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July 18, 2023

VIA ELECTRONIC MAIL

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

**RE: Docket No. 22-49-EL-The Narragansett Electric Company d/b/a Rhode Island Energy
Advanced Metering Functionality (“AMF”) Business Case
Clarifications and Objections to Portions of the Technical Record Session Transcripts**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”), attached is the electronic version of Rhode Island Energy’s Clarifications and Objections to Portions of the Technical Record Session Transcripts (“Clarifications and Objections”) for the Rhode Island Public Utilities Commission’s (the “Commission”) consideration in its review of the Company’s AMF Business Case in the above-referenced docket.¹

Thank you for your time and attention to this matter. If you have any questions, please contact Jennifer Brooks Hutchinson at 401-316-7429.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Jennifer Brooks Hutchinson", with a long horizontal flourish extending to the right.

Jennifer Brooks Hutchinson

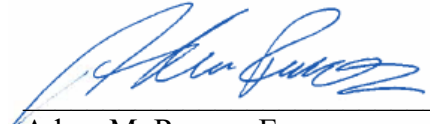
Attachment

cc: Docket No. 22-49-EL Service List
John Bell, Division
Leo Wold, Esq.

¹ Per communication from Commission counsel on October 4, 2021, the Company is submitting an electronic version of this filing followed by hard copies filed with the Clerk within 24 hours of the electronic filing.

CERTIFICATE OF SERVICE

I certify that a copy of the within documents was forwarded by e-mail to the Service List in the above docket on the 18th day of July, 2023.



Adam M. Ramos, Esq.

The Narragansett Electric Company d/b/a Rhode Island Energy
Docket No. 22-49-EL Advanced Meter Functionality (AMF)
Service list updated 4/17/2023

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STATE OF RHODE ISLAND

RHODE ISLAND PUBLIC UTILITIES COMMISSION

In re: The Narragansett Electric Company)
d/b/a Rhode Island Energy’s Advanced) Docket No. 22-49-EL
Metering Functionality Business Case)
_____)

**THE NARRAGANSETT ELECTRIC COMPANY D/B/A RHODE ISLAND ENERGY’S
CLARIFICATIONS AND OBJECTIONS TO PORTIONS OF THE TECHNICAL
RECORD SESSION TRANSCRIPTS**

The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”) respectfully submits its Clarifications and Objections to Portions of the Technical Record Session Transcripts (“Clarifications and Objections”) for the Rhode Island Public Utilities Commission’s (the “Commission”) consideration in its review of the Company’s Advanced Metering Functionality (“AMF”) Business Case. Specifically, the Company requests that the Commission grant its objections to certain portions of the Technical Record Session Transcripts and exclude those portions from the record in this docket. The Company further requests that the Commission consider other portions of the Technical Record Session Transcripts in light of the Company’s subsequent clarifications of or modifications to those portions, all as specified herein.

Introduction

The Commission has held three technical record sessions (“Tech Sessions”) in this matter. On February 22, 2023, the Commission held a Tech Session to discuss the benefit-cost analysis. The Tech Session on May 10, 2023 addressed the Company’s vendor contracts. The June 13, 2023 Tech Session addressed (a) the proposed pace of the AMF rollout, (b) the specific

functionalities offered by the selected meters/software technology, and (c) the incremental costs and benefits to customers of those functionalities.

To facilitate an unencumbered exchange of information, the Company's witnesses at the Tech Session were not placed under oath, and the Company's attorneys had limited involvement in the lines of questioning. As such, some of the statements these witnesses made during the technical session were amended, supplemented, expanded upon, or otherwise modified by the Company's subsequent responses to data requests and supplemental testimony.

The Company does not object generally to the admission of the Tech Session transcripts as evidence in this docket. The Company notes, however, that the statements made by its representatives were not under oath,¹ and therefore should not be considered testimony. *See* 810-RICR-00-00-1.22(A) (“Witnesses whose testimony is to be taken shall be sworn, or shall affirm, before their testimony shall be deemed evidence in the proceeding or any questions are put to them.”); *see also* *Buonomano v. Coastal Resources Mgmt. Council*, 1996 WL 936877 *3 (R.I. Super. 1996) (“The Council notes the general rule on the issue that, unless required by statute, rule or regulation, the swearing of witnesses is not required in administrative proceedings.”); *Zurow v. City of Cleveland*, 399 N.E.2d 92 (Ohio Ct. App. 1978) (zoning dispute, holding “[w]here a party demands that witnesses be sworn, or objects to unsworn testimony, and the administrative agency proceeds to hear unsworn testimony, such testimony is not evidence upon which a decision may be made,” the applicable administrative rules “requires that before

¹ It is the Company's understanding that its representatives will not be asked to adopt the statements in the transcripts under oath at the hearing. That understanding underlies the Company's position that it does not object to admission of the Tech Session transcripts as evidence. The Company would object to adopting everything that was said during the Tech Session transcripts under oath.

testifying[,] a witness shall be sworn to testify to the truth”). Rather, they should be considered non-testimonial evidence and given such weight as appropriate in that capacity.²

Additionally, the Company has reviewed the Tech Session transcripts and prepared a list of clarifications, modifications, amendments, supplementations, and/or explanations that have been provided in subsequent responses to data requests or subsequent testimony. The Company’s lack of objection to the admission of these portions of the Tech Session transcripts is predicated on the statements in the transcripts being understood in the context of and, as appropriate, superseded by, these later data request responses and/or testimony.

Further, the Company has identified certain limited portions of the Tech Session transcripts to which it objects having admitted as evidence. The Company has identified the portion of the transcript and the basis for its objection below.

Finally, in its review of each Tech Session transcript, the Company observed numerous clerical mistakes, some of which impact the substance of the statements made. For example, in the February 22, 2023 transcript, on page 185, line 1, the transcripts says “depression link”; in fact, the witness said “depreciation life.” Similarly, in the June 13, 2023 transcript, on page 49, the words attributed to William Hennegan were actually spoken by Attorney Ramos. And throughout the transcripts, the references to “last gas” should be “Last Gasp.” Due to the number

² Unsworn testimony generally is afforded less weight than sworn testimony and, in some circumstances, is insufficient on its own to support a factual finding. *See, e.g., RICO Corp. v. Town of Exeter*, 787 A.2d 1136, 1144 (R.I. 2001) (unsworn testimony cannot be used to establish a non-conforming use in zoning matters); *Ferrell v. Wall*, 889 A.2d 177, 184 (R.I. 2005) (observing that affidavits are sworn statements which “[o]ur legal system treats with great seriousness” and which may be “regarded as truthful,” whereas unsworn statements are not necessarily regarded in the same way); *Hanaford v. Stevens & Co.*, 98 A. 209, 212 (R.I. 1916) (noting that unsworn testimony is less reliable than sworn testimony); *see also* 73A C.J.S. Public Administrative Law & Proc. § 302 (“The relaxation of the rules of evidence in administrative proceedings and the fact that administrative tribunals are permitted to accept evidence which would not be admissible in a court of law do not permit administrative adjudications without a basis in evidence having a rational probative force.”).

of times that issues like these arise in the transcripts, the Company has not identified each and every instance and proposed corrections. As such, to the extent that the Commission or any party wishes to rely upon specific statements from the Tech Sessions during the hearing or as part of a decision in this matter, the Company respectfully requests that the Commission or party inquire whether such excerpt contains any of these clerical mistakes and assess whether any corrections need to be made.

I. February 22, 2023 Transcript

The February 22, 2023 Technical Record Session addressed the benefit cost analysis performed by the Company as part of its AMF Business Case. The following witnesses participated in that Technical Record Session:

- Philip Walnock (Rhode Island Energy)
- Wanda Reder (Grid-X Partners, on behalf of Rhode Island Energy)
- Flora Flygt (Grid-X Partners, on behalf of Rhode Island Energy)

These witnesses were not under oath. As such, some of the statements these witnesses made during the Technical Record Session were amended, supplemented, expanded upon, or otherwise modified by the Company's subsequent written testimony or responses to data requests.

A. Objections and Motion for Rulings

The Company does not object to any portions of the Transcript from February 22, 2023.

B. Subsequent Modifications and Clarifications

The Company requests that the following portions of the Transcript be understood in the context of and as modified or clarified by the written responses identified here:

1. Reder Testimony at Tr. 12:15-14:21 was modified and expanded upon by the Company's responses to data requests Division 3-4 and Division 3-5.
2. Walnock Testimony at Tr. 18:1-21 was modified and expanded upon by the Company's responses to data requests PUC 5-1, PUC 5-2, and PUC 5-3.
3. Reder Testimony at Tr. 20:23-21:4 and Walnock Testimony at Tr. 21:20-22:2 was modified and expanded upon by the Company's responses to data request PUC 5-6.
4. Reder and Flygt Testimony at Tr. 22:3-26:1 was modified and expanded upon by the Company's response to data request PUC 5-8.
5. Reder Testimony at Tr. 32:2-12 was modified and expanded upon by the Company's response to data request PUC 5-5.
6. Reder and Walnock Testimony at Tr. 44:9-46:8 was modified and expanded by the Company's response to data requests PUC 5-6 and 5-11.
7. Flygt Testimony at Tr. 53:22-54:14. In the course of reviewing this transcript and preparing for the hearings, Ms. Flygt learned that, while she understood and believed at the time of the February 22, 2023 Technical Record Session that the ICE calculator provided values in response to her query in 2022 dollars, the ICE calculator had actually provided the values in 2016 dollars. The Company and Ms. Flygt will address this change at the hearings.
8. Flygt, Reder, and Walnock Testimony at Tr. 61:2-66:11 was modified by the Company's responses to data requests PUC 5-14, PUC 5-15, and PUC 5-16.
9. Flygt Testimony at Tr. 73:18-25 was modified and expanded upon by the Company's response to data request PUC 5-13.

10. Flygt and Reder Testimony at Tr. 82:10-88:10 was modified and expanded upon by the Company's responses to data requests PUC 5-17, PUC 5-18, PUC 5-19, PUC 5-21, and PUC 5-23.
11. Walnock and Reder Testimony at Tr. 97:4-98:19 and Walnock Testimony at Tr. 99:12-100:17 was modified and expanded upon by the Company's responses to data requests PUC 5-20 and PUC 5-22.
12. Flygt Testimony at Tr. 125:17 – 161:5 was clarified and expanded upon by the Company's responses to data requests PUC 5-24 and PUC 5-25.
13. Flygt Testimony at Tr. 174:7-180:15 was modified and expanded upon by the Company's responses to data requests PUC 5-24 and PUC 5-25.

II. May 10, 2023 Transcript

The May 10, 2023 Technical Record Session addressed the contracts executed or proposed for Advanced Metering Functionality (“AMF”) between or among Rhode Island Energy and PPL Corporation, on the one hand, and its proposed AMF vendor Landis+Gyr, on the other. At the commencement of the Technical Record Session, Commission staff provided a detailed description of the topics the Commission expected the Company to address. *See* Tr. 9:13-10:17. The following witnesses participated in that Technical Record Session:

- Philip Walnock (Rhode Island Energy)
- Matthew Gray (Rhode Island Energy)
- William Hennegan (Rhode Island Energy)
- Wanda Reder (Grid-X Partners, on behalf of Rhode Island Energy)

These witnesses were not under oath. As such, some of the statements these witnesses made during the Technical Record Session were amended, supplemented, expanded upon, or

otherwise modified by the Company's subsequent written testimony or responses to data requests. Additionally, the Company has certain objections to the form and substance of the discussion at the Technical Record Session that were not addressed during the Technical Record Session.

A. Objections and Motion for Rulings

The Company objects to the following portions of the Transcript and moves that these be excluded from the record:

1. Walnock Testimony at Tr. 44:4-25. The Company objects to the form of the question at Tr. 44:19-23. This question fell outside the stated scope for the Technical Record Session. The Company further objects to the compound form of the question.
2. Walnock & Hennegan Testimony at Tr. 48:2-23. The Company objects to the form of the question at Tr. 48:2-5. This question fell outside the stated scope for the Technical Record Session. The Company further objects to the form on the question on the grounds that the question was ambiguous, incomplete, and compound.
3. Gray Testimony at Tr. 58:7-25. The Company objects to the form of the question at Tr. 58:7-15. This question fell outside the stated scope for the Technical Record Session.
4. Walnock & Hennegan Testimony at Tr. 85:23-87:9. The Company objects to the form of the questions at Tr. 85:23-86:8, 86:10-19, and 86:23-87:1. These questions all fell outside the stated scope for the Technical Record Session.

5. Walnock & Reder Testimony at Tr. 167:1-169:17. The Company objects to the form of the questions at Tr. 167:1-15 and Tr. 168:24-25. These questions fell outside the stated scope for the Technical Record Session and were ambiguous and compound.
6. Walnock Testimony at Tr. 181:18-182:2. The Company objects to the form of the questions at Tr. 181:18-24. This question fell outside the stated scope for the Technical Record Session and ambiguous.
7. Walnock, Reder, & Gray Testimony at Tr. 184:3-185:5. The Company objects to the form of the questions at Tr. 184:3-7, 184:13-16, and 184:21-185:3. These questions fell outside the stated scope for the Technical Record Session and were ambiguous, incomplete, and compound.
8. Comments of the Chair at Tr. 198:19-207:13. These comments did not include any responses or statements from the Company and do not constitute evidence.

B. Subsequent Modifications and Clarifications

The Company requests that the following portions of the Transcript be understood in the context of and as modified or clarified by the written responses identified here:

1. Walnock Testimony at Tr. 17:13-22 was modified and expanded upon by the Joint Pre-Filed Supplemental Direct Testimony of Philip J. Walnock and Stephanie A. Briggs [hereinafter “Suppl. Testimony”] at 5:4-6:11.
2. Walnock Testimony at Tr. 22:3-20 was modified and expanded upon by the Suppl. Testimony at 7:11-8:2 and 11:10-12:11.
3. Walnock Testimony at Tr. 30:24-31:10 was modified and expanded upon by the Suppl. Testimony at 16:17-17:1.

4. Walnock Testimony at Tr. 34:18-35:18 was modified and expanded upon by the Suppl. Testimony at 22:1-24:5.
5. Walnock Testimony at Tr. 61:11-64:5 and Reder Testimony at Tr. 64:6-21 were modified and expanded upon by the Company's response and supplemental response to data request PUC 6-4.
6. Walnock Testimony at Tr. 67:25-75:16 was modified and expanded upon by the Suppl. Testimony at 27:11-29:19 and the Company's responses to data requests PUC 6-3, PUC 7-14, PUC 7-15, PUC 7-16, PUC 7-17, PUC 7-18, PUC 7-19, PUC 7-20, PUC 7-21, PUC 7-22, PUC 7-23, PUC 7-24, and supplemental response to data request PUC 7-23.
7. Walnock Testimony at Tr. 101:21-102:24 was modified and expanded upon by the Suppl. Testimony at 30:1-32:17 and the Company's responses to data requests PUC 6-5, PUC 7-17, PUC 7-22, PUC 7-23, and supplemental response to data request PUC 7-23.
8. Walnock Testimony at Tr. 105:20-109:7 was modified and expanded upon by the Suppl. Testimony at 30:1-32:17 and the Company's responses to data requests PUC 6-5, PUC 7-17, PUC 7-22, PUC 7-23, and supplemental response to data request PUC 7-23.
9. Walnock Testimony at Tr. 110:2-111:17 was modified and expanded upon by the Suppl. Testimony at 32:5-17 and the Company's response to data request PUC 6-5.

10. Walnock, Gray, and Reder Testimony at Tr. 112:25-117:14 was modified and expanded upon by the Company's responses to data requests PUC 6-4, PUC 7-1, PUC 7-8, and the Company's supplemental response to data request PUC 6-4.
11. Walnock Testimony at Tr. 119:2-11 was modified and expanded upon by the Company's responses to data requests PUC 6-1 and PUC 6-5.
12. Walnock Testimony at Tr. 131:3-14 was modified and expanded upon by the Company's supplemental response to PUC RR-1.
13. Walnock Testimony at Tr. 135:9-12, 135:20-22 was modified and supplemented by Suppl. Testimony at 31:18-20.
14. Walnock Testimony at Tr. 142:18-143:15 was modified and expanded upon by the Company's response to data request PUC 6-5.
15. Walnock, Reder, and Gray Testimony at Tr. 194:8-195:22 was modified and expanded upon by the Company's responses to data requests PUC 6-6 and 6-7.

III. June 13, 2023 Transcript

The June 13, 2023 Technical Record Session addressed: (a) the proposed pace of the AMF rollout, (b) the specific functionalities offered by the selected meters/software technology, and (c) the incremental costs and benefits to customers of those functionalities. The following witnesses participated in that Technical Record Session:

- Phil Walnock (Rhode Island Energy)
- Wanda Reder (Grid-X on behalf of Rhode Island Energy)
- Matt Gray (Rhode Island Energy)
- Ryan Constable (Rhode Island Energy)
- Bill Hennegan (Rhode Island Energy)

- Robin W. Blanton (Gregory L. Booth, PLLC, on behalf of the Rhode Island Division of Public Utilities and Carriers)

These witnesses were not under oath. As such, some of the statements these witnesses made during the technical session were amended, supplemented, expanded upon, or otherwise modified by the Company's subsequent responses to data requests.

A. Objections and Motion for Rulings

The Company objects to the following portions of the Transcript and moves that these be excluded from the record:

1. Constable Testimony at Tr. 69:25-72:9. The Company objects to the question as soliciting hearsay. Ryan Constable is answering a series of questions about how the Company's Control Center might use certain data. Mr. Constable is not a part of the Company's Control center. Mr. Constable relays several hearsay statements purporting to explain what representatives of the Control Center have told him, including: "the control center wants this data," "the control center is concerned with the volume of the data," "the control center was concerned when we were putting line devices in," and "now they use the data every minute of the day." Mr. Constable proceeds to elaborate on what he believes the Control Center's "concerns" are, and eventually confirms that Mr. Bianco should pose these questions directly to representatives of the Control Center, to obtain accurate and complete answers.
2. Constable Testimony at Tr. 74:19-75:7. The Company objects based on lack of foundation and personal knowledge. Ryan Constable answers the following hypothetical question centering on operations in Pennsylvania: "So, let's say

you're in Pennsylvania, you get information every 4 to 6 hours, that data represents the measurement that's in, you know, worse granularity, right, lower resolution. Can that data be used for operations? I'll just ask, you know, to get an understanding of the voltage on the system at the same time of day, or are they relying on sensors on the systems, or neither? None of that is happening in Pennsylvania." Mr. Constable has no personal knowledge of Pennsylvania operations and makes his lack of personal knowledge clear, when he prefaces his answer with "It is my understanding..." He proceeds to answer the hypothetical question by relying on his speculation about what Pennsylvania operators probably do and consider.

B. Subsequent Clarification and Modifications

The Company requests that the following portions of the Transcript be understood in the context of and as modified or clarified by the written responses identified here:

1. Walnock Testimony at Tr. 57:14-23; supplemented by Response to PUC 7-1.
2. Constable Testimony at Tr. 63:17-24, 69:19-23; modified by Response to PUC 7-1.
 - 1.
3. Walnock Testimony at Tr. 127:7-22; expanded upon by Response to PUC 7-7.
4. Walnock, Constable, and Reder Testimony at Tr. 128:15-133:12; supplemented and expanded upon by Responses to PUC 7-2, and PUC 7-3.
5. Walnock Testimony at Tr. 151:16-153:13; supplemented by Response to PUC 7-4.
6. Walnock Testimony at Tr. 156:7-165:20; supplemented by Response to PUC 8-4.

7. Walnock Testimony at Tr. 166:13-167:22; 189:21-191:22; modified by Response to PUC 7-8, PUC 8-4.

Conclusion

The Company respectfully requests that the Commission consider these clarifications and objections as it considers the Tech Session transcripts in this docket.

**THE NARRAGANSETT ELECTRIC
COMPANY d/b/a RHODE ISLAND ENERGY**

By its attorneys,



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Dated: July 18, 2023

CERTIFICATE OF SERVICE

I hereby certify that on July 18, 2023, I sent a copy of the foregoing to the service list by electronic mail.

/s/ Adam M. Ramos