

March 8, 2022

**BY ELECTRONIC MAIL**

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

**RE: Docket 4237 – National Grid 2020 Contact Voltage Annual Report Responses to Division Data Requests – Set 1**

Dear Ms. Massaro:

I have enclosed an electronic version of National Grid's<sup>1</sup> responses to the Division of Public Utilities and Carriers' Sixth Set of Data Requests in the above-referenced docket.<sup>2</sup>

Thank you for your attention to this matter. If you have any questions, please contact me at 781-907-2121.

Very truly yours,



Raquel J. Webster

Enclosures

cc: Docket 4237 Service List  
John Bell, Division  
Tiffany Parenteau, Esq.

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<sup>1</sup> The Narragansett Electric Company d/b/a National Grid (National Grid or Company).

<sup>2</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.

Division 1-1

Request:

In its 2022 Contact Voltage report, the Company indicated there were sixteen (16) mobile events over 1 volt recorded versus in 2021 there were 21 mobile events over 1 volt recorded. In prior years of 2017, 2018, 2019 and 2020 when TRC was the contractor performing the testing there were 8, 4, 0 and 1 event over 1 volt recorded respectively. Explain the dramatic rise in recorded events by OSMOSE. Also, explain why this dramatic rise in events recorded by OSMOSE, the new contractor, does not call into question either the OSMOSE testing or the prior TRC testing accuracy?

Response:

From program inception through 2017, contact voltage testing was conducted annually in 100% of the Designated Contact Voltage Risk Areas (DCVRAs).

Testing all DCVRAs for five consecutive years allowed for the consistent annual repair of 100% of findings greater than 1-volt. Given multiple years at 100% testing and repair, the Company expected to see a lesser number of findings greater than 1-volt from year to year.

In 2018, the Commission approved the Company's request to transition to a 20% testing model over a five-year cycle. Contact voltage testing was conducted annually in 20% of the DCVRAs from 2018 through 2022, completing 100% over the five-year cycle.

Testing was conducted in Providence in fiscal years 2018 through 2020, in Newport and Woonsocket in fiscal year 2021, and in Pawtucket and Westerly in fiscal year 2022.

Notably, it has been up to five years since some of the DCVRAs were last tested. For example, prior to the testing in fiscal year 2021, testing was conducted in Newport and Woonsocket in fiscal year 2017. Prolonged dormancies between testing may lead to accumulated findings.

In addition, the Company no longer owns or maintains streetlights in a majority of the DCVRAs, as streetlights in thirteen of the fourteen DCVRAs have been purchased by their respective municipalities. These municipalities are responsible for making repairs on streetlight findings greater than 1-volt. In fiscal year 2022, all sixteen of the mobile events recorded over 1-volt were on municipal-owned assets. The Company does not track for accuracy or completeness the repairs made on municipal owned assets.

The Company is satisfied that both Osmose and TRC conducted contact voltage testing accurately.

Division 1-2

Request:

On page 8 of the report, the next to last line indicates THD greater than 10. Should it read THD greater than 10 percent?

Response:

Yes. This line should read "Of the 16, two were determined to have voltage less than 4.5 with a THD greater than 10 percent."

Division 1-3

Request:

Explain in detail why the Company believes that mobile events over 1 volt in 2021 and 2022 are much higher than any of the prior testing periods since 2015 when accounting for the fact that the early years of testing were for 100 percent of the DCVAR and now testing is only for 20 percent of the DCVAR.

Response:

From program inception through 2017, contact voltage testing was conducted annually in 100% of the Designated Contact Voltage Risk Areas (DCVRAs).

Testing 100% of DCVRAs for five consecutive years (2013 through 2017) allowed for the consistent annual repair of 100% of findings greater than 1-volt. Given multiple years at 100% testing and repair, the Company expected to see a lesser number of findings greater than 1-volt from year to year.

Beginning in 2018, contact voltage testing was conducted annually in 20% of the DCVRAs.

Testing was conducted in Newport and Woonsocket in fiscal year 2021, and in Pawtucket and Westerly in fiscal year 2022.

It has been four years since Newport and Woonsocket were last tested and five years since Pawtucket and Westerly were last tested. Prolonged dormancies between testing may lead to accumulated findings.

In addition, the Company no longer owns nor maintains streetlights in thirteen of the fourteen DCVRAs because the streetlights have been purchased by their respective municipalities. These municipalities are responsible for making repairs on streetlight findings greater than 1-volt. In fiscal year 2022, all sixteen of the mobile events recorded over 1-volt were on municipal owned assets. The Company does not track these repairs and cannot their verify accuracy or completeness.

Division 1-4

Request:

Explain why the Company performed the testing in November of 2021 when it had previously been performing the testing in February or March of the fiscal year. Also, explain any impact on the testing results by changing the month of testing and if the Company's customer load was lower and if that could impact results.

Response:

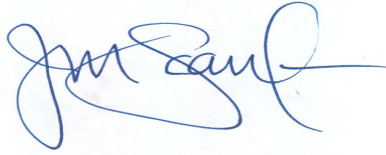
All Inspections and Maintenance programs in Rhode Island, including Contact Voltage Mobile Testing, are fiscal year based (April 1st through March 31st).

Fiscal year 2021 contact voltage testing was conducted February 22, 2021 through February 25, 2021, and the Company filed the annual report with the Rhode Island Public Utilities Commission (the "Commission") on August 18, 2021. The Commission issued its Written Order on November 12, 2021. Upon receipt of this Written Order, the Company contacted Osmose and confirmed availability for it to perform the contact voltage testing for fiscal year 2022, which was conducted November 15, 2021 through November 17, 2021.

The Company utilized Osmose's availability and scheduled the 2022 testing while staying within the parameters of the fiscal year. The Company does not believe that the time of year the tests are performed would impact test results, as most contact voltage events are found on streetlights and, these loads remain constant throughout the year.

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.



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Joanne M. Scanlon

March 8, 2022  
Date

**Docket No. 4237 – Commission’s Proceeding Relating to Stray  
and Contact Voltage Pursuant to Enacted Legislation  
Service List updated 10/15/2020**

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