

February 9, 2022

VIA ELECTRONIC MAIL

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

**RE: Docket 5189– 2022 Annual Energy Efficiency Program Plan
Responses to PUC Post-Hearing Data Requests – Set 1**

Dear Ms. Massaro:

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

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

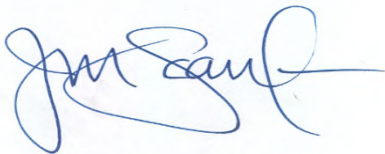
cc: Docket 5189 Service List
Margaret Hogan, Esq.
John Bell, Division

¹ Per the Commission’s request, the Company is providing one copy of this transmittal for the Commission’s file in this docket and six (6) copies, 3-hole punched for the Commission.

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.



Joanne M. Scanlon

February 9, 2022
Date

**Docket No. 5189 - National Grid – 2022 Annual Energy Efficiency Program
Service list updated 12/16/2021**

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PUC Post-Decisional 1-1

Request:

Referencing the Response to Record Request No. 5, has the Company expanded its investigation to determine the extent to which similar conduct has occurred within the residential or other sectors? If so, please provide an update, including a description of the scope of the investigation, and give an estimate of time for completion. When completed, please provide a copy of any final reports.

Response:

Yes, The Narragansett Electric Company ("Company") continues to investigate potential out-of-period invoices as were identified in the residential upstream lighting program¹ to determine the extent to which similar conduct or practices, if any, have occurred within the other energy efficiency programs. Specifically, the Company is currently in the process of determining whether similar conduct was undertaken by employees or if similar accounting practices were utilized across other energy efficiency programs. The Company is targeting June 1, 2022, to complete the expanded investigation and will provide the Public Utilities Commission with a copy of any final reports. If the Company determines that it will not be able complete the expanded investigation by the target date, the Company will supplement the response to this data request with an updated target completion date.

¹ See the Company's response to PUC 5-4(e) in this docket for additional details on the out-of-period invoices related to the residential upstream lighting program.

PUC Post-Decisional 1-2

Request:

Given the pending sale of Narragansett Electric to PPL, and the fact that employee misconduct may have related to employees of National Grid USA Service Company who will not be moving to the PPL affiliate if the sale is approved and that documents and records relevant to the investigation may be in the possession of National Grid USA Service Company, to what extent, if any, will the Commission be able to retain the ability and cooperation of National Grid should the Commission perform or order its own investigation regarding the past programs? Please provide an explanation, including any legal barriers the Company believes may preclude or limit such an investigation after the closing occurs. To the extent that the Company and the PPL affiliate have addressed these potential legal barriers, please provide a description of how they have been addressed.

Response:

PPL Rhode Island Holdings, LLC's ("PPL Rhode Island") acquisition of The Narragansett Electric Company ("Narragansett") from National Grid USA (the "Transaction") is a stock purchase only, where PPL Rhode Island will acquire 100 percent of National Grid USA's outstanding shares of common stock in Narragansett. Through the Transaction, National Grid USA is effectively selling to PPL Rhode Island the business, operations, and activities of Narragansett, including the retail distribution and provision of electric and gas distribution services to customers within Narragansett's service area in the State of Rhode Island. Thus, Narragansett will continue to own and operate its assets and maintain all its franchise rights for the provision of electric and gas distribution service in Rhode Island, under the management and control of PPL Rhode Island. After the Transaction closes, the Public Utilities Commission ("Commission") will retain its regulatory jurisdiction and authority over Narragansett.

At the closing of the Transaction, National Grid USA Service Company, Inc. ("Service Company"), National Grid USA (solely with respect to one section), and Narragansett will enter into a Transition Services Agreement ("TSA") to support activities that will require a more gradual transition of Narragansett from National Grid USA to PPL Rhode Island ownership.¹ In addition, the Share Purchase Agreement ("SPA") for the Transaction provides PPL Rhode Island with the ability, from and after closing, to request and reasonably access records from National Grid USA relating to the Narragansett business.

¹ The master form of TSA is Exhibit A to the Share Purchase Agreement for the Transaction. The Share Purchase Agreement is included as Exhibit A to the Pre-Filed Direct Testimony of Vincent Sorgi, which is attached as Exhibit 1 to the Petition in Division of Public Utilities and Carriers Docket No. D-21-09. The Share Purchase Agreement and TSA can be accessed at: http://www.ripuc.ri.gov/eventsactions/docket/D_21_09_Petition.pdf.

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 5189
In Re: 2022 Annual Energy Efficiency Plan
Responses to the Commission's Post-Decisional Data Requests
Issued on February 2, 2022

PUC Post-Decisional 1-2, page 2

Thus, to the extent the Commission decided to perform or order its own investigation regarding Narragansett's past energy efficiency programs, National Grid USA and the Service Company will reasonably cooperate with Narragansett in making information available to Narragansett as needed, and will support Narragansett in any proceedings, technical sessions, or working group meetings before the Commission, as provided for in the SPA and/or TSA.