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Rhode Island Energy™
a PPL company

March 6, 2023

VIA HAND DELIVERY & ELECTRONIC MAIL

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

RE: Docket No. 22-54-NG – The Narragansett Electric Company
Proposed Fiscal Year 2024 Gas Infrastructure, Safety, and Reliability Plan
Responses to Office of Energy Resources' Data Requests – OER Set 1

Dear Ms. Massaro:

I have enclosed an electronic version of Rhode Island Energy's[1] complete set of responses to the Office of Energy Resources' First Set of Data Requests in the above-referenced matter.[2]

Thank you for your attention to this matter. If you have any questions, please contact me at 401-316-7429.

Very truly yours,

Jennifer Brooks Hutchinson

Enclosure

cc: Docket 22-54-NG Service List
Leo Wold, Esq.
John Bell, Division
Al Mancini, Division

[1] The Narragansett Electric Company d/b/a Rhode Island Energy ("Rhode Island Energy" or the "Company").

[2] Per 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 were 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.

Heidi J. Seddon

March 6, 2023
Date

No. 22-54-NG- RI Energy's Gas Infrastructure, Safety and Reliability (ISR) Plan 2024 - Service List 2/6/2023

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OER 1-1

Request:

Rhode Island Energy (the Company) describes proactive main replacement and rehabilitation of leak-prone pipes on Bates Pages 23-29. Please complete the following table that responds to (a) and (b) below, and provide the table in excel format.

(a) Please provide the total number of miles of leak-prone pipe per municipality for each municipality served by the Company.

(b) Please provide the number of miles of main replacement (or repair or abandonment) planned per municipality for FY 2024 alongside previous annual replacement miles for FY 2015-2022. Please show all municipalities.

(c) Please also include the number of services along with the number of miles. If it doesn't make sense to include the number of services, please explain why. Rank municipalities in order of most total miles of leak-prone pipe currently in place to least.

(d) Calculate the miles of leak-prone pipe currently in place divided by population density (i.e. number of residents per unit of area). Rank municipalities in order of most miles of leak-prone pipe per population density to least.

(e) Calculate the percentage of miles replaced in % by dividing miles of leak-prone pipe replaced, repaired, or abandoned FY23 proposed by total miles of leak-prone pipe currently in place and multiplying by 100. Rank municipalities in order from higher percentage of miles replaced to least.

(f) Please provide the average age of leak-prone pipe (as considered as a count of years from the date placed in service) per municipality for each municipality served by the Company.

Prepared by or under the supervision of: Corey Hogg and Barry Foster

OER 1-1, Page 2

Row	Municipality	Total miles of leak-prone pipe currently in place	Miles of leak-prone pipe replaced, repaired, or abandoned FY23 Proposed	Miles of leak-prone pipe replaced, repaired, or abandoned FY23 Forecasted/Actual		Miles of leak-prone pipe replaced, repaired, or abandoned FY15 Actual
1	Barrington					
...	...					
38	Woonsocket					

Response:

(a) Please refer to column C of Attachment OER 1-1-1.

(b) Please refer to columns D through W of Attachment OER 1-1-1. Note: The FY24 abandonment and service totals by municipality are currently planned, but are subject to change. Based on this being a similar question to OER 1-1 issued on January 26th, 2022 in Docket No. 5210 the FY to date abandonment and service totals by town for FY23 were included as well, despite only FY15-FY22 being requested.

(c) Please refer to Attachment OER 1-1-1.

(d) Please refer to Attachment OER 1-1-2 . The population and land area in square miles used in the calculations was taken from the US Census Bureau's website - https://www.census.gov/.

(e) Please refer to Attachment OER 1-1-3 . Based on this being a similar question to data request OER 1-1 issued on January 26th, 2022 in Docket No. 5210, the proposed abandonment for FY24 was used in these calculations (as opposed to the requested proposed FY23, which was also requested last year).

(f) Please refer to Attachment OER 1-1-4 . A weighted average was used to determine the average age of the leak-prone pipe for each municipality. There is a portion of our main population for which the company considers the install date to be unknown. The mileage of main with an unknown install date for each municipality is noted and was not included in the weighted average calculation.

Prepared by or under the supervision of: Corey Hogg and Barry Foster

*FY24 planned mileage totals and planned service totals by town are accurate as of 02/22/2023 and are subject to change.

**FY23 actual leak-prone pipe abandonment mileage and service count are accurate FYTD as of 02/22/2023.

A	B	C	D	E	F	G	H	I	J	K	L	M
Row	Municipality	Total miles of leak-prone pipe currently in place	Miles of leak-prone pipe replaced, repaired, or abandoned FY24 Proposed *	FY24 Services *	Miles of leak-prone pipe replaced, repaired, or abandoned FY23 Actual **	FY23 Services **	Miles of leak-prone pipe replaced, repaired, or abandoned FY22 Actual	FY22 Services	Miles of leak-prone pipe replaced, repaired, or abandoned FY21 Actual	FY21 Services	Miles of leak-prone pipe replaced, repaired, or abandoned FY20 Actual	FY20 Services
1	Providence	186.10	14.18	936	14.95	1,143	11.11	1,004	4.51	353	4.42	150
2	Pawtucket	140.26	4.15	272	5.43	516	3.45	342	2.48	219	3.39	245
3	Cranston	104.62	4.99	399	3.34	276	5.78	432	1.59	217	10.64	1,005
4	Warwick	67.72	11.16	703	11.42	747	10.88	754	5.52	450	8.47	646
5	Woonsocket	48.37	7.13	547	2.38	223	4.85	400	0.74	94	2.37	122
6	East Providence	43.78	6.24	513	4.88	427	7.45	565	5.53	526	6.18	490
7	North Providence	44.16	4.18	319	2.17	239	4.33	383	2.55	243	2.97	259
8	Johnston	30.54	1.55	70	-	-	1.40	79	0.82	52	2.38	243
9	Cumberland	26.38	1.78	61	1.31	111	0.21	38	0.11	10	-	3
10	Central Falls	20.09	1.61	139	0.01	-	1.26	116	0.56	75	0.05	-
11	West Warwick	17.73	0.06	3	0.16	8	2.55	184	-	-	1.81	132
12	Newport	15.99	2.03	106	0.52	9	1.57	44	0.01	-	0.51	61
13	Lincoln	14.68	4.05	345	0.97	67	2.43	133	0.21	26	1.44	176
14	Bristol	10.87	1.11	154	0.58	57	1.14	91	0.79	93	1.40	139
15	Unknown	10.10	-	-	-	-	-	-	-	-	-	-
16	Coventry	10.15	-	-	-	-	-	-	0.19	6	0.62	29
17	South Kingstown	8.71	-	-	-	-	0.36	12	0.44	7	-	5
18	Westerly	7.93	1.74	82	0.59	21	2.97	162	0.34	13	1.28	147
19	North Smithfield	7.01	1.57	72	1.55	83	0.51	38	-	-	0.90	32
20	Smithfield	6.72	-	-	0.35	22	1.63	88	0.73	51	0.08	2
21	North Kingstown	6.48	0.03	2	0.72	6	2.14	129	0.90	25	2.77	126
22	East Greenwich	5.67	0.06	6	0.17	-	-	-	-	-	0.36	15
23	Middletown	4.31	1.07	58	0.01	-	1.19	102	0.98	157	1.26	15
23	Warren	2.00	0.62	28	0.73	37	0.28	21	0.34	6	-	7
24	Barrington	1.46	0.19	11	0.13	9	0.23	6	0.85	37	0.93	61
25	Narragansett	0.52	-	-	-	-	0.05	4	-	-	-	-
26	Exeter	0.31	-	-	-	-	-	-	-	-	-	-
27	Portsmouth	0.05	-	-	-	-	-	-	-	-	0.06	2
28	Hopkinton	0.02	-	-	-	-	-	-	-	-	-	-
29	Tiverton	-	-	-	-	-	-	-	0.06	8	-	-
30	Burrillville	-	-	-	-	-	-	-	-	-	-	-
31	Scituate	-	-	-	-	-	-	-	-	-	-	-
33	West Greenwich	-	-	-	-	-	-	-	-	-	-	-
	Totals	**842.75**	**69.50**	**4,826**	**52.36**	**4,001**	**67.77**	**5,127**	**30.22**	**2,668**	**54.29**	**4,112**

A	N	O	P	Q	R	S	T	U	V	W
Row	Miles of leak-prone pipe replaced, repaired, or abandoned FY19 Actual	FY19 Services	Miles of leak-prone pipe replaced, repaired, or abandoned FY18 Actual	FY18 Services	Miles of leak-prone pipe replaced, repaired, or abandoned FY17 Actual	FY17 Services	Miles of leak-prone pipe replaced, repaired, or abandoned FY16 Actual	FY16 Services	Miles of leak-prone pipe replaced, repaired, or abandoned FY15 Actual	FY15 Services
1	5.61	568	8.85	939	9.37	824	11.88	330	14.75	1,317
2	2.21	196	3.14	214	1.74	89	1.32	88	2.06	200
3	7.13	698	6.27	551	4.34	292	5.28	341	4.86	332
4	12.11	961	12.28	936	17.53	980	12.01	157	6.77	495
5	0.76	89	0.37	8	2.20	117	2.31	28	0.34	66
6	11.72	1,009	4.88	391	5.31	486	9.02	324	2.32	354
7	4.82	577	1.52	56	0.40	11	0.80	-	1.89	162
8	2.00	178	2.50	103	1.22	65	0.38	34	1.96	157
9	0.89	22	0.94	42	0.58	53	0.60	49	-	-
10	2.21	90	0.02	41	1.35	169	0.25	33	1.00	79
11	0.01	1	0.48	30	0.45	31	0.64	16	0.15	23
12	0.93	38	0.24	28	1.77	111	0.63	13	1.03	88
13	1.59	136	0.73	45	1.68	100	1.55	62	-	-
14	0.03	10	0.92	42	1.30	96	1.01	58	1.10	155
15	-	-	-	-	-	-	-	-	-	-
16	-	-	0.12	5	1.11	-	0.58	-	-	-
17	-	-	-	-	-	-	-	-	-	-
18	3.04	154	5.77	158	3.21	86	3.50	27	1.80	195
19	0.32	-	-	-	0.35	16	-	-	-	-
20	1.63	119	0.75	62	0.16	14	2.10	25	0.07	8
21	-	-	0.83	51	5.45	338	1.11	79	3.15	116
22	-	-	0.33	14	0.60	17	-	-	0.24	14
23	2.39	66	2.30	138	1.18	29	-	-	2.64	18
23	1.00	72	0.67	34	0.08	6	0.78	31	0.21	31
24	0.73	53	0.78	35	1.82	111	2.17	140	2.36	133
25	-	-	2.99	167	-	-	-	-	-	-
26	-	-	-	-	-	-	-	-	-	-
27	-	-	0.03	-	-	-	-	-	-	-
28	-	-	-	-	-	-	-	-	-	-
29	-	-	-	-	0.10	4	-	-	-	-
30	-	-	-	-	-	-	-	-	-	-
31	-	-	-	-	-	-	-	-	-	-
33	-	-	-	-	-	-	-	-	-	-
	61.13	**5,037**	**57.70**	**4,090**	**63.30**	**4,045**	**57.91**	**1,835**	**48.71**	**3,943**

Ranking	Municipality	Total miles of leak-prone pipe currently in place	Population (Census data as of April 1, 2020)	Land Area in Square Miles	Population Density (Residents / sq mi)	Total Miles of leak-prone pipe currently in place / Population Density
1	Cranston	104.62	82,934	28.34	2,926	0.0358
2	Warwick	67.72	82,823	35.04	2,364	0.0287
3	Johnston	30.54	29,568	23.43	1,262	0.0242
4	Cumberland	26.38	36,405	26.45	1,376	0.0192
5	Providence	186.10	190,934	18.40	10,377	0.0179
6	Coventry	10.15	35,688	59.05	604	0.0168
7	Pawtucket	140.26	75,604	8.68	8,710	0.0161
8	South Kingstown	8.71	31,391	56.45	556	0.0157
9	North Smithfield	7.01	12,588	23.80	529	0.0133
10	East Providence	43.78	47,319	13.24	3,574	0.0122
11	Lincoln	14.68	22,529	18.12	1,243	0.0118
12	North Kingstown	6.48	27,732	43.14	643	0.0101
13	Westerly	7.93	23,359	29.52	791	0.0100
14	Woonsocket	48.37	43,240	7.74	5,587	0.0087
15	Smithfield	6.72	22,118	26.31	841	0.0080
16	North Providence	44.16	34,114	5.62	6,070	0.0073
17	East Greenwich	5.67	14,312	16.39	873	0.0065
18	Newport	15.99	25,163	7.67	3,281	0.0049
19	Bristol	10.87	22,493	9.82	2,291	0.0047
20	West Warwick	17.73	31,012	7.79	3,981	0.0045
21	Middletown	4.31	17,075	12.72	1,342	0.0032
22	Exeter	0.31	6,460	57.47	112	0.0028
23	Warren	2.00	11,147	6.12	1,821	0.0011
24	Central Falls	20.09	22,583	1.20	18,819	0.0011
25	Barrington	1.46	17,153	8.22	2,087	0.0007
26	Narragansett	0.52	14,532	13.89	1,046	0.0005
27	Hopkinton	0.02	8,398	42.95	196	0.0001
28	Portsmouth	0.05	17,871	22.98	778	0.0001
29	Burrillville	-	16,158	55.03	294	N/A
30	Scituate	-	10,384	48.16	216	N/A
31	Tiverton	-	16,359	29.05	563	N/A
33	West Greenwich	-	6,528	50.30	130	N/A
N/A	Unknown	10.10	N/A	N/A	N/A	N/A

*FY 2024 planned mileage totals and planned service totals by town are accurate as of 02/22/2023 and are subject to change.

Ranking	Municipality	Total miles of leak-prone pipe currently in place	Miles of leak-prone pipe replaced, repaired, or abandoned FY24 Proposed *	FY24 Proposed LPP mileage / Total miles of LPP currently in place
1	Warren	2.00	0.62	31.01%
2	Lincoln	14.68	4.05	27.59%
3	Middletown	4.31	1.07	24.82%
4	North Smithfield	7.01	1.57	22.40%
5	Westerly	7.93	1.74	21.95%
6	Warwick	67.72	11.16	16.48%
7	Woonsocket	48.37	7.13	14.74%
8	East Providence	43.78	6.24	14.25%
9	Barrington	1.46	0.19	13.01%
10	Newport	15.99	2.03	12.69%
11	Bristol	10.87	1.11	10.22%
12	North Providence	44.16	4.18	9.47%
13	Central Falls	20.09	1.61	8.01%
14	Providence	186.10	14.18	7.62%
15	Cumberland	26.38	1.78	6.75%
16	Johnston	30.54	1.55	5.07%
17	Cranston	104.62	4.99	4.77%
18	Pawtucket	140.26	4.15	2.96%
19	East Greenwich	5.67	0.06	1.06%
20	North Kingstown	6.48	0.03	0.46%
21	West Warwick	17.73	0.06	0.34%
22	Coventry	10.15	-	0.00%
23	Exeter	0.31	-	0.00%
24	Hopkinton	0.02	-	0.00%
25	Narragansett	0.52	-	0.00%
26	Portsmouth	0.05	-	0.00%
27	Smithfield	6.72	-	0.00%
28	South Kingstown	8.71	-	0.00%
29	Burrillville	-	-	N/A
30	Scituate	-	-	N/A
31	Tiverton	-	-	N/A
32	West Greenwich	-	-	N/A
33	Unknown	10.10	-	N/A

Ranking	Municipality	Total miles of leak-prone pipe currently in place	Average Age of leak-prone Pipe (Weighted Average, as a count of years from the date placed in service)	Miles of leak-prone pipe w/ an Unknown Installation Date (not included in calcuation)
1	Barrington	1.46	66.34	0.08
2	Bristol	10.87	104.11	10.32
3	Burrillville	-	0.00	0.00
4	Central Falls	20.09	84.46	16.09
5	Coventry	10.15	58.16	0.27
6	Cranston	104.62	92.08	0.87
7	Cumberland	26.38	69.96	34.98
8	East Greenwich	5.67	60.86	0.06
9	East Providence	43.78	91.51	0.86
10	Exeter	0.31	54.25	0.10
11	Hopkinton	0.02	56.00	1.03
12	Johnston	30.54	76.29	0.38
13	Lincoln	14.68	67.00	21.75
14	Middletown	4.31	67.40	1.17
15	Narragansett	0.52	54.00	0.04
16	Newport	15.99	77.47	9.96
17	North Kingstown	6.48	57.84	1.28
18	North Providence	44.16	76.37	9.17
19	North Smithfield	7.01	77.13	4.71
20	Pawtucket	140.26	78.80	121.74
21	Portsmouth	0.05	56.28	0.27
22	Providence	186.10	112.50	3.65
23	Scituate	-	-	-
24	Smithfield	6.72	68.13	0.54
25	South Kingstown	8.71	54.59	0.08
26	Tiverton	-	-	0.18
27	Unknown	10.10	115.23	2.76
28	Warren	2.00	61.29	4.52
29	Warwick	67.72	72.67	0.63
30	West Greenwich	-	-	-
31	West Warwick	17.73	58.64	0.12
32	Westerly	7.93	70.50	24.51
33	Woonsocket	48.37	87.43	33.46

OER 1-2

Request:

How does the Company coordinate with municipalities and communities in response to gas leaks? What activities are conducted to maintain the safety of residents during response to a gas leak?

Response:

When the Company is notified of a gas leak through one of several different means, such as odor calls from residents, calls for assistance from first responders such as fire departments, leak survey notifications, or others, it deploys a Customer Meter Services technician to complete a leak investigation. Under typical circumstances, the technician completes the investigation without interaction with municipality representatives. Technicians often interact with residents during the investigation. In many cases, the technician must survey inside private homes to complete the investigation. Leaks are classified during the conduct of the investigation into one of several types depending on the hazardousness, which is generally related to the proximity of the leak to enclosed structures such as buildings or manholes.

Because of the Company's fast response to notifications of potential gas leaks as well as the steep reduction in remaining leak prone pipe, which targets the riskiest pipe first, it is rare that members of the public are in immediate danger. Technicians are trained to minimize the hazard, for example by not introducing sources of ignition to the situation, while they work to either make the situation safe or move those in danger to safety as quickly and as safely as possible. When available, technicians work with other first responders to facilitate evacuations, but need not wait for outside aid before initiating an evacuation. Technicians communicate with supervisors and the Company's Dispatch department during the course of an investigation, and if they have need for additional help or support, such as from the fire department, this is communicated through Dispatch.

Type 1 leaks are the most hazardous and the Company takes immediate steps upon discovery to remediate these and eliminate the hazard. Remediation typically requires a Field Operations crew to dig into the street, sidewalk, or on private property to reach the leak and make repairs. Field Operations crews usually employ heavy equipment to aid in the remediation process, and they often request traffic control support from municipal and state police departments. After the leak has been repaired, the Company retroactively files an emergency road opening permit as necessary with the necessary authorities.

OER 1-2, Page 2

Type 2, 2A, and 3 leaks are not immediately hazardous, and a more planned approach can be taken to remediate these. Type 2 and 2A leak discoveries automatically create repair work orders in the Company's tracking system. These work orders are used by permit coordinators to seek permission from municipalities and the state to repair leaks. On rare occasions that permits are denied, the Company works with the permit authority to make sure the reason for the work request is clearly communicated and attempts to find solutions for concerns expressed by the permit agency. Once a permit is obtained, the work is scheduled and the Company arranges for traffic control help with police departments as necessary.

OER 1-3

Request:

Bates Pages 27-28 describes the data used in the annual System Integrity Report for system performance as including leak receipts. What analysis does the company perform in making its consideration of leak receipts as an indicator of system performance?

Response:

The Company utilizes Trend Analysis to compare year-over-year data to demonstrate the benefits of the ISR Plan. There is variability to the annual data due to weather and other factors, but the analysis of the trend gives the Company an overall picture of the performance. In the case of the Rhode Island gas distribution system, the trend is going downward, so it demonstrates that the enhancements the Company is implementing are resulting in a downward trend in leak receipts on a per mile basis and therefore heightened performance overall.

Prepared by or under the supervision of: Barry Foster

OER 1-4

Request:

In Book 1 of the FY24 Gas ISR the Company presents year on year assessments of Gross Unaccounted For Gas as part of Schedule 1. How does the Company assess Gross Unaccounted For Gas?

Response:

The Company presents the Gross Unaccounted For Gas from its PHMSA F7100 Annual Report. Part G of the Form shows this calculation as:

[(Purchased gas + produced gas) minus (customer use + company use + appropriate adjustments)] divided by (customer use + company use + appropriate adjustments) times 100 equals percent unaccounted for.

This unaccounted volume reflects the difference between the volume of gas that is injected into the gas distribution system and the gas that is used on an annual basis as measured by customer meters.

Prepared by or under the supervision of: Barry Foster

OER 1-5

Request:

Does the Company propose any activities in FY24 to proactively detect or monitor for gas leaks or for methane leakage in assessing Gross Unaccounted For Gas?

Response:

The Company policies and procedures define the leak survey methods used to proactively patrol the gas network for potential leaks. These activities include walking survey, cast iron patrol, Winter Leak Operations, Special Surveys and include the timelines for completing this work dependent upon location, building type and season.

When leaks are discovered, based upon the classification of the leak, they are repaired or monitored in accordance with our procedures. The Company plans to continue to follow current policies and procedures in FY2024.

In addition to methane leakage, Gross Unaccounted For Gas includes accuracy variations in the equipment used to measure gas. The Company is evaluating new technologies such as ultrasonic meters which have a higher accuracy than conventional displacement meters. As displacement meters age, they typically begin to slow down (not speed up), which is to say they register less than the actual amount of flow. The allowable range of accuracy for a displacement meter is +/- 2.0%. Ultrasonic meters have advertised a +/- 0.5% accuracy, which if proven over the life of the meter could help eliminate a portion of the Gross Unaccounted For Gas.

Another program being evaluated is the "Pick for Test" Program. This program is meant to evaluate the meters being returned from the field to recognize patterns with failures associated with age, manufacturer, location, and use. If the Company were to recognize that specific variables led to an increase in meters slowing down at an accelerated rate, a program could be developed to target those specific meters for replacement prior to reaching the point where accuracy problems could exist.

OER 1-6

Request:

Has the Company conducted any further assessment as to what extent proposed investments in the gas distribution system in the FY24 ISR are compatible with hydrogen blending apart from the research projects noted in the Company's response to OER 1-5 in the FY23 ISR? If so, please specify the percentage of new investments that are compatible with hydrogen blending and to what level of hydrogen mixing (ex. 5% or 10% hydrogen blend). If no, is that research still expected to be completed in Q4 of 2023?

Response:

The Company continues to replace leak prone pipes with high density polyethylene pipes as part of its safety and reliability programs. Going forward and where possible, the Company's preferred strategy is to focus on installing high pressure systems, neighborhood style replacement, as the higher pressure helps enhance system reliability and the projects can be completed in a more efficient manner. An additional benefit of updating an entire neighborhood/area to high density polyethylene pipes is that those segments of new mains/services will have a higher probability of being compatible and ready for the potential injection of hydrogen or renewable fuels in the future. To date, the percentage of hydrogen blending has not yet been established by the gas industry.

The hydrogen blending research referenced in, Data Request OER 1-5 in Docket No. 5210 was in reference to research that was being conducted by National Grid USA ("National Grid"). Since PPL Rhode Island Holdings, LLC's acquisition of the Company from National Grid, the Rhode Island gas distribution network is no longer part of that hydrogen blending research. The Company is a member of the American Gas Association and Northeast Gas Association, which both have technical sessions on hydrogen blending and Rhode Island Energy is an active participant in those sessions.

In addition, Rhode Island Energy's Kentucky affiliate, Louisville Gas and Electric, is evaluating two hydrogen blending projects as part of the Southeast Hydrogen Hub. The Company will monitor these projects to determine the role hydrogen plays on the Rhode Island gas distribution system.

Prepared by or under the supervision of: Laeyeng Hunt

OER 1-7

Request:

Does the Company propose any activities in FY24 to proactively plan for gas system optimization (e.g. strengthening branches to support pockets of customers for whom Renewable Natural Gas is the only viable decarbonized option, trimming branches and supporting electrification for pockets of customers who have access to other viable decarbonized options)? If not, what was the decision-making process and why were these alternate options decided against?

Response:

The Company is proposing to perform gas system optimization activities in FY 2024 for the purposes of reinforcing branches to achieve consistent pressure, particularly in low pressure areas on the outer limits of the gas system. Isolating branches for trimming – versus reinforcing them – runs counter to improving overall system pressure and reliability. As referenced in the Company's response to OER 1-6 in this docket, the Company's preferred strategy going forward is to employ a neighborhood-style replacement approach, where possible, which helps enhance the system pressure for an entire neighborhood/area and allows for completion of projects in a more efficient manner. As neighborhoods/areas are replaced with all plastic pipes, the Company anticipates having more flexibility as to the type of gas (e.g., renewable nature gas and hydrogen) that can be delivered. Under this approach, in pockets where branches have yet to be replaced/upgraded to high pressure, the Company can evaluate whether it could be feasible to support non-pipeline alternatives for an entire neighborhood instead of only a handful of customers along a single branch.

OER 1-8

Request:

Did the Company consider alternate decarbonization options beyond decarbonized fuel (i.e., geothermal and/or district heating) for FY24? If so, please describe this consideration. If not, why were such alternatives not considered?

Response:

The Company is evaluating a potential electrification pilot involving the participation of two residential customers located off of an approximately 200-foot, low-pressure leak prone pipe system on Harris Avenue in Woonsocket, RI. The Company is in the very early stages of scoping the potential proposed pilot.