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September 13, 2023

VIA ELECTRONIC MAIL

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

**RE: Docket No. 22-53-EL – FY2024 Electric Infrastructure, Safety, and Reliability Plan
Quarterly Update – First Quarter Ending June 30, 2023
Responses to PUC Data Requests – Set 6**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy, I have enclosed an electronic version of the Company's responses to the Public Utilities Commission's Sixth Set of Data Requests issued in the above-referenced docket related to the Company's quarterly update for the first quarter ending June 30, 2023.

The Company received an extension to September 20, 2023 to file its responses to PUC 6-4 and PUC 6-8.

Thank you for your attention to this matter. If you have any questions, please contact me at 401-784-4263.

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrew S. Marcaccio".

Andrew S. Marcaccio

Enclosure

cc: Docket 22-53-EL Service List

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-53-EL
In Re: FY 2024 Electric Infrastructure, Safety, and Reliability Plan
Quarterly Report - First Quarter Ending June 30, 2023
Responses to the Commission's Sixth Set of Data Requests
Issued on August 23, 2023

PUC 6-1

Request:

Referring to Attachment A and the column referenced as “YTD June 30, 2023” - “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:

The Company phases the approved annual spending levels to the months when work is anticipated to occur during the year. Monthly spending for blankets and some program work is fairly consistent, and therefore, spending is spread evenly throughout the year. Spending for specific projects and programs (including URD and UG Cable) with major activity milestones is included in the months when the activity is expected to occur.

The Narragansett Electric Company
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PUC 6-2

Request:

Refer to Attachment A and the Plan Year 2024 spending forecast for Discretionary Spending. Is the Company now planning on overspending the Discretionary Budget by \$4.6 million or is this provided as a forecast that is subject to adjustments that could be implemented to meet budget limitations for that category?

Response:

At the time the Company filed its FY2024 Electric ISR Plan Quarterly Report for the First Quarter Ended June 30, 2023, with the Public Utilities Commission, the Company anticipated overspending the Discretionary Budget by \$4.6 million. The Company forecasts project and program spending monthly, and after reviewing July's actuals, the forecast is now projected to be closer to budget. There are risks associated with the current forecast, primarily related to additional supply chain delays and resourcing concerns that were discussed and accounted for in the revised forecast.

One of the main drivers of the forecasted overspend for Discretionary Spending is the Dyer St project, which had no budget in FY 2024 but incurred delays late in FY 2023 that pushed spending into the current Plan Year. In general, when projects incur delays, the Company sees spending for these projects get pushed into subsequent ISR years. At this time, the Company does not intend to remove or decrease spending on projects that are included in the current ISR Plan to offset for projects that experienced prior year delays. However, the Company will continue to evaluate the Company's spending and surrounding circumstances. See the Company's response to PUC 6-6 for a further discussion of how the Company evaluates potential adjustments to the spending plan.

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PUC 6-3

Request:

Referring to Attachment A and the line items associated with Asset Condition, 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 project,
- (b) the original cost estimate for the project that was included in the aggregated \$23.3 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 (if any) that were not included in the original forecast of \$23.3 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.

Response:

Please see Attachment PUC 6-3-1 for Table 1 and Attachment PUC 6-3-2 for Table 2. Please note, there are credits in some of the line items because of accruals or spending type reclassifications made to projects during the Plan Year.

Table 1 - FY 2024 Asset Condition Projects Budgeted (\$000)

(a)		(b)	(c)	(d)	(e)
<u>Project #</u>	<u>Project Description</u>	<u>2024 Budget</u>	<u>2024 Q1 CAPEX Actuals</u>	<u>2024 CAPEX Forecast</u>	<u>Variance Over / (Under)</u>
C032019	Battery Replacement	230	23	230	(0)
COS0017	Asset Replace Blanket	4,900	1,762	4,901	1
COS0026	Substation Asset Repl Blanket	320	(0)	320	(0)
Blanket Total		5,220	1,762	5,221	1
C026281	I&M - D-Line OH Work From Insp.	2,850	127	3,000	150
C080076	I&M - Sub-T OH Work From Insp	150	(0)	(0)	(150)
I&M Total		3,000	127	3,000	0
C087912	3763 Pole Replacements	783	202	1,292	509
CRI3053	Recloser Repl - 18 Reclosers	1,300	-	1,305	5
C086869	ACNW Vlt 72 Reconstruction, Prov.	-	(28)	(0)	(0)
C089195	RI Repl ACNW Vault Vent Blowers	600	-	600	-
C091640	RI Repl ACNW Vault Vent Blowers	-	13	13	13
C091975	RI NW Vault 19 Boston Store, Prov.	-	10	10	10
CRI3045	Network Vlt 296 Broadway/Main, Pawt	-	2	2	2
Other Total		2,683	198	3,222	539
C081006	Franklin Sq Breaker Replacement	437	197	1,371	934
Substation Breakers & Reclosers Total		437	197	1,371	934
C055343	RI UG Cable Placeholder	2,306	-	(409)	(2,715)
C055370	RI UG Cable Repl Prog Fdr 1144/1109	-	11	11	11
C055371	RI UG Cable Repl Prog Fdr 1142/1105	-	48	48	48
C055392	RI UG Cable Repl Program - Secondar	1,732	308	2,038	306
C074307	RI UG 79F1 duct Charles & Orms Sts	-	0	0	0
C078921	RI UG Cable Repl Program - Fdr 1158	425	1	426	1
C078928	RI UG Cable Repl Program - Fdr 1164	282	1	283	1
C087120	RI UG Cable Repl Prog Fdr 1103	-	747	747	747
C087124	RI UG Cable Repl Prog Fdr 1171	-	191	191	191
C087126	RI UG Cable Repl Prog Fdr 1103A	-	10	10	10
C087128	RI UG Cable Repl Prog Fdr 1103B	482	378	1,584	1,102
C087133	RI UG Cable Repl Prog Fdr 1121	273	1	274	1
C091235	RI UG Cable Repl Program 28F1&28F2	-	283	283	283
C091405	RI UG Cable Repl Program Manning St	-	11	11	11
C091408	RI UG CABLE REPL PROGRAM FDR 1152	-	2	2	2
C091409	RI UG CABLE REPL PROGRAM FDR 1153	-	1	1	1
UG Cable Replacement Total		5,500	1,993	5,500	0
C047398	IRURD Wionkheige	-	0	0	0
C047829	IRURD High Hawk	1,500	546	1,664	164
C049356	IRURD Silver Maple Phase 2	-	29	29	29
C049462	IRURD SIGNAL RIDGE, EAST GREENWICH	-	58	58	58
C050070	IRURD Placeholder RI	745	-	(263)	(1,008)
C050299	IRURD Eastward Look	1,454	1	1	(1,453)
C084961	IRURD Sandy Point Farms Phase 1	-	28	28	28
C084965	IRURD Sandy Point Farms Phase 2	579	56	635	56
C086494	IRURD LightHouse URD Cable Replacement	-	1	1	1
C088337	IRURD EG Heights URD Cable Replacement	571	2	769	198
C088340	IRURD Paddock Estates URD Cable Replace	177	-	-	(177)
C088735	IRURD FAIR OAKS LN URD RI- LINCOLN	250	-	-	(250)
C088838	IRURD HIGH POINT & CIRCLE DR N.S.	250	(9)	190	(60)
C089226	IRURD Wethersfield Commons URD	750	4	1,738	988
C091285	URD Stone Ridge Acres	-	463	1,423	1,423
CRI3013	URD Winchester Ave - North Smithfie	-	3	3	3
CRI3026	URD Bicentennial Way - North Provid	-	1	1	1
URD Program Total		6,276	1,181	6,276	1
Total Asset Condition Projects Budgeted		23,346	5,482	24,820	1,475

Table 2 - FY 2024 Asset Condition Projects not Budgeted (\$000)

(a)		(b)	(c)	(d)	(e)
<u>Project #</u>	<u>Project Description</u>	<u>2024 Budget</u>	<u>2024 Q1 CAPEX Actuals</u>	<u>2024 CAPEX Forecast</u>	<u>Variance Over / (Under)</u>
C062633	HMI RI Replacements	0	5	5	5
C051212	South St repl indoor subst D-SUB	0	(156)	(144)	(144)
C078474	Franklin Sq Sub_1105 & 1109 NW	0	18	18	18
C082439	Franklin Sq-Replace 11kV Sub Equip	0	4	4	4
C090149	RI Repl UG Fault Ind Dyer St/Ea Geo	0	11	11	11
C091524	CLX Cable Replacement-Water Street	0	(38)	(38)	(38)
C088827	Valley and Farnum 23kV Conversion	0	35	35	35
Other Total		0	(120)	(108)	(108)
C069166	Pawtucket 1 Breaker Replacement	0	2	2	2
C083782	Replace 12.47 Breakers Drumrock 14	0	1	1	1
Substation Breakers & Reclosers Total		0	4	4	4
Total Asset Condition Projects Not Budgeted		0	(117)	(105)	(105)

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PUC 6-5

Request:

Referring to Attachment E and the project identified as "3763 Pole Replacements," please provide a description of the project and a more detailed explanation of why the deferral occurred. Please also provide a schedule showing:

- (a) the original spending estimate for FY 2023 that was included in the approved budget for FY 2023,
- (b) the actual spending that occurred in FY 2023,
- (c) the original spending estimate that was approved for FY 2024,
- (d) a forecast of spending for FY 2024, and
- (e) the difference between column (a) and column (d).

Response:

The Company performed an assessment on the 3763 line, which identified structural deficiencies and asset condition issues. This is a 69 kV line that runs from the Jepson Substation in Middletown, through the Newport Naval Station, to the Gate 2 Substation on the Naval Station. The assessment recommended replacement of ten structures and elimination of an eleventh, with six being within the secure area of the Naval Station. The Company planned to complete construction in FY2023.

The United States Navy required additional approvals that complicated Historic (SHPO, RIHPHC & Tribal) and environmental permitting. In addition, securing access to the secure area of the Naval Station for multiple contractors was more time consuming than the Company originally anticipated. As a result of these delays, the Company had to reschedule construction and the outage from early spring 2023 to fall 2023. Construction is on-going and scheduled to be in-service in October 2023.

The table below shows the FY2023 budget, column (a), as well as current FY2024 forecast, column (d). The Company included column (b) to the equation in column (e) to show the difference between the original estimate for the project and the forecasted spend. The project estimate is \$1,250,000, and the current forecast is \$1,292,000.

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<u>Project Name</u>	<u>(a)</u> <u>FY 2023</u> <u>Budget</u>	<u>(b)</u> <u>FY 2023</u> <u>Actuals</u>	<u>(c)</u> <u>FY 2024</u> <u>Budget</u>	<u>(d)</u> <u>FY 2024</u> <u>Forecast</u>	<u>(e)</u> <u>Difference</u> <u>(a) - (d) + (b)</u>
3763 Line Structure Replacement	\$1,250,000	\$271,150	\$783,000	\$1,292,000	\$42,000

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PUC 6-6

Request:

Please describe what adjustments the Company could make to its Discretionary Budget spending plans, without creating an unacceptable risk to reliability and safety, to perform on or under budget in the Discretionary spending category for FY 2024.

Response:

If spending within the Discretionary Budget is adjusted downward, it will result in increased risk to the safety and reliability of the Company's electric distribution system. To determine whether that risk may be "acceptable" requires continuing evaluation by the Company as described below.

When evaluating potential adjustments to spending, the Company looks at the surrounding circumstances including, but not limited to, the increased risk to safety and reliability of foregoing an investment, scheduling concerns, supply chain delays, permitting, project costs (including the rate impact to customers), and the incremental cost of delay. The point in time within the Plan Year is also a consideration. The earlier in the fiscal year, the more susceptible a budget forecast is to change. See also the Company's response to PUC 6-2, which discusses how timing issues can impact spending in comparison to budget over an ISR Plan year. The Company strives to communicate any potential changes in spending through its regular quarterly reporting, review meetings, and informal communications with the Division of Public Utilities and Carriers.

At this time, the Company has not yet identified any adjustments it could make to its Discretionary Budget spending plans without creating an unacceptable risk to reliability and safety in light of all the factors described above. The Company's anticipated course of action is to continue to execute the approved Discretionary Budget as well as projects that incurred delays in FY 2023 that pushed spending into the current Plan Year, including the Dyer St Substation project. The Company will continue to monitor its approved budget and the surrounding circumstances throughout the Plan Year. As described in the Company's response to PUC 6-2, the Company's expected Discretionary spending in FY 2024 has moved closer to the budgeted amount since the Company filed its first quarterly report.

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PUC 6-7

Request:

Referring to Attachment B, please provide a more detailed explanation of why the original estimated plant additions are now being forecasted to be 28% higher by the end of FY 2024. Please provide a schedule showing the projects which comprise the forecasted additions of \$69.4 million, specifically identifying the projects that were not included in the original target of \$45.1 million. For each project, please indicate the fiscal year when the project was first identified in an ISR filing.

NOTE: Projects with a total cost of less than \$250,000 may be aggregated into two line items (i.e., one for those included in the original target and one for those that were not in the original target) and there is no need to identify the years of inclusion in the ISR.

Response:

The table below provides a more detailed explanation of the differences between the target and forecasted plant additions included in the FY2024 Electric ISR Plan Quarterly Report for the First Quarter Ending June 30, 2023.

The Narragansett Electric Company
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RIPUC Docket No. 22-53-EL

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<u>Spending Rationale</u>	<u>Plant Additions Target</u>	<u>Plant Additions Forecast</u>	<u>Variance</u>	<u>Explanation</u>
<i>\$'000s</i> Customer Request / Public Requirement	\$27,353	\$27,908	\$555	--
Damage Failure	16,387	14,764	(1,623)	Delivery of the spare Westerly transformer was targeted for FY 2024. Notification was received in Spring 2023 that delivery was delayed to June 2024 - \$1.6m.
Asset Condition	32,298	55,242	22,944	Primarily Dyer Street Substation and Providence Study Project Ph 1B projects. See Attachment PUC 6-7-1 for more information.
Non-infrastructure	1,650	1,033	(617)	Reduced Copper to Fiber project plant additions forecast. See Attachment PUC 6-7-1 for more information.
System Cap & Performance	<u>11,187</u>	<u>13,126</u>	<u>1,939</u>	Delays in putting Harrison and Merton Substation improvement projects into service, \$0.3m increase in Kingston Substation improvement project. See Attachment PUC 6-7 for more information.
FY2024 Plant Additions	<u>\$88,874</u>	<u>\$112,073</u>	<u>\$23,199</u>	

Please see Attachment PUC 6-7 for a schedule showing the projects that comprise the forecasted additions of \$69.4 million, identification of projects not included in the original target of \$45.1 million, and the fiscal year when the project was first identified in an ISR Plan filing.

FY 2024 Q1 Forecasted vs Targeted Plant Additions

<u>Project #</u>	<u>Project Description</u>	<u>2024 FORECAST PIS</u>	<u>Included / Not Included in Target</u>	<u>FY 2024 TARGET Plant Additions</u>	<u>First Year in ISR</u>
C051212	SOUTH ST REPL INDOOR SUBST D-SUB	503	Not included	-	FY 2015
C026281	I&M - D-LINE OH WORK FROM INSP.	1,914	Included	1,877	Program
	Projects under \$250k - with Plant Addition Target	63	Included	93	--
	I&M	1,977		1,970	
C032019	Batteries	116	Included	118	Program
COS0017	Asset Replacement Blanket	5,598	Included	4,826	Blanket
COS0026	Substation Asset Repl Blanket	240	Included	271	Blanket
	Asset Repl Blankets	5,838		5,096	
	IRURD Program	7,117	Included	7,117	Program
	Projects under \$250k - w/o Plant Addition Target	15	Not Included	-	--
C081006	FRANKLIN SQ BREAKER REPLACEMENT	1,400	Included	1,400	FY 2019
	Substation Breakers & Reclosers Total	1,415		1,400	
	UG Cable Replacement Program	4,758		4,758	Program
CRI3053	Recloser Repl - 18 Reclosers	1,305	Included	1,300	FY 2024
C087912	3763 Pole Replacements	1,400	Included	527	FY 2022
	RI Repl ACNW Vault Vent Blowers	444	Included	590	Program
	Projects under \$250k - with Plant Addition Target	353	Included	422	--
	Projects under \$250k - w/o Plant Addition Target	17	Not Included	-	--
	Asset Condition - Other	3,519		2,839	
C051205	DYER ST D Sub REPLACE INDOOR SUBST	468	Not Included	-	FY 2017
C051211	DYER ST D Line REPLACE INDOOR SUBST	9,610	Not Included	-	FY 2018
	Dyer Street Substation	10,078		-	
C078734	Ph 1A-PROVSTUDY ADMIRAL ST 4&11KV CONVERI	335	Not Included	-	FY 2020
C078797	Ph 1B-PROVSTUDY ADMIRAL ST-ROCHAMB D-SUB	1,645	Included	3,000	FY 2020
C078802	Ph 1B-PROVSTUDY OLNEYVILLE 4KV D-LINE	5,482	Included	6,000	FY 2020
C078803	Ph 1B-PROVSTUDY ADMIRAL ST 12KV MH&DUCT	12,460	Not Included	-	FY 2020
	Providence Study	19,921		9,000	
Plant Additions - Asset Condition		55,241		32,298	
C05360E	CAP OH 5360 RIE1000	-	in error	580	Ongoing
	Projects under \$250k - with Plant Addition Target	151	Included	152	--
COS0006	GENL EQUIP BLANKET	328	Included	377	Blanket
C086391	Verizon Copper to Fiber Conversions	554	Included	542	FY 2021
Plant Additions - Non-Infrastructure		1,033		1,650	

FY 2024 Q1 Forecasted vs Targeted Plant Additions

<u>Project #</u>	<u>Project Description</u>	<u>2024 FORECAST PIS</u>	<u>Included / Not Included in Target</u>	<u>FY 2024 TARGET Plant Additions</u>	<u>First Year in ISR</u>
C058310	HARRISON SUB IMPROVEMENTS (D-SUB)	640	Not Included	-	FY 2021
C058404	KINGSTON SUB IMPROVEMENTS (D-SUB)	1,325	Included	1,038	FY 2021
C058401	MERTON SUB IMPROVEMENTS (D-SUB)	674	Not Included	-	FY 2021
	Projects under \$250k - w/o Plant Addition Target	(68)	Not Included	-	--
	Aquidneck Island	2,572		1,038	
CRI3052	Weaver Hill Rd. Dline SubT Ext	817	Included	817	FY 2024
CRI3028	Nasonville #127 Sub (D-Line)	37	Included	37	FY 2024
C087362	Natick 3V0 D-SUB	247	Included	270	FY 2022
	2024 3V0	270	Included	270	FY 2024
	Projects under \$250k - w/ Plant Addition Target	169	Included	284	--
	3V0	686		824	
C087244	COVID Lincoln Ave Fdr 72F5	418	Included	242	FY 2022
	Projects under \$250k - w/ Plant Addition Target	173	Included	196	--
	COVID spending	591		438	
COS0015	RELIABILITY BLANKET	1,900	Included	2,292	Blanket
COS0016	LOAD RELIEF BLANKET	277	Included	247	Blanket
COS0025	SUBSTATION LR/REL Blanket	188	Included	187	Blanket
	Blankets and Reserves	2,364		2,726	
C074433	BRISTOL 51 - EMS AND BREAKER RPLMT	274	Included	549	FY 2018
	Projects under \$250k - w/ Plant Addition Target	435	Included	541	--
	EMS	710		1,090	
C085688	RI- VVO Putnam Pike	419	Not Included	-	FY 2021
	Projects under \$250k - w/out Plant Addition Target	139	Not Included	-	--
	VVO/CVR	558		-	
C005505	IE - OS DIST TRANSFORMER UPGRADES	1,192	Included	1,273	Program
C091130	RI Animal Fence Installations	500	Included	226	FY 2023
CRI3002	RI Energy CEMI 4 Program	772	Included	615	FY 2024
CRI3014	Chopmist 34F3 Stepdown Conversion	533	Included	533	FY 2024
CRI3041	Coventry 54F1 Reconductoring	338	Not Included	-	FY 2024
	Projects under \$250k - w/ Plant Addition Target	850	Included	1,570	--
	Projects under \$250k - w/out Plant Addition Target	608	Not Included	-	--
	Other	4,793		4,216	
Plant Additions - System Capacity & Performance		13,126		11,187	
FY 2024 Discretionary Plant Additions		69,401		45,134	

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PUC 6-9

Request:

Referring to page 23 of 24, please provide a more detailed explanation of the expected “cost sharing complications” that are identified in the description.

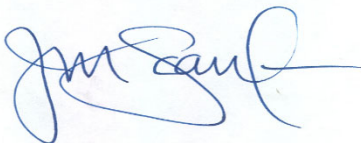
Response:

The cost sharing complications identified in the Tiverton Project update refers to the Company's petition that will be filed with the Public Utilities Commission (“Commission”) for the Acceleration of a System Modification Due to an Interconnection Request. The scope of the DG interconnection consists entirely of an underground manhole and duct system along Fish Road, Route 177, and Brayton Road to accommodate the 11.7MW size. Pending the Commission's ruling on the petition, the Company anticipates reimbursing the developer for the estimated costs at the time the project is reconciled. These costs and plant additions will be included in the FY2025 Electric ISR Plan that the Company files with the Commission.

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



Joanne M. Scanlon

September 13, 2023

Date

**Docket No. 22-53-EL – RI Energy’s Electric ISR Plan FY 2024
Service List as of 8/24/2023**

Name/Address	E-mail Distribution	Phone
The Narragansett Electric Company d/b/a Rhode Island Energy Andrew Marcaccio, Esq. 280 Melrose St. Providence, RI 02907 Adam S. Ramos, Esq. Hinckley Allen 100 Westminster Street, Suite 1500 Providence, RI 02903-2319 Stephanie Briggs Patricia C. Easterly Susan M. Toronto Alan LaBarre Ryan Constable Kathy Castro Jeffrey Oliveira	amarcaccio@pplweb.com ;	401-784-4263
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