

September 11, 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
Rhode Island Energy's Reply Testimony**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the "Company"), enclosed is the Company's reply testimony to the Division's position memorandum dated September 7, 2023 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

**THE NARRAGANSETT ELECTRIC COMPANY
d/b/a RHODE ISLAND ENERGY
RIPUC DOCKET NO. 5209
FY 2023 ELECTRIC INFRASTRUCTURE, SAFETY, AND RELIABILITY PLAN
ANNUAL RECONCILIATION FILING
WITNESSES: GOODING, CASTRO & GRZESIUK
REPLY TESTIMONY**

JOINT PRE-FILED REPLY TESTIMONY

OF

NICOLE GOODING

KATHY CASTRO

AND

BRIAN GRZESIUK

September 11, 2023

**THE NARRAGANSETT ELECTRIC COMPANY
d/b/a RHODE ISLAND ENERGY
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1 **I. Introduction and Qualifications**

2 **Nicole Gooding**

3 **Q. Ms. Gooding, please state your name and business address.**

4 A. My name is Nicole Gooding. My business address is 280 Melrose St., Providence Rhode
5 Island 02907.

6

7 **Q. Ms. Gooding, by whom are you employed and in what position?**

8 A. I am employed by The Narragansett Electric Company d/b/a Rhode Island Energy (the
9 “Company” or “Rhode Island Energy”) as ISR Manager. In my position, I am responsible
10 for the filing and reporting of electric infrastructure, safety, and reliability (“ISR”) plans,
11 as well as the electric distribution five-year investment plan.

12

13 **Q. Have you previously submitted testimony in this proceeding?**

14 A. Yes, I submitted pre-filed direct testimony in this proceeding on August 1, 2023.

15

16 **Kathy Castro**

17 **Q. Ms. Castro, please state your name and business address.**

18 A. My name is Kathy Castro. My business address is 280 Melrose Street, Providence,
19 Rhode Island 02907.

20

1 **Q. Ms. Castro, by whom are you employed and in what position?**

2 A. I am employed by Rhode Island Energy as the Director of Asset Management and
3 Engineering. In my position, I am responsible for planning and oversight of projects and
4 programs that ensure a safe and reliable electric distribution system.

5

6 **Q. Ms. Castro, please describe your educational background and professional
7 experience.**

8 A. In 2003, I graduated from Worcester Polytechnic Institute with a Bachelor of Science
9 Degree in Electrical Engineering. In the same year, I was employed by National Grid
10 Service Company (“NGSC”) as an Associate Distribution Design Engineer responsible
11 for design of new facilities for business and capital improvement projects. In 2005, I
12 earned a Graduate level Certificate of Power Systems Management and Engineering from
13 Worcester Polytechnic Institute. In 2005, I joined the Distribution Planning and
14 Engineering department as an Engineer, promoted to Senior Engineer in 2008. In this
15 role, I was responsible for identifying asset, capacity, and reliability issues, justifying
16 proposed solutions, and initiating selected projects for Operations and Substation
17 engineering departments. I also reviewed and recommended solutions to serve customers
18 requiring significant demand. In 2010, I joined a consultant company located in
19 Rockland, Massachusetts as a Senior Engineer. In this role, I was responsible for
20 completing distribution system impact analysis of distributed generation for utilities
21 across New England and New York. Within one year, I was promoted to Manager of

1 Engineering responsible for building a department that focused on Distribution Planning
2 short- and long-term studies. In 2017, I was promoted to Director of Engineering
3 overseeing Distribution Design and Planning functions. In March of 2018, I returned to
4 NGSC and assumed the position as Manager of Distribution Planning and Asset
5 Management, and on May 25, 2022, I became the Director of Asset Management &
6 Engineering for Rhode Island Energy.

7
8 **Q. Have you previously testified before the Public Utilities Commission (“PUC”)?**

9 A. Yes. I have previously testified before the PUC in support of the Company’s Fiscal Year
10 (“FY”) 2020, FY 2021, and FY 2024 electric ISR plans.

11
12 **Brian Grzesiuk**

13 **Q. Mr. Grzesiuk, please state your name and business address.**

14 A. My name is Brian Grzesiuk. My business address is 280 Melrose Street, Providence,
15 Rhode Island 02907.

16
17 **Q. Mr. Grzesiuk, by whom are you employed and in what position?**

18 A. I am employed by Rhode Island Energy as Senior Manager – Financial Business Partner,
19 Rhode Island Finance. In my position, I am responsible for budgeting and forecasting, long
20 term business planning, and supporting the strategic, operational, and financial decision
21 making for the electric distribution business.

1 **Q. Mr. Grzesiuk, please describe your educational background and professional**
2 **experience.**

3 A. In 2013, I graduated from Suffolk University with a Bachelor of Science Degree in
4 Accounting. In 2014, I received my Master of Finance Degree from Suffolk University.
5 In October 2017, I joined National Grid as a Senior Financial Analyst supporting the US
6 Transmission Business, which included National Grid's Rhode Island, Massachusetts,
7 and New York Transmission Businesses. I was promoted to Finance Manager in 2018,
8 where I still supported the Transmission business unit and roles and responsibilities
9 included financial planning & analysis, controllable cost planning, and finance support on
10 complex capital delivery projects. In 2019, I moved positions to Finance Manager of
11 Electric Complex Capital Delivery, where I supported the Electric and Transmission
12 business units at National Grid. In 2021, I supported the New England Gas Business as a
13 Finance Business Partner before coming to Rhode Island Energy as a Senior Manager in
14 June 2022.

15
16 **Q. Have you previously testified before the PUC?**

17 A. No. I have not previously testified before the PUC.

18

1 **II. Purpose of Testimony**

2 **Q. What is the purpose of this joint reply testimony?**

3 A. The purpose of this joint reply testimony is to respond to the position of the Division of
4 Public Utilities and Carriers as set forth in the memoranda of John Bell, Chief
5 Accountant, and Gregory L. Booth, Engineering Consultant.

6
7 **Q. How is this joint reply testimony structured?**

8 A. This testimony is broken up by topic. Specifically, this testimony addresses:

- 9 • The Reconciliation Process and how it has operated historically;
10 • Reclosers;
11 • Distributed Generation (“DG”) Review;
12 • Large Project Estimates;
13 • The Company’s Long Range Plan;
14 • Reliability Statistics; and
15 • Corporate Overheads.
16

17 **III. Reconciliation Process**

18 **Q. Could you summarize your understanding of Mr. Booth’s process to evaluate**
19 **spending variances between the approved Fiscal Year 2023 Infrastructure, Safety,**
20 **and Reliability Plan (“FY23 ISR Plan”) budget and the Company’s FY 2023 ISR**
21 **Plan Reconciliation Filing?**

22 A. Yes. Mr. Booth examined the spending variances by category on a case-by-case basis.
23 Except with respect to Reclosers (which the Company addresses in detail in Section IV

1 below), Mr. Booth conducted a prudency review of the expenditures associated with each
2 variance or determined that the issue was not yet ripe for a prudency review.

3
4 **Q. Could you give an example of how Mr. Booth conducted a prudency review of a**
5 **spending variance on a case-by-case basis?**

6 A. Yes. In the category of Discretionary Spend – Asset Condition, Mr. Booth reviewed the
7 Company’s spending on Underground Residential Cable Replacement, which exceeded
8 the budget by \$3 million. In this case, Mr. Booth looked at the Underground Residential
9 Cable Replacement protocol that was established by the Company and accepted by the
10 Division, the shifting of funding from a delayed program to this program, and the
11 continuing need of the program. Ultimately, he concluded that exceeding the budget by
12 \$3 million was prudent. Specifically, Mr. Booth noted that he supported the acceleration
13 of spending in this category for several reasons:

14 The Division supports this accelerated spending in FY 2023
15 for several reasons: 1) this is a long term program in which
16 deteriorated failing cables are replaced using a well-
17 established protocol accepted by the Division many years
18 ago; 2) the Division views the Underground Cable
19 Replacement program (addressing 80 to 100 year old duct
20 bank system) and the Underground Residential
21 Development (URD) replacement program as
22 complimentary and necessary so when one program is
23 delayed it is reasonable to shift spending to the other
24 program to maintain an adequate pace of cable replacement;
25 and 3) these complimentary programs will continue for a
26 decade or more and are essential for reliability and safety
27 associated with a critical component of the distribution
28 infrastructure.

1 **Q. Is this analysis consistent with Mr. Booth’s assessment of other categories of**
2 **overspend?**

3 A. Yes. Mr. Booth consistently noted throughout his memorandum that changes and
4 adjustments to the specific spending on specific projects approved in the FY 2023 ISR
5 Plan are to be expected and that appropriate shifts of expenditures to other investments
6 that further address safety and reliability are expected and prudent actions taken by the
7 Company. For example, on page 5 of his memorandum, Mr. Booth noted that he expects
8 that the Company will “make strategic discretionary project adjustments to manage
9 prospective ISR Plan budgets and implement cost controls.”

10

11 **Q. Is this type of case-by-case prudence review an appropriate approach to evaluating**
12 **spending variances between the approved ISR Plans and Reconciliation Filings?**

13 A. Yes. Customers benefit from the Company’s ability to be agile and nimble in the
14 management of the safety and reliability of the electric distribution system. Evaluating
15 prudence on a case-by-case basis, (as opposed to strictly enforcing specific pre-approved
16 investments and limiting the Company’s flexibility in making appropriate modifications
17 to investments within the established budgets), incentivizes the Company to take action
18 when it believes a shift in ISR spending is in the best interest of customers. Additionally,
19 this flexibility is not unchecked. The Company is transparent about the changes and
20 modifications it makes to its ISR investments and the reasons for those changes – both
21 through its regular quarterly reporting, review meetings, and informal communications

1 with the Division. This transparency allows the Division to act as a meaningful check on
2 the prudence of variances in spending and to advise the PUC through the reconciliation
3 process regarding its opinion on whether any such variances are consistent with the
4 approved ISR Plan and budget and appropriately recoverable as prudent investments
5 through the ISR reconciliation.

6
7 **Q. Would the flexibility referenced above introduce risk to customers that the**
8 **Company will make investments that are not needed?**

9 A. No. Any such risk is mitigated by the Division's review and recommendation process
10 and the PUC's authority to reject rate recovery for any spend on plant placed in service
11 that it determines was not prudent for purposes of recovery through ISR reconciliation.
12 All investments the Company reports through an ISR reconciliation, whether specifically
13 identified in the approved ISR Plan or made as the result of an adjustment in response to
14 operational circumstances identified by the Company, are for the purpose of maintaining
15 the safety and reliability of the system in the short term and the long term.

16
17 Overall, every investment in these categories is an important investment for the safety
18 and reliability of the electric distribution system. The creation, review, and ultimate
19 approval of an ISR spending plan for any given year is a determination that it is
20 appropriate to invest in the system at the budget that results from the spending plan. But,
21 investments in safety and reliability projects are and will be ongoing. Throughout the

1 ISR year, some anticipated spend in one category may be delayed. Work that qualifies as
2 spending of an equivalent amount in another complementary category may be identified
3 to provide safe and reliable service – such as the acceleration in spend on Underground
4 Residential Development replacement in response to a delay in the Underground Cable
5 Replacement, which Mr. Booth identified as reasonable and appropriate. This approach
6 recognizes the ongoing nature of safety and reliability investment efforts and the
7 constantly changing nature of the circumstances and conditions in the operation of the
8 system.

9
10 **Q. How can the Commission fairly evaluate the prudence of changes to pre-approved**
11 **investments as part of the reconciliation filing?**

12 A. The burden is on the Company to demonstrate the prudence of these investments for
13 purposes of recovery through the ISR reconciliation process. If the Company makes
14 investments that differ from those that were identified in the approved ISR Plan, the
15 Company has an obligation to explain the variance and the reasons why it was
16 appropriate and prudent for the Company to make the adjustment. Through the quarterly
17 reporting process, planning meetings, and other informal communications, the
18 adjustments are unlikely to be surprises, and the Company endeavors to provide the
19 Division with significant information to evaluate the Company’s decision and provide its
20 view to the Commission as to the prudence of the adjustments. Then, the Commission
21 retains the discretion to make the ultimate determination based on the information

1 presented as to whether the investment adjustments are prudent for purposes of recovery
2 through the ISR reconciliation process – that is, consistent with the approved ISR Plan.

3
4 **Q. Is the process you described here consistent with the manner in which the ISR**
5 **reconciliation process has been governed historically?**

6 A. Yes.

7
8 **IV. Reclosers**

9 **Q. Earlier in your testimony, you indicated that conducting a case-by-case prudence**
10 **review of spending variances is appropriate. Did the Division conduct a prudence**
11 **review of the installation of reclosers?**

12 A. No. As opposed to conducting a prudence review, Mr. Booth uniformly concluded that
13 the Company should not receive rate recovery through this ISR reconciliation for any of
14 its spending on reclosers under the System Capacity and Performance blanket spending
15 category because he determined that the spend on reclosers during the FY2023 ISR Plan
16 year was “a precursor to the Company’s intended deployment of hundreds of reclosers
17” As such, Mr. Booth did not evaluate the prudence of the Company’s decision to
18 invest in the particular reclosers the Company installed under the System Capacity and
19 Performance blanket, despite acknowledging that the Company historically has made
20 investments in reclosers as part of its prudent and appropriate spending in that ISR
21 category.

1 **Q. Was Mr. Booth’s conclusion that the Company should not receive recovery in this**
2 **reconciliation process for the recloser reinvestments placed in service in FY2023**
3 **justified without conducting a prudency review?**

4 A. No. Although the Company agrees with the general principle that, if the PUC expressly
5 rejects a particular investment in its review and approval of the ISR Plan and budget, then
6 the Company should not be able to avoid the consequences of that decision by making
7 the investment anyway and then seeking ISR cost recovery through the reconciliation
8 process, barring emergency or satisfying some standard in addition to prudency – but that
9 is not the case here. Rather, the Company invested in reclosers during FY2023 as a
10 consequence of standard operational practice. The review and evaluation of the
11 Company’s proposed recloser program in its FY 2024 ISR Plan filing was separate and
12 apart from the specific reclosers for which the Company seeks recovery through this FY
13 2023 ISR Reconciliation filing under the System Capacity and Performance blanket. The
14 Company made specific decisions with respect to each of these reclosers consistent with
15 the evaluation it has undertaken to make recloser investments historically under this
16 spending category. Accordingly, the determination of whether the Company should
17 receive cost recovery for these specific reclosers through this reconciliation should be
18 through a prudency review of the specific investments decision – not a categorical
19 rejection based on the subsequent rejection of a broader recloser project that was
20 addressed to different circumstances.

21

1 **V. DG Review**

2 **Q. Mr. Booth indicated that the Division is waiting for the Company’s report on DG**
3 **projects prior to determining whether the prudence of DG interconnection**
4 **investments should remain and be included in rate base. When does the Company**
5 **expect to complete the DG report?**

6 A. The Company expects to complete the DG report by the end of the year. This report will
7 include findings from the review on the selected projects as well as lessons learned and
8 process changes.

9

10 **Q. Why is the DG Report taking longer than anticipated to complete?**

11 A. The process for determining the appropriate amount of DG interconnection investments
12 to be included in rate base is complex and, as more information becomes available,
13 additional questions arise. The Company is validating findings with National Grid, and as
14 more information on specific charges becomes available, additional discussions are
15 needed with stakeholders such as CEI, Finance and Plant Accounting to determine what,
16 if any, adjustments need to be made. As the Company digs deeper into these projects,
17 there could be adjustments to the \$1.2 million. The Division has noted in its report that
18 “...it is premature to determine the prudence of whether any DG interconnection
19 investments exceeding customer contributions should remain in rate base”.¹ The

¹ Division Position Memorandum for the FY 2023 ISR Annual Reconciliation filed 9/7/2023 Page 5.

1 Company plans to share the report and provide necessary information with the Division
2 once the report is finalized.

3
4 **VI. Large Project**

5 **Q. Mr. Booth indicated the Company's estimating process has shown that projects are**
6 **historically underestimated. Can you explain the Company's estimating process?**

7 A. The Company's estimates, specifically for large projects, evolve throughout the life of a
8 project. The process is a multi-phase approach which begins with study grade estimates
9 used for alternative analysis and option selection then develops to detailed estimates
10 which are used for execution and construction.

11
12 Typically, large projects originate from area studies which include multi stepped
13 comprehensive solutions. These normally include but are not limited to substation
14 rebuilds, expansions, area distribution line reconductoring and reconfiguration. At this
15 stage of the process estimates are developed to an accuracy that will allow system area
16 planners to evaluate alternatives and select preferred plans. When the preferred plan is
17 identified the system area planner develops a cashflow for the project based on the
18 system need date and project execution influencing factors that are known at the time, for
19 example material lead times. This stage of the process utilized tools built off historical
20 project actual costs and contingency models but did not offer a mechanism to take into
21 account project specific characteristics that influence the accuracy of an estimate. Since

1 the Company transitioned to PPL it has engaged with estimators who have construction
2 experience to further improve the accuracy of these study grade estimates earlier in the
3 process.

4
5 The next stage of a project involves detailed engineering which further refines the scope
6 of a project and improves the accuracy of the estimate so that the work is ready for
7 construction. These estimates are typically known as construction grade estimates.

8 During this stage of the process the Company's procurement department engages with the
9 market for large material and construction procurement, like Substation transformers or
10 civil construction crews. This bid process uses real time bids which are used for the
11 construction grade estimates.

12
13 While the Company is confident the engagement of estimators with construction
14 experience in the early stage of the process will improve estimate accuracy it will take
15 time before results are evident. The Company will continue to review projects as they
16 evolve and take appropriate steps to ensure the most prudent solution is being progressed.

17 Dyer Street substation rebuild is an example where the Company took pause when a
18 detailed building remediation estimate came in much higher than what was originally
19 considered during the early stage of the project. Instead of progressing the Company
20 reevaluated alternatives resulting in rebuilding the station at South Street at a lower cost.

21

1 Additionally, the Company cautions the comparison of early-stage estimates to actual
2 costs. Dyer Street station rebuild saw significant material increases and building
3 demolition costs which would have been present for any alternative the Company
4 progressed with. These were due to market conditions that the Company could not
5 foresee and control. Also, the project experienced schedule delays due to global supply
6 chain disruptions. A factor that was unknown at the time the project was originally
7 estimated. Finally, during construction unknown underground site conditions we
8 identified which increased the scope of work.

9
10 **Q. Mr. Booth also indicated concerns with project delays and a lack of visibility of**
11 **schedule and spending adjustments. How does the Company plan on addressing**
12 **this?**

13 A. The Company will continue to provide updates on Large Projects in quarterly reports and
14 will work to incorporate visibility into schedule and spending shifts incurred from project
15 delays. The Company's Long Range Plan, provided on September 8, 2023, shows the
16 latest impact to future year forecasts from current project delays.

17

1 **VII. Long Range Plan**

2 **Q. Mr. Booth indicated that the Company is refining its Long Range Plan. When does**
3 **the Company anticipate completing its revisions?**

4 A. The Company provided a copy of its Long Range Plan to the Division on September 8,
5 2023. This included a forecast of projects over ten year period, an update on Area Study
6 efforts and project summaries for proposed work in the FY 2025 ISR Plan. The Company
7 anticipates additional discussions with the Division on this document to address questions
8 on future investments and the overall spending plan.

9

10 **VIII. Reliability Statistics**

11 **Q. Mr. Booth indicated that the Company should provide the Company's IEEE**
12 **statistics and position. Can the Company provide its latest update?**

13 A. Yes. For Calendar Year 2022, Rhode Island Energy had an IEEE SAIFI of .81, placing it
14 in the first quartile nationally and in the fourth quartile for the Northeast region. IEEE
15 SAIDI information is being reviewed by the Company and an update will be provided
16 once the statistics and position are known.

17

1 **IX. Corporate Overheads**

2 **Q. Why are the reported corporate overhead charges of \$1.2 million well above the**
3 **five-year average of \$12,000?**

4 A. The reported corporate overhead charges are above the 5-year average due to a timing
5 difference between the amount charged and when the corporate overhead account is
6 cleared. Under National Grid ownership,² Corporate Overheads were cleared at the fiscal
7 year end in March, resulting in lower reported balances in previous years. PPL took over
8 the Corporate Overheads clearing process from January 1, 2023, and continued to follow
9 the same process as National Grid. At the end of March 2023, PPL under cleared the
10 Corporate Overheads account, hence the \$1.2 million balance. This balance has since
11 been distributed across capital projects, using the same process that National Grid
12 followed.

13
14 **Q. Would any of the reported corporate charges be treated differently under National**
15 **Grid's policy or potentially be considered improper under past practice?**

16 A. No. PPL has not treated the corporate charging or clearing process any differently than
17 National Grid.

18

² On May 25, 2022, PPL Rhode Island Holdings, LLC, a wholly owned indirect subsidiary of PPL Corporation (“PPL”), acquired 100 percent of the outstanding shares of common stock of the Company from National Grid USA (“National Grid”)(the “Acquisition”).

1 **Q. When would the reported corporate overhead charges of \$1.2 million impact rates?**

2 A. The reported corporate overhead charges have since been allocated to specific projects
3 and will impact rates as these projects go into service.

4

5 **X. Conclusion**

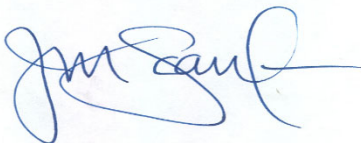
6 **Q. Does this conclude your joint reply testimony?**

7 A. Yes.

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 11, 2023

Date

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

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