

STEVEN J. BOYAJIAN

One Financial Plaza, 14th Floor
Providence, RI 02903-2485
Main (401) 709-3300
Fax (401) 709-3399
sboyajian@rc.com
Direct (401) 709-3359

Also admitted in Massachusetts

August 29, 2023

VIA HAND DELIVERY & ELECTRONIC MAIL

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

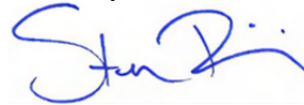
**RE: Docket No. 22-54-NG – The Narragansett Electric Company
Proposed Fiscal Year 2024 Gas Infrastructure, Safety, and Reliability Plan
Responses to PUC Data Requests – PUC Set 7**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”), I have enclosed the Company’s responses to the Public Utilities Commission’s Seventh Set of Data Requests in the above-referenced docket.

Thank you for your attention to this matter. If you have any questions, please contact me at 401-709-3359.

Sincerely,



Steven J. Boyajian

Enclosure

cc: Docket 22-54-NG Service List

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

August 29, 2023

Date

No. 22-54-NG- RI Energy's Gas Infrastructure, Safety and Reliability (ISR) Plan 2024 - Service List 4/6/2023

Name/Address	E-mail Distribution	Phone
The Narragansett Electric Company d/b/a Rhode Island Energy Jennifer Hutchinson, Esq. 280 Melrose Street Providence, RI 02907	JHutchinson@pplweb.com ;	401-784-7288
	COBrien@pplweb.com ;	
	JScanlon@pplweb.com ;	
	JMOBrien@rienergy.com ;	
	PLaFond@rienergy.com ;	
	NKocon@rienergy.com ;	
Steve Boyajian, Esq. Robinson & Cole LLP One Financial Plaza, 14th Floor Providence, RI 02903	SBriggs@pplweb.com ;	401-709-3359
	JOliveira@pplweb.com ;	
	SBoyajian@rc.com ;	
	HSeddon@rc.com ;	
Division of Public Utilities & Carriers Leo Wold, Esq.	Leo.Wold@dpuc.ri.gov ;	401-780-2130
	Margaret.I.hogan@dpuc.ri.gov ;	
	Al.mancini@dpuc.ri.gov ;	
	John.bell@dpuc.ri.gov ;	
	Robert.Bailey@dpuc.ri.gov ;	
	Paul.roberty@dpuc.ri.gov ; ellen.golde@dpuc.ri.gov ;	

David Effron Berkshire Consulting 12 Pond Path North Hampton, NH 03862-2243	Djeffron@aol.com ;	603-964-6526
Rod Walter, CEO/President Rod Walker & Associates	Rwalker@RWalkerConsultancy.com ;	706-244-0894
	jwalker@rwalkerconsultancy.com ;	
Office of Energy Resources Al Vitali, Esq.	Albert.vitali@doa.ri.gov ;	
	nancy.russolino@doa.ri.gov ;	
	Christopher.Kearns@energy.ri.gov ;	
	Shauna.Beland@energy.ri.gov ;	
	William.Owen@energy.ri.gov ;	
	Anika.Kreckel@energy.ri.gov ;	
Office of Attorney General Nick Vaz, Esq. 150 South Main St. Providence, RI 02903	nvaz@riag.ri.gov ;	401-274-4400 x 2297
	mbedell@riag.ri.gov ;	
File an original and five copies Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick RI 02888	Luly.massaro@puc.ri.gov ;	401-780-2107
	Patricia.lucarelli@puc.ri.gov ;	
	Todd.bianco@puc.ri.gov ;	
	Alan.nault@puc.ri.gov ;	
	Christopher.Caramello@puc.ri.gov ;	

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-54-NG
In Re: FY 2024 Gas Infrastructure, Safety and Reliability Plan
Quarterly Report - First Quarter Ending June 30, 2023
Responses to the Commission's Seventh Set of Data Requests
Issued on August 18, 2023

PUC 7-1

Request:

Referring to Attachment B and the column referenced as "FYTD" - "Budget," please explain how the Company forecasted the Q1 budget in that column. For example, was it an allocation of annual costs or was it an attempt to forecast the amount of spending the Company expected would actually occur in Q1 based on the Commission's approval of the relevant budget items?

Response:

For reference for all responses in PUC set 7, please see Attachment PUC 7-1, which is an updated FY2024 Gas ISR Portfolio forecast through July 2023. This forecast is current as of August 24, 2023.

The Company creates an annual budget spread by month for each line item in its budget prior to the start of the plan year. The budget spread is based on historical averages, work planned by category over the course of the year, any known resourcing constraints, and other factors. The Q1 FYTD Budget listed in the FY2024 Gas ISR First Quarter report is the sum of the original budget spread allocations for the first three months of FY2024.

This budget spread was initially set in early March and then adjusted following the Commission's order on March 29, 2023 establishing the budget approval for FY2024. The initial monthly/quarterly budget spread assumed more lower cost, smaller diameter (less than 12-inch) projects would be included in the work mix earlier in the season, as has been the case historically, but instead the Company identified many higher risk projects that were workable at the beginning of the season and they have been more expensive, large diameter (12-inch) projects. See response to PUC 7-4 for more information.

**The Narragansett Electric Company
d/b/a Rhode Island Energy - RI Gas
Forecasted Capital Spending by Investment Categories - Detail
As of August 24, 2023
(\$000)**

FY 2024 - Total

Categories	Budget	Forecast	Variance
NON-DISCRETIONARY			
Public Works			
<i>CSC/Public Works - Non-Reimbursable</i>	\$16,875	\$17,214	\$339
<i>CSC/Public Works - Reimbursable</i>	\$1,372	\$1,372	(\$0)
<i>CSC/Public Works - Reimbursements</i>	(\$1,070)	(\$3,161)	(\$2,091)
Public Works Total	\$17,177	\$15,425	(\$1,752)
Mandated Programs			
<i>Corrosion</i>	\$1,534	\$1,534	\$0
<i>Purchase Meter (Replacement)</i>	\$7,095	\$4,555	(\$2,540)
<i>Reactive Leaks (CI Joint Encapsulation/Service Replacement)</i>	\$8,000	\$8,144	\$144
<i>Service Replacement (Reactive) - Non-Leaks/Other</i>	\$1,748	\$1,748	\$0
<i>Main Replacement (Reactive) - Maintenance (incl Water Intrusion)</i>	\$1,167	\$2,167	\$1,000
<i>Low Pressure System Elimination (Proactive)</i>	\$1,300	\$1,300	\$0
<i>Transmission Station Integrity</i>	\$4,201	\$2,455	(\$1,747)
<i>Pipeline Integrity - IVP - Wampanoag Trail Pipeline Replacement</i>	\$575	\$575	(\$0)
<i>Other Mandated</i>	\$0	\$0	\$0
Mandated Total	\$25,621	\$22,478	(\$3,143)
Damage / Failure (Reactive)			
<i>Damage / Failure (Reactive)</i>	\$25	\$25	\$0
NON-DISCRETIONARY TOTAL	\$42,824	\$37,929	(\$4,895)
DISCRETIONARY			
Proactive Main Replacement			
<i>Main Replacement (Proactive) - Leak Prone Pipe</i>	\$73,172	\$74,651	\$1,479
<i>Main Rehabilitation (Proactive) - Large Diameter LPCI Program</i>	\$3,994	\$5,942	\$1,948
<i>Atwells Avenue</i>	\$1,100	\$1,100	\$0
Proactive Main Replacement Total	\$78,266	\$81,694	\$3,428
Proactive Service Replacement			
Proactive Service Replacement Total	\$559	\$559	\$0
Reliability			
<i>System Automation</i>	\$792	\$592	(\$200)
<i>Heater Installation Program</i>	\$5,006	\$5,013	\$7
<i>Heater Installation Program - Wampanoag Trail Heaters Replacement and Ownership Transfer</i>	\$0	\$0	\$0
<i>Pressure Regulating Facilities</i>	\$5,200	\$5,193	(\$7)
<i>Allens Ave Multi Station Rebuild</i>	\$0	\$0	\$0
<i>Take Station Refurbishment</i>	\$1,164	\$782	(\$383)
<i>Take Station Enhancement Program -Tiverton GS Ownership Transfer</i>	\$190	\$673	\$483
<i>Valve Installation/Replacement (incl Storm Hardening & Middletown/Newport)</i>	\$606	\$296	(\$310)
<i>Gas System Reliability</i>	\$2,530	\$8,035	\$5,505
<i>I&R - Reactive</i>	\$1,402	\$1,402	\$0
<i>Distribution Station Over Pressure Protection</i>	\$2,420	\$2,120	(\$300)
<i>LNG</i>	\$16,313	\$14,048	(\$2,265)
<i>LNG - Portable Equipment Purchase</i>	\$6	\$177	\$171
<i>Replace Pipe on Bridges</i>	\$1,350	\$1,350	\$0
<i>Access Protection Remediation</i>	\$60	\$60	\$0
<i>Tools & Equipment</i>	\$1,034	\$1,034	\$0
Reliability Total	\$38,074	\$40,775	\$2,701
SUBTOTAL DISCRETIONARY (Without Gas Expansion)	\$116,899	\$123,027	\$6,129

d/b/a Rhode Island Energy - RI Gas
Forecasted Capital Spending by Investment Categories - Detail
As of August 24, 2023
(\$000)

FY 2024 - Total

Categories	Budget	Forecast	Variance
Southern RI Gas Expansion Project			
<i>Pipeline</i>	\$0	\$0	\$0
<i>Other Upgrades/Investments</i>	\$0	\$0	\$0
<i>Regulator Station Investment</i>	\$3,700	\$1,616	(\$2,084)
<i>Southern RI Gas Expansion Project Total</i>	\$3,700	\$1,616	(\$2,084)
DISCRETIONARY TOTAL (With Gas Expansion)	\$120,599	\$124,643	\$4,045
CAPITAL ISR TOTAL (Base Capital - Without Gas Expansion)	\$159,722	\$160,956	\$1,234
CAPITAL ISR TOTAL (With Gas Expansion)	\$163,422	\$162,572	(\$850)
Additional Capital Investments (Not currently included in the ISR)			
<i>Aquidneck Island Long Term Capacity Options</i>	\$500	\$634	\$134
<i>LNG - Cumberland Tank Replacement</i>	\$0	\$200	\$200

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-54-NG
In Re: FY 2024 Gas Infrastructure, Safety and Reliability Plan
Quarterly Report - First Quarter Ending June 30, 2023
Responses to the Commission's Seventh Set of Data Requests
Issued on August 18, 2023

PUC 7-2

Request:

Referring to Attachment B and the line item identified as “Main Replacement (Proactive) Leak Prone Pipe,” please provide two tables as follows:

In Table 1, please provide the following information relating to the FY 2024 Budget which was approved by the Commission for this category:

- (a) identification of the specific replacement project,
- (b) the original cost estimate for the project that was included in the aggregated \$73.2 million budget for this category,
- (c) amount of spending occurring in Q1,
- (d) the amount of spending that is being forecast for the project for the entire FY 2024, and
- (e) the variance between column (b) and (d).

In Table 2, please provide the same information provided in Table 1 for any projects that were not included in the original forecast of \$73.2 million that was approved by the Commission but have been added to the Company's plan for FY 2024. In this Table 2 please designate \$0 in column (b) for each project.

NOTE: Any projects which had an over/underspend for FY 2024 at less than \$100,000 may be aggregated into a single line item in the applicable Table.

Response:

Please refer to Attachment PUC 7-2, which contains both Table 1 and Table 2. With respect to each table in Attachment PUC 7-2, please note the following:

- For Table 1:
 - o Items (a), (b), and (c) are included as requested.
 - o For items (d) and (e), the Company does not forecast spending down to an individual project level, by fiscal year, in the Proactive Main Replacement – Leak Prone Pipe category, thus items (d) and (e) cannot be provided.
 - o No aggregation was done in Table 1 as no variance was calculated.

PUC 7-2, Page 2

- For Table 2:
 - Items (a) and (c) are included as requested.
 - For items (d) and (e), the Company does not forecast spending down to an individual project level, by fiscal year, in the Proactive Main Replacement – Leak Prone Pipe category, thus items (d) and (e) cannot be provided. The “FY2024 Project List” and associated mileage and total estimated cost are used as a proxy to calculate a budget for the overall volume of work that is forecasted to be performed in this program.
 - All work orders that incurred under \$100,000 in spend through the end of the first quarter of FY2024 were aggregated in Table 2, Row 5.
 - Most of the projects included in Table 2 were not advanced to replace those in Table 1 (because of late-developing shifts in priority). Most of the projects included in Table 2 represent “Carryover” work that started prior to FY2024. The Company incurred costs for those projects during FY2024 because they were started in prior fiscal years but not completed during FY2023 either because the Company was unable to complete construction or final roadway and/or sidewalk restoration took place during FY2024.

Table 1				
Town	PP wo#	Project Title	Original Cost Estimate*	Q1 Actual Spending (April 1st through June 30th)
Bristol	90000194262	573-744 Hope St, BST	\$879,076	\$0
Bristol	90000217168	68-151 Bay View Av, BST	\$838,956	\$4,327
Central Falls	90000225867	Perry St, CFL	\$1,369,373	\$0
Cranston	90000225860	W Hill Dr, CRA	\$1,430,064	\$168
Cumberland	90000225808	1507-1802 Mendon Rd, CLD	\$1,077,384	\$1,146,750
Cumberland	90000225838	Mullen Av, CLD	\$1,194,792	\$0
Cumberland	90000226153	Glenside Rd, CLD	\$366,254	\$462
Cumberland	90000226154	Fountain St, CLD	\$322,734	\$3,401
East Greenwich	90000215166	Pierce St, EGW	\$47,049	\$54,337
East Greenwich	90000220896	Upland Av, EGW	\$101,081	\$0
East Greenwich	90000220897	Third Av, EGW	\$58,387	\$222
East Greenwich	90000220899	Fourth Av, EGW	\$35,095	\$222
East Providence	90000210583	N Broadway, EPV	\$271,130	\$549
East Providence	90000210913	Waterman Av, EPV	\$3,051,123	\$0
East Providence	90000218038	419-583 N Broadway, EPV	\$1,286,746	\$528,102
East Providence	90000218389	2145-2289 Pawtucket Av, EPV	\$465,964	\$422
East Providence	90000220953	25-90 N Broadway, EPV	\$523,924	\$2,826
East Providence	90000225872	Josephine Av, EPV	\$184,472	\$151,669
East Providence	90000225951	Pavilion Av, EPV	\$1,003,605	\$0
East Providence	90000233734	2464-2556 Pawtucket Av, EPV	\$1,401,495	\$6,408
Johnston	90000142764	1294 Atwood Av, JOH	\$74,608	\$0
Johnston	90000211786	1423-1741 Atwood Av, JOH	\$1,378,783	\$5,780
Johnston	90000218000	Pocasset St, JOH	\$170,231	\$0
Lincoln	90000212041	Old Main St, LNC	\$1,134,941	\$857,184
Lincoln	90000219059	Old River Rd, LNC	\$631,145	\$908,605

Table 1				
Town	PP wo#	Project Title	Original Cost Estimate*	Q1 Actual Spending (April 1st through June 30th)
Lincoln	90000225844	Walker St, LNC	\$1,113,000	-\$23,808
Lincoln	90000234597	Chapel St, LNC	\$1,260,730	\$19,036
Middletown	90000118390	Maple Av, MDT	\$924,880	\$0
Newport	90000142705	1-170 Spring St, NPR	\$1,272,646	\$0
Newport	90000185659	Broadway, NPR	\$691,623	\$0
Newport	90000216936	Dearborn St, NPR	\$239,779	\$0
Newport	90000219163	Rolling Green Rd, NPR	\$708,839	\$0
North Providence	90000146500	Redwood Dr, NPV	\$266,809	\$137,880
North Providence	90000204675	957-1074 Mineral Spring Av, NPV	\$1,611,212	\$0
North Providence	90000204830	Atlantic Blvd, NPV	\$1,386,003	\$348,060
North Providence	90000215933	1-173 Woonasquatucket Av, NPV	\$1,623,450	\$435,830
North Smithfield	90000194318	Morse Av, NSF	\$1,414,834	\$26,276
North Smithfield	90000214975	Main St, NSF	\$338,190	\$198,894
Pawtucket	90000194335	George St, PAW	\$745,011	\$0
Pawtucket	90000211769	Conant St, PAW	\$586,914	\$0
Pawtucket	90000212483	Oakdale Av, PAW	\$502,526	\$60,147
Providence	90000142541	Whitehall St, PVD	\$870,424	\$0
Providence	90000155243	1016-1100 Hope St, PVD	\$529,941	\$290,656
Providence	90000175665	Carr St, PVD	\$681,805	\$0
Providence	90000187222	Reservoir Av, PVD	\$1,123,038	\$0
Providence	90000187225	Burlington St, PVD	\$365,167	\$0
Providence	90000188537	Harris Av, PVD (incl. 2 RR crossings)	\$930,223	\$0
Providence	90000194347	330-505 Silver Spring St, PVD	\$805,087	\$376
Providence	90000194780	Rt 10 S Offramp @ Union Av, PVD	\$232,522	\$0
Providence	90000195699	1-111 Harris Av, PVD	\$38,091	\$0
Providence	90000210631	Woodbine St, PVD	\$314,845	\$0
Providence	90000210644	Burnside St, PVD	\$405,514	\$0

Table 1				
Town	PP wo#	Project Title	Original Cost Estimate*	Q1 Actual Spending (April 1st through June 30th)
Providence	90000210746	Abbott St, PVD	\$1,094,182	\$0
Providence	90000212129	Penn St, PVD	\$1,053,400	\$0
Providence	90000212419	531-690 Manton Av, PVD	\$655,060	\$160,143
Providence	90000212520	632-734 Hope St, PVD	\$1,209,268	\$0
Providence	90000214966	Duncan Av, PVD	\$619,980	\$96
Providence	90000215259	Anthony Av, PVD	\$1,344,598	\$0
Providence	90000215445	578-776 Plainfield St, PVD	\$1,086,015	\$0
Providence	90000215465	336-463 Benefit St, PVD	\$1,380,894	\$216
Providence	90000221185	125-201 Washington St, PVD	\$351,061	\$0
Providence	90000225974	Herschel St, PVD	\$1,212,520	\$1,648
Providence	90000226925	Olney St, PVD	\$693,162	\$0
Providence	90000230891	Narragansett Av, PVD	\$2,484,406	\$20,390
Providence	90000230974	697-908 Eddy St, PVD	\$2,902,345	\$5,140
Warwick	90000194417	Terrace Av, WWK	\$365,062	\$0
Warwick	90000204632	Scenic Dr, WWK	\$790,150	\$0
Warwick	90000204634	Warwick Av, WWK	\$1,337,982	\$258,757
Warwick	90000211760	Governors Dr, WWK	\$355,627	\$391
Warwick	90000211833	Benefit St, WWK	\$126,639	\$91,376
Warwick	90000215125	Parkside Dr, WWK	\$1,229,914	\$677,740
Warwick	90000220850	Morris St, WWK	\$168,603	\$0
Warwick	90000220901	Link St, WWK	\$751,805	\$798
Warwick	90000220925	Tennyson Rd, WWK	\$414,089	\$0
Warwick	90000225940	Watson St, WWK	\$434,967	\$960
Westerly	90000204638	Ward Av, WLY	\$1,204,548	\$876,630
Westerly	90000220866	E Capalbo Dr, WLY	\$176,333	\$0
Woonsocket	90000175911	S Main St, WSO	\$599,691	\$0
Woonsocket	90000217184	481-604 Blackstone St, WSO	\$454,500	\$486

Table 1				
Town	PP wo#	Project Title	Original Cost Estimate*	Q1 Actual Spending (April 1st through June 30th)
Woonsocket	90000226114	Park Pl, WSO	\$2,611,681	\$2,234
Woonsocket	90000226116	Lincoln St, WSO	\$1,907,364	\$547
Woonsocket	90000226144	West St, WSO	\$844,111	\$2,071
Woonsocket	90000229862	Third Av, WSO	\$1,781,593	\$6,649
Woonsocket	90000229863	Second Av, WSO	\$1,120,835	\$136,548
Woonsocket	90000234900	Mason St - LP Abandonment, WSO	\$143,154	\$195
		Total	\$73,187,058	\$7,407,795

*Note: The total of the estimates for the FY2024 project list is approximately \$15K higher than the PUC approved budget. The PUC order instructed the Company to reduce a specific dollar value and number of miles. This project list represents the Company's best attempt to comply with both elements of that order.

Table 2			
Town	PP wo#	Project Title	Q1 Actual Spending (April 1st through June 30th)
N/A	90000163678	Accrual - CRCC203 (Steel)	\$981,017
N/A	90000163679	Accrual - CRCC207 (Cast Iron)	\$3,037,432
N/A	Multiple	Sub \$100K Spending wo#'s	\$2,320,696
Bristol	90000218031	Burton St, BST	\$124,738
Bristol	90000219165	Center St, BST	\$113,338
Bristol	90000220948	1-45 Bay View Av, BST	\$107,304
Cranston	90000092282	Eldridge St, CRA	\$218,161
Cranston	90000142840	Haven Av, CRA	\$658,981
Cranston	90000211272	Eileen Av, CRA	\$192,049
Cranston	90000214927	Frances Av, CRA	\$105,114
Cranston	90000215080	1-87 Packard St, CRA	\$373,711
Cranston	90000218033	Prospect St, CRA	\$465,359
Cranston	90000219650	Perkins Av, CRA	\$210,031
Cranston	90000220590	Appleton St, CRA	\$183,441
Cranston	90000220826	Bald Hill Rd, CRA	\$108,194
Cranston	90000220960	Forest Av, CRA	\$348,615
Cranston	90000224128	660-1119 Reservoir Av, CRA	\$1,764,267
Cranston	90000229281	969-1300 Park Av, CRA	\$1,703,922
Cumberland	90000212432	Clark St, CLD	\$226,354
Cumberland	90000219663	127-250 Mendon Rd, CLD	\$249,690
Cumberland	90000225865	Geldard St, CLD	\$256,522
East Providence	90000223205	Central Av, EPV	\$384,205
Johnston	90000218041	Osgood St, JOH	\$103,654
Johnston	90000219208	Ashby St, JOH	\$173,805
Johnston	90000220828	Gesmondi Dr, JOH	\$276,305
Lincoln	90000226150	Hazel St, LNC	\$347,597
North Providence	90000212523	Elizabeth Dr, NPV	\$201,984

Table 2			
Town	PP wo#	Project Title	Q1 Actual Spending (April 1st through June 30th)
North Providence	90000214933	211-299 Woonasquatucket Av, NPV	\$975,150
North Smithfield	90000185670	Woonsocket Hill Rd, NSF	\$285,948
North Smithfield	90000212438	Smithfield Rd, NSF	\$475,140
North Smithfield	90000219267	Greene St, NSF	\$114,793
Pawtucket	90000211188	Cherry St, PAW	\$247,579
Pawtucket	90000211208	Harrison St, PAW	\$224,748
Pawtucket	90000211518	Broadway, PAW	\$225,122
Pawtucket	90000211538	Fenner St, PAW	\$274,650
Pawtucket	90000211546	1-75 East Av, PAW	\$138,427
Pawtucket	90000212444	380-433 Lonsdale Av, PAW	\$268,411
Pawtucket	90000214948	504-546 Smithfield Av, PAW	\$103,439
Pawtucket	90000214950	Progress St, PAW	\$446,225
Providence	90000185689	Dover St, PVD	\$202,141
Providence	90000194364	Linden Dr, PVD	\$101,820
Providence	90000211756	589-700 Hartford Av, PVD	\$319,949
Smithfield	90000211875	Waterman Av, SMF	\$116,421
Warwick	90000175801	Buttonwoods Av, WWK	\$158,255
Warwick	90000194383	Archdale Dr, WWK	\$261,899
Warwick	90000212599	George St, WWK	\$170,654
Warwick	90000215424	Moccasin Dr, WWK	\$364,787
Woonsocket	90000194428	Blackstone St, WSO	\$288,806
Woonsocket	90000210929	Ballou St, WSO	\$231,832
Woonsocket	90000210947	Willow Av, WSO	\$558,959
Woonsocket	90000212431	Summer St, WSO	\$1,231,548
Woonsocket	90000212440	Cass Av, WSO	\$229,266
		Total	\$23,252,454

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-54-NG
In Re: FY 2024 Gas Infrastructure, Safety and Reliability Plan
Quarterly Report - First Quarter Ending June 30, 2023
Responses to the Commission’s Seventh Set of Data Requests
Issued on August 18, 2023

PUC 7-3

Request:

Referring to Attachment B and the “Proactive Main Replacement” category, please identify the projected number of miles of pipe that is assumed will be replaced within the forecasted \$81.7 million Proactive Main Replacement Total.

Response:

The Company plans to abandon a total of 47.8 miles of pipe within the Proactive Main Replacement & Rehabilitation categories.. The miles are made up of 47.5 miles in the Proactive Main Replacement – Leak Prone Pipe program and 0.3 miles for the Atwells Avenue project. The Proactive Main Replacement – Leak Prone Pipe subcategory is forecasted to spend \$74.651 million, and the Atwells Avenue project is forecasted to spend \$1.100 million. The additional \$5.942 million of the \$81.7 is forecasted for the completion of six CISBOT projects, please see PUC 7-12 for additional details regarding the Proactive Main Rehabilitation – Large Diameter LPCI Program.

The table below provides a breakdown of the budget and forecast as of August 24, 2023 for the Proactive Main Replacement & Rehabilitation categories.

Categories	Budget	Forecast	Variance
Proactive Main Replacement & Rehabilitation			
<i>Main Replacement (Proactive) - Leak Prone Pipe</i>	\$73,172	\$74,651	\$1,479
<i>Main Rehabilitation (Proactive) - Large Diameter LPCI Program</i>	\$3,994	\$5,942	\$1,948
<i>Atwells Avenue</i>	\$1,100	\$1,100	\$0
<i>Proactive Main Replacement Total</i>	\$78,266	\$81,694	\$3,428

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-54-NG
In Re: FY 2024 Gas Infrastructure, Safety and Reliability Plan
Quarterly Report - First Quarter Ending June 30, 2023
Responses to the Commission's Seventh Set of Data Requests
Issued on August 18, 2023

PUC 7-4

Request:

Refer to page 5 and the statement: “Through the first quarter of FY 2024, the Company spent approximately \$34.52 million of projected YTD budget of \$21.91 million for the Proactive Main Replacement programs, resulting in an overspending variance of approximately \$12.62 million.” Please explain why there is such a significant variance for Q1. Please also explain why the forecast through the end of FY 2024 for overspending is significantly lower at \$3.4 million, compared to the overspend in the first quarter of \$12.62 million.

Response:

As a result of the Commission's Report and Order No. 24802 in Docket 22-54-NG¹, and the March 29, 2023 open meeting votes upon which the Commission's written order was based, the Company was directed to: 1) “adjust the proactive main replacement program downward by \$7,294,000 associated with 9.5 miles of main across all main replacement categories reducing the proposed installation miles to 60 miles” and, 2) focus on the higher risk projects. To comply, the Company reviewed the portfolio of workable work, that is, projects for which permits had been obtained, project plans (internally referred to as SOPs) had been written, and other pre-construction activities had been completed. The Company removed any lower risk work per the March 29, 2023 directives of the Commission, leaving a resulting workload heavily concentrated in larger diameter (typically 12-inch) installation projects.

These larger diameter projects are more costly per unit length of installation than smaller diameter projects (less than 12-inch), and the productivity – feet installed per day – is lower. The heavy concentration of these larger diameter projects has resulted in the reported overspend versus budget for the first quarter of the fiscal year.

Since the March 29, 2023 open meeting votes, the Company has worked diligently to identify, prepare, permit, and otherwise make ready to construct, a number of smaller diameter projects which meet the risk scoring constraint specified by the Commission at its March 29, 2023 open meeting. Incorporating these smaller diameter projects into the latter part of the construction season should result in a reversion to the original budget for the Proactive Main Replacement category by fiscal year end.

¹ Report and Order No. 24802 (Aug. 22, 2023), RIPUC Docket No. 22-54-NG (FY2024 Gas Infrastructure, Safety and Reliability Plan).

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-54-NG
In Re: FY 2024 Gas Infrastructure, Safety and Reliability Plan
Quarterly Report - First Quarter Ending June 30, 2023
Responses to the Commission's Seventh Set of Data Requests
Issued on August 18, 2023

PUC 7-5

Request:

Refer to page 6 and the discussion relating to the addition of two CISBOT jobs. To the extent the Company believes it is important and prudent to add these CISBOT jobs in FY 2024, please explain why the Company is not reducing other discretionary expenditures by \$2.13 million in other activities associated with another discretionary program in order to make room for the addition of the two CISBOT jobs and, therefore, avoid or mitigate the overspend in the total FY 2024 discretionary budget.

Response:

The Company believes that "walking in" two higher risk score CISBOT projects, which are to take place on cast iron mains aged 97 and 112 years having risk scores of 13.0 and 13.8, respectively, to be prudent in improving the overall safety, and reducing the greenhouse gas emissions, of its gas distribution system. As CISBOT projects require specialized and proprietary resources, the Company has limited opportunities to execute this work. It was able to secure these resources in conjunction with the necessary permit approvals as well as approval from the Rhode Island Public Transit Authority ("RIPTA") due to required excavations in close proximity to RIPTA property. Given the projected underspend in the reactive, non-discretionary categories for FY 2024, and since the Company has eliminated the lower risk projects from its Discretionary portfolio for FY 2024, leaving only higher risk projects, the Company believes it is reasonable to progress this work without reducing its Discretionary budget forecast commensurately.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-54-NG
In Re: FY 2024 Gas Infrastructure, Safety and Reliability Plan
Quarterly Report - First Quarter Ending June 30, 2023
Responses to the Commission's Seventh Set of Data Requests
Issued on August 18, 2023

PUC 7-6

Request:

Referring to Attachment B and the projected overspend in the Discretionary category (without gas expansion), does the Company make any attempt to reasonably manage its discretionary capital spending activity to stay within the discretionary budget that was approved by the Commission? If yes, please explain why the Company is forecasting a cost overrun of over \$8.6 million. If not, please explain why not.

Response:

Please see PUC 7-1, Attachment PUC 7-1-1, which is an updated FY2024 Gas ISR Portfolio forecast through July 2023. This forecast is current as of August 24, 2023. The updated Discretionary (Without Gas Expansion) forecast is \$123.03 million, or \$6.13 million more than budget. Thus, the \$8.6 million dollar forecasted overrun has decreased since the end of the first quarter.

Since the inception of the ISR, the Company has endeavored to manage its budget to the overall ISR approval level, while simultaneously working to meet its overall Leak Prone Pipe abandonment targets. Due to the reactive nature of many ISR programs and the Company's efforts to maintain a sufficiently sized resource pool that is capable of executing a similar amount of Leak Prone Pipe abandonment year over year, the Company has frequently moved dollars and resources between various programs in order to achieve multiple workplan goals simultaneously.

To conform its activities to the Commission's directives from its March 29, 2023 open meeting, as embodied in Report and Order No. 24802 issued August 22, 2023, the Company has removed all low-risk work from its Discretionary portfolio. All the work remaining, therefore, is necessary and the Company no longer considers this work to be discretionary, but rather necessary to the maintenance of a safe and reliable gas system.

PUC 7-7

Request:

Please identify any projects forecasted to be completed in FY 2024 which could be deferred in FY 2024 (without causing an unacceptable safety risk) in order for the Company to complete its proposed FY 2024 discretionary capital spending program on budget or under budget, instead of planning to overspend by \$8.6 million.

Response:

Please refer to the updated Gas ISR Portfolio forecast in PUC 7-1, Attachment PUC 7-1-1, which shows a forecast of \$6.129 million over budget for the Discretionary category through the end of July 2023. This \$2.499 million reduction as compared to the forecast submitted in the first quarter report is due largely to a supply chain issue related to the Exeter Boil-Off Gas Compressor project within the LNG.

The Company has been unable to identify projects that do not impose high short-term risk due to material integrity or high long-term risk related to reliability and future work on high risk integrity projects. Although the Company has not previously managed the Discretionary budget as a standalone portion of the overall Gas ISR Plan budget, should it become necessary to do so, despite forecasted underspending in other categories of the Gas ISR Plan and the overall portfolio, the Company believes that it could manage the Discretionary portfolio to the approved budget value through several different steps:

1. Allow projects to walk-out or underspend organically due to circumstances beyond the Company's control, such as the aforementioned supply chain issues, inability to obtain permits, conflicts with other utilities or municipalities, resource constraints, and other similar factors.
2. Not replace those projects in the portfolio with the next available, highest risk discretionary projects.
3. If necessary, not begin new projects at the end of the fiscal year which would carry into FY2025. This would inevitably reduce the total amount of Leak Prone Pipe that the Company could abandon in the next fiscal year.

An important consideration with respect to the above strategy is that, since the Company completes a significant amount of reactive or non-discretionary work under budgets identified as Discretionary, it may become necessary to include additional reactive projects within the Discretionary portfolio. Depending on timing, it may no longer be possible at that point to slow or defer other work to make up for those additional costs and stay on budget in the Discretionary

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-54-NG
In Re: FY 2024 Gas Infrastructure, Safety and Reliability Plan
Quarterly Report - First Quarter Ending June 30, 2023
Responses to the Commission's Seventh Set of Data Requests
Issued on August 18, 2023

PUC 7-7, Page 2

category. Additionally, delaying the start of new projects from the end of FY2024 into the start of FY2025, specifically within the Proactive Main Replacement – Leak Prone Pipe category, would reduce the FY2024 spending but would likely have \$0 impact on the total capital additions placed in-service for FY2024. Thus, the deferral of work would have minimal impact in seeking to reduce customer bill impacts.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-54-NG
In Re: FY 2024 Gas Infrastructure, Safety and Reliability Plan
Quarterly Report - First Quarter Ending June 30, 2023
Responses to the Commission's Seventh Set of Data Requests
Issued on August 18, 2023

PUC 7-8

Request:

Referring to page 9 of 12 and the subcategory of “Gas System Reliability” which states: “Four projects have been exchanged into the portfolio for FY 2024” Please explain what it means for projects to have been “exchanged into” FY 2024.

Response:

The phrase “exchanged into” is meant to indicate that four projects were added (sometimes referred to as being “walked in”) to the Gas System Reliability category for FY2024 and four projects have been deferred or are being redesigned so the construction will not occur in FY2024 (sometimes referred to as being “walked out”) of the Gas System Reliability category. The phrase indicates that the number of planned projects has remained the same because of the exchange.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-54-NG
In Re: FY 2024 Gas Infrastructure, Safety and Reliability Plan
Quarterly Report - First Quarter Ending June 30, 2023
Responses to the Commission's Seventh Set of Data Requests
Issued on August 18, 2023

PUC 7-9

Request:

Referring to Attachment B and the subcategory of "Gas System Reliability," please provide two table as follows:

In Table 1, please provide the following information relating to the FY 2024 Budget which was approved by the Commission for this category:

- (a) identification of the specific project,
- (b) the original cost estimate for the project that was included in the aggregated \$2.5 million budget for this category,
- (c) amount of spending occurring in Q1,
- (d) the amount of spending that is being forecast for the project for the entire FY 2024, and
- (e) the variance between column (b) and (d).

In Table 2, please provide the same information provided in Table 1 for any projects that were not included in the original forecast of \$2.5 million that was approved by the Commission but have been added to the Company's plan for FY 2024 following Commission approval. In this Table 2 please designate \$0 for column (b) for each project.

NOTE: Any projects which had an over/underspend for FY 2024 at less than \$100,000 may be aggregated into a single line item in the applicable Table.

Response:

Please see Attachment PUC 7-9, which contains the information requested for Table 1 and Table 2.

Table 1						
WO#	(a) Project Name	Town	(b) Cost Estimate	(c) Q1 Spend (Apr – Jun)	(d) FY24 Forecast Spend	(e) Variance = (b-d)
90000228513	163-200 Sunbury St LP-35#	PVD	\$ 136,000	\$ 2,181	\$ 135,671	\$ -
90000209541	Old River Rd, Manville (LP-99)	LNC	\$ 667,000	\$ 336,766	\$ 662,967	\$ -
90000231856	Beverly Dr	LNC	\$ 318,000	\$ 1,304	\$ 1,304	\$ 316,696
90000231076	NPV 1-26 Borah St (LP-60)	NPV	\$ 15,000	\$ 1	\$ 1	\$ 14,999
90000231075	Diamond Hill-Dewey (60)	WSO	\$ 30,000	\$ -	\$ -	\$ 30,000
90000220806	East Ave/Bald Hill Rd SFE	WWK	\$ 700,000	\$ 1,604	\$ 692,536	\$ -
90000220913	Cannon St SFE	CRA	\$ 654,000	\$ -	\$ 653,915	\$ -
90000218149	NPR 10-35 P1-3	NPR	\$ 10,000	\$ -	\$ -	\$ 10,000
Gas System Reliability			\$ 2,530,000	\$ 341,856	\$ 2,146,394	\$ 371,695

Table 2						
WO#	(a) Project Name	Town	(b) Cost Estimate	(c) Q1 Spend (Apr – Jun)	(d) FY24 Forecast Spend	(e) Variance = (b-d)
90000231875	Greenwich Ave EPV*	EPV	\$ -	\$ 9,412	\$ 3,722,781	\$ -
90000235055	EPV 99# System Integration Phase 1	EPV	\$ -	\$ 1,164	\$ 827,029	\$ -
90000233804	Allens Ave Bypass	PVD	\$ -	\$ 10,544	\$ 647,061	\$ -
90000234946	Mason St 60# Install	WSO	\$ -	\$ 15,906	\$ 655,104	\$ -
Multiple	Project Development/ Closeout			\$ 36,631	\$ 36,631	
Updated Gas System Reliability			\$ -	\$ 73,657	\$ 5,888,606	\$ -

*Note: Actual spend was not included in Q1 FY2024 reported total, but will be included in Q2+. Forecast was included in total forecast of \$8.035M

PUC 7-10

Request:

Please explain the level of urgency and reasons for such urgency to add the four projects to FY 2024 referenced on pages 9-10, that appears to be contributing to the Company's forecast of overspending the discretionary Gas System Reliability budget that was approved by the Commission by over \$5.5 million.

Response:

The four projects "walked-in" to the Gas System Reliability budget that increased the overall forecast were walked-in to FY024 for several reasons.

- As part of the Company's ongoing Gas System Planning process and development of the FY2025 (and beyond) workplan, the Company re-visited existing work scopes that were Low Pressure ("LP") to Low Pressure projects, along with projects that were being scoped for FY2025 (and nearer term fiscal years). In doing so, the Company identified projects and areas of the system where cost savings could be achieved (across various categories in the Gas ISR Portfolio) if projects were rescoped as LP to High Pressure ("HP") projects. Upgrading services from LP to HP enhances gas system reliability and safety because HP systems include regulators on each service for overpressure protection. Also, a typical LP main size is 6-inches, whereas a typical HP main size is 2-inches. The installation process of the smaller diameter HP main is faster, and the smaller main makes it easier for the Company work around other utilities, helps to avoid congestion under streets, and is less costly to install. The projects such as Greenwich Avenue; East Providence ("Greenwich Ave"); East Providence 99 pounds per square inches gauged integration ("EPV 99# Integration"); and Mason Street, Woonsocket 60# installation ("Mason St 60#") are all needed to bring HP gas lines to areas targeted for Leak Prone Pipe ("LPP") abandonment that were previously scoped as LP to LP projects. Prioritizing these projects in FY2024 will enable related Proactive Main Replacement – Leak Prone Pipe ("MRP") and Public Works projects to be built as LP to HP conversions when those projects reach their construction phase at the end of FY2024, FY2025, or soon after.¹ Ensuring that 100% of the leak prone pipe is eliminated from an area also aligns with several potential Future of Gas strategies, such as Hydrogen blending.
- The completion of the "walk-in" Gas System Reliability projects in FY2024 is necessary to complete work ahead of paving, and to achieve timelines of the other MRP and Public Works

¹ Some projects affected will start in FY2025, but have phases that will require multiple years to complete.

PUC 7-10, Page 2

projects that will utilize the HP mains from the Gas System Reliability projects to complete LP to HP replacements as part of their replacement/abandonment projects. The Company has been coordinating with the municipalities where the future MRP and Public Works projects are located, and municipal paving timelines have been a factor in expediting the Gas System Reliability projects into FY2024. This coordination with municipalities, and other utility companies, presents an opportunity for cost savings across the portfolio through the avoidance or sharing of paving costs.

- The Allens Avenue bypass project is necessary to assist with the work scheduled for next year at the Wampanoag Gate Station, which feeds the 200# single feed system in East Providence as well as into Allens Avenue via the Providence River crossing. The 99# system is required to backfeed the single feed 200# system in order to maintain feeds to the 25# and 99# stations on the East Providence side that are fed from the 200# system. This project is necessary to safely and efficiently provide a proper backfeed from Allens Avenue to the East Providence systems while work at Wampanoag Gate Station is underway.
- The EPV 99# Integration project is not only required to allow other projects to convert their LP scopes to LP to HP replacements, but it is also the first phase of projects that will provide a second feed to the 99# single feed system outside of the Wampanoag Trail Gate Station, which feeds various systems in East Providence EPV (35# , 25# Riverside / Barrington / Warren area, 5#, and LP). This project is necessary to maintain reliability to East Providence EPV customers that are fed from these systems.

PUC 7-11

Request:

Referring to page 12 and the reference to the \$144.06 forecast of capital additions placed in-service during FY 2024, please provide an estimate of how much that in-service forecast would decrease if the Company did not overspend the discretionary budget by \$8.6 million and, instead, managed the budget to not exceed the Commission's approved budget amount for the "Discretionary (without Gas Expansion)" category. To arrive at an estimate, the Company should use its best judgment as to how it would prudently manage its spending under those hypothetical circumstances to achieve that budget discipline. Please explain the assumptions made in providing the estimate.

Response:

As of August 24, 2023, the current forecasted year-end spend is \$160.96 million, which is \$1.23 million above the annual budget for Gas ISR (excluding the Southern RI Gas Expansion Project). As was noted on page 2 of the FY2024 First Quarter Report, the Company had anticipated that the forecast would trend closer to the FY2024 budget by the end of the second quarter and it has.

- The \$160.96 million forecasted year-end spending includes the current forecasted spend of \$123.03 million for the Discretionary categories (without Southern RI Gas Expansion), which is \$6.13 million above budget.
- Considering the entire Gas ISR Plan (including the Southern RI Gas Expansion Project), the current forecasted year-end spend is \$162.57 million, which is \$0.85 million below the annual budget for the entire portfolio. The forecasted capital additions placed in-service ("PIS") during FY2024 for the entire Gas ISR Plan are currently \$145.95 million, or \$9.87 million below target.

Approach 1:

For this data request and the exercise of providing a forecasted plant in service ("PIS") calculation where the Discretionary spending forecast equals the Discretionary budget, the Company made the following theoretical adjustments. Please note, the Company does not support this approach in its entirety and an alternative, Approach 2, is also provided, below.

1. \$123.03 million: Current Discretionary Forecast
2. \$(0.750 million): Reduction of Gas System Reliability forecast – likely reducing project scope for Greenwich Avenue

PUC 7-11, Page 2

3. \$(5.379) million: Deferral of the installation of main in the Proactive Main Replacement (“MRP”) category at the end of FY2024 while pursuing Public Works jobs in FY2024 instead of waiting until FY2025 to satisfy municipal requests. This approach would require a sufficient number of Public Works jobs to advance in order for the Company to keep pace with its leak prone pipe abandonment targets. This approach may cause a slight delay in the abandonment timeline for the MRP projects for which main installation was deferred into FY2025, but it would help to minimize negative impacts to the overall portfolio abandonment targets in FY2025. Although this approach would have a neutral impact on portfolio spending, it would likely increase the Company’s FY2024 PIS forecast by approximately \$3.83 million because the Company anticipates that approximately 75 percent of the increase of Public Works main would be placed in service during FY2024, whereas the Company would have anticipated that none of the MRP projects for which main installations are deferred would have reached abandonment and been placed in service in FY2024.

Under Approach 1, the forecasted PIS during FY2024 for the entire Gas ISR Plan would be \$149.25 million, or \$6.57 million below target. This would result in a PIS forecast increase of approximately \$3.30 million versus the current forecast.

As indicated above, with the exception of reducing the Gas System Reliability forecast by \$0.75 million in connection with a reduction in project scope, the Company does not support Approach 1. The Company developed the following alternative approach to address variances in category spending as compared to the approved Gas ISR Plan.

Approach 2:

1. Additional CISBOT projects and increased Gas System Reliability spending in FY2024: The Company would continue engaging with the PUC and the Division to communicate the importance of progressing with this work in FY2024 (as stated in responses to Data Requests PUC 7-5 (CISBOT) and PUC 7-10 (Gas System Reliability)).
2. The Company would continue engaging with the Public Utilities Commission (the “PUC”) and the Division of Public Utilities and Carriers (the “Division”) regarding the categorization of Gas ISR projects as strictly Discretionary or Non-Discretionary. As the Company explained in its responses to Data Requests PUC 1-1, 1-2, and 1-4 in Docket No. 23-23-NG, although Gas ISR projects may be proposed or managed under a Discretionary category, there are often reactionary/Non-Discretionary factors that prompt

PUC 7-11, Page 3

the Company to complete a project on either an accelerated or delayed timeline. Therefore, the Company would encourage the PUC and Division to assess the Company's budget to actual spend performance across the entire Gas ISR portfolio, as opposed to assessing spending at the Discretionary/Non-Discretionary level, provided that plan and budget modifications were deemed reasonable, necessary, and in line with Gas ISR work.

3. As was mentioned in the Company's Proposed FY2024 Gas ISR Plan¹ dated December 22, 2023, the Southern RI Gas Expansion Project has been managed and tracked as a distinct portfolio of spend since FY2020 because it presented unique challenges for the Company in management of the Gas ISR Plan during the Main Installation phase of the. However, since the Main Installation phase of the Southern RI Gas Expansion Project was completed in FY2023, 1) that newly installed main is now part of the Company's gas distribution system, and 2) the primary purpose of managing the Southern RI Gas Expansion Project as a distinct portfolio of spending has been fulfilled. The remaining work on the Southern RI Gas Expansion Project is primarily station work, which draws from the same internal and contractor resources that are utilized for Transmission Station Integrity (Mandated/Non-Discretionary category) and various Reliability (Discretionary) categories in FY2024, FY2025, and beyond.

Whether or not the Company is being asked to manage the year end forecast at the Non-Discretionary and Discretionary level, which it has not been asked to do historically within reason, the Company would be to seek the PUC's approval to recategorize the remaining Southern RI Gas Expansion Project spending under the Discretionary – Reliability categories. The Southern RI Gas Expansion categories are forecasted to be underspent in FY2024 by \$2.08 million, so including the FY2024 budget in with the Reliability categories would reduce the Discretionary overspending forecast by the \$2.08 million.

4. The Company will likely reduce the Gas System Reliability forecast by \$0.75 million as the scope for the Greenwich Avenue project is likely reducing.

If the PUC and Division agreed with the Company's strategies listed above and the only additional spending modification made were to reduce the Gas System Reliability forecasted spending by \$0.75 million, the Company's forecasted spend for the entire Gas ISR Portfolio (including Southern RI Gas Expansion) would be \$161.82 million, or \$1.60 million below the

¹ See FY2024 Gas Infrastructure, Safety and Reliability Plan, at 20 and 41, RIPUC Docket No. 22-54-NG.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-54-NG
In Re: FY 2024 Gas Infrastructure, Safety and Reliability Plan
Quarterly Report - First Quarter Ending June 30, 2023
Responses to the Commission's Seventh Set of Data Requests
Issued on August 18, 2023

PUC 7-11, Page 4

FY2024 budget. This would result in a PIS forecast of \$145.41 million, or \$10.40 million below target.

The Company recognizes the amount of time and resources dedicated to the development, review, and approval of a Gas ISR Plan on an annual basis by the parties that are involved with the process. The Company's annual Gas ISR Plan includes several line items, especially in the non-Discretionary category, which are reactive in nature and are estimated in the plan formulation process based upon prior years' work loads, discussions with third parties, and other factors. The Company also recognizes that there is an expectation that the Company will strive to execute the planned activities, and resulting spending, as close to plan as feasible, and it does strive to do so. However, execution of the projects across the Gas ISR portfolio involves interaction and coordination with a myriad of third parties including state and municipal bodies, other utilities, and contractors, and often requires the Company to react to fluid field conditions. These factors sometimes require the Company use its best discretion to modify components of the Gas ISR Plan. When these deviations become necessary, the Company makes efforts to engage with and inform the Division and the PUC.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-54-NG

In Re: FY 2024 Gas Infrastructure, Safety and Reliability Plan
Quarterly Report - First Quarter Ending June 30, 2023
Responses to the Commission’s Seventh Set of Data Requests
Issued on August 18, 2023

PUC 7-12

Request:

Referring to Attachment B and the line item “Main Rehabilitation (Proactive) – Large Diameter LPCI Program” forecast of \$5.9 million, please break out the costs associated with that line item to distinguish costs related to (a) main replacement, (b) rehabilitation work that involves Cast-Iron Lining (“CI Lining”), (c) rehabilitation work that involves Cast-Iron Sealing Robot (“CISBOT”), and (d) any other capital work that is not categorized in (a), (b), or (c) above. Please also indicate the number of miles forecasted for each of these categories.

Response:

The Large Diameter LPCI Program forecast of \$5.942 million breaks down as follows:

- a. Main replacement: \$0
- b. Cast-Iron Lining: \$0.250 million; work planned for this year includes engineering, material purchase, and service transfers in preparation for lining projects in FY2025 and beyond.
- c. CISBOT: \$5.692 million; four projects in the original budget proposal are already completed and the Company is moving forward with two additional projects in Providence.
- d. Other: \$0

The chart below provides the estimated footage of main and the number of joints that will be rehabilitated on each project, along with the number of pits that will be necessary to complete the work. The shaded projects are complete.

Project Name	Town	Type	Est Footage	Joint Count	Pit Count
Legion Way	Cranston	CISBOT	1625	135	3
Early St	Providence	CISBOT	1185	98	2
Thames St #2	Newport	CISBOT	1400	116	2
Thames St #3	Newport	CISBOT	1260	105	2
Russell St	Providence	CISBOT	1730	144	4
Canal St	Providence	CISBOT	540	45	2