Andrew S. Marcaccio, Counsel
PPL Services Corporation
AMarcaccio@pplweb.com

280 Melrose Street
Providence, RI 02907
Phone 401-784-4263

Rhode Island Energy™
a PPL company

February 23, 2024

VIA ELECTRONIC MAIL

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

RE: Docket No. 23-48-EL – The Narragansett Electric Company d/b/a Rhode Island Energy's Proposed FY 2025 Electric Infrastructure, Safety, and Reliability Plan
Responses to PUC Data Requests – Set 5 (Complete Set)

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the "Company"), enclosed are the Company's complete set of responses to the Public Utilities Commission's ("PUC") Fifth Set of Data Requests in the above-referenced matter.

This transmittal contains the Company's response to PUC 5-1, which completes the Company's responses in this set.

Thank you for your attention to this transmittal. If you have any questions or concerns, please do not hesitate to contact me at 401-784-4263.

Sincerely,

Andrew S. Marcaccio

Enclosures

cc: Docket No. 23-48-EL Service List

PUC 5-1

Request:

In its response to DIV 1-16, the Company states that it is proposing to complete the Docket 4600 analysis for any new projects and programs with over $2 million planned spend during the proposed FY 2025 ISR Plan Year. These projects include the Engineering Reliability Review Program and the Distribution Automated Recloser Program.

a. Please indicate where the Company identified the $2 million in spend as the threshold for conducting a Docket 4600 BCA analysis for new spending proposals.

b. Please indicate why the Company is focused on the FY 2025 proposed spending for proposals that anticipate spending in excess of $2 million over multiple years (e.g., $12.8 million for mobile substations over a three-year period).

c. Please provide a Docket 4600 BCA analysis for all new program proposals for FY 2025 in System Capacity & Performance, but not area studies.

Response:

a. The $2 million threshold for conducting a Docket 4600 BCA analysis is not identified in any document. The Company identified that spending amount as a reasonable threshold for conducting the analysis. The Company is receptive to discussions on more formal guidelines to determine when the analysis should be conducted.

b. The Company focuses on new spend within the proposed fiscal year when determining which projects to conduct a Docket 4600 analysis because it corresponds to costs the Company will incur before it submits its next ISR filing. The Company is receptive to discussions on more formal guidelines to determine when the analysis should be conducted.

c. The Excel versions of Attachments PUC 5-1-1 and PUC 5-2-2 provide a Docket 4600 BCA analysis for the Electromechanical Relay Replacements and Mobile Substations, respectively.

PUC 5-2

Request:

On Bates page 300 of Book 1, the Company noted that it would be open to tracking major projects where spending is in excess of $5 million rather than the $10 million threshold, please provide a table with a separate line item for each project. The table should include:

a. Separate line for each project.
b. Forecasted spending through FY 2024 (if any).
c. FY 2025 spending.
d. Forecasted spending by year FY 2026 through project completion.
e. Total forecasted spending for each project.
f. The level of confidence the company has in each spending forecast (+/- %).
g. Please update the table from PUC 2-5 to include these projects.

Response:

For items (a) through (f), please see Attachment PUC 5-2-1 for a list of major projects with spending in excess of $5 million. For projects in Study and Preliminary Engineering stages, the table below provides a description of the milestones of the stage which inform the estimate. This table is also included as part of the Company's Joint Testimony, Exhibit 2, Bates pages 299-301.

PUC 5-2, page 2

Major Project Lifecycle

Stage	Milestones During This Stage:
Study Phase	• Consistent estimate methods across all alternatives. • Subject matter expert consultation with field visits to develop scopes. • Desktop environmental, subsurface, and permitting review. • Project Management consultation to develop construction execution assumptions. • Depending on the status of the project, there may be additional revisions to study estimate depending on available information.
Preliminary Engineering	• Engineering consultant onboarded. • Sound Study • Ground Borings • Scope refined • Preliminary outage planning • Detailed design begins • Estimates are refined as additional information becomes available.
Detailed Engineering	• Scope/Drawings Ready for Bid • Material Procurement • Final Design Complete • Permits Received (in parallel with Construction Resource Procurement) • Estimates are refined as additional information becomes available.
Construction Resource Procurement	• RFP Issued • Negotiations/Clarifications with Bidders • Construction Contractor Awarded • Estimate (+/- 10%) refined – budget discipline applied
Construction	• Construction Commences • Construction Complete • Change Orders Reviewed/Approved
Closeout	• Lessons Learned Documented • Project Financially Closed

For item (g), please see Attachment PUC 5-2-2 for a revised Attachment 3 using the Exhibit 2 (Bates page 299-301) budget framework updated to include Major Projects greater than $5 million and to include FY 2024 forecasts as of December 31, 2023.

Prepared by or under the supervision of: Kathy Castro and Daniel Glenning

Line	(a) Project Description $000's	(b) Forecasted Spending through FY 2024	(c) FY 2025 Forecasted Spending	(d) Total Forecasted Spending	(e) Total Forecasted Spending	(f) Level of Confidence in Forecast (+/- %)
1	Dyer Street Substation *	$15,463	$15	$0	$15,478	+/-10%
2	Admiral St. 12KV Substation (Ph 1B) *	6,404	5,513	2,500	14,417	Detailed Engineering Estimate
3	Kingston #131 Equipment Replacement *	96	400	16,405	16,901	Study Phase/Study Estimate
4	Phillipsdale Substation *	0	100	14,740	14,840	Study Phase/Study Estimate
5	Southeast Substation *	14,090	0	0	14,090	+/-10%
6	Apponaug Substation (CRIE) *	27	150	5,550	5,727	Study Phase/Study Estimate
7	East Providence Substation (D-SUB) **	1,622	2,685	5,261	9,568	Preliminary Engineering Estimate
8	Hospital #146 Equipment Replacement **	98	320	5,039	5,457	Study Phase/Study Estimate
9	Merton #51 Equipment Replacement **	0	0	8,164	8,164	Study Phase/Study Estimate
10	Auburn 115/12.4kV Substation (D-Sub) **	0	0	7,484	7,484	Study Phase/Study Estimate
11	Chase Hill Second Half of Station **	0	0	5,030	5,030	Study Phase/Study Estimate
12	Nasonville #127 Sub (D-Sub) **	2,303	3,566	3,589	9,458	Preliminary Engineering

* Separately Tracked Major Projects - threshold greater than $10m
** Separately Tracked Major Projects - threshold greater than $5m

Line Number	Spending Rationale and Category	ISR Grouping	Docket 22-53-EL			5 Year Investment Plan - Capital Spending					Major Project - Details						
			FYTD Actuals 12/31/23	Preliminary FY 2024 Q3 Forecast	FY 2024 Budget	FY 2025	FY 2026	FY 2027	FY 2028	FY 2029	Major Project - Current Phase	Current Sanction - CAPEX only	Initial Estimate - CAPEX only	Date of Last Sanction	Est'd Constr Start	Est'd Constr End	Capital Spending through FY 2023
1	**Non-Discretionary**																
2	CR/PR	New Business - Commercial	8,745	11,025	9,093	9,366	9,647	9,937	10,235	10,542							
3	CR/PR	New Business - Residential	5,471	7,212	7,212	7,428	7,651	7,880	8,117	8,361							
4	CR/PR	Public Requirements	1,953	1,249	1,249	3,140	3,234	3,331	3,431	3,531							
5	CR/PR	Transformers and Related Equipment	6,776	8,350	5,000	8,000	8,000	8,000	8,000	8,000							
6	CR/PR	Meters and Meter Work	1,036	2,089	2,605	2,533	430	100	100	100							
7	CR/PR	Distributed Generation	5,781	1,000	1,000	1,000	1,000	1,000	1,000	1,000							
8	CR/PR	Third Party Attachments	(732)	331	280	288	297	306	315	324							
9	CR/PR	Land and Land Rights	329	500	500	515	530	546	562	579							
10	CR/PR	Outdoor Lighting	352	813	575	592	610	628	647	666							
11	D/F	Damage /Failure	9,920	12,545	10,940	11,268	11,606	11,954	12,313	12,682							
12	D/F	Reserves	-	-	979	1,008	1,038	1,070	1,102	1,135							
13	D/F	Failed Assets	2,619	4,340	1,323	2,537	1,972	-	-	-							
14	D/F	Storms	3,176	3,662	1,950	3,000	3,000	3,000	3,000	3,000							
15	**Total Non-Discretionary**		**45,426**	**53,116**	**42,706**	**50,675**	**49,015**	**47,752**	**48,822**	**49,921**							

Line Number	Spending Rationale and Category	ISR Grouping	Docket 22-53-EL			5 Year Investment Plan - Capital Spending					Major Project - Details						
			FYTD Actuals 12/31/23	Preliminary FY 2024 Q3 Forecast	FY 2024 Budget	FY 2025	FY 2026	FY 2027	FY 2028	FY 2029	Major Project - Current Phase	Current Sanction - CAPEX only	Initial Estimate - CAPEX only	Date of Last Sanction	Est'd Constr Start	Est'd Constr End	Capital Spending through FY 2023
1	**Discretionary - Asset Condition & System Capacity (excluding Separately Tracked Major Projects)**																
2	Asset Condition	Underground Cable Replacement	4,231	4,281	5,500	5,500	6,000	6,000	6,000	6,500							
3	Asset Condition	URD Cable Replacement	5,321	6,496	6,276	5,000	5,411	5,723	5,823	5,500							
4	Asset Condition	Blanket Projects	4,298	5,686	5,220	6,177	6,338	6,504	6,676	6,850							
5	Asset Condition	I&M	257	476	3,000	1,530	1,530	1,530	1,530	1,530							
6	Asset Condition	Substation Breakers & Reclosers	1,231	1,231	437	736	2,060	3,240	-	-							
7	Asset Condition	Other Area Study Projects - BSVS	1,058	1,058	-	781	1,556	2,457	2,280	1,156							
8	Asset Condition	Other Area Study Projects - CRIE	27	27	-	50	75	35	293	315							
9	Asset Condition	Other Area Study Projects - CRIW	-	-	-	1,883	6,317	10,196	3,730	390							
10	Asset Condition	Other Area Study Projects - East Bay	-	-	-	100	505	570	570	190							
11	Asset Condition	Other Area Study Projects - Newport	194	194	-	446	1,189	802	-	-							
12	Asset Condition	Other Area Study Projects - NWRI	135	135	-	500	3,007	2,725	1,432	250							
13	Asset Condition	Other Area Study Projects - Providence	-	-	-	492	5,396	6,575	4,630	4,630							
14	Asset Condition	Other Area Study Projects - SCW	-	-	-	-	-	-	1,029	2,297							
15	Asset Condition	Tiverton Substation	60	60	-	75	393	786	786	393							
16	Asset Condition	Providence Area LT Supply & Distrib Study *	-	-	-	20,382	10,580	7,064	-	-							
17	Asset Condition	Reserve	-	-	-	-	1,000	1,000	1,000	1,000							
18	Asset Condition	Batteries / Chargers	31	227	230	195	387	319	100	-							
19	Asset Condition	Recloser Replacements	1,209	1,209	1,300	-	-	-	-	-							
20	Asset Condition	UG Improvements and Other	2,732	2,809	1,383	700	565	-	-	-							

Line Number	Spending Rationale and Category	ISR Grouping	Docket 22-53-EL			5 Year Investment Plan - Capital Spending					Major Project - Details						
			FYTD Actuals 12/31/23	Preliminary FY 2024 Q3 Forecast	FY 2024 Budget	FY 2025	FY 2026	FY 2027	FY 2028	FY 2029	Major Project - Current Phase	Current Sanction - CAPEX only	Initial Estimate - CAPEX only	Date of Last Sanction	Est'd Constr Start	Est'd Constr End	Capital Spending through FY 2023
1	Syst Cap & Perf	Aquidneck Island	1,189	1,327	1,038	-	-	-	-	-							
2	Syst Cap & Perf	New Lafayette Substation	197	361	750	910	5,886	151	-	-							
3	Syst Cap & Perf	Warren Substation *	-	-	-	1,800	2,943	747	111	-							
4	Syst Cap & Perf	Nasonville Substation (D Sub + D Line)	1,346	2,338	1,912	-	-	-	-	-							
5	Syst Cap & Perf	East Providence Substation *	-	-	-	3,600	2,700	2,051	-	-							
6	Syst Cap & Perf	Weaver Hill Road Substation	419	665	1,507	1,105	3,054	3,475	2,496	1,229							
7	Syst Cap & Perf	3V0	201	217	1,095	186	540	-	-	-							
8	Syst Cap & Perf	EMS/RTU	(15)	(15)	658	135	1,147	2,350	750	-							
9	Syst Cap & Perf	Overloaded Transformer Replcmts	1,118	1,500	1,500	1,500	1,500	1,500	1,500	1,500							
10	Syst Cap & Perf	Blanket Projects	5,209	5,639	2,490	2,605	2,725	2,851	2,983	3,072							
11	Syst Cap & Perf	Other Area Study Projects - BSVS	120	120	400	680	681	968	-	-							
12	Syst Cap & Perf	Other Area Study Projects - CRIW	366	845	1,371	1,441	1,125	1,125	675	-							
13	Syst Cap & Perf	Other Area Study Projects - East Bay	-	-	-	84	378	378	-	-							
14	Syst Cap & Perf	Other Area Study Projects - Newport	-	-	-	793	976	461	-	-							
15	Syst Cap & Perf	Other Area Study Projects - NWRI	775	1,185	1,933	108	128	-	-	-							
16	Syst Cap & Perf	Other Area Study Projects - SCE	-	-	-	1,684	6,404	333	-	-							
17	Syst Cap & Perf	Other Area Study Projects - SCW	101	137	364	927	4,101	3,909	2,576	1,147							
18	Syst Cap & Perf	Tiverton D-Line	130	130	109	328	656	656	328	440							
19	Syst Cap & Perf	Reserve	-	-	-	-	1,000	1,000	1,000	1,000							
20	Syst Cap & Perf	CEMI-4	1,072	1,221	1,230	2,619	2,698	2,779	2,862	-							
21	Syst Cap & Perf	ERR	-	-	-	2,000	2,060	2,122	2,185	2,251							
22	Syst Cap & Perf	Distrib Automation Recloser Program	-	-	-	5,957	7,228	7,185	10,165	14,970							
23	Syst Cap & Perf	ADMS/DERMS Advanced	-	-	-	-	-	3,159	1,568	-							
24	Syst Cap & Perf	DER Monitor/Manage	-	-	-	-	-	2,288	4,043	-							
25	Syst Cap & Perf	Electromech RelayUpgrades	-	-	-	1,234	603	1,267	2,513	1,263							
26	Syst Cap & Perf	Fiber Network	-	-	-	200	-	-	-	-							
27	Syst Cap & Perf	VVO - Smart Capacitors and Regulators	235	235	-	400	8,439	6,701	6,701	6,701							
28	Syst Cap & Perf	Mobile Substation	-	-	-	1,278	3,834	7,668	-	-							
29	Syst Cap & Perf	Other projects and programs	(1,686)	(1,451)	541	478	100	100	100	100							
30	**Discretionary - Asset Condition & System Capacity (excluding Separately Tracked Major Projects)**		**31,559**	**38,342**	**40,244**	**76,599**	**113,216**	**110,751**	**78,436**	**64,675**							

Line Number	Spending Rationale and Category	ISR Grouping	Docket 22-53-EL			5 Year Investment Plan - Capital Spending					Major Project - Details						
			FYTD Actuals 12/31/23	Preliminary FY 2024 Q3 Forecast	FY 2024 Budget	FY 2025	FY 2026	FY 2027	FY 2028	FY 2029	Major Project - Current Phase	Current Sanction - CAPEX only	Initial Estimate - CAPEX only	Date of Last Sanction	Est'd Constr Start	Est'd Constr End	Capital Spending through FY 2023
1	**Discretionary - Non-Infrastucture**																
2	Non-Infrastructure	General Equip & Telecom Blanket	(805)	536	700	712	724	737	750	764							
3	Non-Infrastructure	Verizon Copper to Fiber	11	26	1,000	180	75	-	-	-							
4	**Discretionary - Non-Infrastructure**		**(793)**	**562**	**1,700**	**892**	**799**	**737**	**750**	**764**							
5	**Discretionary - Separately Tracked Major Projects**																
6	Major Projects	Dyer Street Substation (D Sub + D Line)	1,861	2,553	-	15	-	-	-	-	Construction	$10,658	$10,842	Apr-21	Sep-21	FY 2025	$14,651
5	Major Projects	East Providence Substation (D Sub + D Line) **	720	976	1,330	-	-	-	-	-	--	--	--	--	--	--	--
6	Major Projects	East Providence Substation (D Sub) **	-	-	-	2,685	2,309	2,952	-	-	Preliminary Eng'g	$6,000	$6,000	Feb-17	Apr-24	Oct-26	$892
7	Major Projects	Warren Substation (D Sub + D Line) *	1,915	2,381	1,969	-	-	-	-	-	--	--	--	--	--	--	--
6	Major Projects	Admiral St 12kV Substation	-	-	-	5,513	2,500	-	-	-	Construction	$12,831	$12,831	Aug-21	Sep-21	FY 2026	$2,731
7	Major Projects	Providence Area LT Study Projects (Ph 1A,1B,2,4) *	17,685	25,783	24,314	-	-	-	-	-	--	--	--	--	--	--	--
8	Major Projects	Kingston Equipment Replacement	-	-	-	400	3,361	8,403	1,681	2,961	Study Phase	--	$16,805	--	Oct-25	FY 2029	$0
7	Major Projects	Phillipsdale Substation	-	-	-	100	5,728	7,240	1,448	324	Study Phase	--	$6,025	--	Oct-25	FY 2029	$0
8	Major Projects	Apponaug Substation ***	-	-	-	150	1,120	1,980	1,750	700	Study Phase	$5,700	$3,800	Jul-23	FY 2026	FY 2029	$0
9	Major Projects	Hospital #146 Equipment Replacement ***	-	-	-	320	2,064	2,680	296	-	Study Phase	$5,360	$5,359	Dec-23	FY 2026	FY 2028	$0
8	Major Projects	Merton #51 Equipment Replacement ***	-	-	-	-	816	2,449	4,082	816	Study Phase	--	$8,164	--	FY 2027	FY 2029	$0
9	Major Projects	Auburn 115/12.4kV Substation (D-Sub) ***	-	-	-	-	-	832	1,663	4,989	Study Phase	--	$6,590	--	FY 2028	FY 2029	$0
10	Major Projects	Chase Hill Second Half of Station ***	-	-	-	-	1,006	2,012	1,006	1,006	Study Phase	--	$5,030	--	FY 2027	FY 2029	$0
9	Major Projects	Nasonville #127 Sub (D-Sub) ***	-	-	-	3,566	3,100	489	-	-	Study Phase	$10,786	$13,325	Jul-23	FY 2026	FY 2027	$0
10	Major Projects	Southeast Substation	327	327	66	-	-	-	-	-	Construction	$11,244	$9,000	Jun-19	Oct-19	FY 2025	$15,198
11	**Discretionary - Separately Tracked Major Projects**		**22,508**	**32,020**	**27,679**	**12,749**	**22,004**	**29,036**	**11,925**	**10,796**							
12	**Discretionary - Advanced Metering Functionality (AMF)**																
13	AMF	Meter Costs	-	-	-	28,655	62,932	2,000	-	-							
14	AMF	Network Costs	-	-	-	4,935	6,975	2,046	-	-							
15	AMF	System Costs	-	-	-	14,356	14,160	3,560	-	-							
16	AMF	Program Costs	-	-	-	3,779	3,779	945	-	-							
17	**Discretionary - Advanced Metering Functionality**		**-**	**-**	**-**	**51,725**	**87,846**	**8,550**	**-**	**-**							
18	**Total Discretionary**		**53,275**	**70,924**	**69,623**	**141,965**	**223,865**	**149,074**	**91,111**	**76,235**							
19	**Total Capital Spending including AMF**		**98,700**	**124,040**	**112,329**	**192,640**	**272,880**	**196,826**	**139,933**	**126,155**							
20	**Total Capital Spending excluding AMF**		**98,700**	**124,040**	**112,329**	**140,915**	**185,034**	**188,276**	**139,933**	**126,155**							

-

* These projects are reported separately in Attachment G in the FY 2024 ISR Quarterly Reports but would no longer be considered Separately Tracked Major Projects in future years based on the proposed budgetary framework provided in Docket 23-48 EL.

** East Providence Substation D Sub + D Line is reported separately in Attachment G in the FY 2024 ISR Quarterly Reports. Only the D Sub portion of the project would be reported separately under the proposed budgetary framwork provided in Docket 23-48 EL.

*** These projects, with forecasts of greater than $5 million, have been included to the Separately Tracked Major Projects category.

PUC 5-3

Request:

On Bates page 215, discussing the "tree growth regulator" budget of $100,000, the Company states, "if approved, the Company will work with municipal and state officials to identify candidates for treatment on this year's feeders." Is the $100,000 the cost of the chemical? If not, please itemize the expenses covered by the $100,000 budget.

Response:

The $100,000 is not only the cost of the chemical. It includes all components of the program, including labor to deliver the precise treatment to each chosen tree, which constitutes the majority of the proposed cost of the program. The itemized budget for this program is broken down mainly by season and is set forth in the table below. The Company intends to treat trees in Newport in the spring and the other areas around Providence in the fall after the trees go dormant. Because the timing of the treatment is so critical, the Company has identified trees in Newport that need to be trimmed prior to the growing season

PUC 5-3, page 2

Tree Growth Regulator Program Budget FY25	
IT foundation, GIS development (with communities)	$600.00
Mobilization-Demobilization	$2,400.00
Spring Treatment	
120 Trees Newport , $1.50 per inch DBH average tree 20"	$3,600.00
2 person crew with vehicle and equipment (week)	$7,000.00
Fall Treatment	
780 Trees Providence, Cranston, East Providence, $1.50 per inch DBH	$23,400.00
2 person crew with vehicle and equipment (6.5 Weeks)	$45,000.00
FY 2025 Effectiveness analysis	$7,000.00
FY 2026 Preplanning	$6,000.00
Total	$95,000.00
Buffer	$5,000.00
*DBH is Diameter at Breast Height	

PUC 5-4

Request:

In Docket No. 22-49-EL when the company was asked to restate the revenue requirement to reflect recovery through the ISR mechanism, the company used the composite depreciation rate, recognizing that such depreciation rate was consistent with the prevailing ISR revenue requirement model, as stated on page 2 of the response of PUC 7-10: "*In addition, for all years in this response, the illustrative revenue requirements were calculated using the FY 2024 ISR model assumptions and do not reflect potential changes that may occur in the ISR calculations once new base distribution rates are approved (such as new depreciation rates and weighted average cost of capital) as any potential changes are not known at this time*". Please explain why the company has now used other depreciation rates in the calculation of the revenue requirement in the current ISR filing.

Response:

In data request PUC 7-10 in Docket No. 22-49-EL, the Company provided an illustrative revenue requirements schedule reflecting a scenario of recovery of AMF capital investment through the FY 2024 ISR mechanism. Based on readily available information at the time of the discovery response, the Company applied the same composite book depreciation rate and MACRS tax life to the AMF capital investments as all other capital investments in the FY 2024 electric ISR revenue requirement model.

While the Company recognizes that a composite book depreciation rate has been applied to all other electric ISR capital investments in the ISR filings since the last base distribution rate case, the AMF capital investments are different from other ISR capital investments, most significantly that the AMF capital investments include software capital investments that have not been traditionally recovered through the ISR mechanism. As such, the composite book depreciation rate used for all other ISR investments does not take into account the depreciation rate for software capital investments and is calculated based on the electric distribution capital from the last base distribution rate case which does not include capital software. Thus, the Company believes that it is appropriate to apply depreciation rates for the types of applicable AMF capital investments incurred rather than a composite depreciation rate. As a result, the Company calculated a separate revenue requirement for each investment category of meters, software and network and applied the respective book depreciation rates that were approved in the last base distribution rate case in Docket No. 4770 (4.49%, 14.29%, and 5.00%, respectively).

PUC 5-4, page 2

Similarly, the Company applied the specific modified accelerated cost recovery system (MACRS) tax life and tax rates that are applicable to each investment category.

Additionally, there are other components of the AMF capital recovery approval in Docket No. 22-49-EL that differ from the recovery method of all other ISR capital investments. For example, the Company is allowed to recover the AMF revenue requirement through a fixed charge embedded in the applicable customer charge for each rate class while the revenue requirement for all other ISR capital investments is recovered through a per kWh factor for each rate class.

PUC 5-5

Request:

Referencing Attachment PUC 2-2-1, page 1 of 23 (Annual Revenue Requirement Summary – AMF Capital Investment), please add a second separate section below to show the same information in the same format but calculated by using the same depreciation rate used for the rest of the ISR Capital Investments.

Response:

As described in the response to PUC 4-5, the removal of MDMS costs from the capital revenue requirement was inadvertently removed from the meter category rather than software in FY 2025. Attachment PUC 4-5 was provided as a revised revenue requirement that properly reflected the removal of MDMS costs from the software category in FY 2025 in the same format as Attachment PUC 2-2-1.

Therefore, in this response, the Company is providing Attachment PUC 5-5 which adds a separate section below showing the same information in the same format as the corrected revenue requirement provided on Attachment PUC 4-5, Page 1, but calculated using the same depreciation rate and MACRS tax life as used for the rest of the Electric ISR capital investments.

The Narragansett Electric Company
d/b/a Rhode Island Energy
Electric Infrastructure, Safety, and Reliability (ISR) Plan - AMF
Annual Revenue Requirement Summary - AMF Capital Investment

Line No.		Fiscal Year 4/1/24 - 3/31/25 2025 (a)	Fiscal Year 4/1/25 - 3/31/26 2026 (b)	Fiscal Year 4/1/26 - 3/31/27 2027 (b)
	AMF Incremental Capital Investment: Using Specific Book Depreciation & MACRS Tax Rate (Company Filing)			
1	Meters - Forecasted Revenue Requirement on FY 2025 Incremental Capital included in ISR	$1,962,748	$4,717,269	$4,536,406
2	Software - Forecasted Revenue Requirement on FY 2025 Incremental Capital included in ISR	$1,973,270	$4,318,218	$4,045,486
3	Network - Forecasted Revenue Requirement on FY 2025 Incremental Capital included in ISR	$347,052	$829,759	$805,749
4	Meters - Forecasted Revenue Requirement on FY 2026 Incremental Capital included in ISR	$0	$4,050,863	$9,738,411
5	Software - Forecasted Revenue Requirement on FY 2026 Incremental Capital included in ISR	$0	$1,498,283	$3,278,431
6	Network - Forecasted Revenue Requirement on FY 2026 Incremental Capital included in ISR	$0	$471,771	$1,128,169
7	Meters - Forecasted Revenue Requirement on FY 2027 Incremental Capital included in ISR	$0	$0	$162,605
8	Software - Forecasted Revenue Requirement on FY 2027 Incremental Capital included in ISR	$0	$0	$416,360
9	Network - Forecasted Revenue Requirement on FY 2027 Incremental Capital included in ISR	$0	$0	$137,640
10	Subtotal	$4,283,071	$15,886,162	$24,249,257
11	MDMS Software - Depreciation - No Return - FY 2025 invesment	$118,564	$237,128	$237,128
12	MDMS Software - Depreciation - No Return - FY 2026 invesment	$0	$101,626	$203,252
13	MDMS Software - Depreciation - No Return - FY 2027 invesment	$0	$0	$0
14	Subtotal	$118,564	$338,754	$440,380
15	**Total AMF Capital Investment Component of Revenue Requirement**	**$4,401,635**	**$16,224,916**	**$24,689,637**

Column/Line Notes:
10 Total Lines 1 through 9
14 Total Lines 11 through 13
15 Line 10 + Line 14

	AMF Incremental Capital Investment: Using Composite Book Depreciation and MACRS Tax Rate (Requested Scenario)			
16	Meters - Forecasted Revenue Requirement on FY 2025 Incremental Capital included in ISR	$1,711,178	$4,263,493	$4,169,763
17	Software - Forecasted Revenue Requirement on FY 2025 Incremental Capital included in ISR	$980,401	$2,442,723	$2,389,021
18	Network - Forecasted Revenue Requirement on FY 2025 Incremental Capital included in ISR	$292,508	$731,578	$723,887
19	Meters - Forecasted Revenue Requirement on FY 2026 Incremental Capital included in ISR	$0	$3,532,952	$8,802,985
20	Software - Forecasted Revenue Requirement on FY 2026 Incremental Capital included in ISR	$0	$744,302	$1,854,412
21	Network - Forecasted Revenue Requirement on FY 2026 Incremental Capital included in ISR	$0	$397,744	$994,803
22	Meters - Forecasted Revenue Requirement on FY 2027 Incremental Capital included in ISR	$0	$0	$140,644
23	Software - Forecasted Revenue Requirement on FY 2027 Incremental Capital included in ISR	$0	$0	$206,517
24	Network - Forecasted Revenue Requirement on FY 2027 Incremental Capital included in ISR	$0	$0	$115,809
25	Subtotal	$2,984,087	$12,112,791	$19,397,841
26	MDMS Software - Depreciation - No Return - FY 2025 invesment	$26,226	$52,453	$52,453
27	MDMS Software - Depreciation - No Return - FY 2026 invesment	$0	$22,480	$44,959
28	MDMS Software - Depreciation - No Return - FY 2027 invesment	$0	$0	$0
29	Subtotal	$26,226	$74,932	$97,412
30	**Total AMF Capital Investment Component of Revenue Requirement**	**$3,010,313**	**$12,187,724**	**$19,495,253**

Column/Line Notes:
25 Total Lines 16 through 24
29 Total Lines 26 through 28
30 Line 25 + Line 29

PUC 5-6

Request:

Referring to the response to PUC 3-12, Attachment 3-12-1, page 1 of 2, lines 4 & 5, please explain the difference between projects CN04904 Meter Purchase (AMR) $1,681 and COS004 Meter Blanket $852k.

Response:

Project CN04904 – Meter Purchases (AMR) forecast of $1,681 captures the capex material costs of purchasing AMR meters for growth and replacements throughout FY25.

Project COS0004 – Meter Blankets forecast of $852k captures capex labor costs for Rhode Island Energy employees performing meter installations and replacements throughout FY25.

PUC 5-7

Request:

Please update the response to PUC 3-12, Attachment PUC 3-12-2, to include subtotals for discretionary and non-discretionary blankets.

Response:

Please see Attachment PUC 5-7 for a list of blanket projects with subtotals for discretionary and non-discretionary.

Prepared by or under the supervision of: Kathy Castro

(a)	(b)		(c)	(d)	(e)
Line	**Project #**	**Project Description**	**FY 2024 Forecast (FY 2024 Q2 Report) $000's**	**FY 2024 Budget $000's**	**FY 2025 Budget $000's**
1	COS0002	Damage Failure Blanket - Substation	$721	$640	$659
2	COS0004	Meter Blanket	835	835	852
3	COS0010	New Business Residential Blanket	6,800	6,800	7,004
4	COS0011	New Business Commercial Blanket	5,900	5,900	6,077
5	COS0012	Streetlighting Blanket	575	575	592
6	COS0013	Public Requirements Blanket	1,200	1,200	2,124
7	COS0014	Damage/Failure Blanket	10,300	10,300	10,609
8	COS0022	3rd Party Attachment Blanket	280	280	288
9		Non-Discretionary Capital Spending - Blanket Projects	26,613	26,530	28,205
10	COS0006	General Equipment Blanket	400	400	412
11	COS0015	Reliability Blanket	2,795	2,000	2,100
12	COS0016	Load Relief Blanket	824	240	247
13	COS0017	Asset Replacement Blanket	4,900	4,900	5,847
14	COS0025	Substation LR/Reliability Blanket	250	250	258
15	COS0026	Substation Asset Repl Blanket	320	320	330
16		Discretionary Capital Spending - Blanket Projects	9,489	8,110	9,194
17	**Total Capital Spending - Blanket Projects**		**$36,102**	**$34,640**	**$37,399**

PUC 5-8

Request:

Please update the response to PUC 3-12, Attachment 3-12-2, the update should:

a. Include only discretionary blankets.
b. Maintain columns a through e.
c. Update column (c) to reflect the FY 2024 forecast with actuals through January 2024 (or the most recent data available).
d. Add columns for actuals for the Fiscal Years 2023, 2022, 2021, 2020.

Response:

Please see the updated response below.

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
Line	**Project #**	**Project Description**	**Preliminary FY 2024 Forecast through 12/31/23 $000's**	**FY 2024 Budget $000's**	**FY 2025 Budget $000's**	**FY 2023 Actuals $000's**	**FY 2022 Actuals $000's**	**FY 2021 Actuals $000's**	**FY 2020 Actuals $000's**
1	COS0006	General Equipment Blanket	$400	$400	$412	$307	$458	$206	$161
2	COS0015	Reliability Blanket	3,577	2,000	2,100	3,173	1,653	1,234	1,121
3	COS0016	Load Relief Blanket	1,812	240	247	270	199	96	332
4	COS0017	Asset Replacement Blanket	5,366	4,900	5,847	4,607	3,629	3,415	3,316
5	COS0025	Substation LR/Reliability Blanket	250	250	258	(4)	6	122	(24)
6	COS0026	Substation Asset Repl Blanket	320	320	330	122	50	366	182
7	**Total Capital Spending - Discretionary Blanket Projects**		**$11,724**	**$8,110**	**$9,194**	**$8,474**	**$5,994**	**$5,438**	**$5,087**

Prepared by or under the supervision of: Kathy Castro

PUC 5-9

Request:

Please provide a table with the following information:

a. Please provide a list of cities and town in which the **AMF Network** (AMF amounts charged to FERC account 397) will be deployed in **FY 2025**.

b. Please provide a list of cities and towns in which **AMF meters** will be deployed in in **FY 2025**.

c. Please provide a list of cities and town in which the **AMF Network** (AMF amounts charged to FERC account 397) will be deployed in **FY 2026**.

d. Please provide a list of cities and towns in which **AMF meters** will be deployed in **FY 2026**.

e. For a. through d. above, please provide data by quarter if available.

Response:

a. Please see Attachment PUC 5-9-1.

b. Please see Attachment PUC 5-9-2.

c. Please see Attachment PUC 5-9-3.

d. Please see Attachment PUC 5-9-4.

e. The response to 5-9 e. is captured, using Infrastructure Safety and Reliability Plan fiscal quarters, within Attachments PUC 5-9-1 through 5-9-4.

Below is a list of towns in which the AMF Network is planned to be deployed in FY 2025.

Deployment Sector	Town	Qtr-Year
Westerly	Westerly	Q2 2025
Westerly	Hopkinton	Q2 2025
Westerly	Richmond	Q2 2025
Westerly	Charlestown	Q3 2025
Westerly	South Kingstown	Q3 2025
Westerly	Narragansett	Q3 2025
Middletown	Jamestown	Q3 2025
Middletown	Newport	Q3 2025
Middletown	Middletown	Q3 2025
Middletown	Little Compton	Q3 2025
Middletown	Tiverton	Q3 2025
Middletown	Portsmouth	Q3 2025
North Kingstown-West	North Kingstown	Q4 2025
North Kingstown-West	Exeter	Q4 2025
North Kingstown-West	West Greenwich	Q4 2025
North Kingstown-West	Coventry	Q4 2025
North Kingstown-West	East Greenwich	Q4 2025
North Kingstown-East	West Warwick	Q4 2025
North Kingstown-East	Warwick	Q4 2025

Below is a list of towns in which the AMF Meters are planned to be deployed in FY 2025.

Deployment Sector	Town	Qtr-Year
Westerly	Westerly	Q4 2025
Westerly	Hopkinton	Q4 2025
Westerly	Richmond	Q4 2025

Below is a list of towns in which the AMF Network is planned to be deployed in FY 2026.

Deployment Sector	Town	Qtr-Year
North Kingstown-East	Warwick	Q1 FY 2026
Providence-West	Cranston	Q1 FY 2026
Providence-West	Johnston	Q1 FY 2026
Providence-East	East Providence	Q1 FY 2026
Providence-East	Barrington	Q1 FY 2026
Providence-East	Warren	Q1 FY 2026
Providence-East	Bristol	Q1 FY 2026
Providence	Providence	Q1 FY 2026
Chopmist	Foster	Q1 FY 2026
Chopmist	Scituate	Q1 FY 2026
Chopmist	Glocester	Q2 FY 2026
Chopmist	Smithfield	Q2 FY 2026
Chopmist/Lincoln-East	North Providence	Q2 FY 2026
Lincoln-East	Pawtucket	Q3 FY 2026
Lincoln-East	Central Falls	Q3 FY 2026
Lincoln-East	Lincoln	Q3 FY 2026
Lincoln-West	Cumberland	Q3 FY 2026
Lincoln-West	Woonsocket	Q3 FY 2026
Lincoln-West	North Smithfield	Q3 FY 2026
Lincoln-West	Burrillville	Q3 FY 2026

Below is a list of towns in which the AMF Meters are planned to be deployed in FY 2026.

Deployment Sector	Town	Qtr-Year
Westerly	Charlestown	Q1 2026
Westerly	South Kingstown	Q1 2026
Westerly	Narragansett	Q1 2026
Middletown	Jamestown	Q1 2026
Middletown	Newport	Q1 2026
Middletown	Middletown	Q1 2026
Middletown	Little Compton	Q1 2026
Middletown	Tiverton	Q1 2026
Middletown	Portsmouth	Q1 2026
North Kingstown-West	North Kingstown	Q1 2026
North Kingstown-West	Exeter	Q1 2026
North Kingstown-West	West Greenwich	Q1 2026
North Kingstown-West	Coventry	Q2 2026
North Kingstown-West	East Greenwich	Q2 2026
North Kingstown-East	West Warwick	Q2 2026
North Kingstown-East	Warwick	Q2 2026
Providence-West	Cranston	Q2 2026
Providence-West	Johnston	Q2/Q3 2026
Providence-East	East Providence	Q3 2026
Providence-East	Barrington	Q3 2026
Providence-East	Warren	Q3 2026
Providence-East	Bristol	Q3 2026
Providence	Providence	Q3/Q4 2026
Chopmist	Foster	Q4 2026
Chopmist	Scituate	Q4 2026
Chopmist	Glocester	Q4 2026
Chopmist	Smithfield	Q4 2026
Chopmist/Lincoln-East	North Providence	Q4 2026
Lincoln-East	Pawtucket	Q4 2026
Lincoln-East	Central Falls	Q4 2026
Lincoln-East	Lincoln	Q4 2026
Lincoln-West	Cumberland	Q4 2026
Lincoln-West	Woonsocket	Q1 2027
Lincoln-West	North Smithfield	Q1 2027
Lincoln-West	Burrillville	Q1 2027

PUC 5-10

Request:

Referring to the response to PUC 3-11, the company cites cost increases as one rationale for increasing the blanket threshold from $100,000 to $500,000. What evidence did the company rely on to determine that $500,000 is the appropriate threshold (other than that is what PPL uses).

Response:

There were multiple factors that the Company considered when it determined that it would increase the blanket threshold from $100,000 to $500,000. The Company's process for making that decision is described below. The $100,000 threshold has been in effect for approximately 20 years, and costs have increased during that timeframe (as reflected in the Distribution Electric construction costs set forth in the Handy Whitman Index for the North Atlantic region). Those cost increases justified a reassessment of the threshold.

The Company began internal discussions about increasing the threshold for individual work requests within blanket projects during 2022 as the transition to PPL's work management and plant accounting systems was underway. PPL does not have a blanket threshold and rarely pulls specific projects. As a step towards PPL's work management procedure Rhode Island Energy decided to increase the threshold from $100,000 to $500,000. Review of blanket project work takes place throughout the year. It continues to indicate that individual work requests within blanket projects are set up for small dollar, high volume work. The overall majority of individual work requests, excluding monthly confirming work requests, are below the $100,000.

PUC 5-11

Request:

Referencing the testimony on Bates page 14 and language on Attachment 6, Bates page 159, the Company asserts that the company's distribution system reliability has been worsening over time. The testimony is that the trend is positive (meaning a worsening SAIFI score).

a. Please test the null hypothesis that the trend is the result of random variation. More specifically: Please calculate a p-value for the null hypothesis test, and report if the null hypothesis can be rejected with a 99% confidence interval. Please report the method used (e.g., Mann-Kendall, Spearman, etc.) and a brief statement of why the method was chosen (e.g., appropriate for determining monotonic rank trend for non-parametric data will ties). If other statistical variables were calculated to reach a p-value, please report those (e.g., z-score, Kendall's tau coefficient, Spearman's coefficient).

b. Please repeat part a, but update the data to include the preliminary 2023 data provided in response to PUC 3-17.

Response:

The Company did not base its determination on the need for investments to maintain and improve reliability on a statistical analysis of whether there is a worsening SAIFI trend. Rather, the Company observed the linear trend of worsening SAIFI as additional support for its observation that additional investments, such as reclosers, are reasonably needed to maintain reliable distribution service in the short and long term. It is not the Company's position that any particular statistical level of confidence that there is a worsening SAIFI trend under either the Regulatory metric or the IEEE metric is necessary to conclude that there is a need for the reliability investments proposed. Rather, the Company takes the position that the metrics together with other indicators of reliability, such as regional IEEE SAIFI (4th Quartile) and customer satisfaction scores (3rd Quartile Overall & Power Quality and Reliability) support the need for the cost effective reliability investments the Company has proposed. However, the Company conducted the requested analysis with PUC reliability values using the Mann-Kendall method.

PUC 5-11, page 2

a. 2013 to 2022 Tests – PUC values

i. The p-value for the null hypothesis test was calculated at 0.2068.

ii. At a 99% confidence interval, the null hypothesis is not rejected and the Mann-Kendall method indicates that there is no trend.

iii. The Mann-Kendall method was used because it was mentioned within the question and is a method to determine upward or downward trends. Specifically, the Mann-Kendall Test is used to determine whether a time series has a monotonic upward or downward trend. It does not require that the data be normally distributed or linear. It does require that there is no autocorrelation.

iv. The variables calculated are shown in the table below.

Mann-Kendall Variables – SAIFI Test – PUC Values - 2013 to 2022
99% Confidence Tests

n	10
confidence	**99%**
alpha	0.01
MK-stat	15
s.e.	11.0905
z-stat	1.2623
p-value	0.2068
trend	no

b. 2013 to 2023 (preliminary value) – PUC values

i. The test was repeated with preliminary 2023 data with a SAIFI of 0.668. The p-value for this null hypothesis test was calculated at 0.6384

ii. At a 99% confidence interval, the null hypothesis is not rejected and the Mann-Kendall method indicates that there is no trend.

iii. The variables calculated are shown in the table below.

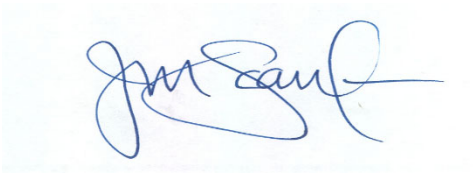
Mann-Kendall Variables – SAIFI Test – PUC Values - 2013 to Preliminary 2023
99% Confidence Tests

n	11
confidence	**99%**
alpha	0.01
MK-stat	7
s.e.	12.7671
z-stat	0.4700
p-value	0.6384
trend	no

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

February 23, 2024
Date

Docket No. 23-48-EL – RI Energy's Electric ISR Plan FY 2025
Service List as of 1/25/2024

Name/Address	E-mail Distribution	Phone
The Narragansett Electric Company d/b/a Rhode Island Energy Andrew Marcaccio, Esq. 280 Melrose St. Providence, RI 02907 Adam S. Ramos, Esq. **Hinckley Allen** 100 Westminster Street, Suite 1500 Providence, RI 02903-2319	amarcaccio@pplweb.com; cobrien@pplweb.com; jscanlon@pplweb.com; aramos@hinckleyallen.com; sbriggs@pplweb.com; NABegnal@RIEnergy.com; smtoronto@RIEnergy.com; ATLaBarre@RIEnergy.com; rconstable@RIEnergy.com; krcastro@RIEnergy.com; CJRooney@RIEnergy.com; joliveira@pplweb.com; TGShields@pplweb.com; nhawk@pplweb.com;	401-784-4263
Division of Public Utilities (Division) Gregory Schultz, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	gSchultz@riag.ri.gov; Ellen.golde@dpuc.ri.gov; John.bell@dpuc.ri.gov; Al.contente@dpuc.ri.gov; Robert.Bailey@dpuc.ri.gov; Christy.Hetherington@dpuc.ri.gov; Margaret.l.hogan@dpuc.ri.gov; Paul.roberti@dpuc.ri.gov;	

David Effron Berkshire Consulting 12 Pond Path North Hampton, NH 03862-2243	Djeffron@aol.com;	603-964-6526
Gregory L. Booth, PLLC 14460 Falls of Neuse Rd. Suite 149-110 Raleigh, N. C. 27614	gboothpe@gmail.com;	919-441-6440
Linda Kushner L. Kushner Consulting, LLC 514 Daniels St. #254 Raleigh, NC 27605	Lkushner33@gmail.com;	919-810-1616
Office of Energy Resources Al Vitali, Esq.	Albert.vitali@doa.ri.gov; nancy.russolino@doa.ri.gov; Christopher.Kearns@energy.ri.gov; Shauna.Beland@energy.ri.gov; William.Owen@energy.ri.gov;	
Office of Attorney General Nick Vaz, Esq. 150 South Main St. Providence, RI 02903	nvaz@riag.ri.gov; mbedell@riag.ri.gov;	401-274-4400 x 2297
Conservation Law Foundation (CLF) James Rhodes, Esq. Conservation Law Foundation 235 Promenade Street Suite 560, Mailbox 28 Providence, RI 02908	jrhodes@clf.org;	401-225-3441
File an original & five (5) copies w/: Luly E. Massaro, Commission Clerk Cynthia Wilson-Frias, Esq. Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov; Cynthia.WilsonFrias@puc.ri.gov; Todd.bianco@puc.ri.gov; Alan.nault@puc.ri.gov; Kristen.L.Masse@puc.ri.gov;	401-780-2107
Matt Sullivan, Green Development LLC	ms@green-ri.com;	