

September 8, 2023

VIA ELECTRONIC MAIL

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

**RE: Docket No. 5209 - FY 2023 Electric Infrastructure, Safety, and Reliability Plan
Reconciliation Filing
Responses to PUC Data Requests – Set 2**

Dear Ms. Massaro:

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

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

Sincerely,



Andrew S. Marcaccio

Enclosures

cc: Docket No. 5209 Service List

PUC 2-1

Request:

Referencing PUC 1-4-2, please refile with a total. Please explain why there are two projects in excess of \$100,000 in that list.

Response:

Please see Attachment PUC 2-1 for a revised version of Attachment PUC 1-4-2 with a total included at the bottom. Please note, only a portion of these costs contributed to the blanket projects budget to be exceeded by \$1.4 million as referenced in the fifth bullet on Bates page 36, Section c. of the Company's FY2023 Electric Infrastructure, Safety, and Reliability Plan Annual Reconciliation filed with the Public Utilities Commission on August 1, 2023, in this docket.

The two projects in Attachment PUC 1-4-2 that were more than \$100,000 were estimated to be below the blanket threshold. The Company does not typically move projects out of the blanket that exceed the threshold. In FY2023, the reliability blanket had charges across 139 different work orders and less than four percent of those work orders were above \$100,000.

COS0015 - Reliability Blanket Project

Capital Spending

<u>WO #</u>	<u>Work Order Number Description</u>	<u>FY 2023</u>
10030462626	REPLACE RECLOSER W/ NEW VIPER RECLO	65,635
10030496447	Replace 2 poles, Install recloser w	18,830
10030505542	Pole 58- Replace Recloser	18,084
10030495981	Distribution Electric Reliability	64,553
10030575105	Replace recloser on P193-50 Pontiac	61,219
10030590393	Install NXT pole top recloser on po	71,558
10030619260	Replace loadbreak switch w/ Viper P	101,429
10030619273	Distribution Electric Reliability	68,857
10030619400	Viper Recloser - Distribution Elect	102,365
10030620524	Install Recloser on new pole 165-50	74,083
10030622003	Install N/O VIPER Recloser & N/O B	78,921
10030622114	VIPER RECLOSER - P43 Victory Hwy	64,511
10030623956	Install Viper Recloser P64 Central	66,216
10030624448	Recloser Feeder Tie Install 126W51/	74,211
10030631121	INSTALL N/O VIPER RECLOSER P2 TUPEL	92,404
10030633763	Replace Viper Recloser P213 Shore R	81,454
10030633904	Ins recoser p 1 Metcalf Ave, North	77,984
10030638721	REPLACE LB ON PL 5 W/ N/O VIPER REC	46,724
10030643811	Install Viper Recloser P51 Oak St H	65,580
10030644864	Install VIPER 6IVS to P5 River St 1	43,690
10030645665	14F3 Viper 6IVS Recloser Install	73,493
10030646190	Install Viper Pole 95 River Rd	69,459
10030647433	Distribution Electric Reliability d	74,052
10030739748	Install recloser @ P.16 School St,	2,449
10030657875	Replace JO P26(45/H1) Install viper	59,021
10024662755	Distribution Electric Reliability.P	6,467
10027068486	P5-50 Replace w/55H1 - Replace PTR	24,977
10030352213	replace pole, install recloser, ins	21,607
Total		\$ 1,669,834

PUC 2-2

Request:

- (a) Is the Company seeking to put any costs in rates through this reconciliation associated with the \$1.7M of mainline recloser program project costs?
- (b) How does the Company typically treat the inventory of reclosers for rate accounting purposes?
- (c) Is the Company recording any AFUDC on the \$1.7M listed in Attachment PUC 1-4-1?

Response:

- (a) There are no plant additions associated with the \$1.7M of mainline recloser program project costs in this reconciliation.
- (b) Reclosers are typically held in inventory (Account 154) prior to issuance to capital projects. Until issued to a capital project, which is subsequently placed in service, the reclosers have no impact on rate accounting. In a rate case, inventory is included in working capital. .
- (c) The Company is recording approximately \$9,875 of AFUDC charges within the \$1.7 million in Attachment PUC 1-4-1.

PUC 2-3

Request:

Does the Company typically keep an inventory of reclosers? If so, how does the Company determine the proper number in inventory?

Response:

Yes, the Company keeps an inventory of reclosers on hand, which is typically a two-to-four month supply depending on the type of recloser. The two-to-four month supply accounts for both recloser additions and replacements which is based on historical usage.

The Company considers multiple factors when determining the proper number in inventory, and these levels have increased in recent years. The higher the criticality of the unit, or the number of units used, the higher the desired inventory level is. Demand for reclosers across the market has also increased. Lastly, supply chain disruptions seen in recent years, such as longer lead times and supplier uncertainty, have led the Company to not only increase inventory levels but also diversify its supplier list to supplement inventory.

PUC 2-4

Request:

Referencing PUC 1-2 and PUC 1-4, why are there replacement reclosers in System Capacity and Performance? What makes these different from Asset Condition replacements? (Ex: WO # 10030462626; 10030496447; 100305050552; 10030633763; 10030575105; 10030619260; 10030638721; 10030657875).

Response:

The work request system uses abbreviated titles that may not be easily translated. For instance, work orders: 10030496447, 10030619260, 10030638721, and 10030657875 are not recloser replacement work orders. These work orders included replacing poles and/or removing load break switches to enable the installation of a new recloser.

Replacing reclosers can be done under the System Capacity and Performance spending rationale when related to a loading, voltage, protection, or reliability need. For example, when circuits are reconfigured and new open tie points selected, the new open tie points can be at an existing recloser location. That recloser can be replaced with a unit that has voltage sensing on both sides of the recloser. The dual voltage sensing is necessary for protection and switching needs that maintain reliability performance. Existing reclosers can also be replaced under System Capacity and Performance when the accumulation of distributed generation creates a reverse power flow condition at the recloser and the protection functionality needs to be upgraded. Rhode Island Energy envisions the possibility of future recloser replacement needs in advance of a deteriorated asset condition for future reliability, protection, and communication reasons.

PUC 2-5

Request:

- (a) Referencing PUC 1-6, please describe the project Valley 102W51 Summer Prep Work and the nature of the plant additions that were higher than spend.
- (b) Please explain why there are not plant additions for Animal Fence Installations or CLX Cable Replacement – Water Street.
- (c) Is stray voltage the same as contact voltage? If not, please provide the definition of stray voltage as compared to contact voltage. Please provide more detail of the project, including why it is classified as System Capacity and Performance instead of Asset Condition.

Response:

- (a) The Valley 102W51 Summer Prep Work consists of transferring load in preparation for summer peak, which included replacing a disconnect switch with a three phase load break and the installation of a new pole top recloser. This work began in FY 2022 and continued into FY 2023. The project table in 1-6 shows higher plant additions than spend because the total spend of the project was put into service in FY 2023.
- (b) Both the Animal Fence Installations and CLX Cable Replacement – Water Street were completed in FY 2024 and have since gone into service. The Company anticipates seeking recovery for these projects in the FY 2024 Annual Reconciliation.
- (c) Stray voltage is not the same as contact voltage. Stray voltage is defined as “a voltage (usually smaller than 10 volts) resulting from the normal delivery and/or use of electricity that may be present between two conductive surfaces that can come into contact with members of the general public and/or animals.” Stray voltage is not related to power system faults and is generally not considered hazardous.

Contact voltage is defined as “[v]oltage resulting from abnormal power system conditions that may be present between two conductive surfaces that can come into contact by members of the general public and/or animals.” Contact voltage is caused by power system fault current as it flows through the impedance of available fault current pathways. Contact voltage is not related to normal system operation and can exist at levels that may be hazardous.¹

¹ See Docket No. 4237, PUC Report and Order No. 20871.

PUC 2-5, page 2

The scope of the project is to accelerate the replacement of 1,568 feet of single-phase CLX cable between Poles 17 and 32 on Water Street in Portsmouth, RI. This was a small portion of the CLX cable slated for replacement in FY 2030 as part of the Newport Area Study. It is classified under the Asset Condition category.

PUC 2-6

Request:

Referencing Bates 7 of the filing, Ms. Gooding states, “[t]he Company reviewed \$4.9 million in plant additions and determined that \$1.2 million will remain in rate base. These plant additions represent system improvements or projects where the actual costs exceeded the estimate, and the difference could not be collected from the customer.” Please show the allocation of the \$1.2 million to System Improvements and projects where the actual costs exceeded the estimate.

Response:

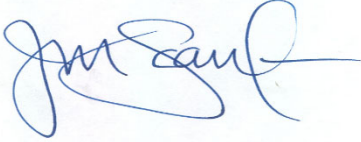
The \$1.2 million is comprised of five different projects. One project had total plant additions of \$344,000 which represents System Improvements. This amount is subject to the Company’s ongoing review as the Company continues to obtain additional information that may impact what portion of these total plant additions represent System Improvements. An additional project makes up \$495,000 of the \$1.2 million and consists of labor costs including the use of apprentice crews. The remainder of the \$1.2 million, approximately \$376,000, relates to System Modifications where the actual costs exceeded the CIAC collected.

As the Company continues to receive information from National Grid and continues to evaluate the remaining projects, new findings could result in adjustments to the plant in service. As the Company digs deeper into these projects, there could be adjustments to the \$1.2 million.

Certificate of Service

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

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



Joanne M. Scanlon

September 8, 2023
Date

Docket No. 5209 – RI Energy’s Electric ISR Plan FY 2024
Service List as of 8/30/2023

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