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Also admitted in Massachusetts

September 12, 2023

**VIA HAND DELIVERY & ELECTRONIC MAIL**

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

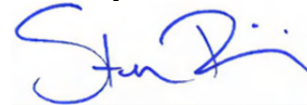
**RE: Docket No. 22-54-NG – The Narragansett Electric Company  
Fiscal Year 2024 Gas Infrastructure, Safety, and Reliability Plan  
Responses to PUC Data Requests – PUC Set 8 (Full Set)**

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 Eighth Set of Data Requests (Full Set) in the above-referenced docket. This submission includes the Company’s responses to PUC 8-3 and 8-11.

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

September 12, 2023

Date

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

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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 Eighth Set of Data Requests  
Issued on August 31, 2023

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PUC 8-1

Request:

The last paragraph of PUC 7-6 states: "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."

- (a) Please define what the Company means by "its Discretionary portfolio."
- (b) Does the Company have a project list of some type which reflects this Discretionary portfolio? If yes, please provide a copy.
- (c) Please explain how projects that were originally categorized as discretionary within the portfolio became non-discretionary when the Company removed other low-risk projects from the portfolio. Why were they categorized as discretionary in the first place if they are necessary to the maintenance of a safe and reliable gas system?

Response:

- (a) The Company traditionally initiated and categorized projects as Discretionary or Non-Discretionary based upon what degree of control it has on when particular work needs to be completed with Discretionary projects being those without a stimulus requiring immediate advancement. Non-Discretionary programs include projects that must be completed because of legal requirements, regulatory code, and/or agreement or are the result of damage or failure, with limited exceptions. For example, projects that are created in the Public Works category are driven by external factors such as other utility projects or municipal and/or state paving plans that require the Company to perform its work in a timely manner and then vacate the site to allow for subsequent, third-party work to take place. For the remainder of the work that does not fall into a Non-Discretionary program, the Company has more control, or discretion, over the timing of a project. All work that the Company initiates and executes within the ISR Plan is necessary to the safety and reliability of the Company's gas distribution system regardless of categorization of the work as Discretionary or Non-Discretionary.

PUC 8-1, Page 2

Having initiated and progressed a project through various stages of pre-construction readiness under a Discretionary program, the Company is often forced to react to one of a number of conditions that lessen or eliminate the previous discretion it had in determining when to execute the project. These factors include third-party interference or encroachment, deteriorated main condition, new municipality paving plan information, new operational performance data, and other factors. Despite the reactionary factor stimulus that places time pressure on the projects, effectively making them Non-Discretionary, the Company has continued to progress these projects under the initiating funding accounting for reasons explained further in the Company's response to PUC 8-5.

- (b) Please see Attachment PUC 8-1.
- (c) All work initiated and completed within the Gas ISR Plan is necessary to ensure the safety and reliability of the gas system regardless of the categorization of the work as Discretionary or Non-Discretionary. Please see the response to part (a) that describes how the Company may initially categorize a project or work as Discretionary or Non-Discretionary. Once all lower risk projects are removed from the Discretionary category, however, the remaining work residing in the Discretionary category and projects under development at the beginning of the fiscal year accelerated into a workable state, should be performed as soon as feasible for the Company to continue to maintain a safe and reliable gas system.

Main WO#	Project Title	Town	Carry-Over?	Program	Work Type	Total Est. Abd Mi.
90000228443	Division St Bridge Brackets	PAW	N	Integrity	Corrosion	0.0
90000195699	1-111 Harris Ave	PVD	N	Integrity	Rush Main	0.3
90000185689	Dover St	PVD	Y	Integrity	N/A	0.4
90000194364	Linden Dr	PVD	Y	Integrity	N/A	0.1
90000204547	Lambert Ave (Insertion)	WSO	N	Integrity	Ahead of RIDOT Paving	0.1
90000194262	573-744 Hope St	BST	N	Integrity	Contingent	0.4
90000175665	Carr St	PVD	N	Integrity	Other	0.3
90000194351	Amy St	PVD	Y	Integrity	N/A	0.2
90000208982	Thames @ Washington Sq 12in Valve	NPR	N	Integrity	Relief Valve	0.0
90000208968	Thames @ W Narragansett 12in Valve	NPR	N	Integrity	Relief Valve	0.0
90000209009	Rhode Island @ Champlin 6in Valve	NPR	N	Integrity	Relief Valve	0.0
90000155218	Brighton St	PVD	N	Integrity	Other	0.1
90000155230	Dean St	PVD	Y	Integrity	N/A	0.8
90000209097	Althea St	PVD	Y	Integrity	Rush Main	0.1
90000185659	Broadway	NPR	N	Integrity	N/A	0.3
90000184051	Island Ave (RR Crossing)	EPV	N	Integrity	Other	0.1
90000207468	Carroll Av @ Ocean	NPR	N	Reliability	Single Valve Bypass	0.0
90000118037	Williams St	NPR	N	Integrity	N/A	0.4
90000204638	Ward Ave	WLY	N	Integrity	Ahead of RIDOT Paving	1.2
90000204634	Warwick Ave	WWK	N	Integrity	N/A	1.3
90000211756	Hartford Ave	PVD	Y	Integrity	N/A	0.6
90000210746	Abbott St	PVD	N	Integrity	Active Leaks	0.4
90000210644	Burnside St	PVD	N	Integrity	N/A	0.3
90000212419	531-590 Manton Ave	PVD	N	Integrity	Encroachment	0.6
90000212483	Oakdale Ave	PAW	Y	Integrity	N/A	0.4
90000188537	Harris Ave	PVD	N	Integrity	Other	0.7
90000187222	Reservoir Ave	PVD	N	Integrity	N/A	0.7
90000142541	Whitehall St	PVD	N	Integrity	N/A	0.4
90000175676	Gloucester St	PVD	N	Integrity	Contingent	0.2
90000211833	Benefit St	WWK	Y	Integrity	N/A	0.1
90000212523	Elizabeth Dr	NPV	Y	Integrity	N/A	0.2
90000210771	Winrooth Ave	PVD	Y	Integrity	Other	0.6
90000210913	Waterman Ave	EPV	N	Integrity	Contingent	0.8
90000211769	Conant St	PAW	N	Integrity	Contingent	0.4
90000211435	1-34 Central Ave	PAW	Y	Integrity	Contingent	0.5
90000210499	Atwells Ave Phase 3	PVD	N	Integrity	Other	0.5
90000194359	Gallup St	PVD	N	Integrity	Other	0.7
90000212129	Penn St	PVD	N	Integrity	N/A	0.4
90000217370	George Washington Hwy	LNC	N	Integrity	Rush Main	0.2
90000218389	2145-2289 Pawtucket Ave	EPV	N	Integrity	Contingent	0.2
90000214933	211-670 Woonasquatucket Ave	NPV	Y	Integrity	N/A	2.2
90000221185	125-201 Washington St	PVD	N	Integrity	Ahead of Paving	0.1
90000220861	Meadowbrook Dr	CLD	Y	Integrity	Ahead of Paving	0.2
90000215797	Oak St	CRA	Y	Integrity	N/A	0.4
90000222544	1 Sanford St	PVD	N	Integrity	Ahead of Paving	0.0
90000218032	696-786 Atwood Ave	CRA	Y	Integrity	N/A	0.5
90000220422	Bourne Ave	EPV	N	Integrity	Envirojetting	0.0
90000220412	North Broadway	EPV	N	Integrity	Envirojetting	0.0
90000220424	New London Ave	CRA	N	Integrity	Envirojetting	0.0
90000220425	Dexter St	PVD	N	Integrity	Envirojetting	0.0

90000220401	Waldo Dr	PVD	N	Integrity	Envirojetting	0.0
90000215166	Pierce St	EGW	N	Integrity	N/A	0.0
90000211750	Staniford St	PVD	N	Integrity	N/A	0.1
90000220815	Rawinson Dr	COV	N	Integrity	N/A	0.2
90000220826	Bald Hill Rd	CRA	N	Integrity	N/A	0.1
90000220842	Washington St	NKS	N	Integrity	N/A	0.1
90000211746	55-120 Ellery St	PVD	N	Integrity	N/A	0.6
90000212432	Clark St	CLD	N	Integrity	N/A	0.3
90000220828	Gesmondi Dr	JOH	Y	Integrity	N/A	0.2
90000215452	1-118 Potters Ave	PVD	Y	Integrity	Active Leaks	0.6
90000215933	1-173 Woonasquatucket Ave	NPV	N	Integrity	N/A	0.6
90000220844	Church Ln	NKS	N	Integrity	N/A	0.1
90000214938	Emanuel St	NPV	N	Integrity	N/A	0.8
90000220912	Miles Ave	NPV	N	Integrity	Active Leaks	0.2
90000218000	Pocasset St	JOH	N	Integrity	N/A	0.1
90000220896	Upland Ave	EGW	N	Integrity	N/A	0.1
90000217932	46-52 Top St	PVD	N	Integrity	N/A	0.0
90000220964	S Fairview St	JOH	N	Integrity	N/A	0.1
90000211601	Whipple St	CLD	N	Integrity	N/A	0.0
90000219279	Mill St	CLD	Y	Integrity	N/A	0.2
90000219276	Maple St	WSO	Y	Integrity	N/A	0.1
90000218047	75-130 Homewood Ave	NPV	Y	Integrity	N/A	0.5
90000220897	Third Ave	EGW	N	Integrity	N/A	0.0
90000220899	Fourth Ave	EGW	N	Integrity	N/A	0.0
90000218041	Osgood Ave	JOH	N	Integrity	N/A	0.2
90000212594	Arnolds Neck Dr	WWK	N	Integrity	N/A	0.1
90000224128	660-1119 Reservoir Ave	CRA	Y	Integrity	Ahead of Paving	1.6
90000210512	Ruggles St	PVD	N	Integrity	N/A	0.4
90000219678	Croade St	WAN	N	Integrity	N/A	0.1
90000155243	1016-1100 Hope St	PVD	N	Integrity	N/A	0.2
90000217203	Yale Ave	PVD	N	Integrity	N/A	0.0
90000218059	1-94 Legion Way	CRA	N	Integrity	CISBOT	0.0
90000214966	Duncan Ave	PVD	N	Integrity	N/A	0.3
90000215374	Baltimore St	PVD	N	Integrity	N/A	0.1
90000217235	Glenwood Dr	WWK	N	Integrity	N/A	0.0
90000214953	Lincoln Ave	PAW	Y	Integrity	N/A	0.3
90000155334	Railroad Ave	WLY	Y	Integrity	N/A	0.2
90000219663	127-250 Mendon Rd	CLD	Y	Integrity	N/A	0.1
90000218051	Hanover St	PVD	N	Integrity	N/A	0.4
90000223446	180-380 Westminster St	PVD	Y	Integrity	Ahead of Paving	0.6
90000214950	Progress St	PAW	Y	Integrity	Ahead of Paving	0.6
90000214970	Dudley St	PVD	N	Integrity	N/A	0.4
90000220949	Broadmoor Rd	CRA	N	Integrity	N/A	0.7
90000215259	Anthony Ave	PVD	N	Integrity	N/A	0.8
90000220806	Bald Hill Rd-East Ave	WWK	N	Reliability	N/A	0.7
90000211208	Harrison St	PAW	Y	Integrity	N/A	0.6
90000220901	Link St	WWK	N	Integrity	N/A	0.6
90000219236	873-1010 Cranston St	CRA	N	Integrity	Associated w/ Reg Work	0.5
90000211621	Ivy St	PVD	N	Integrity	N/A	0.5
90000215537	Glenham St	PVD	N	Integrity	N/A	0.4
90000220931	Bradford St	BST	N	Integrity	N/A	0.5

90000218048	Spruce St	PVD	N	Integrity	N/A	0.2
90000217831	364-420 Wellington Ave	CRA	N	Integrity	N/A	0.4
90000209055	Cowesett @ Quaker	WWW	Y	Reliability	Reg Station	0.0
90000212041	Old Main St	LNC	N	Integrity	N/A	1.4
90000221104	120-262 Tuckerman Ave	MDT	N	Integrity	Contingent	0.1
90000212431	Summer St	WSO	Y	Integrity	Contingent	2.0
90000223205	Central Ave	EPV	Y	Integrity	Ahead of Paving	0.7
90000217555	Mayfield Rd @ Oaklawn Ave	CRA	N	Reliability	Single Valve Bypass	0.0
90000204089	Park @ Maple	CRA	N	Reliability	Reg Station	0.0
90000217184	481-604 Blackstone St	WSO	N	Integrity	N/A	0.3
90000218021	Oxford St	PVD	N	Integrity	Contingent	1.7
90000092282	Eldridge St	CRA	Y	Integrity	N/A	0.4
90000204611	1970-2117 Pawtucket Ave	EPV	Y	Integrity	Ahead of Paving	0.7
90000226925	Olney St	PVD	N	Integrity	N/A	0.3
90000218038	419-583 N Broadway	EPV	N	Integrity	N/A	0.7
90000228513	Sunbury St	PVD	Y	Reliability	N/A	0.0
90000225808	1570-1802 Mendon Rd	CLD	N	Integrity	Ahead of RIDOT Paving	0.5
90000208691	Wolcott @ St Georges	MDT	N	Reliability	Reg Station	0.0
90000225865	Geldard St	CLD	Y	Integrity	Encroachment	0.2
90000232149	Cumberland Hill Rd Test Pits	WSO	Y	Integrity	N/A	0.0
90000225848	143-212 Greenwood St	CRA	N	Integrity	N/A	0.6
90000226153	Glenside Rd	CLD	N	Integrity	N/A	0.3
90000226154	Fountain St	CLD	N	Integrity	N/A	0.3
90000225872	Josephine Ave	EPV	N	Integrity	N/A	0.1
90000229281	969-1030 Park Ave	CRA	Y	Integrity	Ahead of Paving	1.0
90000223838	Tiverton Gate Station	NPR	Y	Reliability	Gate Station Replacement	0.0
90000225938	607-783 Mendon Rd	WSO	N	Integrity	N/A	0.4
90000225937	Lefrancois Blvd	WSO	N	Integrity	N/A	0.4
90000232375	Chestnut St	WWK	N	Integrity	Rush Main	0.0
90000225846	Gardiner Ave	LNC	Y	Integrity	N/A	0.1
90000220905	North St	JOH	N	Integrity	N/A	0.1
90000220804	Bay Spring Ave	BRG	N	Integrity	Ahead of 3rd Party	0.2
90000230255	Bentley St	EPV	N	Integrity	Rush Main	0.1
90000220913	Cannon St	CRA	N	Reliability	N/A	0.5
90000214977	Alden Ave	WWK	N	Integrity	N/A	0.1
90000229980	Wolcott Ave	MDT	Y	Integrity	Contingent	2.1
90000220850	Morris St	WWK	N	Integrity	Active Leaks	0.1
90000215424	Moccasin Dr	WWK	Y	Integrity	Ahead of Paving	0.8
90000225974	Herschel St	PVD	N	Integrity	Rush Main	0.4
90000212383	Parade St	PVD	N	Integrity	N/A	0.6
90000220925	Tennyson Rd	WWK	N	Integrity	N/A	0.4
90000220866	E Capalbo Dr	WLY	N	Integrity	N/A	0.2
90000218007	Benbridge Ave	WWK	N	Integrity	N/A	0.8
90000211760	Governors Dr	WWK	N	Integrity	Active Leaks	0.4
90000215638	Fairview St	PVD	N	Integrity	N/A	0.1
90000187225	Burlington St	PVD	N	Integrity	N/A	0.1
90000215445	578-776 Plainfield St	PVD	N	Integrity	Encroachment	0.8
90000230676	Thames St (Section 2) CISBOT NPR	NPR	Y	Integrity	CISBOT	0.0
90000202255	Wellington @ Thames LP- Reg Replacement	NPR	N	Reliability	Reg Station	0.0
90000230868	Thames St (Section 3) - CISBOT	NPR	N	Integrity	CISBOT	0.0



90000215125	Parkside Dr	WWK	N	Integrity	Active Leaks	1.1
90000226150	Hazel St	LNC	Y	Integrity	N/A	0.5
90000219163	Rolling Green Rd	NPR	N	Integrity		0.6
90000225658	Barstow St	PVD	N	Integrity	N/A	0.4
90000219256	391-480 Woodward Rd	NPV	N	Integrity	Contingent	0.6
90000219278	480-547 Woodward Rd	NPV	N	Integrity	Contingent	0.4
90000219208	Ashby St	JOH	N	Integrity	N/A	0.8
90000211786	1423-1741 Atwood Ave	JOH	N	Integrity	N/A	0.9
90000204830	Atlantic Blvd	NPV	N	Integrity	N/A	1.2
90000217168	68-151 Bay View Ave	BST	N	Integrity	N/A	0.6
90000218064	Early St - CISBOT	PVD	N	Integrity	CISBOT	0.0
90000225189	Smith @ Sunset	NPV	N	Reliability	Reg Station	0.0
90000207469	3362 Kingstown Rd (Walters Corner)	SKS	N	Reliability	Single Valve Bypass	0.0
90000230797	Petteys Ave (16" 10#) - LINING	PVD	N	Integrity	Lining	0.0
90000118390	Maple Ave	MDT	N	Integrity	Associated w/ Reg Work	0.5
90000219772	Maple @ Yarnell	MDT	N	Reliability	Planned Projects	0.0
90000214975	Main St	NSF	N	Integrity	N/A	0.3
90000194335	George St	PAW	N	Integrity	N/A	0.6
90000225867	Perry St	CFL	N	Integrity	N/A	0.9
90000232506	Cumberland Vapor Line Project	CLD	N	Reliability	Planned Projects	0.0
90000232502	Cumberland Boil Off Line Project	CLD	N	Reliability	Planned Projects	0.0
90000209991	Dey St- Heater Replacement	EPV	N	Reliability	Heater	0.0
90000146500	Redwood Dr	NPV	N	Integrity	N/A	0.2
90000219059	Old River Rd	LNC	Y	Integrity	N/A	0.0
90000209541	Old River Rd	LNC	N	Reliability	N/A	0.4
90000220953-A	25-90 N Broadway	EPV	N	Integrity	Associated w/ Reg Work	0.2
90000220953-B	25-90 N Broadway (header-outlet)	EPV	N	Reliability	Planned Projects	0.0
90000210583	N Broadway	EPV	N	Integrity	Contingent	0.1
90000225940	Watson St	WWK	N	Integrity	N/A	0.8
90000230874	55-189 Canal St - CISBOT	PVD	N	Integrity	CISBOT	0.0
90000230974	697-908 Eddy St	PVD	N	Integrity	Rush Main	1.3
90000194347	330-505 Silver Spring St	PVD	N	Integrity	Ahead of Paving	1.1
90000144219	Station @ Pond (RIS-017)	CRA	N	Reliability	Reg Station	0.0
90000222517	Waterman Greystone Outlet Valve Replacement	NPV	N	Reliability	Planned Projects	0.0
90000207471	295 Wampanoag Trl 5 Psig @ Boyd Ave	EPV	N	Reliability	Single Valve Bypass	0.0
90000229862	Third Ave	WSO	N	Integrity	Contingent	2.2
90000229863	Second Ave	WSO	N	Integrity	Contingent	1.2
90000236448	60-90 Newport Ave	EPV	N	Integrity		0.3
90000236886	601 Metacom Ave	WAN	N	Integrity	Rush Main	0.2
90000231875	Greenwich Ave (LP-99)	EPV	N	Reliability	Contingent	2.1
90000194417	Terrace Ave	WWK	N	Integrity	Active Leaks	0.4
90000235055	East Providence 99# System Integration (Phase 1)	EPV	N	Reliability	Contingent	0.1
90000234740	Dagget Ave	PAW	N	Reliability	Other Reg Work	0.0
90000233804	Allens Ave bypass run	PVD	N	Reliability	Planned Projects	0.0
90000220963	Harding Ave	JOH	N	Integrity	Rush Main	0.8
90000220936	Constitution St	BST	N	Integrity	N/A	0.5
90000233734	2464-2556 Pawtucket Ave	EPV	N	Integrity	Rush Main	1.2
90000142764	1294 Atwood Ave	JOH	N	Integrity	N/A	0.0
90000220920	Oxbow Farms Apartment Complex	MDT	N	Integrity		0.0
90000238462	Brook St @ George St	PVD	N	Reliability	Reg Station	0.0

90000225904	1088-1131 Main St	PAW	N	Integrity	Contingent	0.3
90000236076	E School St	WSO	N	Integrity	Ahead of Paving	0.9
90000234597	Chapel St	LNC	N	Integrity	Ahead of Paving	1.6
90000230689	Russell St - CISBOT	PVD	N	Integrity	CISBOT	0.0
90000235502	Aaron Ave	BST	N	Integrity	Ahead of Paving	0.6
90000235961	Cumberland Hill Rd	WSO	N	Integrity	Contingent	1.9
90000234900	Mason St (Abandonment)	WSO	N	Integrity	Contingent	0.4
90000234946	Mason St	WSO	N	Reliability	Contingent	0.0
90000226114	Park Pl	WSO	N	Integrity	Contingent	2.2

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 22-54-NG  
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PUC 8-2

Request:

Does the Company have an inventory list which identifies all high-risk leak-prone pipes in the system? If yes, please provide a copy.

Response:

The Company considers its entire leak prone pipe inventory to have some varying degree of risk associated with it.

For a listing of projects containing segments of main that the Company has identified as high risk, please refer to Attachment PUC 8-2. Typically, projects are comprised of various segments of main, which are combined into a project scope based on engineering judgment. Priority scores are calculated for the segment(s) of concern that drew attention to the area; that score is then assigned to the project as a whole. Attachment PUC 8-2 lists both the project title and the location of the segment(s) within the project that are driving the high priority score. Please note that this list of projects is accurate as of September 6, 2023, and includes projects that are currently in progress. A project does not drop off the Company's analyzed inventory until it has been completed and the associated leak prone pipe has been abandoned.

Sorted by Town Name and Project Title

<u>Town</u>	<u>Project Title</u>	<u>Location of Segments Within Project Driving Pr Score</u>	<u>Total Project Install Mileage</u>	<u>Total Project Abandonment Mileage</u>
Bristol	260-428 High St, BST	High St from Washington St to State St	0.71	0.95
Bristol	573-744 Hope St, BST	#573 Hope St to #697 Hope St	0.43	0.43
Bristol	68-151 Bay View Av, BST	Bay View Av from Manchester St to Thompson Av	0.60	0.59
Cranston	364-420 Wellington Av, CRA	#364 Wellington Av to #414 Wellington Av / Park Av from Wellington Av to Station St	0.12	0.44
Cranston	418-545 Pontiac Av, CRA	Rolfe St from Pontiac to Auburn / Auburn St from #260 to #180 / Potter St from Aubrun to Clarence	2.80	2.73
Cranston	969-1030 Park Av, CRA	Park Av from Foslyn Av to Reservoir Av	0.95	1.01
Cranston	Heather St, CRA	Franklin Av from Webster Av to Whipple Av / Ryder Av from Whipple Av to #12 / Whipple Av from Franklin Av to #135 Heather St	0.55	0.64
Cranston	Oak St, CRA	Oak St from #25 Oak St to Park Av	0.36	0.36
Cranston	Smith St, CRA	Smith St from Narragansett Blvd to Dennis Av / Dennis Av from Smith St to Northup St / Northup St from Dennis Av to #336	1.68	1.83
Cranston	Welfare Av, CRA	#31 Friendly Rd to #111 Friendly Rd	2.30	2.38
Cranston	Wellington Av, CRA	#860 to #900 Wellington Av	0.16	0.16
Cumberland	Meadowbrook Dr, CLD	Meadowbrook Dr from Mendon Rd to #51 Meadowbrook Dr	0.17	0.17
Cumberland	Old Willis Rd, CLD	Old Willis Rd from #30 to #70	0.67	0.52
East Providence	25-90 N Broadway, EPV	N Broadway from #90 to Greenwood Av	0.20	0.20
East Providence	575-585 Taunton Av, EPV	On site main to #575-585 Taunton Av	0.05	0.05
East Providence	60-90 Newport Av, EPV	On site main to #60 - #90 Newport Av	0.25	0.35
East Providence	Pavilion Av, EPV	Pavilion Av from #138 to #182	0.55	0.58
East Providence	Pearl Av, EPV	Pearl Av from #15 to #32	0.29	0.27
East Providence	Roger Williams Av, EPV	Roger Williams Av from Bourne Av to #20 Roger Williams Av	0.34	1.06
East Providence	Waterman Av, EPV	Waterman Av from Pawtucket Av to #435	1.81	1.66
Johnston	1294 Atwood Av, JOH	Culvert at #1294 Atwood Av	0.02	0.02
Johnston	1423-1741 Atwood Av, JOH	#1516 through #1524 Atwood Av	0.86	0.87
Johnston	Serrel Sweet Rd, JOH	Harris Av from #35 to Chesnut St / Chestnut St from Harris Av to Serrel Sweet / Serrel St from Chestnut to Putnam	2.35	2.77
Lincoln	Old Main St, LNC	Chestnut St from Maple St to #66-68	1.25	1.42
Newport	1-170 Spring St, NPR	Spring St from #83 to #170	0.49	0.50
Newport	555-561 Thames St, NPR	Thames St from Lee Av to Wellington Av	0.03	0.03
Newport	Broadway, NPR	Broadway from Malbone Rd to Fowler Av	0.31	0.32
Newport	Dearborn St, NPR	Dearborn St from Spring St to Thames St	0.11	0.11
Newport	William St, NPR	William St from Bellevue Av to Spring St	0.41	0.42
North Providence	1-173 Woonasquatucket Av, NPV	Woonasquatucket Av from #171 to Fruit Hill Av	0.58	0.58
North Providence	211-670 Woonasquatucket Av, NPV	Woonasquatucket Av from Smith St to Iris Ln	2.12	2.16
North Providence	957-1074 Mineral Spring Av, NPV	Mineral Spring Av from Dorman Av to #977 Mineral Spring Av	0.68	0.78
North Providence	Atlantic Blvd, NPV	Brae St from #28 Brae St to Gaudet Dr / Gaudet Dr from Brae St to Hatherly St	1.33	1.25
North Providence	Elizabeth Dr, NPV	Elizabeth Dr from Mineral Spring Av to #36 Elizabeth Dr / Marilyn Dr from Elizabeth Dr to Angela Ct / Angela Ct from Marilyn Dr to #21 Angela Ct	0.25	0.22
North Providence	Emanuel St, NPV	Emanuel St - Woonasquatucket Av to #48 Emanuel St	0.73	0.84
North Providence	Smith St, NPV	Smith St - 1723 to 1789	0.46	0.46
North Smithfield	Morse Av, NSF	Morse Av - #80 to Alice Av / Alice Av - Morse Av to Warren Av / Warren Av - Alice Av to #50	0.95	1.32
Pawtucket	585-665 Main St, PAW	Harrison St from Slater St to Main St	1.02	1.02
Pawtucket	Conant St, PAW	Conant St from #181 to #210	0.39	0.39
Pawtucket	Dora St, PAW	Dora St from Pieve St to Fairmount Av	1.68	1.68
Pawtucket	George St, PAW	Cedar St from #2 to George St / George St from Cedar St to S Union St	0.43	0.62
Pawtucket	Harrison St, PAW	Lonsdale Av from Quincy Av to Harrison St / Harrison St from Lonsdale Av to Slater St	0.51	0.55
Pawtucket	Lincoln Av, PAW	Lincoln Av from Monticello Rd to Ridgewood Rd	0.04	0.29
Pawtucket	Oakdale Av, PAW	Oakdale Av from Smithfield Av to Columbia Av	0.27	0.44

Sorted by Town Name and Project Title

<u>Town</u>	<u>Project Title</u>	<u>Location of Segments Within Project Driving Pr Score</u>	<u>Total Project Install Mileage</u>	<u>Total Project Abandonment Mileage</u>
Pawtucket	Progress St, PAW	Progress St from East Av to Capwell Av	0.60	0.60
Providence	1016-1100 Hope St, PVD	Hope St from #1016 to #1070	0.18	0.23
Providence	1-118 Potters Av, PVD	Potters Av from Eddy St to Burnside St	0.56	0.56
Providence	1-168 Eaton St, PVD	Eaton St from Camden Av to Pinehurst Av / Tyndall Av from Pinehurst Av to #50	1.60	1.68
Providence	1-180 Westminster St, PVD	Westminster St from Dyer St to Dorrance St	0.05	0.26
Providence	125-201 Washington St, PVD	Washington St from Mathewson St to Empire St	0.12	0.13
Providence	142-188 Potters Av, PVD	Reynolds Av from Prairie Av to Burnside St / Burnside St from Reynolds Av to Potters Av	0.52	0.57
Providence	168-340 Eaton St, PVD	Roslyn Av from #65 to Eaton St / Hilltop Av from #97 to Eaton St / Eaton St from #240 to #176	1.46	1.63
Providence	200-310 Canal St - LINING, PVD	Canal St from N Court St to N Main St	0.38 (Lining)	0.00
Providence	265-270 Laurel Av, PVD	Laurel Av from Grotto Av to Blackstone Blvd	0.04	0.04
Providence	300-445 Elmwood Av, PVD	Elmwood Av from Daboll St to Carter St	0.50	0.85
Providence	307-349 Hope St, PVD	Hope St from #305 to #349	0.05	0.31
Providence	330-505 Silver Spring Av, PVD	Silver Spring Av from Batcheller Av to Bismark St	1.04	1.06
Providence	336-463 Benefit St, PVD	Benefit St - #372 to #432	0.40	0.48
Providence	445-584 Smith St, PVD	Richter St from Chalkstone Av to Smith St	0.73	0.73
Providence	46-52 Top St, PVD	Top St from Chace Av to Twelfth St	0.03	0.03
Providence	531-690 Manton Av, PVD	Manton Av from #687 to #600	0.23	0.61
Providence	55-120 Ellery St, PVD	Rosedale St from Messer St to #90	0.55	0.55
Providence	578-776 Plainfield St, PVD	Jewell St from #10 to Plainfield St / Plainfield St from Jewell St to #600	0.47	0.78
Providence	584-832 Smith St, PVD	Smith St from Elmhurst Av to Oakland Av	0.63	0.61
Providence	585-1000 Douglas Av, PVD	Douglas Av from Corina St to Easton St	1.07	1.18
Providence	589-700 Hartford Av, PVD	Hartford Av - #613 to #632	0.62	0.65
Providence	632-734 Hope St, PVD	Langham Rd from #10 to Hope St / Hope St from Langham Rd to Savoy St	0.42	0.44
Providence	65-153 Manton Av, PVD	Manton Av from #178 to Chafee St	0.60	0.80
Providence	697-908 Eddy St, PVD	Eddy St from Eudora St to Public St / Public St from Eddy St to #250	1.26	1.24
Providence	770-824 Broad St, PVD	Broad St from Potters Av to Lillian Av	0.55	0.70
Providence	832-996 Smith St, PVD	River Av from #490 to #423 / Intersection of River Av / Smith St	0.83	0.84
Providence	Abbott St, PVD	Abbott St from Knowles St to Camp St	0.46	0.45
Providence	Amy St, PVD	Ives St from E George St to Preston St / Amy St from Ives St to Gano St	0.16	0.25
Providence	Anthony Av, PVD	Anthony Av from Noyes Av to Homestea Av / Homestead Av from Anthony Av to Potters Av	0.80	0.82
Providence	Barstow St, PVD	Valley St from #217 to Atwells Av	0.39	0.40
Providence	Bath St, PVD	Jewett St from Valley St to Bath St / Bath St from Jewett St to W Park St	0.45	0.74
Providence	Burlington St, PVD	Burlington St from Bayard St to Hope St	0.07	0.07
Providence	Burnside St, PVD	Burnside St from Gallup St to #175	0.26	0.26
Providence	Carr St, PVD	Intersection of Cactus St and Carr St / Carr St from Cactus St to #54	0.27	0.27
Providence	Charles St, PVD	Charles St from Christopher St to Smart St	0.42	0.42
Providence	Delaine St, PVD	Manton Av from #25 to Delaine St	0.27	0.43
Providence	Dudley St, PVD	Dudley St from #236 to #189	0.33	0.43
Providence	Duncan Av, PVD	Locust St from Camp St to Knowles St	0.30	0.28
Providence	Fairview St, PVD	Fairview St from Pemberton to Carleton	0.12	0.12
Providence	Friendship St - LINING, PVD	Friendship St from Dorrance St to Dyer St	0.08 (Lining)	0.00
Providence	Gallup St, PVD	Gallup St from Broad St to Gordon Av	0.48	0.72
Providence	Glenham St, PVD	Glenham St from Prairie Av to Taylor St / Mt Vernon St from Glenham St to #1	0.18	0.42
Providence	Gloucester St, PVD	Gloucester St from Sunbury St to #71 Gloucester St	0.19	0.19

Sorted by Town Name and Project Title

<u>Town</u>	<u>Project Title</u>	<u>Location of Segments Within Project Driving Pr Score</u>	<u>Total Project Install Mileage</u>	<u>Total Project Abandonment Mileage</u>
Providence	Hanover St, PVD	Hanover St from Bucklin St to Elmwood Av	0.39	0.39
Providence	Harris Av, PVD (incl. 2 RR crossings)	Harris Av from #115 to #339	0.59	0.70
Providence	Ivy St, PVD	Forest St from Camp St to Ivy St / Ivy St from Forest St to Larch St / Larch St from Ivy St to #46-48	0.45	0.51
Providence	Lancaster St, PVD	Woodbine St from #70 to Steele St / Steele St from Woodbine St to Lancaster St / Lancaster St from Steele St to #100 Lancaster St	0.46	0.49
Providence	Langdon St, PVD	Monticello St from Hawkins St to #81 / Opper St from Branch Av to Social St / Greeley St from Opper St to Charles St	2.80	2.74
Providence	Laurel Hill Av - LINING, PVD	Dorchester Av from Lowell Av to Laurel Hill Av / Laurel Hill Av from Dorchester Av to Sterling Av	0.24 (Lining)	0.00
Providence	Marietta St, PVD	Marietta St from Charles St to EOM at #80	0.16	0.16
Providence	Ocean St, PVD	Ocean St from Gallup St to Oxford St	1.36	1.40
Providence	Ohio Av, PVD	Ohio Av from #301 to #200	0.41	0.41
Providence	Olney St, PVD	Olney St from N Main St to Brown St	0.26	0.28
Providence	Oxford St, PVD	Oxford St from #72 to Prairie Av	1.23	1.65
Providence	Parade St, PVD	Willow St from #51 to Parade St / Parade St from Willow St to Hudson St	0.40	0.62
Providence	Penn St, PVD	Tell St from Courtland St to Knight St / Knight St from Tell St to Penn St	0.40	0.39
Providence	Reservoir Av, PVD	Reservoir Av from #400 to Roger Williams Av	0.54	0.65
Providence	Rt 10 S Offramp @ Union Av, PVD	Union Av @ Huntington Av (Rt 10 Offramp)	0.07	0.07
Providence	Ruggles St, PVD	Ruggles St from Smith St to Chad Brown St / Dickens St from Ruggles St to Oakland Av / Chad Brown St from #8 to Camden Av	0.28	0.38
Providence	Sackett St, PVD	Price St from #10 to Sackett St / Sackett St from Broad St to #33	0.51	0.52
Providence	Sharon St, PVD	Sharon St from Eerie St to Eaton St / Eaton St from River Av to #501 / La Salle Dr	2.95	2.82
Providence	Somerset St, PVD	Providence St from Dudley St to Somerset St	0.50	0.51
Providence	Spruce St, PVD	Spruce St from Bond St to #72	0.16	0.16
Providence	Staniford St, PVD	Staniford St from Blackstone St to Willard Av	0.06	0.07
Providence	Washington St, PVD	Jackson Walkway / Washington St from Franklin St to Jackson Walkway	0.83	1.04
Providence	Waterman St, PVD	Waterman St from Prospect St to Thayer St	0.47	0.47
Providence	Whitehall St, PVD	Kelley ST from Bancroft St to Magnolia St / Magnolia St from #167 to Whitehall St / Whitehall St from Magnolia St to Clarence St	0.37	0.37
Providence	Whittier Av, PVD	Whittier Av from Dewey St to Laban St	1.53	1.56
Providence	Winrooth Av, PVD	Winrooth Av from #52 to View St / View St from Winrooth Av to River Av	0.47	0.59
Providence	Woodbine St, PVD	Woodbine St from Camp St to Ivy St / Lancaster St from Camp St to Ivy St / Ivy St from Hart St to #226	1.06	1.06
Providence	Yale Av, PVD	Yale Av from Carleton St to EOM at #14 Yale Av	0.03	0.03
Smithfield	Greenville Av, SMF	Greenville Av from Cedar Grove Dr to Lark Rd	0.34	0.39
Warwick	158-586 Warwick Av, WWK	Warwick Av from #280 to #440	1.37	2.59
Warwick	Parkside Dr, WWK	Abbey Av from Fair St to Parkside Dr	1.18	1.09
Warwick	Warwick Av, WWK	Warwick Av from #665 to Jefferson St	0.98	1.29
Woonsocket	481-604 Blackstone St, WSO	Blackstone St from River St to Harris Av	0.23	0.23
Woonsocket	Nursery Av, WSO	Nursery Av from Ridge St to Campeau St / Campeau St from Nursery Av to Dana St	0.71	0.70
Woonsocket	S Main St, WSO	S Main St from Providence St to Front St	0.38	0.56
		<b>Installation/Abandonment Mileage Total</b>	<b>76.49</b>	<b>86.19</b>
		<b>Lining Mileage Total</b>	<b>0.70</b>	<b>0.00</b>

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 Eighth Set of Data Requests  
Issued on August 31, 2023

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PUC 8-3

Request:

In the response to PUC 7-7 (which asked about projects forecasted to be completed in FY 2024 that could be deferred in order to complete its discretionary spending program on budget), there is the following statement:

“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.”

- (a) Why has the Company completed “reactive or non-discretionary” projects under the discretionary budget instead of addressing them under the appropriate non-discretionary budget category?
- (b) Has this misclassification practice ever been disclosed to the Division or the Commission? If so, when?
- (c) In FY 2023 and/or FY 2022, has the Company misclassified any non-discretionary projects as discretionary in the respective reconciliation filings? If so, please identify the projects and indicate the project expenditures.
- (d) Is the Company maintaining that moving projects that are non-discretionary into the discretionary category would help the Company meet a discretionary budget constraint under the given hypothetical? If so, please explain how increasing the number of discretionary projects would help. If not, please clarify.

Response:

- (a) In its Gas ISR Plans and quarterly and year-end reports, the Company has consistently provided an explanation of project categories by stating, “Non-Discretionary programs include projects that are required by legal, regulatory code, and/or agreement, or are the result of damage or failure, with limited exceptions.” The Company began utilizing the footnote in quarterly and year-end reports starting in the fourth quarter of FY2016 and in proposed Gas ISR Plans starting in FY2020.

When projects are initiated, the Company creates an electronic work order in its Power Plan asset management system. This work order is tied to a funding code that

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relates to budget categories, including those within the Gas ISR Plan portfolio and specifically ties to the Discretionary and Non-Discretionary classifications. Projects created under the Proactive Main Replacement program funding code, which historically has been reported in the Discretionary portion of the Gas ISR Plan portfolio, may later have reason to be advanced for reactive reasons.

Once charges have accumulated against a work order, it becomes problematic to reallocate those charges within the system to a different funding code or different work order. Reallocation requires manual journal entries within the asset management system. Additionally, the transfer of charges from one work order to another results in the loss of visibility and granularity in the cost element levels of the order. Essentially, the Company would lose sight of the detailed spend on the original work order.

For these reasons, the Company has been reluctant to create new work orders and move charges from projects initiated in the Discretionary category to those under the Non-Discretionary category. The Company tracks projects that were completed for reactive reasons within the Discretionary category outside of its asset management and financial systems and could provide this detail in periodic reporting to the Public Utilities Commission ("Commission") and the Division of Public Utilities and Carriers ("Division"), if beneficial. For example, within the Proactive Main Replacement – Leak Prone Pipe ("MRP") category, the Company could provide a breakdown of miles installed and abandoned, broken down by primary drivers, including, without limitation, Risk Score, Contingent (which indicates that a project was contingent on, or was a prerequisite to, another project), Ahead of Paving, Leak Activity, Logistics, Rush Main, or Encroachment. The Company provided more detailed descriptions of the primary drivers in its response to PUC 1-2 - Supplemental filed with the Commission in Docket No. 23-23-NG, a copy of which is provided as Attachment PUC 8-3-1 for ease of reference.

- (b) The Company has not "misclassified" any work. The practice has been to categorize specific types of work related to advance notice of third-party and municipal utility and road work in the City State Construction and/or Public Works categories, which are Non-Discretionary, and most other types of work in the Discretionary category. As stated in the Company's response to part (a), above, the Company has assigned work to the Discretionary and Non-Discretionary classifications based on the original reason for the initiation of the project and not to any subsequent change in the need for, or timing of, a project.



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  
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Responses to the Commission's Eighth Set of Data Requests  
Issued on August 31, 2023

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PUC 8-3, page 3

Nonetheless, the Company has been unable to find specific instances where it specifically identified reactive work carried out under the Discretionary classification prior to its answers to data requests in the Commission's First Set of Data Requests in Docket No. 23-23-NG (regarding the Company's FY2023 Gas ISR Reconciliation) and Seventh Set of Data Requests in Docket No. 22-54-NG (regarding the FY2024 Gas ISR Plan Quarterly Report for the First Quarter Ending June 30, 2023).

During informal, quarterly, and year-end reviews of the Gas ISR Plan between the Company and the Division, the topic of why a project is being advanced (or delayed) has been discussed, as needed. When applicable, these discussions have included discussion of the reactionary factor(s) that are causing the project to be advanced and the category (i.e., within either Discretionary or Non-Discretionary) that will receive the charges.

- (c) Please see Attachment PUC 8-3-2 for projects completed under the Discretionary classification in FY2022 and FY2023 for reactionary factors.
- (d) No. The Company is not suggesting movement of project costs from one category to another as a method to align forecasted and/or reported spending with existing category budgets.

In its response to PUC 7-7, the Company was explaining that, in a scenario where the Company is asked to manage actual spend in the Discretionary categories to the Discretionary budget (versus maintaining the flexibility to manage the overall Gas ISR Plan spend against the overall Gas ISR Plan budget, as prudent), the classification of the reasons for advancing a project become more significant than the initial classification of a project when conceived. For example, a project may arise late in the year for reactionary factors, such as a Rush Main or an Encroachment, in the Proactive Main Replacement category, and the Company may have no choice but to complete that work in FY2024. By completing that work and incurring the costs in FY2024, the Company may still hypothetically go over-budget in FY2024, despite taking hypothetical steps 1-3 as explained in the Company's response to PUC 7-7.

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 23-23-NG

In Re: 2023 Distribution Adjustment Charge Filing  
Responses to Commission's First Set of Data Requests  
Issued August 10, 2023

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PUC 1-2 - Supplemental

Request:

Please provide the following:

- a. Schedule 1 – a listing of all the projects within the Proactive Main Replacement Program that were the basis for the Company's original spending forecast of \$78,918,000 which was approved by the Commission. In the schedule, please indicate the original cost estimate for each and the actual spending that occurred.
- b. Schedule 2 – a listing of all the projects within the Proactive Main Replacement Program that were not included in the original spending forecast, but were advanced in FY2023 and contributed to the overspend in that category. In the schedule, please indicate the original cost estimate (if any) that the Company had prior to commencing the project and the actual spending that occurred.
- c. For each project identified in Schedule 2, please identify the location and condition of the pipeline that was replaced, and provide an explanation of the main drivers behind why the Company considered it important to proceed with the replacement in FY2023.

Response:

During Fiscal Year ("FY") 2023, the Company had work activity on 475 individual projects within the Proactive Main Replacement & Rehabilitation Program categories. These projects fall into three distinct sub-categories relative to the original project list presented in the FY2023 Gas ISR Plan:

1. Projects that began, but were not completed, prior to the start of FY2023. These projects were not included in the FY2023 proposed project list. The projects spanned the gamut of statuses from just started to nearly complete at the start of FY2023. A large portion of the charges on these projects in FY2023 were for close out and final restoration and paving activities. In total, there were 194 projects in this category with a total spend of \$30.055 million.
2. Projects that were included in the Company's proposed FY2023 Gas ISR Plan. There were 104 projects proposed in the Proactive Main Replacement & Rehabilitation Program for FY2023, including two CISBOT projects. Of these, the Company incurred spend, including engineering, permitting, administrative, construction, restoration, and other costs, on 98 of them totaling \$28.792 million. Please see Attachment PUC 1-2-1 for the list of these projects.

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3. Projects that were not included in the Company's proposed FY2023 Gas ISR Plan but the Company began construction on them for reasons such as cast-iron encroachments by third parties, rush mains due to material condition, projects ahead of paving by municipalities, high risk scoring, specialty resource availability, among others. In addition, this category includes spend on projects that had preparatory charges, such as engineering or material purchases during FY2023 in preparation for execution in a future fiscal year. There was a total of 189 projects in this category totaling \$31.880 million. Please see Attachment PUC 1-2-2 for the list of these projects. Please see Attachment PUC 1-2-3 for explanations of the main drivers for advancing them.

The summary of these project categories illustrates the rolling portfolio-based nature of the work the Company undertakes. Projects begin year-round, often carry into following years (especially when factoring in restoration) and are re-prioritized as conditions and third-party activities and demands change. Comparing the spending of a particular project in FY2023 against its estimate is likely to generate a large variance because of spend that may have occurred on the project ahead of or trailing the fiscal year in which the major construction portion of the project took place.

In preparing its response to this data request, the Company recognized that there is a \$1.003 million variance between the spend presented in the FY2023 Gas ISR Plan reconciliation filing and the sum of the projects presented in this response. This variance is the result of accounting adjustments that were tracked at the category program level for FY2023, and the Company is in the process of reconciling this variance. The Company will supplement this response when it has determined the root cause of this variance and any changes resulting therefrom.

- a. Attachment PUC 1-2-1 lists all projects within the Proactive Main Replacement program that formed the basis for the original \$78,918,000 budget.
- b. Attachment PUC 1-2-2 lists all projects within the Proactive Main Replacement program that had preparatory charges, such as engineering, permitting, materials, administration, or other pre-construction costs during FY2023 but did not begin construction and were not included in the FY2023 Gas ISR Plan. Attachment PUC 1-2-3 lists all projects within the Proactive Main Replacement program that began construction during FY2023 but were not included in the Company's proposed ISR Plan.
- c. Attachment PUC 1-2-3 indicates the main drivers of the Company's decision to advance the identified projects. The Main Driver codes are defined as follows:

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- Risk Score: The project was brought into the program because it had a sufficiently high risk score and had progressed to a workable state.
- Contingent: The project was contingent on, or was a prerequisite to, another project. Completing both projects together either was necessary or logistically expedient.
- Ahead of Paving: The project was undertaken upon notification by a municipality or the Rhode Island Department of Transportation of paving work taking place in proximity to the Company's Leak Prone assets. In some cases, the project was originally designed as a proactive replacement already, or in other cases the project did not fit the requirements of the Public Works program. The Company has found that even simpler mill and pave operations can have a detrimental effect on leak prone assets and therefore attempts to replace leak prone assets when notified ahead of paving operations. Also, paving can lead to a moratorium on road opening permits, which would prevent the Company from replacing leak prone assets in newly paved streets.
- Leak Activity: The project either had increased leak activity or an active leak within its scope. In the latter case, the project was undertaken to satisfy the Company's obligation to repair leaks within certain timeframes.
- Logistics: The project was undertaken when no other higher priority project was available to start due to permitting, resource availability, or other limitations but was used to meet the Company's abandonment obligation for leak prone pipe.
- Rush Main: The project was undertaken when other excavation activity, such as a leak repair, found significant deterioration of the main, warranting immediate replacement.
- CISBOT: The project was undertaken opportunistically when the specialty contractor for this work was available, the project was permitted, and all other pre-construction requirements were met. Because of the unique nature of CISBOT work, the Company took advantage of the availability of the proprietary resource to advance this work. The Company has found in the past that the contractor is not always available when the Company would prefer or in alignment with municipal permit requirements.

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- Encroachment: The project was undertaken to remediate a cast-iron encroachment impacting one of the Company's small diameter cast-iron assets due to third-party or environmental excavation. The Company usually issues encroachment work orders under the Public Works category except in cases where a main replacement segment already has been designed under the Proactive Main category. The Company is obligated to remediate cast-iron encroachments as quickly as is feasible per the Code of Federal Regulations<sup>1</sup> as well as internal Operations and Maintenance procedures.

Supplemental Response:

As noted above, in preparing its original response to this data request, the Company recognized that there was a \$1.003 million variance between the spend presented in the FY2023 Gas ISR Plan reconciliation filing and the sum of the projects presented in that response. The Company determined that the root cause of the variance was that, at the time the original response was submitted, the team preparing the response did not have access to the work order detail level costs for a subset of work orders that made up the aggregate number reported in the reconciliation filing. Upon consulting with the Plant Accounting team, these work order level details were merged into the original response, resulting in no variance between the sum of the details and the aggregate reporting. The Company has reconciled the variance regarding the projects within the three Proactive Main Replacement & Rehabilitation Program sub-categories relative to the original project list presented in the FY2023 Gas ISR Plan. The resulting corrected information is provided below (in bold):

1. Projects that began, but were not completed, prior to the start of FY2023. These projects were not included in the FY2023 proposed project list. The projects spanned the gamut of statuses from just started to nearly complete at the start of FY2023. A large portion of the charges on these projects in FY2023 were for close out and final restoration and paving activities. In total, there were **189** projects in this category with a total spend of **\$30.853** million.
2. Projects that were included in the Company's proposed FY2023 Gas ISR Plan. There were 104 projects proposed in the Proactive Main Replacement & Rehabilitation Program for FY2023, including two CISBOT projects. Of these, the Company incurred spend, including engineering, permitting, administrative, construction,

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<sup>1</sup> See 49 CFR 192.755 <https://www.govinfo.gov/content/pkg/CFR-2013-title49-vol3/pdf/CFR-2013-title49-vol3-sec192-755.pdf>.

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restoration, and other costs, on 98 of them totaling **\$29.015** million. Please see Attachment PUC 1-2-1 (Supplemental) for the list of these projects.

3. Projects that were not included in the Company's proposed FY2023 Gas ISR Plan but the Company began construction on them for reasons such as cast-iron encroachments by third parties, rush mains due to material condition, projects ahead of paving by municipalities, high risk scoring, specialty resource availability, among others. In addition, this category includes spend on projects that had preparatory charges, such as engineering or material purchases during FY2023 in preparation for execution in a future fiscal year. There was a total of **195** projects in this category totaling **\$32.362** million. Please see Attachment PUC 1-2-2 (Supplemental) for the list of these projects. Please see Attachment PUC 1-2-3 (Supplemental) for explanations of the main drivers for advancing them.

Projects within the Proactive Main Replacement program that formed basis for the original \$78,918,000 budget.

Sub-Category	Project Description	FY 2023 Actual	FY 2023 Actual	Original Total
		Spend	Spend	Project Estimate
		Submitted 8/23/23	Revised 8/25/23	
Main Replacement Leak Prone Pipe	1016-1100 Hope St, PVD (main)	\$ 6,266	\$ 6,265	\$ 529,941
	1-101 Greeley Av, WWK	\$ 264,957	\$ 264,977	\$ 431,737
	111-320 Greeley Av, WWK	\$ 489,687	\$ 500,528	\$ 1,077,398
	1-118 Potters Av, PVD	\$ 856,497	\$ 856,553	\$ 1,659,650
	1-173 Woonasquatucket Av, NPV	\$ 3,887	\$ 3,888	\$ 1,455,886
	127-250 Mendon Rd, CLD	\$ 88,342	\$ 89,550	\$ 329,640
	13-27 Redwood Dr, NPV (main)		\$ -	\$ 280,262
	1-87 Packard St, CRA	\$ 1,173,253	\$ 1,196,936	\$ 1,624,339
	1970-2117 Pawtucket Av, EPV	\$ 1,093,289	\$ 1,093,347	\$ 1,506,136
	224-259 East Av, PAW	\$ 3,155	\$ 3,157	\$ 308,745
	315-433 Elmwood Ave, PVD (main)	\$ 6,516	\$ 6,516	\$ 2,151,347
	332-458 River St, WSO	\$ 1,453	\$ 1,453	\$ 446,544
	336-463 Benefit St, PVD	\$ 1,467	\$ 1,466	\$ 1,450,519
	364-420 Wellington Av, CRA	\$ 1,409	\$ 1,409	\$ 446,364
	46-52 Top St, PVD	\$ 527	\$ 527	\$ 118,501
	47-53 Railroad Ave, WLY (main)	\$ 248,092	\$ 248,826	\$ 335,341
	481-604 Blackstone St, WSO	\$ 10,496	\$ 10,496	\$ 585,997
	504-546 Smithfield Av, PAW	\$ 1,021,080	\$ 1,036,068	\$ 1,344,035
	55-120 Ellery St, PVD	\$ 728	\$ 728	\$ 1,648,557
	578-776 Plainfield St, PVD	\$ 649	\$ 649	\$ 988,911
	696-786 Atwood Av, CRA	\$ 289,546	\$ 290,432	\$ 1,143,491
	70-250 Centerville Rd, WWK	\$ 3,286	\$ 3,286	\$ 1,302,918
	74-131 Pequot Av, WWK	\$ 149,604	\$ 149,744	\$ 211,503
	8-56 Spring St, NPR (main)	\$ 1,207	\$ 1,207	\$ 1,410,000
	936-1074 Mineral Spring Av, NPV	\$ 815	\$ 815	\$ 1,611,212
	Abbott St, CLD	\$ 571,139	\$ 571,164	\$ 1,101,316
	Alden Av, WWK	\$ 1,422	\$ 1,423	\$ 145,700

Projects within the Proactive Main Replacement program that formed basis for the original \$78,918,000 budget.

Sub-Category	Project Description	FY 2023 Actual	FY 2023 Actual	Original Total
		Spend	Spend	Project Estimate
		Submitted 8/23/23	Revised 8/25/23	
	Anthony Av, PVD	\$ 409	\$ 409	\$ 1,412,393
	Arnolds Neck Dr, WWK	\$ 770	\$ 770	\$ 72,643
<b>Main Replacement Leak Prone Pipe (continued)</b>				
	Bald Hill Rd, CRA	\$ 298	\$ 298	\$ 98,115
	Baltimore St, PVD	\$ 935	\$ 935	\$ 405,156
	Barstow St, PVD		\$ -	\$ 1,027,152
	Bath St, PVD	\$ 570	\$ 570	\$ 1,013,014
	Bay Spring Av, BRG	\$ 247	\$ 247	\$ 313,202
	Bishop Av, EPV	\$ 248,129	\$ 248,156	\$ 529,092
	Burton St, BST	\$ 996,061	\$ 1,023,496	\$ 956,180
	Cass Av, WSO	\$ 668,064	\$ 674,206	\$ 591,359
	Center St, BST	\$ 434,512	\$ 444,756	\$ 479,428
	Chalapa Av, WSO	\$ 161,080	\$ 161,084	\$ 220,171
	Christine Dr, BRG	\$ 52,056	\$ 52,063	\$ 82,969
	Clark St, CLD	\$ 3,954	\$ 3,955	\$ 632,268
	Cottage St, PAW	\$ 21,050	\$ 21,060	\$ 1,238,799
	Crest Dr, PAW	\$ 850,130	\$ 854,679	\$ 1,793,320
	Croade St, WAN	\$ 20,954	\$ 20,955	\$ 83,288
	Dearborn St, NPR	\$ 278	\$ 278	\$ 275,560
	Dudley St, PVD	\$ 3,309	\$ 3,311	\$ 958,393
	Duncan Av, PVD	\$ 611	\$ 611	\$ 651,240
	E Earle St, CLD	\$ 1,148,255	\$ 1,157,632	\$ 1,583,530
	Eileen Av, CRA	\$ 872,113	\$ 874,525	\$ 571,324
	Emanuel St, NPV	\$ 32,860	\$ 32,875	\$ 837,360
	Fairview St, PVD		\$ -	\$ 395,543
	Frances Av, CRA	\$ 554,862	\$ 555,407	\$ 606,179
	George St, PAW	\$ 91,868	\$ 91,912	\$ 782,575



Projects within the Proactive Main Replacement program that formed basis for the original \$78,918,000 budget.

Sub-Category	Project Description	FY 2023 Actual	FY 2023 Actual	Original Total
		Spend	Spend	Project Estimate
		Submitted 8/23/23	Revised 8/25/23	
	Gesmondi Dr, JOH	\$ 27,408	\$ 27,408	\$ 290,820
	Glenham St, PVD	\$ 708	\$ 708	\$ 710,142
	Glenwood Dr, WWK	\$ 3,197	\$ 3,199	\$ 35,641
	Grover St, NPV	\$ 227,837	\$ 227,858	\$ 314,303
<b>Main Replacement Leak Prone Pipe (continued)</b>				
	Hanover St, PVD	\$ 744	\$ 743	\$ 1,191,863
	Harrison St, PAW	\$ 191,638	\$ 200,872	\$ 766,967
	Langdon St, PVD	\$ 740	\$ 740	\$ 1,431,357
	Lincoln Av, PAW	\$ 42,971	\$ 42,975	\$ 219,428
	Long St, WWK	\$ 314,464	\$ 317,928	\$ 346,252
	Maple St, WSO	\$ 74,761	\$ 76,133	\$ 246,126
	Mason St, WAN	\$ 190,675	\$ 192,863	\$ 307,739
	Metropolitan Rd, PVD	\$ 933,857	\$ 938,310	\$ 1,360,488
	Moccasin Dr, WWK	\$ 271,758	\$ 271,758	\$ 913,426
	Morris St, WWK		\$ -	\$ 168,603
	Namquid Dr, WWK	\$ 864,598	\$ 865,595	\$ 1,449,075
	Oak St, CRA	\$ 339,920	\$ 342,137	\$ 694,568
	Old Forge Rd, BRG	\$ 70,134	\$ 70,134	\$ 111,488
	Old River Rd, LNC	\$ 1,439	\$ 1,439	\$ 1,140,911
	Owens St, WWK	\$ 208,642	\$ 208,666	\$ 234,732
	Pequot Av, WWK	\$ 385,661	\$ 385,693	\$ 639,610
	Perkins Av, CRA	\$ 512,585	\$ 522,863	\$ 653,837
	Pierce St, EGW	\$ 630	\$ 630	\$ 49,421
	Pocasset St, JOH		\$ -	\$ 166,893
	Progress St, PAW	\$ 158,210	\$ 158,282	\$ 1,183,830
	Rawlinson Dr, COV	\$ 3,107	\$ 3,108	\$ 283,000
	Read Av, LNC	\$ 288,310	\$ 288,954	\$ 394,975

Projects within the Proactive Main Replacement program that formed basis for the original \$78,918,000 budget.

Sub-Category	Project Description	FY 2023 Actual	FY 2023 Actual	Original Total
		Spend Submitted 8/23/23	Spend Revised 8/25/23	Project Estimate
	Roberta Av, PAW	\$ 715,935	\$ 726,887	\$ 1,194,480
	Rolling Green Rd, NPR		\$ -	\$ 795,654
	Ruggles St, PVD	\$ 651	\$ 651	\$ 549,148
	Sand Pond Rd, WWK	\$ 488,263	\$ 493,164	\$ 740,373
	Sandlewood Av, WWK	\$ 139,306	\$ 139,346	\$ 145,757
	Seneca Av, PAW	\$ 8,581	\$ 8,582	\$ 756,245
<b>Main Replacement Leak Prone Pipe (continued)</b>				
	Smith St, LNC	\$ 652,691	\$ 652,852	\$ 913,904
	Spruce St, PVD	\$ 360	\$ 360	\$ 459,083
	Standish Av, CRA	\$ 81,880	\$ 81,984	\$ 98,701
	Staniford St, PVD	\$ 1,133	\$ 1,133	\$ 202,685
	Stone Av, WWK	\$ 403,092	\$ 409,696	\$ 324,303
	Summer St, WSO	\$ 1,160,719	\$ 1,187,127	\$ 2,103,825
	Viewesta Rd, WWK	\$ 31,717	\$ 31,720	\$ 54,453
	Wasaga Rd, PAW	\$ 144,411	\$ 147,573	\$ 167,311
	Washington St, NKS	\$ 1,060	\$ 1,060	\$ 109,834
	Washington St, PVD	\$ 469	\$ 469	\$ 2,256,470
	Whipple St, CLD	\$ 2,178	\$ 2,179	\$ 84,959
	Wood St, WWK	\$ 1,068,705	\$ 1,068,819	\$ 1,210,088
	Woonsocket Hill Rd, NSF	\$ 607,350	\$ 615,992	\$ 787,944
	Yale Av, PVD	\$ 73	\$ 73	\$ 100,315
<b>Main Repl Leak Prone Pipe Total</b>		<b>\$ 23,074,714</b>	<b>\$ 23,284,261</b>	<b>\$ 71,617,269</b>
<b>Atwells Ave - Project</b>				
	Atwells Av - Section 3, PVD	\$ 506	\$ 506	\$ 987,131
	Atwell Av - Section 1 & 2, PVD	\$ 2,753,834	\$ 2,753,251	\$ 6,241,763
<b>Atwells Ave - Project Total</b>		<b>\$ 2,754,340</b>	<b>\$ 2,753,757</b>	<b>\$ 7,228,894</b>

Projects within the Proactive Main Replacement program that formed basis for the original \$78,918,000 budget.

<b>Sub-Category</b>	<b>Project Description</b>	<b>FY 2023 Actual Spend Submitted 8/23/23</b>	<b>FY 2023 Actual Spend Revised 8/25/23</b>	<b>Original Total Project Estimate</b>
<b>CISBOT</b>	1092-1247 Chalkstone Av - CISBOT, P	\$ 1,196,267	\$ 1,196,386	\$ 890,060
	Thames St (Section 1), NPR - CISBOT	\$ 1,092,611	\$ 1,105,786	\$ 851,665
	Tobey St (2 of 2), PVD (CISBOT)	\$ 674,231	\$ 674,526	\$ 602,982
<b>CISBOT Total</b>		<b>\$ 2,963,109</b>	<b>\$ 2,976,698</b>	<b>\$ 2,344,707</b>
<b>Grand Total</b>		<b>\$ 28,792,164</b>	<b>\$ 29,014,716</b>	<b>\$ 81,190,871</b>

Projects which did not start in FY 2023 but which had preparatory charges in FY 2023

Sub-Category	Project Title	FY 2023 Actual Spend	
		Submitted 8/23/23	Revised 8/25/23
Main Repl Leak Prone Pipe	10-37 Whitehall St, PVD (main)	\$ 325	\$ 325
	10-86 Balding Rd, BRG (service)	\$ 26	\$ 26
	1088-1131 Main St, PAW	\$ 15,494	\$ 15,494
	11-35 Herbert st, PVD (service)	\$ 241	\$ 241
	1207-1275 Elmwood Av, PVD (s	\$ 638	\$ 638
	125-201 Washington St, PVD	\$ 206	\$ 206
	1294 Atwood Av, JOH (main)	\$ 1,093	\$ 1,093
	133-164 Delaine St, PVD (main)	\$ 452	\$ 452
	1423-1741 Atwood Av, JOH	\$ 883	\$ 883
	143-212 Greenwood St, CRA	\$ 8,329	\$ 8,329
	1536-1600 Cranston St, CRA	\$ 16,494	\$ 16,494
	1570-1704 Mendon Rd, CLD	\$ 956	\$ 957
	2145-2289 Pawtucket Av, EPV	\$ 10,932	\$ 10,932
	215-385 Union Ave, CRA (service)	\$ (1,126)	\$ (1,126)
	231-319 Mendon Av, PAW	\$ 13,326	\$ 13,326
	25-90 N Broadway, EPV	\$ 9,705	\$ 9,705
	307-349 Hope St, PVD	\$ 391	\$ 391
	330-505 Silver Spring Av, PVD	\$ 20,506	\$ 20,506
	391-480 Woodward Rd, NPV	\$ 675	\$ 675
	41-134 Mitchell St, PVD (service)	\$ 2,013	\$ 2,013
	419-584 N Broadway, EPV	\$ 14,452	\$ 14,477
	50-81 Roger Williams Ct, PVD (main)	\$ 28	\$ 28
	531-690 Manton Av, PVD	\$ 9,920	\$ 9,920
	553-591 Hartford Ave, PVD (service)	\$ 45,949	\$ 45,949
	585-665 Main St, PAW	\$ 542	\$ 542
	607-783 Mendon Rd, WSO	\$ 8,298	\$ 8,298
65-153 Manton Av, PVD	\$ 15,322	\$ 15,322	

Projects which did not start in FY 2023 but which had preparatory charges in FY 2023

Sub-Category	Project Title	FY 2023 Actual Spend Submitted 8/23/23	FY 2023 Actual Spend Revised 8/25/23
	68-151 Bay View Av, BST	\$ 1,438	\$ 1,438
	697-908 Eddy St, PVD	\$ 513	\$ 513
<b>Main Repl Leak Prone Pipe (continued)</b>	72-281 Old Pocasset Rd, JOH	\$ (1,300)	\$ (1,300)
	873-1010 Cranston St, CRA	\$ 7,137	\$ 7,137
	962-1092 Main St, WAN	\$ 14,819	\$ 14,819
	Abbott St, PVD	\$ 270	\$ 270
	Accrual - Mandated- Leak Prone Pipe	\$ (251,537)	\$ (251,537)
	Anthony Dr, CLD	\$ 251	\$ 251
	Ashby St, JOH	\$ 243	\$ 243
	Atlantic Blvd, NPV	\$ 1,047	\$ 1,047
	Barstow St, PVD	\$ 12,537	\$ 12,537
	Beach St, WLY (main)	\$ 4	\$ 4
	Borah St, NPV	\$ 219	\$ 235
	Boyle Av, CLD	\$ 4,667	\$ 4,667
	Bradford St, BST	\$ 17,931	\$ 18,031
	Broadmoor Rd, CRA	\$ 20,548	\$ 21,436
	Burlington St, PVD	\$ 5,175	\$ 5,175
	Burnside St, PVD	\$ 909	\$ 909
	Carr St, PVD (main)	\$ 329	\$ 329
	Catherine St, NPR	\$ 12,275	\$ 12,275
	Church Ln, NKS	\$ 780	\$ 780
	Columbus Av, PAW	\$ 216	\$ 216
	Conant St, PAW	\$ 345	\$ 345
	Constitution St, BST	\$ 1,436	\$ 1,436
	Cranston St, PVD	\$ 158	\$ 158
	Dewey St, WSO	\$ 734	\$ 734

Projects which did not start in FY 2023 but which had preparatory charges in FY 2023

Sub-Category	Project Title	FY 2023 Actual Spend Submitted 8/23/23	FY 2023 Actual Spend Revised 8/25/23
	Dexter St - Envirojetting, PVD	\$ 11	\$ 11
	E Capalbo Dr, WLY	\$ 2,597	\$ 2,597
	Fales St, CFL	\$ 512	\$ 512
	Fountain St, CLD	\$ 5,419	\$ 5,419
<b>Main Repl Leak Prone Pipe (continued)</b>	Fourth Av, EGW	\$ 236	\$ 236
	Gallup St, PVD	\$ 294	\$ 294
	Gladstone St (main)	\$ 1,047	\$ 1,053
	Glenside Rd, CLD	\$ 10,365	\$ 10,365
	Gloucester St, PVD (main)	\$ 145	\$ 145
	Gorizia St, PAW	\$ 166	\$ 166
	Governors Dr, WWK	\$ 309	\$ 309
	Greenville Av, SMF	\$ 158	\$ 158
	Harding Av, JOH	\$ 3,416	\$ 3,416
	Herschel St, PVD	\$ 25,892	\$ 25,892
	Ivy St, PVD	\$ 809	\$ 809
	Lambert Av, WSO	\$ 253	\$ 253
	Lefrancois Blvd, WSO	\$ 6,943	\$ 6,943
	Lincoln St, WSO	\$ 11,738	\$ 11,738
	Link St, WWK	\$ 13,604	\$ 13,857
	Lowden St, PAW	\$ 14,514	\$ 14,514
	Main St, NSF	\$ 390	\$ 390
	Maple Ave (main)	\$ 522	\$ 522
	Mason St (service)	\$ 0	\$ -
	Memorial Dr, PAW	\$ 158	\$ 158
	Miles Av, NPV	\$ 507	\$ 507
	Morse Av, NSF	\$ 6	\$ 6

Projects which did not start in FY 2023 but which had preparatory charges in FY 2023

Sub-Category	Project Title	FY 2023 Actual Spend Submitted 8/23/23	FY 2023 Actual Spend Revised 8/25/23
	Mullen Av, CLD	\$ 9,326	\$ 9,326
	N Broadway, EPV	\$ 706	\$ 706
	Narragansett Av, PVD	\$ 28,990	\$ 28,990
	New London Av - Envirojetting, CRA	\$ 231	\$ 232
	North St, JOH	\$ 359	\$ 359
	Northup Ave PVD	\$ 508	\$ 508
<b>Main Repl Leak Prone Pipe (continued)</b>	Ohio Av, PVD	\$ 171	\$ 171
	Old Main St, LNC	\$ 15,447	\$ 15,447
	Olney St, PVD	\$ 15,700	\$ 15,793
	Olney St, PVD (service)	\$ 1,470	\$ 1,538
	Osgood St, JOH	\$ 406	\$ 406
	Park Pl, WSO	\$ 444	\$ 444
	Parkside Dr, WWK	\$ 10,622	\$ 10,622
	Pavilion Av, EPV	\$ 5,365	\$ 5,364
	Pearl Av, EPV	\$ 269	\$ 269
	Pleasant St, NKS	\$ 6,424	\$ 6,428
	Post Rd (main)	\$ (541)	\$ (541)
	RIDOT I-195 Cont14 Service Relys	\$ 1,730	\$ 1,744
	S Fairview St, JOH	\$ 1,366	\$ 1,366
	Sackett St, PVD	\$ 242	\$ 242
	Second Av, WSO	\$ 755	\$ 771
	Sidney Av, WSO	\$ 8,471	\$ 8,471
	Smith St, CRA	\$ 259	\$ 259
	Smith St, NPV	\$ 349	\$ 349
	Somerset St, PVD	\$ 375	\$ 375
	Spooner Av, WWK	\$ 2,615	\$ 2,615

Projects which did not start in FY 2023 but which had preparatory charges in FY 2023

Sub-Category	Project Title	FY 2023 Actual Spend Submitted 8/23/23	FY 2023 Actual Spend Revised 8/25/23
	Sterling St, EPV	\$ 5,325	\$ 5,325
	Tennyson Rd, WWK	\$ 13	\$ 13
	Third Av, EGW	\$ 236	\$ 236
	Third Av, WSO	\$ 32,886	\$ 32,931
	Tiffany Cir, BRG	\$ 28	\$ 28
	Tilley Av, NPR	\$ 323	\$ 323
	Upland Av, EGW	\$ 753	\$ 753
	W Hill Dr, CRA	\$ 9,415	\$ 9,415
<b>Main Repl Leak Prone Pipe (continued)</b>	Walker St, LNC	\$ 23,809	\$ 23,808
	Ward Av, WLY	\$ 10,471	\$ 10,471
	Warwick Av, WWK	\$ 24,873	\$ 25,708
	Washington Av, PVD	\$ 4	\$ 4
	Water St, EGW	\$ 707	\$ 707
	Waterman Av, EPV	\$ 664	\$ 664
	Watson St, WWK	\$ 15,832	\$ 15,832
	Webster St, NPR (main)	\$ 390	\$ 390
	Wellington Av, CRA	\$ 2,940	\$ 2,960
	West St, WSO	\$ 11,572	\$ 11,590
	Whitman St, PAW	\$ 216	\$ 216
	Winrooth Av, PVD	\$ 1,180	\$ 1,180
	Rt 10 S Offramp @ Union Av, PVD		\$ 11,835
	Oxford St, PVD <sup>1</sup>	--	
<b>Main Repl Leak Prone Pipe Total</b>		<b>\$ 423,274</b>	<b>\$ 415,156</b>
<b>Cast Iron Main Lining-RI</b>	N Main St - LINING, PVD	\$ 1,117	\$ 1,117
	Petteys Av (16" 10#) - LININ	\$ 439	\$ 439



Projects which did not start in FY 2023 but which had preparatory charges in FY 2023

Sub-Category	Project Title	FY 2023 Actual Spend	
		Submitted 8/23/23	Revised 8/25/23
	Oxford St, PVD <sup>1</sup>	\$ 23,025	\$ 23,025
<b>Cast Iron Main Lining-RI Total</b>		<b>\$ 24,581</b>	<b>\$ 24,581</b>
<b>CISBOT</b>	1-94 Legion Wy - CISBOT, CRA	\$ 109,831	\$ 109,831
	55-189 Canal St - CISBOT, PVD	\$ 2,138	\$ 11,013
	Early St - CISBOT, PVD	\$ 92,589	\$ 92,589
	Killingly St, JOH - CISBOT	\$ 59,503	\$ 59,503
	Thames St (Section 3) - CISBOT, NPR	\$ 11,116	\$ 11,785
<b>CISBOT Total</b>		<b>\$ 275,176</b>	<b>\$ 284,721</b>
<b>Grand Total</b>		<b>\$ 699,567</b>	<b>\$ 724,458</b>

1. Previously reported as Proactive Main Replacement

Projects that were advanced into FY 2023 but not included in the FY 2023 ISR Plan with Main Drivers and Main Condition

Category	Project Title	Risk Score	Main Driver for FY 2023 Advancement	FY 2023 Spend Submitted 8/23/23	FY 2023 Spend Revised 8/25/23	Project Estimate
Main Repl Leak Prone Pipe	1-34 Central Av, PAW	21.03	Risk Score	\$ 181,882	\$ 183,690	\$ 724,193
	1-45 Bay View Av, BST	10.86	Risk Score	\$ 256,188	\$ 256,859	\$ 244,641
	1-47 Marquette Dr, WWK (main)	10.51	Risk Score	\$ 532,345	\$ 533,989	\$ 897,597
	156-277 Narragansett Pkwy, WWK	10.91	Risk Score	\$ 760,462	\$ 774,688	\$ 854,015
	163-279 Diamond Hill Rd, WWK	3.29	Contingent	\$ 339,243	\$ 354,132	\$ 425,901
	211-299 Woonasquatucket Av, NPV	16.75	Risk Score/ Leak Activity	\$ 3,965,521	\$ 4,004,321	\$ 4,118,403
	336-642 Allens Av - 16" 10# CI Aban	2.48	Contingent	\$ 124,352	\$ -	\$ 212,101
	434-642 Allens Av - 20" 7# CI Aband	14.17	Risk Score	\$ 137,057	\$ -	\$ 173,065
	589-700 Hartford Av, PVD	22.05	Risk Score	\$ 1,073,583	\$ 1,081,689	\$ 1,380,475
	660-1119 Reservoir Av, CRA	12.69	Ahead of Paving	\$ 3,752,721	\$ 3,774,006	\$ 3,308,418
	75-130 Homewood Av, NPV	14.5	Risk Score	\$ 527,320	\$ 529,851	\$ 603,181
	969-1300 Park Av, CRA	15.58	Risk Score	\$ 1,091,627	\$ 1,091,627	\$ 2,388,858
	99-129 Brightridge Av, EPV	13.04	Ahead of Paving	\$ 522,439	\$ 522,790	\$ 814,127
	Appleton St, CRA	12.78	Risk Score	\$ 556,202	\$ 556,598	\$ 896,482
	Bell Av, EPV	16.05	Ahead of Paving	\$ 163,418	\$ 165,178	\$ 257,193
	Bellevue Av, NPV	11.3	Risk Score	\$ 671,989	\$ 688,644	\$ 688,746
	Benefit St, WWK	16.96	Risk Score	\$ 7,914	\$ 7,914	\$ 130,416
	Benjamin Dr, NPV (main)	16.37	Ahead of Paving	\$ 152,281	\$ 152,281	\$ 40,204
	Bicentennial Wy, NPV	7.7	Rush Main	\$ 734,385	\$ 739,847	\$ 824,819
	Calderwood Dr, WWK	10.83	Risk Score	\$ 517,852	\$ 520,499	\$ 545,073
	Canonchet Av, WWK	12.49	Risk Score	\$ 369,987	\$ 379,014	\$ 594,733
	Carrie Av, EPV	12.33	Risk Score	\$ 111,630	\$ 111,928	\$ 178,359
	Case St, EPV	7.73	Ahead of Paving	\$ 232,685	\$ 232,832	\$ 119,540
	Central Av, EPV	14.93	Ahead of Paving	\$ 869,889	\$ 887,995	\$ 1,199,461
	Charles Av, WLY	4.41	Logistics	\$ 169,822	\$ 169,839	\$ 210,248
	Cornell Av, EPV	15.27	Risk Score	\$ 111,516	\$ 111,536	\$ 141,660
	Cumberland Hill Rd - 12 inch 60# ba	N/A	Rush Main	\$ 776	\$ 815	\$ -
	Eddy St, PVD	11.14	Ahead of Paving	\$ 1,102,474	\$ 1,102,568	\$ 1,373,399
	Eldridge St, Cranston AR main	10.7	Risk Score	\$ 468,150	\$ 473,589	\$ 624,683
	Ferncliff Av, NPV	11.22	Risk Score	\$ 223,051	\$ 223,067	\$ 190,410
	Ferris Av, EPV	8.33	Ahead of Paving	\$ 259,801	\$ 259,822	\$ 403,695
	Forest Av, CRA	10.4	Risk Score	\$ 965,603	\$ 966,605	\$ 1,509,516
	Gardiner Av, LNC	8.81	Contingent	\$ 10,809	\$ 10,809	\$ 119,079
	Geldard St, CLD	7.42	Encroachment	\$ 179,094	\$ 182,812	\$ 379,124

Projects that were advanced into FY 2023 but not included in the FY 2023 ISR Plan with Main Drivers and Main Condition

Category	Project Title	Risk Score	Main Driver for FY 2023 Advancement	FY 2023 Spend		Project Estimate
				Submitted 8/23/23	Revised 8/25/23	
	Greene St, NSF	6.15	Leak Activity	\$ 212,300	\$ 215,031	\$ 312,781
	Hazel St, LNC	5.78	Logistics	\$ 42,962	\$ 42,962	\$ 904,636
	Holland Av, EPV	3.88	Logistics	\$ 129,201	\$ 129,305	\$ 173,808
<b>Main Repl Leak Prone Pipe (continued)</b>	Indian Rd, EPV	5.71	Logistics	\$ 417,658	\$ 417,677	\$ 443,180
	Lake Shore Dr, WWK	2.49	Ahead of Paving	\$ 1,013,953	\$ 1,014,859	\$ 2,175,646
	Linden Dr, PVD	24.54	Risk Score	\$ 166,483	\$ 177,205	\$ 140,963
	Lonsdale Av, CFL (main)	10.76	Ahead of Paving	\$ 986,179	\$ 986,871	\$ 920,955
	Meadowbrook Dr, CLD	18.69	Ahead of Paving	\$ 92,792	\$ 93,841	\$ 220,804
	Memorial Blvd, NPR	13	Encroachment	\$ 1,026,531	\$ 1,045,403	\$ 774,141
	Mill St, CLD	9.15	Contingent	\$ 130,041	\$ 130,043	\$ 449,413
	Morse Av, WWK	1.63	Rush Main	\$ 459,149	\$ 459,190	\$ 558,419
	Naples Av, PVD	16.01	Risk Score	\$ 1,189,331	\$ 1,190,515	\$ 1,704,815
	Nimitz Rd, EPV	11.92	Ahead of Paving	\$ 616,682	\$ 617,322	\$ 920,905
	Oak St, WLY	2.72	Leak Activity	\$ 218,675	\$ 218,725	\$ 256,514
	Oakdale Av, PAW	16.3	Risk Score	\$ 43,334	\$ 43,338	\$ 527,863
	Prospect St, CRA	14.6	Risk Score	\$ 886,064	\$ 888,951	\$ 792,591
	Reardon Av, EPV	2.4	Ahead of Paving	\$ 286,984	\$ 290,905	\$ 529,237
	Redfern St, NPV	11.67	Risk Score	\$ 157,878	\$ 157,954	\$ 267,628
	Russell Ln, SMF	2.55	Logistics	\$ 178,616	\$ 178,627	\$ 228,432
	Sweet St, SMF	2.79	Logistics	\$ 144,195	\$ 144,207	\$ 160,732
	Victory Av, WWW	8.4	Logistics	\$ 149,199	\$ 152,793	\$ 103,651
	Winrooth Av, PVD	25.56	Risk Score	\$ 516,017	\$ 516,079	\$ 832,943
<b>Main Repl Leak Prone Pipe Total</b>				<b>\$ 30,208,290</b>	<b>\$ 30,163,636</b>	<b>\$ 39,971,872</b>
<b>Cast Iron Main Lining-RI</b>	<b>336-642 Allens Av - 16" 10# CI Aban<sup>1</sup></b>				\$ 227,644	\$ 212,101
	<b>434-642 Allens Av - 20" 7# CI Aband<sup>1</sup></b>				\$ 272,956	\$ 173,065
					<b>\$ 500,600</b>	<b>\$ 385,166</b>
<b>CISBOT</b>	<b>94-188 Legion Wy - CISBOT, CRA</b>	9.21	CISBOT	\$ 810,384	\$ 811,057	\$ 623,607
	<b>Thames St (Section 2) - CISBOT, NPR</b>	6.87	CISBOT	\$ 161,823	\$ 162,679	\$ 1,018,819
<b>CISBOT Total</b>				<b>\$ 972,206</b>	<b>\$ 973,737</b>	<b>\$ 1,642,426</b>
<b>Grand Total</b>				<b>\$ 31,180,496</b>	<b>\$ 31,637,973</b>	<b>\$ 41,999,464</b>

1. Previously reported as Proactive Main Replacement

**PUC 8-3-2: FY2023**

Projects completed under the Discretionary classification in FY2023 for reactionary factors.

Plan Year	WO#	Project Title	Town	Program	Work Type
FY23	90000185694	Sessions St, PVD	PVD	Integrity	Ahead of Paving
FY23	90000175690	Vinton St, PVD	PVD	Integrity	Rush Main
FY23	90000172062	Benjamin Dr NPV	NPV	Integrity	Ahead of Paving
FY23	90000155107	Union Av, PVD	PVD	Integrity	Ahead of Paving
FY23	90000143075	1207-1275 Elmwood Av, PVD	PVD	Integrity	Ahead of Paving
FY23	90000142626	392-498 Douglas Av, PVD	PVD	Integrity	Other
FY23	90000194355	Branch Av, PVD	PVD	Integrity	Ahead of 3rd Party
FY23	90000194428	Blackstone St, WSO	WSO	Integrity	Ahead of Paving
FY23	90000185662	Memorial Blvd NPR	NPR	Integrity	Encroachment
FY23	90000194373	Terrace Av, PVD	PVD	Integrity	Ahead of Paving
FY23	90000212444	380-433 Lonsdale Av PAW	PAW	Integrity	Ahead of Paving
FY23	90000211854	Waterman Av NPV	NPV	Integrity	Contingent
FY23	90000211548	Summit Av NSF	NSF	Integrity	Contingent
FY23	90000204642	Slade St PAW	PAW	Integrity	Contingent
FY23	90000211538	Fenner St, PAW	PAW	Integrity	Contingent
FY23	90000211188	Cherry St, PAW	PAW	Integrity	Ahead of Paving
FY23	90000194305	Wannamoissett Rd EPV	EPV	Integrity	Ahead of Paving
FY23	90000194304	Vineyard Av EPV	EPV	Integrity	Associated w/ Reg Work
FY23	90000216931	Ten Rod Rd NKS	NKS	Reliability	Ahead of Paving
FY23	90000216932	Franklin St, WAN	WAN	Reliability	Ahead of Paving
FY23	90000219454	Lisbon St PVD	PVD	Integrity	Rush Main
FY23	90000210490	Pleasant St CLD	CLD	Integrity	Ahead of Paving
FY23	90000218412	Case St, EPV	EPV	Integrity	Ahead of Paving
FY23	90000218031	Burton St BST	BST	Integrity	Encroachment
FY23	90000218350	Nimitz Rd, EPV	EPV	Integrity	Ahead of Paving
FY23	90000223708	Morse Av, WWK	WWK	Integrity	Rush Main
FY23	90000218415	Bishop Av, EPV	EPV	Integrity	Ahead of Paving

**PUC 8-3-2: FY2023**

Projects completed under the Discretionary classification in FY2023 for reactionary factors.

Plan Year	WO#	Project Title	Town	Program	Work Type
FY23	90000218379	Bell Av, EPV	EPV	Integrity	Ahead of Paving
FY23	90000220556	Cobble Hill Rd LNC	LNC	Reliability	Associated w/ Reg Work
FY23	90000218042	Smith St, LNC	LNC	Integrity	Ahead of Paving
FY23	90000218482	Ferris Av, EPV	EPV	Integrity	Ahead of Paving
FY23	90000212440	Cass Av, WSO	WSO	Integrity	Associated w/ Reg Work
FY23	90000220576	1235-1279 Wampanoag Trl, EPV	EPV	Reliability	Ahead of RIDOT Paving
FY23	90000175417	632-710 Lonsdale Av CFL	CFL	Integrity	Ahead of Paving
FY23	90000219212	99-129 Brightridge Av EPV	EPV	Integrity	Ahead of Paving
FY23	90000225745	Bicentennial Wy, NPV	NPV	Integrity	Rush Main
FY23	90000216520	Scott Rd Test Pits CLD	CLD	Reliability	Contingent
FY23	90000219815	170 Crompton Av EGW	EGW	Growth	Rush Main
FY23	90000229704	481 Broadway St PAW	PAW	Growth	Rush Main
FY23	90000218468	Reardon Av EPV	EPV	Integrity	Ahead of Paving
FY23	90000229823	Thackery St PVD	PVD	Integrity	Rush Main
FY23	90000221899	Lake Shore Dr, WWK	WWK	Integrity	Ahead of Paving
FY23	90000229127	Normandy Dr WWK	WWK	Integrity	Rush Main
FY23	90000150319	Marquette Dr, WWK	WWK	Integrity	Contingent
FY23	90000228264	Orient St WWK	WWK	Integrity	Contingent

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  
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PUC 8-4

Request:

Please provide a second version of the Table in the response to PUC 7-12 which separately states for each project: (i) the original estimated CISBOT cost, if any, (ii) the original estimated cost for CI Lining, if any, (iii) the spending that occurred through Q1 for each category of work, (iv) the amount the Company is now forecasting for each type of work that will be spent for each project in FY 2024, (v) the amount the Company is now forecasting for each type of work that will be spent for each project to completion, and (vi) the variance between the original cost estimates and the forecast for each type of work to completion.

Response:

Please see the table below for the requested information.

Project	Project Type	Original Estimate	Q1 Spending	FY2024 Forecast	Total Forecast	Variance Between Cost Estimate and Forecast (over)/under
Thames St. (Section 1), Newport	CISBOT	\$851,666	-\$6,658	\$0	\$1,172,825	(\$321,159)
Thames St. (Section 2), Newport	CISBOT	\$1,018,819	\$1,021,139	\$1,202,163	\$1,360,490	(\$341,671)
Thames St. (Section 3), Newport	CISBOT	\$971,804	\$802,923	\$829,242	\$842,654	\$129,150
Early St., Providence	CISBOT	\$750,711	\$820,897	\$971,049	\$1,055,669	(\$304,958)
1-94 Legion Wy, Cranston	CISBOT	\$1,292,663	\$101,058	\$1,208,164	\$1,323,027	(\$30,364)
Russell St., Providence	CISBOT	\$1,492,205	\$103,175	\$1,492,205	\$1,492,205	\$0
55-189 Canal St., Providence	CISBOT	\$641,301	\$673	\$650,000	\$641,301	\$0
Petteys Ave., Providence	Lining		\$35,702	\$45,000	\$45,000	
602-710 Killingly St., Johnston	CISBOT	\$1,326,726	\$103,403	\$103,403	\$1,326,726	\$0
485-684 Chalkstone St., Providence	CISBOT	\$890,060	\$114,562	\$114,562	\$890,060	\$0

The Company’s current Fiscal Year 2024 forecast for these projects is \$6.62 million. The increase over the Quarterly Report for the First Quarter Ending June 30, 2023 is driven by unexpected costs associated with the Thames Street and Early Street projects.

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PUC 8-5

Request:

In the response to PUC 7-2, there is a statement: “the Company does not forecast spending down to an individual project level, by fiscal year.” If the Company does not forecast spending down to an individual project level, please explain whether and how the Commission can reasonably rely upon the Company’s annual spending forecast for the total aggregate spending in the Main Replacement program.

Response:

Because of the large number of projects in the Proactive Main Replacement portfolio at any given time, the Company has developed aggregate measures of expenditure versus production output, that is, miles of main installation and abandonment. The Company tracks the production output of its various resources, such as contractor construction and paving crews, and Company Customer Meter Service and Field Operations technicians, versus time and cost and uses this data to develop in-year forecasting as well as to inform its budget building for future years. The Company’s year-end spend for this category typically has fallen within a few percent of the third quarter forecast, which shows the Company monitors and controls its spending in this category.

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PUC 8-6

Request:

At the time of filing its annual Gas ISR proposal, is the Company able to reasonably identify the main replacement projects which are “carry-over work” that the Company expects will be a part of the spending that occurs in the prospective fiscal year? Please explain.

Response:

To a certain degree, the Company is able to identify projects that will carry over into a following fiscal year when the Company finalizes its budget in early December of each year. In the late summer and early fall period, the Company reviews all in-progress work and forecasts which projects are likely to reach the abandonment stage given different variables such as project state, resource availability, likelihood of being allowed by the permitting authority to continue working through the winter, difficulty of final abandonment work, and other factors. Once the Company identifies the projects that are likely to reach abandonment, the Company concentrates its resources and efforts on those, and the remaining projects will then be identified as “carry-over” for the following year. This project list is subject to change as circumstances such as weather, operational obstacles, resourcing, or other factors change throughout the final quarter of the fiscal year. Changes to these factors may allow additional projects to be completed ahead of forecast or other projects to be added to the carry-over list.



PUC 8-7

Request:

In response to Division 1-22 that was provided in Docket 22-54-NG in the Company's original filing, the Division requested a list of six proposed CISBOT projects that were included in the Company's initial plans. The total cost of those six projects sums to approximately \$5.5 million.

- (a) Please explain why the Company only budgeted for \$3.994 million in the Main Replacement (Proactive) – Large Diameter LPCI program, given its CISBOT estimates.
- (b) Please explain what caused such a significant shift in spending from the date of approval and why this was not identified as an issue during the ISR hearings in March of this year, less than two weeks before the beginning of Q1 of the ISR fiscal year.

Response:

- (a) The Company's response to Division 1-22 was related to the Company's proposed 21-month plan. The Company trimmed several projects out of this initial proposal to bring the 12-month plan back in line with what it believed could be reasonably executed during the FY2024 construction season.
- (b) The Company has a prospective portfolio of many large diameter pipeline rehabilitation and refurbishment projects in development at any given time. Although the Company only identified \$3.994 million worth of these projects in the proposed FY2024 Gas ISR Plan, it had several more in late-stage development. As explained in the Company's responses to PUC 7-5 and PUC 8-8, large diameter pipeline rehabilitation and refurbishment projects, like CISBOT and Cured-in-Place Lining projects, utilize proprietary methods and equipment undertaken by specialty vendors. The Company was able to take advantage of favorable weather to begin its first CISBOT project for the calendar 2023 construction season in late FY2023. Additional projects followed, one after the other, and it soon became clear that the Company would be able to retain and continue to utilize the specialty resource, in coordination with permitting and other pre-construction activities, to extend this program further than initially anticipated for FY2024, while keeping the overall Gas ISR Plan forecast reasonably close to budget and without exceeding the Plant In-Service target.

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PUC 8-8

Request:

In response to PUC 7-5, the Company states that it “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.” If these projects were creating a high risk and implicated prudency considerations, why did the Company not identify these projects in March of this year during the Commission’s review of the capital spending plan and disclose the need to adjust the budget to the Commission?

Response:

CISBOT projects rely on a single contractor with a limited number of resources. From a resource and scheduling perspective, this can be challenging because it results in competition between different utilities to secure the crews necessary to execute CISBOT projects. When the Company allows a crew that has been previously secured to perform CISBOT work to leave and go perform work for another customer, rather than moving them from one Rhode Island Energy project directly to another, it can often be challenging to re-secure their services. Each year, the Company readies more projects than are possible to be executed within the budget to allow for flexibility in the event any project is delayed and/or unworkable because of permitting or scheduling reasons.

There were three sections of CISBOT work planned on Thames Street in Newport, two of which were planned to be completed after the Russell Street and Canal Street projects. With seasonal restrictions always an issue on Thames Street because of the Newport tourism season, those two sections of Thames Street were moved up on the schedule ahead of Early Street, Russell Street, and Canal Street and worked in the late Winter/early Spring timeframe because the contractor was already in the area working the first section of Thames Street in late FY2023. Thames Street is a very busy thoroughfare in the City of Newport, making leaks disruptive to the community and challenging to repair. In addition, the seasonal restrictions leave a short window to allow for planned work to be completed each year. The Company saw an opportunity to ensure these projects were completed by shifting the project schedule, knowing that, if it were to wait on the Thames Street projects/sections, they could not be worked until after Labor Day (which may subject them to the previously mentioned crew scheduling issues), and proceeded accordingly.

Once Thames Street was fully completed, the crew was sent to Early Street, which was the next highest priority job on the list. Upon completion of Early Street, Russell Street was next on the

PUC 8-8, Page 2

list; however, because of the complex nature of the location (much of the main to be rehabilitated is located within the Rhode Island Public Transit Authority bus terminal (another challenging location in which to repair leaks), there were delays in the design and permitting process, and the project was not ready to be worked. Canal Street had seasonal restrictions attached to it and could not be worked until the Fall. Rather than allowing the contractor to leave the area after the Early Street job and risk not being able to get them back once the Russell Street and/or Canal Street jobs were ready to be worked and undershooting the budget and workplan targets for the fiscal year, the decision was made to have the CISBOT contractor next work the Legion Way project in Cranston. This project was of a similar priority score to the Russell Street and Canal Street projects (11.5 versus 13.0 and 13.8) and was ready to be worked when the Early Street job was wrapping up.

Russell Street and Canal Street were originally the Company's second and third priority projects heading into FY2024 to be completed under the Large Diameter Cast Iron Rehabilitation program. With the fluid approach that must be taken with the program because of the limited contractor resources that can perform the work (in this case CISBOT) and the challenges associated with securing those resources, adjustments in the schedule were made to address other priority projects that will help meet and exceed rehabilitation goals and maximize available resources. With the pace at which the contractor was able to move through the first four CISBOT projects to start FY2024 and the timing of the completion of Legion Way lining up with the workability of Russell Street and Canal Street, the Company was presented with the opportunity to perform more CISBOT work in FY2024 than it originally thought possible allowing for the completion of these priority projects.

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PUC 8-9

Request:

Refer to PUC 7-9 and 7-10.

- (a) When did the Company “re-visit” the work scopes relating to the Gas System Reliability projects?
- (b) When did work commence on the \$3.7 million Greenwich Ave project?
- (c) Why did the Company not identify the need to do the Greenwich Ave project in March when the FY 2024 plan was being considered by the Commission?

Response:

- (a) The Company began a comprehensive review of the Gas System Reliability program early in calendar year 2023 following the addition of several new engineers in the department. The new team reviewed all of the existing proposed projects in light of winter operations and new load forecast data. They also collaborated with other asset management teams to identify synergies and dependencies with upcoming projects to evaluate if there were any projects needing to be rescope, added, or removed. Projects are revisited throughout the year as variables arise that cause the need to re-scope or revisit these types of projects. Some examples of these variables are winter performance data, load forecasts, customer usage data, GIS data, new Synergy software modeling, updated leak scores, regulator station assessments and project plans, unexpected field issues (such as failed flow tests), and paving lists. The Company recently has realigned its Engineering departments, allowing closer collaboration, alignment, and efficiencies of short- and long-term plans across different asset management groups.
- (b) Engineering work commenced for the Greenwich Avenue project earlier in the 2023 calendar year. Field work has not commenced.
- (c) The Greenwich Avenue project first was identified following communications regarding prospective FY2025 Proactive Main Replacement work on Pawtucket Avenue in East Providence and the goal to transfer this low-pressure area to high-pressure. This area is at the extremity of the low-pressure system following previous low- to high-pressure conversions and the low-pressure regulator station abandonment at Dodge at Martin. Through a more extensive review of the area, this

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project will provide multiple system benefits for East Providence customers. Installing the high-pressure lines up Pawtucket Avenue with the appropriately sized main would provide the capability to integrate the single-feed 99 psig station at Wampanoag Trail Gate Station to the 99 psig system north of Interstate 195, which is fed from the Dey Street Gate Station. This also provides for the strategic replacement of the existing low-pressure system in East Providence through the Proactive Main Replacement program beginning in FY2025.

The Company did not make a final decision to move this project into its FY2024 workplan until after the beginning of the fiscal year.

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PUC 8-10

Request:

Please provide a supplementary response to PUC 7-11 which assumes hypothetically (i) that the Company would not be held to any leak prone pipe abandonment targets (thus, there would be no need to advance any Public Works jobs) and (ii) the Company would be required to be on budget or below budget in the Discretionary category (without Gas Expansion).

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 the Gas ISR Plan (excluding the Southern RI Gas Expansion Project).

- 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.

For this data request and the exercise of providing a forecasted plant in service ("PIS") calculation where (i) the Company would not be held to any leak prone pipe abandonment targets and (ii) the Discretionary spending forecast equals the Discretionary budget (without the Southern RI Gas Expansion Project), the Company made the following theoretical adjustments. Please note, the Company does not support this approach (with the exception of reducing the Gas System Reliability forecast) because it would likely delay the timing and reduce the volume of leak prone pipe that would be abandoned in FY2025.

1. \$123.03 million: Current Discretionary Forecast.
2. \$(0.750) million: Reduction of Gas System Reliability forecast – likely through reduction of the project scope for Greenwich Avenue.
  - a. PIS Calculation: If only this spending forecast reduction is made, the PIS forecast for the entire Gas ISR Plan would be \$145.43 million.

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3. \$(5.379) million: Deferral of the installation of main in the Proactive Main Replacement ("MRP") category at the end of FY2024 and without advancing any Public Works projects from FY2025.
4. \$(0.240) million: Additional deferral of the installation of main in the MRP category at the end of FY2024 to account for the reallocation of capital overhead charges (across all applicable Gas Capital projects, ISR Plan and Non-ISR Plan) from decreasing the MRP forecast by \$5.379 million and Gas System Reliability by \$0.750 million.
5. +\$0.219 million: Increase costs in the Non-Discretionary categories to account for the reallocation of capital overhead charges from decreasing MRP forecast by \$5.379 million and Gas System Reliability by \$0.750 million.
6. +\$0.005 million: Increase costs in the Southern RI Gas Expansion Project categories to account for the reallocation of capital overhead charges from decreasing MRP forecast by \$5.379 million and Gas System Reliability by \$0.750 million.

After making the second through sixth forecast adjustments, above, the resulting FY2024 Gas ISR Plan PIS forecast would be approximately \$145.57 million, or an increase of \$0.14 million, versus only decreasing the Gas System Reliability forecast by \$0.750 million. There exists an interplay between variables as many adjustments are made, but the primary point that this scenario illustrates is that there is very little impact to the FY2024 PIS forecast and potential customer bill impacts by deferring approximately \$5.379 million of MRP work into FY2025.

Alternatively, keeping the \$5.379 million in the MRP forecast and allowing the Company to maximize available resources, while having no significant impact on the FY2024 PIS total, seems to achieve the goals and customer benefits of the PIS model that the Public Utilities Commission ordered to be implemented for the Gas ISR Plan at the end of FY2021.

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PUC 8-11

Request:

The response to PUC 7-1 contains the statement: “the Company identified any higher risk projects that were workable at the beginning of the season . . .” Please explain how the Company determines whether a high-risk project is workable and how far in advance of a fiscal year is the Company typically able to identify whether a high risk project is “workable.” Please explain all the factors that are considered in making the determination that a high risk project is workable.

Response:

The Company defines the term “workable” as the status of a project when it is ready for the commencement of construction. For a project to be workable, the construction team must have possession of the following documents: the physical work packet, including the design drawings stamped by a professional engineer, maps, a completed environmental checklist, a signed Delegation of Authority approval, and a completed and signed Gas Main Work Packet checklist. In addition, municipal and/or state permits, an approved System Operating Procedure (“SOP”), and a completed environmental review, if required, must be on hand. For any project not started within the specified time frames provided on the permits as set by the municipality or within 12 months of receipt of the approvals, the permit and SOP are reviewed again for validity and resubmitted for approval, if necessary.

The Company cannot determine at what point in advance of a particular fiscal year a high-risk project is workable because of the many factors that affect workability, with permitting being the most variable and outside the control of the Company.



PUC 8-12

Request:

Hypothetically, assume the Commission had re-set the Gas ISR budgeting and planning process with the following changes as of the time of approving the FY 2024 plan: (i) there was no requirement to replace or abandon any specified number of miles of leak prone pipe and, (ii) instead, the category now designated for "Main Replacement" had the objective of replacing the most leak-prone pipe in the high risk categories reasonably possible (given all practical constraints typically considered by the Company to determine whether a project is workable).

For illustrative purposes under the given assumptions, please provide an estimate of:

- (a) the number of distinct workable high risk projects – as a practical matter - that would have been available in FY 2024,
- (b) the approximate number of miles of high risk leak-prone pipe that – hypothetically and reasonably - could have been replaced,
- (c) the total spend that likely would have occurred by the end of FY 2024 associated with completing that estimated number of high risk projects, and
- (d) if the project would continue post-FY 2024 in order to be completed, the total spending to completion.

Response:

The Company does not believe that the hypothetical situation outlined would have resulted in a significant difference from the current spend and production trajectory. Prior to the state of FY2024, the Company prepared to deliver a portfolio of projects with varying levels of risk, cost, geographical diversity, material type and size, and other factors making the overall execution success of the program more likely. Such preparation included identification, engineering, printing, permitting, and other necessary pre-construction activities.

In the scenario proposed, limiting the execution to projects deemed higher risk while attempting to maximize the number of miles replaced, just as the construction season was poised to start (marked by the lifting of municipal moratoriums on excavations), leaves little room to react. The Company would be forced to work only the higher risk projects that were already workable while shifting to expedite other higher risk work through engineering, permitting, and other pre-

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construction activities in time to prevent the loss of contractor resources and start projects in time to finish them within the construction season.

Given these limitations, the Company has developed the following estimates:

- (a) The Company has identified 50 projects of higher risk under the Proactive Main Replacement category that it believes would have been available to work during FY2024.
- (b) These projects represent approximately 23 miles of installation and 27 miles of abandonment.
- (c) Of the projects that the Company estimates it could have started and finished under this scenario, the total cost estimate for the projects is \$31.0 million. It is unlikely, however, that all project costs would be borne or incurred in FY2024 because final restoration would likely take place in the following fiscal year. Similarly, the Company expects that it would have spent significantly on closing out projects that began in the previous fiscal year, either by continuing construction activities and/or performing final restoration. Further, the Company also expects that reactive projects would have entered this portfolio during the course of the year, either shifting some of this work or adding to it.
- (d) It is difficult to extend the hypothetical exercise to a full year forecast. The Company's best estimate is that ten of the 50 projects noted in the Company's response to part (a), above, would be unlikely to be completed and would carry over into FY2025. These projects carry a total cost estimate of \$9.51 million.