gas plant situated along the western banks of the Seekonk River in Pawtucket, Rhode Island. The site is approximately 23 acres and includes a former electrical generating station, former manufactured gas plant (MGP) and two on-site fill areas. One of the larger MGPs in Rhode Island, the plant operated from approximately 1881 to 1954. After 1954, the plant produced oil gas for peak shaving purposes until 1968 when it was decommissioned. The site is currently used for electric and gas operations by the Company. Costs incurred during fiscal year 2019 are related to environmental support associated with the City of Pawtucket Master Plan redevelopment project, which includes the northern portion of the site; maintenance of publicly available sources of information regarding the Tidewater Environmental Project (including the National Grid Tidewater website and two bulletin boards near the site) per the Rhode Island Department of Environmental Management (RIDEM)-approved Public Involvement Plan; annual groundwater monitoring and quarterly non-aqueous phase liquid gauging and preparation of a report to document sampling; bi-weekly site inspections and preparation of bi-weekly and monthly status reports for submittal to RIDEM; implementation of design-related investigation activities to support the proposed remedy design; completion and submission of the Remedial Action Work Plan for the site; and initiation of permitting for the proposed remedy design.

	Payments During this Period	Payments to date
Balance Prior to NGRID/EUA Merger		\$147,637
1 Consulting Costs	\$297,607	\$3,596,453
2 Construction/Disposal/Removal Costs	\$5,764	\$2,272,580
3 DEM/EPA Oversight Costs	\$2,230	\$46,310
4 Property Purchases/Settlements/Legal	\$4,710	\$112,674
5 Other Costs		
RI General Treasurer Reimbursement	\$0	\$6,538
Project Management/Other	\$9,853	\$305,279
Preliminary Cost Estimate	\$0	\$2,641
Total	\$320,164	\$6,490,112

**Section II.**  
**Site Specific Expenses**  
**April 1, 2018 through March 31, 2019**  
**(Fiscal Year 2019)**

**G. Exchange Street, Pawtucket**

This approximately 2.5 acre site was used for remote gas storage sometime before 1902 until sometime between 1923 and 1949. The property is currently paved and used as a parking lot. Site investigations have not been conducted at this time. No activities were performed in fiscal year 2019.

	Payments During this Period	Payments to date
Balance Prior to NGRID/EUA Merger		\$0
1 Consulting Costs	\$0	\$0
2 Construction/Disposal/Removal Costs	\$0	\$0
3 DEM/EPA Oversight Costs	\$0	\$0
4 Property Purchases/Settlements/Legal	\$0	\$0
5 Other Costs (Preliminary Cost Estimate)	\$0	\$2,641
Total	\$0	\$2,641



**Section II.**  
**Site Specific Expenses**  
**April 1, 2018 through March 31, 2019**  
**(Fiscal Year 2019)**

**H. High Street, Central Falls**

This is the site of a former manufactured gas plant that operated from 1850 until 1887. Site investigations have not been conducted at this site. The property is currently utilized for the manufacture of firearms components. Consultant costs were incurred in fiscal year 2019 for project management.

	Payments During this Period	Payments to date
Balance Prior to NGRID/EUA Merger		\$0
1 Consulting Costs	\$58	\$15,477
2 Construction/Disposal/Removal Costs	\$0	\$0
3 DEM/EPA Oversight Costs	\$0	\$0
4 Property Purchases/Settlements/Legal	\$1,316	\$5,096
5 Other Costs (Preliminary Cost Est./Sanborn Maps)	\$0	\$2,766
Total	\$1,374	\$23,339

**Section II.**  
**Site Specific Expenses**  
**April 1, 2018 through March 31, 2019**  
**(Fiscal Year 2019)**

**I. Hamlet Avenue, Woonsocket**

The site is the location of a former manufactured gas plant and former power plant in Woonsocket, Rhode Island. The site consists of five areas based on historical and current site usage, including the former power plant and manufactured gas plant areas. Portions of the former gas plant area are currently used for Company gas and electric operations. The former power plant area was separated from the other areas in 2001 to facilitate a Brownfield Redevelopment being performed by others. The Company was required to remediate and dispose of impacted soils during the redevelopment activities in this area. Remediation activities on the power plant area began in late 2008 and were completed in fiscal year 2010. A report documenting the implemented remedial activities was submitted to Rhode Island Department of Environmental Management (RIDEM) in July 2010. In February 2016, based on the results of site investigations, RIDEM assigned a new case number for the substation/access road area of the site. Activities performed in fiscal year 2019 included the installation of a new perimeter fence, site inspections and investigations, and discussions with the property owner of the former power plant area at 115 Front Street for the preparation of an Environmental Land Usage Restriction.

	Payments During this Period	Payments to date
Balance Prior to NGRID/EUA Merger		\$52,372
1 Consulting Costs	\$41,238	\$923,229
2 Construction/Disposal/Removal Costs	\$50,261	\$786,954
3 DEM/EPA Oversight Costs	\$3,109	\$8,404
4 Property Purchases/Settlements/Legal	\$3,138	\$32,651
5 Other Costs (Preliminary Cost Est.)		
Preliminary cost estimate	\$0	\$2,641
Project Management/Other	\$23,565	\$105,900
RI General Treasurer Reimbursement	\$0	\$13,935
<b>Total</b>	<b>\$121,311</b>	<b>\$1,926,086</b>

**Section II.**  
**Site Specific Expenses**  
**April 1, 2018 through March 31, 2019**  
**(Fiscal Year 2019)**

**J. Pond Street, Woonsocket**

This site was used for remote gas storage from 1865 until sometime between 1911 and 1950. Site investigations have not been conducted at this time. The property is currently in use as a housing authority office. No activities were performed in fiscal year 2019.

		Payments During this Period	Payments to date
Balance Prior to NGRID/EUA Merger			\$0
1	Consulting Costs	\$0	-\$7,837
2	Construction/Disposal/Removal Costs	\$0	\$0
3	DEM/EPA Oversight Costs	\$0	\$0
4	Property Purchases/Settlements/Legal	\$0	\$0
5	Other Costs		
	Preliminary Cost Estimate	\$0	\$2,641
	Project Management	\$0	\$117
	Total	\$0	-\$5,079

**Section II.**  
**Site Specific Expenses**  
**April 1, 2018 through March 31, 2019**  
**(Fiscal Year 2019)**

**K. Cumberland (remote disposal location)**

This property is currently owned by the Pawtucket Water Supply Board. During the 1930s and 1940s, the Blackstone Valley Gas Company transported oxide box waste from the Tidewater manufactured gas plant site to an area located within this property. Rhode Island Department of Environmental Management (RIDEM) excavated and disposed of the box wastes from this site in the late 1980s. Site investigation and remediation work was completed in 2005. In April 2011, RIDEM issued a No Further Action Letter for the work performed at the site. No future activities are anticipated.

	Payments During this Period	Payments to date <sup>1</sup>
Balance Prior to NGRID/EUA Merger		\$0
1 Consulting Costs	\$0	\$61,675
2 Construction/Disposal/Removal Cost	\$0	\$4,136
3 DEM/EPA Oversight Costs	\$0	\$296,382
4 Property Purchases/Settlements/Legal	\$0	\$0
5 Other Costs		\$0
Other - Payment from Escrow Account Agreement	\$0	-\$46,562
Preliminary Cost Estimate	\$0	\$2,641
Project Management	\$0	\$1,695
RI General Treasurer Reimbursement	\$0	\$3,923
Total <sup>1</sup>	\$0	\$323,890

1. The "Payments to date" for the PWSB Site, Cumberland (remote disposal location) costs and the "Total" project cost include an additional \$296,382 in charges that relate to the Escrow Agreement with the Pawtucket Water Supply Board.

**Section II.**  
**Site Specific Expenses**  
**April 1, 2018 through March 31, 2019**  
**(Fiscal Year 2019)**

**L. Lawn Street, Attleboro, MA (remote disposal location)**

This site has been identified as a remote disposal site for purifier box waste. The box waste has been removed and a Response Action Outcome Statement has been filed. This site is closed and no further work is anticipated.

		Payments During this Period	Payments to date
Balance Prior to NGRID/EUA Merger			\$1,619,940
1	Consulting Costs	\$0	\$0
2	Construction/Disposal/Removal Costs	\$0	\$22,936
3	DEM/EPA Oversight Costs	\$0	\$0
4	Property Purchases/Settlements/Legal	\$0	\$0
5	Other Costs	\$0	\$34
	Total	\$0	\$1,642,910

**Section II.**  
**Site Specific Expenses**  
**April 1, 2018 through March 31, 2019**  
**(Fiscal Year 2019)**

**M. Mendon Road, Attleboro, MA (remote disposal location)**

This site is approximately 5 acres in size and is comprised of two parcels of land located on Mendon Road in Attleboro, Massachusetts. This site was formerly used as a sand and gravel excavation and processing area from 1932 until the early 1960s. During that time, purifier box waste from the Blackstone Valley Gas and Electric Company's Tidewater manufactured gas plant in Pawtucket, RI was disposed of on the property. The waste was excavated and disposed of by the Massachusetts Department of Environmental Quality Engineering in the mid-1980s. This site is closed and no further work is anticipated.

	Payments During this Period	Payments to date
Balance Prior to NGRID/EUA Merger		\$670,893
1 Consulting Costs	\$0	\$0
2 Construction/Disposal/Removal Costs	\$0	\$0
3 DEM/EPA Oversight Costs	\$0	\$0
4 Property Purchases/Settlements/Legal	\$0	\$3,477,465
5 Other Costs	\$0	\$0
Total	\$0	\$4,148,358

**Section II.**  
**Site Specific Expenses**  
**April 1, 2018 through March 31, 2019**  
**(Fiscal Year 2019)**

**N. Melrose Street, Providence**

The property at 280 Melrose Street, in Providence, Rhode Island, operated as a service center by The Narragansett Electric Company since 1923, is currently under investigation and remediation for the presence of contaminants associated with its historical usage. Among other contaminants, polychlorinated biphenyls (PCBs) have been detected in various media at the property, including in soil, concrete, asphalt, and building materials (floors, walls, etc.). The PCBs are present due to historical releases and spills of PCB-contaminated mineral oil dielectric fluid, a substance used in many types of electrical equipment. During fiscal year 2019, activities performed included supplemental sampling activities and planning for PCB abatement of building materials in areas of the building to be renovated as well as oversight and documentation of PCB abatement during renovation activities. Additional activities performed were related to the proposed remedy implementation for the exterior portion of the facility including planning, performance of a Limited Design Investigation, public involvement activities and preparation of regulatory submittals.

	Payments During this Period	Payments to date
1 Consulting Costs	\$383,981	\$1,724,851
2 Construction/Disposal/Removal Costs	\$131,022	\$1,362,779
3 DEM/EPA Oversight Costs	\$253	\$403
4 Property Purchases/Settlements/Legal	\$6,399	\$6,399
5 Other Costs		
Project Management	\$76,350	\$227,776
Laboratory Analysis Fees	\$0	\$12,653
RI General Treasurer Reimbursement	\$0	\$953
<b>Total</b>	<b>\$598,005</b>	<b>\$3,335,814</b>

**Section II.**  
**Site Specific Expenses**  
**April 1, 2018 through March 31, 2019**  
**(Fiscal Year 2019)**

**O. Quonset Point**

The Quonset Point Naval Air Station and the electrical system were built by the U.S. Navy before and during World War II. Being a military facility, large amounts of the electrical system contained polychlorinated biphenyls (PCBs) as a fire resistant additive. The U.S. Government declared the facility surplus to its needs in the early 1970s at which time the State of Rhode Island stepped in to acquire and manage the property as an economic development opportunity, under the Rhode Island Port Authority (RIPA). On November 4, 1986, the Company purchased and took title to the Quonset Point electrical system from RIPA. Through the purchase agreement, RIPA took responsibility for known releases and the Company took responsibility for potential future releases from electrical equipment. The Company expects to continue to incur future environmental costs as a result of PCB contamination discovered in the vicinity of oil-filled electrical distribution assets. No activities were performed in fiscal year 2019.

	Payments During this Period	Payments to date
1 Consulting Costs	\$0	\$5,295
2 Construction/Disposal/Removal Costs	\$0	\$255,862
3 DEM/EPA Oversight Costs	\$0	\$0
4 Property Purchases/Settlements/Legal	\$0	\$0
5 Other Costs		\$0
Project Management	\$0	-\$55,685
RI General Treasurer Reimbursement	\$0	\$750
Total	\$0	\$206,222



**Section II.**  
**Site Specific Expenses**  
**April 1, 2018 through March 31, 2019**  
**(Fiscal Year 2019)**

**P. J.M. Mills**

The J.M. Mills Landfill Site is part of the Peterson/Puritan, Inc. Superfund Site located along the Blackstone River between the towns of Cumberland and Lincoln in Providence County, Rhode Island. The site is over 500 acres and is split into two Operable Units (OUs). The now inactive J.M. Mills Landfill is part of OU2 and from 1954 until 1983 was used for the disposal of wastes, including industrial, municipal and hazardous wastes. Cleanup activities for OU2 by a group of Potentially Responsible Parties (PRPs) for the site began in the early 1990s under an agreement with the U.S. Environmental Protection Agency. In 2003, the Company was identified as a PRP for OU2. In fiscal year 2019, the Company continued to be involved with the PRP Group for this site.

		Payments During this Period	Payments to date
1	Consulting Costs	\$0	\$0
2	Construction/Disposal/Removal Costs	\$0	\$0
3	DEM/EPA Oversight Costs	\$0	\$0
4	Property Purchases/Settlements/Legal	\$10,713	\$296,255
5	Other Costs		
	Project Management	\$8,517	\$39,901
	Laboratory Analysis Fees	\$0	\$0
	RI General Treasurer Reimbursement	\$0	\$0
	<b>Total</b>	<b>\$19,230</b>	<b>\$336,156</b>

**Section II.**  
**Site Specific Expenses**  
**April 1, 2018 through March 31, 2019**  
**(Fiscal Year 2019)**

**Q. Miscellaneous**

Costs for this project are associated with general environmental consulting costs and Company project management costs for the electric operations program.

	Payments During this Period	Payments to date
1 Consulting Costs	\$0	\$111,594
2 Construction/Disposal/Removal Costs	\$0	\$5,273
3 DEM/EPA Oversight Costs	\$0	\$0
4 Property Purchases/Settlements/Legal	\$6,414	\$8,459
5 Other Costs/Project Management	\$60,671	\$631,455
6 KeySpan Insurance Recovery Payment		\$555,057
Total	\$67,085	\$1,311,838

**Section II.**  
**Site Specific Expenses**  
**April 1, 2018 through March 31, 2019**  
**(Fiscal Year 2019)**

**R. Litigation/Legal**

This project is for activities associated with environmental insurance recovery.

	Payments Made this Period	Payments made to date
Litigation Costs Prior to May 2000		
EUA Companies		\$326,832
NEES Companies		\$123,607
Litigation/Legal Costs	\$47,344	\$32,416,851
Total	\$47,344	\$32,867,290

**Section II.**  
**Site Specific Expenses**  
**April 1, 2018 through March 31, 2019**  
**(Fiscal Year 2019)**

**S. Great Lakes Container**

Between 1961 and 1980, a series of owners operated the site as a drum reconditioning business, and accepted drums from various customers, including the Company. U.S. Environmental Protection Agency notified the Company in 2009 that it was designated as a Potentially Responsible Party (PRP), among several other parties. Since that time, the Company, along with numerous other PRPs, entered into a PRP Group Agreement to complete remediation work and share the costs associated with that work. The Company has an approximate 1% allocation share of the costs. Costs incurred in fiscal year 2019 are associated with payments to the PRP group to pay group expenses for contractors and consultants and legal fees.

	Payments During this Period	Payments to date
1 Consulting Costs	\$0	\$0
2 Construction/Disposal/Removal Costs	\$0	\$0
3 DEM/EPA Oversight Costs	\$0	\$0
4 Property Purchases/Settlements/Legal	\$0	\$0
5 Other Costs		\$0
Project Management	\$206	\$206
RI General Treasurer Reimbursement	\$0	\$0
PRP Payments/Legal Fees	\$5,024	\$68,739
Total	\$5,230	\$68,945

**Section II.**  
**Site Specific Expenses**  
**April 1, 2018 through March 31, 2019**  
**(Fiscal Year 2019)**

**T. Chandonnet Site**

In or around 1962 until 1984, retired electrical equipment from Company operations was transported to the Chandonnet scrap metal reclamation business in Lowell, Massachusetts. The equipment often contained polychlorinated biphenyls (PCBs), which resulted in PCB contamination of the Chandonnet property and numerous adjacent properties, including the Pawtucket Canal. In 1986, the Company, together with additional utility companies, was identified by the Massachusetts Department of Environmental Protection (MassDEP) as a Potentially Responsible Party (PRP) at the site. The Company subsequently entered into a PRP cost-sharing agreement, with the Company responsible for the overall management of response actions with reimbursement from the other utilities. Investigation activities were completed in fiscal year 2016 on Company-owned and non-owned adjoining properties, including the Pawtucket Canal. In January 2016, a Revised Phase II Comprehensive Site Assessment/Phase III Remedial Action Plan Report was submitted to MassDEP. In fiscal year 2019, the Company continued discussions with property owners, MassDEP, and the U.S. Environmental Protection Agency regarding the proposed remediation strategy, as well as conducting a preliminary design investigation in the canal and continuing with the upland design.

	Payments During this Period	Payments to date
1 Consulting Costs	\$18,891	\$213,356
2 Construction/Disposal/Removal Costs	\$0	\$7,518
3 DEM/EPA Oversight Costs	\$0	\$0
4 Property Purchases/Settlements/Legal	\$2,063	\$6,720
5 Other Costs		\$0
Project Management	-\$10,411	-\$10,411
Third Party Reimbursements <sup>1</sup>	\$0	-\$66,718
Total	\$10,543	\$150,465

1. Credit for contributions from other PRPs per cost sharing agreement.

**Section II.**  
**Site Specific Expenses**  
**April 1, 2018 through March 31, 2019**  
**(Fiscal Year 2019)**

**U. Admiral Street Cable Termination Yard, Providence**

The Admiral Street site is an electric cable termination yard located at 129 Admiral Street in Providence, Rhode Island and is currently under investigation and remediation for the presence of contaminants associated with its historical usage. In 2011 through 2012, limited remediation of several releases of non-Polychlorinated Biphenyl (non-PCB) cable oil from overhead cable oil reservoirs and feeder cable foundations at the site was conducted. The releases were reported to the Rhode Island Department of Environmental Management (RIDEM) Office of Emergency Response (ER). No further remediation was conducted at that time due to logistical and cost constraints. In 2014, a subsurface electrical conduit was installed along the substation driveway, and excess soil generated was stockpiled and determined to contain concentrations of PCBs and total petroleum hydrocarbons. In early 2016, delineation activities resumed at the site and PCBs were identified in soil in excess of the RIDEM standards, and the condition was reported to the RIDEM Office of ER and the RIDEM Office of Waste Management. In fiscal year 2019, a new perimeter fence was installed on a portion of the property and limited site investigation activities were completed.

		Payments During this Period	Payments to date
1	Consulting Costs	\$49,228	\$115,953
2	Construction/Disposal/Removal Costs	\$43,453	\$64,146
3	DEM/EPA Oversight Costs	\$0	\$0
4	Property Purchases/Settlements/Legal	\$0	\$0
5	Other Costs		\$0
	Project Management	\$16,373	\$25,294
	RI General Treasurer Reimbursement	\$0	\$0
	PRP Payments/Legal Fees	\$0	\$0
	<b>Total</b>	<b>\$109,054</b>	<b>\$205,393</b>

**Section II.**  
**Site Specific Expenses**  
**April 1, 2018 through March 31, 2019**  
**(Fiscal Year 2019)**

**V. Wakefield No. 17 Substation, South Kingstown**

The Wakefield No. 17 Substation is located at 19 Old Tower Hill Road in South Kingstown, Rhode Island and has been used as an automated outdoor electric substation since the Company acquired the site in 1936. The site is currently under investigation and remediation for the presence of contaminants associated with its historical usage. Releases of mineral oil dielectric fluid have been identified at the site over the past several years and have been reported to Rhode Island Department of Environmental Management (RIDEM). In late 2015, limited soil and concrete pre-characterization activities were performed to support substation construction activities. Concentrations of polychlorinated biphenyls (PCBs) in excess of the applicable RIDEM and Toxic Substances Control Act standards were identified in soils throughout the proposed construction area, requiring notification to RIDEM prior to the initiation of substation construction activities. In fiscal year 2019, additional engineering and planning was completed in support of future remediation.

	Payments During this Period	Payments to date
1 Consulting Costs	\$2,461	\$48,459
2 Construction/Disposal/Removal Costs	\$0	\$60,034
3 DEM/EPA Oversight Costs	\$0	\$0
4 Property Purchases/Settlements/Legal	\$0	\$0
5 Other Costs		\$0
Project Management	\$4,406	\$11,157
RI General Treasurer Reimbursement	\$0	\$0
PRP Payments/Legal Fees	\$0	\$0
Total	\$6,867	\$119,650

**Section II.**  
**Site Specific Expenses**  
**April 1, 2018 through March 31, 2019**  
**(Fiscal Year 2019)**

**W. Lakewood No. 57 Substation, Warwick**

The Lakewood No. 57 Substation is located at 18 Lakewood Avenue in Warwick, Rhode Island, was acquired by the Company through purchases in 1929 and 1995, and historically has been used as an outdoor electric substation. The Site is currently under investigation and remediation for the presence of contaminants associated with its historical usage. In 2016, limited soil and concrete pre-characterization activities were performed to support substation construction activities. Concentrations of polychlorinated biphenyls (PCBs) in excess of the applicable Toxic Substances Control Act standards were identified in concrete and soils throughout the proposed construction area. In fiscal year 2019, PCB delineation activities were completed and a Site Characterization and Self-Implementing Cleanup Plan was submitted to the U.S. Environmental Protection Agency.

		Payments During this Period	Payments to date
1	Consulting Costs	\$19,411	\$71,415
2	Construction/Disposal/Removal Costs	\$0	\$122,436
3	DEM/EPA Oversight Costs	\$0	\$0
4	Property Purchases/Settlements/Legal	\$0	\$0
5	Other Costs		\$0
	Project Management	\$7,045	\$17,654
	RI General Treasurer Reimbursement	\$0	\$0
	PRP Payments/Legal Fees	\$0	\$0
	Total	\$26,456	\$211,505



**Section II.**  
**Site Specific Expenses**  
**April 1, 2018 through March 31, 2019**  
**(Fiscal Year 2019)**

**X. Summary of Costs for All Sites**

		Payments During this Period	Payments to date
1	Consulting Costs	\$837,921	\$9,717,463
2	Construction/Disposal/Removal Costs	\$234,030	\$5,932,382
3	DEM/EPA Oversight Costs	\$6,098	\$387,171
4	Property Purchases/Settlements	\$43,440	\$8,380,500
5	Other Costs	\$212,984	\$2,205,350
6	Litigation/Legal Costs	\$52,368	\$32,554,039
7	EUA Balance Prior to NGRID/EUA Merger		\$2,817,674
	Total	\$1,386,841	\$61,994,579
		Payments During this period	Payments to date
A.	Washington Street, Bristol	\$24,411	\$805,706
B.	Thames Street, Bristol	\$1,473	\$4,314,858
C.	Main Street, Warren	\$14,812	\$421,028
D.	Canal Street, Westerly	\$10,956	\$2,335,585
E.	Industrial Drive, Westerly	\$2,526	\$751,867
F.	Tidewater Street, Pawtucket	\$320,164	\$6,490,112
G.	Exchange Street, Pawtucket	\$0	\$2,641
H.	High Street, Central Falls	\$1,374	\$23,339
I.	Hamlet Avenue, Woonsocket	\$121,311	\$1,926,086
J.	Pond Street, Woonsocket	\$0	-\$5,079
K.	Cumberland	\$0	\$323,890
L.	Lawn Street, Attleboro, MA	\$0	\$1,642,910
M.	Mendon Road, Attleboro, MA	\$0	\$4,148,358
N.	Melrose Street	\$598,005	\$3,335,814
O.	Quonset Point	\$0	\$206,222
P.	J.M. Mills	\$19,230	\$336,156
Q.	Miscellaneous	\$67,085	\$1,311,838
R.	Litigation/Legal Costs	\$47,344	\$32,867,290
S.	Great Lakes Container	\$5,230	\$68,945
T.	Chandonnet Site	\$10,543	\$150,465
U.	129 Admiral St., Providence	\$109,054	\$205,393

V.	Wakefield No.17 Substation, South Kingstown	\$6,867	\$119,650
W.	Lakewood No.57 Substation, Warwick	\$26,456	\$211,505
X.	Total	\$1,386,841	\$61,994,579

SECTION III

THE NARRAGANSETT ELECTRIC COMPANY

ENVIRONMENTAL RESPONSE COSTS

APRIL 1, 2018 THROUGH MARCH 31, 2019

ATTACHMENTS

**Attachment 1 to Environmental Response Cost Report  
Contractor/Disposal Costs  
For the Period  
April 1, 2018 through March 31, 2019**

<b>Site</b>	<b>Contractor Name</b>	<b>Physical activities taken to clean-up or remediate contaminated soil or contaminated debris</b>	<b>Costs</b>
Washington Street, Bristol	Clean Harbors Environmental Services	Transportation and disposal of remediation waste	\$328.32
Thames Street, Bristol	N/A	N/A	N/A
Main Street, Warren	Op-Tech Environmental Services	Final payment for installation of engineered cap	\$2,500.00
Canal Street, Westerly	Clean Harbors Environmental Services	Transportation and disposal of remediation waste	\$702.16
Industrial Drive, Westerly	N/A	N/A	N/A
Tidewater Street, Pawtucket	Clean Harbors Environmental Services	Transportation and disposal of remediation waste	\$5,764.40
Exchange Street, Pawtucket	N/A	N/A	N/A
High Street, Central Falls	N/A	N/A	N/A
Hamlet Avenue, Woonsocket	Citiworks	Fence installation	\$43,861.60
	Clean Harbors Environmental Services	Transportation and disposal of remediation waste	\$6,399.04
Pond Street, Woonsocket	N/A	N/A	N/A
Cumberland	N/A	N/A	N/A
Lawn Street, Attleboro, MA	N/A	N/A	N/A
Mendon Road, Attleboro, MA	N/A	N/A	N/A
Melrose Street, Providence	Clean Harbors Environmental Services	Transportation and disposal of remediation waste	\$55,731.72
	Moran Environmental Recovery	Abatement of PCB-impacted building material	\$75,290.00
Quonset Point	N/A	N/A	N/A
J.M. Mills	N/A	N/A	N/A
Miscellaneous MGP	N/A	N/A	N/A
Great Lakes Container	N/A	N/A	N/A
Chandonnet Site	N/A	N/A	N/A
Admiral Street Termination Yard	Clean Harbors Environmental Services	Transportation and disposal of remediation waste	\$22,189.72
	Citiworks	Fence installation	\$21,263.00
Wakefield No.17 Substation	N/A	N/A	N/A
Lakewood No.57 Substation	N/A	N/A	N/A

**Attachment 2 to Environmental Response Cost Report**  
**Consulting Costs**  
**For the Period**  
**April 1, 2018 through March 31, 2019**

<b>Site</b>	<b>Consultant Name</b>	<b>Purpose of Consultant Costs</b>	<b>Costs</b>
Washington Street, Bristol	GZA GeoEnvironmental	Annual monitoring activities; annual inspection of the engineered cap and reporting; and preparation of regulatory submittals	\$16,927.50
Thames Street, Bristol	GZA GeoEnvironmental	Annual inspection of the engineered cap and reporting for the ELUR	\$1,052.96
Main Street, Warren	GZA GeoEnvironmental	Installation of engineered cap oversight and preparation of regulatory submittals	\$4,041.22
Canal Street, Westerly	GZA GeoEnvironmental	Annual monitoring activities and preparation of regulatory submittals	\$2,114.36
Industrial Drive, Westerly	GZA GeoEnvironmental	Annual inspection of the engineered cap and reporting for the ELUR	\$910.28
Tidewater Street, Pawtucket	GZA GeoEnvironmental	Groundwater/NAPL gauging; site inspections; Master Plan support; PIP support; design investigation activities; completion and submission of Remedial Action Work Plan; and permitting of remedy	\$241,964.10
	EECS	Project management	\$34,026.31
	Potomac	Public involvement support	\$21,616.61
Exchange Street, Pawtucket	N/A	N/A	N/A
High Street, Central Falls	EECS	Project management	\$58.00
Hamlet Avenue, Woonsocket	GZA GeoEnvironmental	Site inspections; site investigations; support for discussions with 115 Front Street property owner; preparation and submittal of reports to RIDEM	\$36,281.43
	EECS	Project management	\$4,957.00
Pond Street, Woonsocket	N/A	N/A	N/A
Cumberland	N/A	N/A	N/A
Lawn Street, Attleboro, MA	N/A	N/A	N/A
Mendon Road, Attleboro, MA	N/A	N/A	N/A
Melrose Street, Providence	GZA GeoEnvironmental	Preparation of regulatory submittals; performance of Limited Design Investigation; remedial design for proposed exterior remedy; and construction oversight services	\$381,855.64
	Potomac	Public involvement support	\$2,125.00
Quonset Point	N/A	N/A	N/A
J.M. Mills	N/A	N/A	N/A
Miscellaneous	N/A	N/A	N/A
Great Lakes Container	N/A	N/A	N/A
Chandonnet Site	Anchor QEA	Site Investigations; preparation of regulatory submittals	\$3,980.07
	Innovative Engineering Solutions	Site Investigations; preparation of regulatory submittals	\$9,821.47
	EECS	Project management	\$1,827.07
	Newfields	Laboratory data evaluation	\$3,261.90
Admiral Street Termination Yard	Coneco	Site investigation activities	\$48,481.52
	GZA GeoEnvironmental	Site investigation activities	\$746.59
Wakefield No.17 Substation	Coneco	Site investigation activities	\$2,460.50
Lakewood No.57 Substation	Coneco	Site investigation activities	\$19,411.31