

June 21, 2024

#### VIA HAND DELIVERY & ELECTRONIC MAIL

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

RE: Docket No. 23-37-EL – The Narragansett Electric Company d/b/a
Rhode Island Energy's Petition for Acceleration of a System Modification
Due to Distributed Generation Project
Tiverton Project
Responses to Record Requests (Complete Set)

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the "Company"), enclosed please find the Company's complete set of responses to the record requests issued at the Commission's evidentiary hearings on June 3-6, 2024 in the above-referenced docket.

This transmittal contains the Company's response to Record Request No. 4 submitted on June 5, 2024.

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

Sincerely,

Andrew S. Marcaccio

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Enclosures

cc: Docket 23-37-EL Service List

## STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

TIVERTON PROJECTS	) _) )	
ACCELERATION OF A SYSTEM MODIFICATION DUE TO DISTRIBUTED GENERATION PROJECTS	)	DOCKET NO. 23-37-EL
THE NARRAGANSETT ELECTRIC COMPANY d/b/a RHODE ISLAND ENERGY PETITION FOR	)	

# MOTION OF THE NARRAGANSETT ELECTRIC COMPANY D/B/A RHODE ISLAND ENERGY FOR PROTECTIVE TREATMENT OF CONFIDENTIAL INFORMATION

The Narragansett Electric Company d/b/a Rhode Island Energy (the "Company") hereby respectfully requests that the Public Utilities Commission ("PUC") grant protection from public disclosure certain confidential information submitted by the Company in the above referenced docket. The reasons for the protective treatment are set forth herein. The Company also requests that, pending entry of that finding, the PUC preliminarily grant the Company's request for confidential treatment pursuant to 810-RICR-00-00-1.3(H)(2).

The record that is the subject of this Motion that requires protective treatment from public disclosure is the Company's confidential version of Attachment RR-10 (the "Confidential Attachment"). The Confidential Attachment contains meeting minutes in connection with a meeting between the Company and Green Development, LLC ("Green") that occurred on July 17, 2022. The Company requests protective treatment of the Confidential Attachment in accordance with 810-RICR-00-00-1.3(H) and R.I. Gen. Laws § 38-2-2-(4)(B).

#### I. LEGAL STANDARD

For matters before the PUC, a claim for protective treatment of information is governed by the policy underlying the Access to Public Records Act ("APRA"), R.I. Gen. Laws § 38-2-1 et seq. See 810-RICR-00-00-1.3(H)(1). Under APRA, any record received or maintained by a state or local governmental agency in connection with the transaction of official business is considered public unless such record falls into one of the exemptions specifically identified by APRA. See R.I. Gen. Laws §§ 38-2-3(a) and 38-2-2(4). Therefore, if a record provided to the PUC falls within one of the designated APRA exemptions, the PUC is authorized to deem such record confidential and withhold it from public disclosure.

#### II. BASIS FOR CONFIDENTIALITY

The Confidential Attachment, which is the subject of this Motion, is exempt from public disclosure pursuant to R.I. Gen. Laws § 38-2-2(4)(B) as "[t]rade secrets and commercial or financial information obtained from a person, firm, or corporation that is of a privileged or confidential nature." The Rhode Island Supreme Court has held that this confidential information exemption applies where the disclosure of information is likely either (1) to impair the government's ability to obtain necessary information in the future; or (2) to cause substantial harm to the competitive position of the person from whom the information was obtained. Providence Journal v. Convention Center Authority, 774 A.2d 40 (R.I. 2001). The first prong of the test is satisfied when information is provided to the governmental agency and that information is of a kind that would customarily not be released to the public by the person from whom it was obtained. Providence Journal, 774 A.2d at 47.

The Confidential Attachment consists of financial and commercial information. The Company would customarily not release this information to the public. The Confidential

Attachment contains strategic discussions between Green and the Company regarding Green's

business outlook and future interconnection projects. If released to the public, competitors of

Green could use the information to Green's detriment. As such, the Company would not release

this information to the public. Therefore, this information satisfies the exception found in R.I. Gen.

Laws § 38-2-2(4)(B).

III. **CONCLUSION** 

For the foregoing reasons, the Company respectfully requests that the PUC grant this

motion for protective treatment of the Confidential Attachment.

Respectfully submitted,

THE NARRAGANSETT ELECTRIC COMPANY

d/b/a RHODE ISLAND ENERGY

By its attorney,

Andrew S. Marcaccio (#8168)

Rhode Island Energy

Come & m

280 Melrose Street

Providence, RI 02907

(401) 784-4263

Dated: June 21, 2024

3

#### **CERTIFICATE OF SERVICE**

I hereby certify that on June 21, 2024, I delivered a true copy of the foregoing Motion via electronic mail to the parties on the Service List for Docket No. 23-37-EL.

Joanne M. Scanlon

In Re: Rhode Island Energy's Petition for Acceleration Due To Distributed Generation Project – Tiverton Projects Responses to the Record Requests Issued at the Commission's Evidentiary Hearings On June 3-6, 2024

#### Record Request No. 1

#### Request:

Please provide the cost of curb-to-curb paving for each of the segments of the "red line."

#### Response:

The table below shows estimated costs for curb-to-curb paving for each segment of the "red line" shown in the Response to PUC 1-5

Road Name	Road Type	Curb-to-Curb Paving Estimate
Fish Road	Town	\$423,954
Bulgarmarsh Road (Rt 177)	State	\$505,524
Brayton Road	Town	\$277,402

#### Record Request No. 2

#### Request:

Please produce a set of schedules using details similar to those filed in rate proceedings showing the breakdown of costs.

#### Response:

Attachment RR-2-1 and Attachment RR-2-2 include a set of schedules using details similar to those filed in rate proceedings showing the breakdown of costs.

Attachment RR-2-2 is an update to PUC 2-3.

#### SCHEDULE 1 - GD Costs

	COLIED	DEL 1 - OD 00313								
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)
Schedule	ITEM NO.	DESCRIPTION OF WORK	Unit of Measure	RIE Quantities	Labor	Equipment	Rental Equipment	Subcontractor	Materials	SCHEDULED VALUE
1	1	ENGINEERING / PERMITTING	Lot					\$500,000		\$500,000
1	2	WIRE PROCUREMENT	Lot						\$2,223,702	\$2,223,702
1	3	2 WAY MANHOLE	Ea	29	\$323,349	\$311,780	\$76,788	\$398,331	\$493,104	\$1,603,352
1	4	3 WAY MANHOLE	Ea	5	\$62,785	\$57,101	\$18,960	\$110,024	\$90,492	\$339,362
1	5	9 WAY DUCTBANK	ln-ft	1,100	\$83,884	\$83,848	\$39,165	\$202,826	\$54,849	\$464,572
1	6	6 WAY DUCTBANK	ln-ft	1,100	\$81,165	\$83,655	\$37,896	\$166,969	\$48,470	\$418,155
1	7	4 WAY DUCTBANK	ln-ft	16,800	\$1,232,059	\$1,257,902	\$575,244	\$2,182,041	\$674,272	\$5,921,518
1	8	2 WAY DUCTBANK/RISERS	ln-ft	250	\$55,269	\$62,832	\$18,448	\$59,718	\$15,043	\$211,310
1	9	GENERAL REQUIREMENTS						\$1,586,141		\$1,586,141
1	10	MATERIAL HANDLING (13%)							\$467,991	\$467,991
1	11	CAPITAL OVERHEAD (22%)			\$404,472	\$408,566	\$168,630			\$981,669
1	12	A&G (5%)			\$91,926	\$92,856	\$38,325	\$260,303	\$179,997	\$663,406
1	13	PAGE TOTALS								\$15,381,177

#### SCHEDULE 2 - Recalculate GD Costs with overheads and A&G allocated to rows

	SCHEIN	JLE 2 - Recalculate GD Costs with overneads and <i>i</i>	A&G allocated to rows												
	CONED	SEE 2 Troduction of Coole Wall ever loade and	aco anocatos to rowo								22%	5%	Page 2		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(1)	(m)	(n)		
Schedule	ITEM	DESCRIPTION OF WORK	Unit of	RIE Quantities	Labor	Equipment	Rental	Subcontractor	Materials	SCHEDULED	CAPITAL	A&G (5%)	Total w/OH & A&G		
ciicauic	NO.	DESCRIPTION OF WORK	Measure	KIE Qualitities	Laudi	Equipment	Equipment	Succentractor	nent Subcontractor Materials	Materials	Subcontractor Materials	VALUE	OVERHEAD (22%)	A&G (370)	Total w/Oll & A&G
2	1	ENGINEERING / PERMITTING	Lot		\$0	\$0	\$0	\$500,000	\$0	\$500,000	\$0	\$25,000	\$525,000		
2	2	WIRE PROCUREMENT	Lot		\$0	\$0	\$0	\$0	\$2,223,702	\$2,223,702	\$0	\$111,185	\$2,334,887		
2	3	2 WAY MANHOLE	Ea	29	\$323,349	\$311,780	\$76,788	\$398,331	\$493,104	\$1,603,352	\$156,622	\$80,168	\$1,840,141		
2	4	3 WAY MANHOLE	Ea	5	\$62,785	\$57,101	\$18,960	\$110,024	\$90,492	\$339,362	\$30,546	\$16,968	\$386,876		
2	5	9 WAY DUCTBANK	ln-ft	1,100	\$83,884	\$83,848	\$39,165	\$202,826	\$54,849	\$464,572	\$45,517	\$23,229	\$533,318		
2	6	6 WAY DUCTBANK	ln-ft	1,100	\$81,165	\$83,655	\$37,896	\$166,969	\$48,470	\$418,155	\$44,598	\$20,908	\$483,660		
2	7	4 WAY DUCTBANK	ln-ft	16,800	\$1,232,059	\$1,257,902	\$575,244	\$2,182,041	\$674,272	\$5,921,518	\$674,345	\$296,076	\$6,891,939		
2	8	2 WAY DUCTBANK/RISERS	ln-ft	250	\$55,269	\$62,832	\$18,448	\$59,718	\$15,043	\$211,310	\$30,041	\$10,566	\$251,916		
2	9	GENERAL REQUIREMENTS			\$0	\$0	\$0	\$1,586,141	\$0	\$1,586,141	\$0	\$79,307	\$1,665,448		
2	10	MATERIAL HANDLING (13%)			\$0	\$0	\$0	\$0	\$467,991	\$467,991	\$0	\$0	\$467,991		
2	11	CAPITAL OVERHEAD (22%)			\$404,472	\$408,566	\$168,630	\$0	\$0	\$981,669					
2	12	A&G (5%)			\$91,926	\$92,856	\$38,325	\$260,303	\$179,997	\$663,406					
2	13	PAGE TOTALS								\$15,381,177	\$981,669	\$663,406	\$15,381,177		

#### SCHEDULE 3 - Defined Sections

	COLIED	DEL 9 - Delinea Occilons							
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)
Schedule	ITEM NO.	DESCRIPTION OF WORK	Unit of Measure	RIE Quantities	Fish Rd	Bulgarmarsh (Rt 177)	Brayton Rd	Total	Notes
3	1	ENGINEERING / PERMITTING	Lot		9200	4500	5300	19000	Use ratio of ductbank
3	2	WIRE PROCUREMENT	Lot		9200	4500	5300	19000	Use ratio of ductbank
3	3	2 WAY MANHOLE	Ea	29	15	6	8	29	
3	4	3 WAY MANHOLE	Ea	5	3	1	1	5	
3	5	9 WAY DUCTBANK	ln-ft	1,100	1100	)		1100	
3	6	6 WAY DUCTBANK	ln-ft	1,100	1100	)		1100	
3	7	4 WAY DUCTBANK	ln-ft	16,800	7000	4500	5300	16800	
3	8	2 WAY DUCTBANK/RISERS	ln-ft	250	200	25	25	250	
3	9	GENERAL REQUIREMENTS			9200	4500	5300	19000	Use ratio of ductbank
3	10	MATERIAL HANDLING (13%)			9200	4500	5300	19000	Use ratio of ductbank
3	11	CAPITAL OVERHEAD (22%)						-	
3	12	A&G (5%)							
3	13	PAGE TOTALS							

The Narragansett Electric Company d/b/a Rhode Island Energy RIPUC Docket No. 23-37-EL Attachment RR-2-1 Page 3 of 8

## SCHEDULE 4 - Breakdown Costs By Defined Sections (b) (c)

(a)	(b)	(c)	(d)	(e)	(f)	(g)
Schedule	ITEM NO.	DESCRIPTION OF WORK	Fish Rd	Bulgamarsh (Rt 177)	Brayton Rd	Total
4	1	ENGINEERING / PERMITTING	\$254,211	\$124,342	\$146,447	\$525,000
4	2	WIRE PROCUREMENT	\$1,130,577	\$553,000	\$651,311	\$2,334,887
4	3	2 WAY MANHOLE	\$951,797	\$380,719	\$507,625	\$1,840,141
4	4	3 WAY MANHOLE	\$232,126	\$77,375	\$77,375	\$386,876
4	5	9 WAY DUCTBANK	\$533,318	\$0	\$0	\$533,318
4	6	6 WAY DUCTBANK	\$483,660	\$0	\$0	\$483,660
4	7	4 WAY DUCTBANK	\$2,871,641	\$1,846,055	\$2,174,243	\$6,891,939
4	8	2 WAY DUCTBANK/RISERS	\$201,533	\$25,192	\$25,192	\$251,916
4	9	GENERAL REQUIREMENTS	\$806,427	\$394,448	\$464,572	\$1,665,448
4	10	MATERIAL HANDLING (13%)	\$226,606	\$110,840	\$130,545	\$467,991
4	11	CAPITAL OVERHEAD (22%)				
4	12	A&G (5%)				
4	13	PAGE TOTALS	\$7,691,897	\$3,511,971	\$4,177,310	\$15,381,177

The Narragansett Electric Company d/b/a Rhode Island Energy RIPUC Docket No. 23-37-EL Attachment RR-2-1 Page 4 of 8 SCHEDULE 5A - Percent Breakdown of Costs By Defined Sections
(b) (c)

(a)	(b)	(c)	(d1)	(d2)	(d3)	(e1)	(e2)	(e3)	(f1)	(f2)	(f3)
Schedule	ITEM NO.	DESCRIPTION OF WORK	Fish Rd - System Modification %		Fish Rd - System Improvement %	System	Bulgamarsh Rd - Accelerated Modification %	- System	Brayton Rd - System Modification %	Brayton Rd - Accelerated Mod%	Brayton Rd - System Modification %
5A	1	ENGINEERING / PERMITTING	0%	100%	0%	0%	100%	0%	100%	100%	0%
5A	2	WIRE PROCUREMENT	0%	100%	0%	0%	100%	0%	100%	100%	0%
5A	3	2 WAY MANHOLE	0%	100%	0%	80%	0%	20%	100%	0%	20%
5A	4	3 WAY MANHOLE	0%	100%	0%	80%	0%	20%	100%	0%	20%
5A	5	9 WAY DUCTBANK	0%	22%	78%	100%	0%	0%	0%	0%	0%
5A	6	6 WAY DUCTBANK	0%	33%	67%	100%	0%	0%	0%	0%	0%
5A	7	4 WAY DUCTBANK	0%	50%	50%	80%	0%	20%	50%	0%	20%
5A	8	2 WAY DUCTBANK/RISERS	0%	0%	100%	0%	0%	100%	0%	0%	100%
5A	9	GENERAL REQUIREMENTS	0%	100%	0%	80%	0%	20%	100%	0%	20%
5A	10	MATERIAL HANDLING (13%)	0%	100%	0%	0%	100%	0%	100%	100%	0%
5A	11	CAPITAL OVERHEAD (22%)									
5A	12	A&G (5%)									
5A	13	PAGE TOTALS								·	

The Narragansett Electric Company d/b/a Rhode Island Energy RIPUC Docket No. 23-37-EL Attachment RR-2-1 Page 5 of 8

Ductbank Allocation Method - Fish Rd	Ductbank Allocation Method - Bulgamarsh & Brayton Rds
	Duct Construction %
	Duct Construction %
Duct Count	
Duct Count	
Duct Count	Duct Construction %
	Duct Construction %

Duct Bank Multipliers	Depth to top of duct bank (ft)	Height Duct Bank (ft)	Width of Trench (ft)	Cross Section (ft^2)	% to DG for base 2-way	% for extra ducts vs 2-way	% to DG for base 4- way	% for extra ducts vs 4- way
2-way	3	1	3	12	100%	0%		
4-way	3	2	3	15	80%	20%	100%	0%
6-way	3	2	3.75	18.75	64%	36%	80%	20%
9-way	3	3	3.75	22.5	53%	47%	67%	33%

The Narragansett Electric Company d/b/a Rhode Island Energy RIPUC Docket No. 23-37-EL Attachment RR-2-1 Page 6 of 8

The Narragansett Electric Company d/b/a Rhode Island Energy RIPUC Docket No. 23-37-EL Attachment RR-2-1 Page 7 of 8

#### SCHEDULE 6 - RIE Costs

(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)
Schedule	ITEM NO.	Description	Туре	Unit Cost	Substation	Fish Rd	Bulgamarsh Rd	Brayton Rd	Notes
6	1	Substation - New Feeder Position	Estimate	\$1,022,000	\$1,022,000		\$871,023	\$1,025,871	Study Cost
6	2	33F6 Install Cost	Estimate	\$1,540,409		\$745,882	\$364,834	\$429,693	Study Cost
6	3	1 mile 477 spacer 2nd circuit (per mile)	Estimate	\$1,347,487			\$1,148,426	\$1,352,591	Hypothetical cost if DG did not exist

<----Max Accelerated Modification

#### SCHEDULE 7 - Modified Percent Reimbursement - Section Breakdown

(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
Schedule	ITEM	Description	From	То	% For DG	% For Accel	% For Sys
Schedule	NO.	Description	TIOIII	10	701 OI DG	Mod	Improve
7	1	Sub-T DG Customer Cost Share					
7	2	Substation - New Feeder Position			0.00%	100.00%	0.00%
7	3	Cable 15kV - New Install 33F6	Substation (Fish Rd)	Fish Rd/Bulgar	0.00%	100.00%	0.00%
7	4	Duct Bank Civil Work & Cable Procurement	Substation (Fish Rd)	Fish Rd/Bulgar	0.00%	69.13%	30.87%
7	5	Cable 15kV - New Install 33F6	Fish Rd/Bulgarmarsh Ro	Bulgarmarsh R	0.00%	100.00%	0.00%
7	6	Duct Bank Civil Work & Cable Procurement	Fish Rd/Bulgarmarsh Ro	Bulgarmarsh R	51.21%	32.70%	16.09%
7	7	Cable 15kV - New Install 33F6	Bulgarmarsh Rd (177)/B	Green Dev Site	0.00%	100.00%	0.00%
7	8	Duct Bank Civil Work & Cable Procurement	Bulgarmarsh Rd (177)/B	Green Dev Site	51.58%	32.38%	16.04%

The Narragansett Electric Company d/b/a Rhode Island Energy RIPUC Docket No. 23-37-EL Attachment RR-2-1 Page 8 of 8

Notes

Exact same equipment would be installed for future system needs as installed for DG

Exact same equipment would be installed for future system needs as installed for DG

Exact same equipment would be installed for future system needs as installed for DG, a portion is assigned as system improvement

Exact same equipment would be installed for future system needs as installed for DG

Accelerated Modification capped at RIE hypothetical cost, a portion is assigned as system improvement

Exact same equipment would be installed for future system needs as installed for DG

Accelerated Modification capped at RIE hypothetical cost, a portion is assigned as system improvement

SCHEDULE 8 - Updated PUC 2-3 Table
Updated 2024-06-20

	(a)	(b)	(c)		(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)
	Description	From	То		Costs per DIV	s. % For DG	% For Accel Mod	% For Sys Improve	System Modification (Soley Serve DG)	Accelerated Modification (Aligned With Study Recommendta ion)	System	Allocation Method
1	Sub-T DG Customer Cost Share			1						-		
2	Substation - New Feeder Position			2	\$ 1,022,000	0.00%	100.00%	0.00%	\$0	\$1,022,000	\$0	
3	Cable 15kV - New Install 33F6	Substation (Fish Rd)	Fish Rd/Bulgarmarsh Rd (177) Intersection	3	\$ 745,882	0.00%	100.00%	0.00%	\$0	\$745,882	\$0	
4	Duct Bank Civil Work & Cable Procurement	Substation (Fish Rd)	Fish Rd/Bulgarmarsh Rd (177) Intersection	4	\$ 7,691,897	0.00%	69.13%	30.87%	\$0	\$5,317,300	\$2,374,597	Duct Count - Mixed
5	Cable 15kV - New Install 33F6	Fish Rd/Bulgarmarsh Rd (177) Intersection	Bulgarmarsh Rd (177)/Brayton Rd Intersection	5	\$ 364,834	0.00%	100.00%	0.00%	\$0	\$364,834	\$0	
6	Duct Bank Civil Work & Cable Procurement	Fish Rd/Bulgarmarsh Rd (177) Intersection	Bulgarmarsh Rd (177)/Brayton Rd Intersection	6	\$ 3,511,971	51.21%	32.70%	16.09%	\$1,798,633	\$1,148,426	\$564,911	Ductbank Construction % - 4 way
7	Cable 15kV - New Install 33F6	Bulgarmarsh Rd (177)/Brayton Rd Intersection	Green Dev Site	7	\$ 429,693	0.00%	100.00%	0.00%	\$0	\$429,693	\$0	
8	Duct Bank Civil Work & Cable Procurement	Bulgarmarsh Rd (177)/Brayton Rd Intersection	Green Dev Site	8	\$ 4,177,310	51.58%	32.38%	16.04%	\$2,154,764	\$1,352,591	\$669,955	Ductbank Construction % - 4 way
		I		9	\$ 17,943,586				\$ 3,953,397	\$ 10,380,726	\$ 3,609,463	

	10					Total Potential Reimbursement	\$	13,990,189
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#### Record Request No. 3

#### Request:

What is the amount of load and peak load related to Massachusetts customers served by the Tiverton line (33F6)?

#### Response:

The peak load is approximately 1.5 megawatts or 4% of the area load.

The Narragansett Electric Company d/b/a Rhode Island Energy RIPUC Docket No. 23-37-EL nergy's Petition for Acceleration Due

In Re: Rhode Island Energy's Petition for Acceleration Due
To Distributed Generation Project – Tiverton Projects
Responses to the Record Requests Issued at the
Commission's Evidentiary Hearing
on June 4, 2024

#### Record Request No. 4

#### Request:

Please indicate every place in the Electric ISR Plans where the Tiverton project was identified.

#### Response:

The Company has outlined below where the Tiverton work was identified in the Fiscal Year ("FY") 2023, FY 2024, and FY 2025 Electric Infrastructure, Safety, and Reliability ("ISR") Plans.

#### FY 2023 ISR PLAN

Docket No. 5209

#### **Budget Inclusions:**

The Company did not include a budget for the Tiverton project in the Proposed FY 2023 Electric Infrastructure, Safety, and Reliability Plan ("FY 23 ISR Plan").<sup>1</sup>

#### **References within Filing:**

The Company highlighted the Tiverton Area Study findings on Bates Page 37 of the FY 23 ISR Plan, which reads as follows:

"Concerns: feeders exceeding 90% of thermal rating; contingency capacity issues on transformer and feeder level; reliability issues due to bare open wire construction in heavily treed areas of Little Compton; asset condition concerns.

#### Summary of Recommended Solutions:

- Replace equipment identified for replacement to address asset condition concerns at the Tiverton Substation.
- Extend the proposed 33F6 circuit further south to address normal and contingency loading concerns."

 $\frac{https://ripuc.ri.gov/sites/g/files/xkgbur841/files/eventsactions/docket/5209-NGrid-Book1-Electric-ISR-FY2023-Plan-%28PUC-12-20-21%29.bates.pdf$ 

<sup>&</sup>lt;sup>1</sup> The FY 23 ISR Plan may be accessed at:

In Re: Rhode Island Energy's Petition for Acceleration Due
To Distributed Generation Project – Tiverton Projects
Responses to the Record Requests Issued at the
Commission's Evidentiary Hearing
on June 4, 2024

#### Record Request No. 4, page 2

#### FY 2023 ISR PLAN

Docket No. 5209

#### **Data Requests:**

The Company provided responses to Division 5-1 and Record Request No. 11 with information related to the Tiverton project.

#### **FY 2024 ISR PLAN**

Docket No. 22-53 EL

The Company included two separate budgets in the Proposed FY 2024 Electric Infrastructure, Safety, and Reliability Plan ("FY 24 ISR Plan")<sup>2</sup> named Tiverton Substation, one under Asset Condition and one under System Capacity & Performance. The Asset Condition work is noted for clarity but is unrelated to the Petition and was not approved in the FY 24 ISR Plan. The System Capacity & Performance work was approved as part of the FY 24 ISR Plan and is included in the totals in the Company's Compliance Filing for Electric Rates Effective April 1, 2023 that was submitted on March 30, 2023 ("FY 24 Compliance Filing").<sup>3</sup>

#### **Budget Inclusions**

The proposed budget for Tiverton is in the following places within the FY 24 ISR filings:

#### **Asset Condition (\$131,000):**

- TIV001 Tiverton Sub (D-Sub) on Attachment 2 of the Supplemental Budget for April 1, 2023 through March 31, 2024 filed on January 27, 2023 ("FY 24 Supplemental Budget").<sup>4</sup>
- Tiverton Substation under the Asset Condition category on Attachment 3 of the FY 24 Supplemental Budget.
- Chart 16 on Bates Page 97 of the FY 24 ISR Plan.\*

<sup>&</sup>lt;sup>2</sup> The FY 24 ISR Plan may be accessed at: <a href="https://ripuc.ri.gov/sites/g/files/xkgbur841/files/2023-01/2253-RIE-Book1-ElecISR-RevBates2%201-4-23.pdf">https://ripuc.ri.gov/sites/g/files/xkgbur841/files/2023-01/2253-RIE-Book1-ElecISR-RevBates2%201-4-23.pdf</a>.

<sup>&</sup>lt;sup>3</sup> The FY 24 Compliance Filing may be accessed at: <a href="https://ripuc.ecms.ri.gov/sites/g/files/xkgbur841/files/2023-03/RIE-Compliance-April1-2023-Rates.pdf">https://ripuc.ecms.ri.gov/sites/g/files/xkgbur841/files/2023-03/RIE-Compliance-April1-2023-Rates.pdf</a>.

<sup>&</sup>lt;sup>4</sup> The FY 24 Supplemental Budget may be accessed at: <a href="https://ripuc.ri.gov/sites/g/files/xkgbur841/files/2023-01/2253-RIE-SuppBudget%201-27-23.pdf">https://ripuc.ri.gov/sites/g/files/xkgbur841/files/2023-01/2253-RIE-SuppBudget%201-27-23.pdf</a>.

In Re: Rhode Island Energy's Petition for Acceleration Due
To Distributed Generation Project – Tiverton Projects
Responses to the Record Requests Issued at the
Commission's Evidentiary Hearing
on June 4, 2024

#### Record Request No. 4, page 3

#### **FY 2024 ISR PLAN**

Docket No. 22-53 EL

#### System Capacity & Performance (\$109,000):

- TIV002 Tiverton Sub (D-Line) on Attachment 2 of the FY 24 Supplemental Budget.
- Tiverton Substation under the System Capacity & Performance category on Attachment 3 of the FY 24 Supplemental Budget.
- Chart 17 on Bates Page 103 of the FY 24 ISR Plan.\*
  - \*Both references were made prior to the change from calendar year to fiscal year for the ISR filing.

#### **References within Filing (Both Proposed Budgets):**

The below references are for both the Asset Condition and System Capacity & Performance components.

- The Company highlighted the Area Study findings on Bates Page 70 of the FY 24 ISR Plan which reads as follows:
  - "Concerns: feeders exceeding 90% of thermal rating; contingency capacity issues on transformer and feeder level; reliability issues due to bare open wire construction in heavily treed areas of Little Compton; asset condition concerns.

#### Summary of Recommended Solutions:

- Address asset conditions at Tiverton Substation
- Extend the proposed 33F6 circuit further south to address normal and contingency loading concerns.
- Study completed May 2021"
- Chart 7 on Bates Page 75 of the FY 24 ISR Plan which reads as follows:

[Chart beings on next page]

In Re: Rhode Island Energy's Petition for Acceleration Due
To Distributed Generation Project – Tiverton Projects
Responses to the Record Requests Issued at the
Commission's Evidentiary Hearing
on June 4, 2024

#### Record Request No. 4, page 4

#### FY 2024 ISR PLAN Docket No. 22-53 EL

Chart 7 Large Projects and Associated Area Planning Studies

Project	Respective Planning Area Study
Southeast (aka Dunnell Park)	Legacy Project - Blackstone Valley North
Dyer Street - Indoor Substation	Legacy Project - Providence System Area Study
Providence Study Projects - Phase 1-4	Providence
Apponaug Substation	Central Rhode Island East
Phillipsdale Substation	East Bay
Centredale Substation	Northwest Rhode Island
Tiverton Substation	Tiverton
Aquidneck Island (Newport projects)	Legacy Project - Newport
New Lafayette Substation	South County East
Warren Substation	East Bay
East Providence Substation	East Bay
Nasonville Substation	Northwest Rhode Island
Weaver Hill Road Substation	Central Rhode Island East

#### **References within Filing (Asset Condition Only):**

• Bates Page 99 of the FY 24 ISR Plan which reads as follows:

"Tiverton Substation – The Tiverton Area Study recommended the addition of a 12.47 kV breaker, three regulators, and a new getaway manhole and duct system inside the substation in addition to replacement of equipment with asset condition issues."

#### **Data Requests**

- The Company provided the Tiverton Area Study as Attachment DIV 1-20-6 in DIV 1-20.
- The Company provided a fact sheet that outlines the System Capacity & Performance work (RR# 19-10) and a fact sheet for the Asset Condition work (RR# 19-4) in Record Request #19.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 23-37-EL
In Re: Rhode Island Energy's Petition for Acceleration Due
To Distributed Generation Project – Tiverton Projects

To Distributed Generation Project – Tiverton Projects
Responses to the Record Requests Issued at the
Commission's Evidentiary Hearing
on June 4, 2024

#### Record Request No. 4, page 5

#### FY 2025 ISR PLAN

Docket No. 23-48 EL

The Company included two separate budgets in the Proposed FY 2025 Electric Infrastructure, Safety, and Reliability Plan ("FY 25 ISR Plan") named Tiverton Sub (D-Sub), an Asset Condition project, and Tiverton D-Line, a System Capacity & Performance project. The Asset Condition work is note for clarity but is unrelated to the Petition but was approved in the FY 25 ISR Plan. Please refer to Attachment RR#4 for the pertinent pages of the approved budgets in the Company's Compliance Filing for Electric Rates Effective April 1, 2024 that was submitted on March 27, 2024 ("FY 25 Compliance Filing").<sup>5</sup>

#### **Budget Inclusions:**

#### **Asset Condition (\$75,000):**

- Tiverton Sub (D-Sub), Attachment 2, Line 16 Bates Page 81 of the FY 2025 Electric Infrastructure, Safety, and Reliability Plan ("FY 25 ISR Plan")<sup>6</sup>
- Attachment 3 Line 20 Bates Page 85 of the FY 25 ISR Plan
- Fact Sheet Attachment 5 Bates Page 117 of the FY 25 ISR Plan
- Attachment 5 Long Range Plan Bates Page 152 of the FY 25 ISR Plan

#### System Capacity & Performance (\$328,000):

- Chart 10 Bates Page 70 of the FY 25 ISR Plan
- Tiverton D-Line, Attachment 2, Lines 14 Bates Page 82 of the FY 25 ISR Plan
- Attachment 3 Line 19 Bates Page 86 of the FY 25 ISR Plan
- Attachment 5 Long Range Plan Bates Page 153 of the FY 25 ISR Plan
- Attachment 5 Long Range Plan Bates Page 154 of the FY 25 ISR Plan\*

\*This value was related to the work subject to the Petition and was removed from the FY 25 ISR Plan filing made with the Commission.

<sup>&</sup>lt;sup>5</sup> The full FY 25 Compliance Filing may be accessed at: <a href="https://ripuc.ri.gov/sites/g/files/xkgbur841/files/2024-03/RIEnergy-Compliance-Apr1-2024-Rates">https://ripuc.ri.gov/sites/g/files/xkgbur841/files/2024-03/RIEnergy-Compliance-Apr1-2024-Rates</a> 3-27-24 0.pdf.

<sup>&</sup>lt;sup>6</sup> The FY 25 ISR Plan may be accessed at: <a href="https://ripuc.ri.gov/sites/g/files/xkgbur841/files/2024-01/2348-RIE-Book1-ElecISRPlan 12-21-23.pdf">https://ripuc.ri.gov/sites/g/files/xkgbur841/files/2024-01/2348-RIE-Book1-ElecISRPlan 12-21-23.pdf</a>

#### Record Request No. 4, page 6

#### FY 2025 ISR PLAN Docket No. 23-48 EL

#### References within Filing (Asset Condition Work only):

Bates Page 117 of the FY 25 ISR Plan provides a fact sheet for the Tiverton Substation work that was part of the Company's Long Range Plan.

#### **Data Requests:**

The Company provided responses to DIV 6-7 and DIV 7-10 that answered questions related to reliability in the Tiverton area.

The Company included cash flows associated with Tiverton in various data requests including:

- PUC 2-5
- PUC 3-5
- PUC 3-12
- PUC 5-2
- PUC 6-3

The Company also provided sanctioning information on the project in DIV 1-24.

#### **Testimony**

The Company provided Reply Testimony related to the Tiverton and Weaver Hill petitions on page 22 of 42.

Attachment RR-4 Docket No. 23-37-EL Page 1 of 4

The Narragansett Electric Company d/b/a Rhode Island Energy Compliance Filing - Effective Rates April 1, 2024 Docket No. 23-48-EL - Electric ISR FY2025 - Attachment 3 Page 1 of 4

#### **COMPLIANCE (3/26/2024)**

#### Attachment 3 - Five-Year Budget with Details

\$0000

					φυ	100's										
		1	Oocket 22-53-E	L	5 Yea	ır Investme	nt Plan - Ca	pital Spend	ing			Major Pro	ject - Detail	s		
Line Number	Spending Rationale Category	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 Customer Request /															
2	Public Requirement New Business - Commercial	8,745	11,025	9,093	9,366	9,647	9,937	10,235	10,542							Į.
3	New Business - Residential	5,471	7,212	7,212	7,428	7,651	7,880	8,117	8,361							ļ
4	Public Requirements	1,953	1,249	1,249	3,140	3,234	3,331	3,431	3,531							
5	Transformers and Related Equipment	6,776	8,350	5,000	8,000	8,000	8,000	8,000	8,000							
6	Meters and Meter Work	1,036	2,089	2,605	2,533	430	100	100	100							
7	Distributed Generation	5,781	1,000	1,000	1,000	1,000	1,000	1,000	1,000							
8	Third Party Attachments	(732	331	280	288	297	306	315	324							
9	Land and Land Rights	329	500	500	515	530	546	562	579							
10	Outdoor Lighting	352	813	575	592	610	628	647	666							
11	Total Customer Request/Public Requirement	29,710	32,568	27,514	32,862	31,399	31,728	32,407	33,103							
12	Damage / Failure Damage / Failure	9,920	12,545	10,940	11,268	11,606	11,954	12,313	12,682							ļ
13	Reserves	-	-	979	1,008	1,038	1,070	1,102	1,135							
14	Failed Assets	2,619	4,340	1,323	2,537	1,972	-	-	-							
15	Storms	3,176	3,662	1,950	3,000	3,000	3,000	3,000	3,000							
16	Total Damage/Failure	15,716	20,547	15,192	17,813	17,616	16,024	16,415	16,817							
17	Total Non-Discretionary	45,426	53,116	42,706	50,675	49,015	47,752	48,822	49,921							

The Narragansett Electric Company d/b/a Rhode Island Energy Compliance Filing - Effective Rates April 1, 2024 Docket No. 23-48-EL - Electric ISR FY2025 - Attachment 3 Page 2 of 4

			Г	Oocket 22-53-E	L	5 Yea	ar Investme	nt Plan - Ca	pital Spend	ing			Major Pro	ject - Detail	ls		
Line Number	Spending Rationale	Category	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																
2	Asset Condition																
	Separately																
3	Tracked Major	Dyer Street Substation	1,861	2,553	-	15	-	-	-	-	Construction	\$10,658	\$10,842	Apr-21	Sep-21	FY 2025	
4		Admiral St 12 KV Substation	-	=	-	5,513	2,500	-	-	-	Construction	\$12,831	\$12,831	Aug-21	Sep-21	FY 2026	
5		Providence Area LT Study Projects (Ph 1A,1B,2,4)	17,685	25,783	24,314	-	-	-	-	-							
6		Kingston Equipment Replacement	-	-	-	400	3,361	8,403	1,681	2,961	Study Phase		\$16,805		Oct-25	FY 2029	
7		Phillipsdale Substation D Sub	-	-	-	100	5,728	7,240	1,448	324	Study Phase	 05.500	\$6,025		Oct-25	FY 2029	
8		Apponaug Substation	=	-	-	150	1,120	1,980	1,750	700	Study Phase	\$5,700	\$3,800	Jul-23	FY 2026	FY 2029	
10		Hospital #146 Equipment Replacement	-	-	-	320	2,064 816	2,680 2,449	296 4.082	- 816	Study Phase	\$5,360	\$5,359 \$8,164	Dec-23	FY 2026 FY 2027	FY 2028 FY 2029	
10		Merton #51 Equipment Replacement Southeast Substation	327	327	- 66	-	810	2,449	4,082	810	Study Phase Construction	\$11,244	\$8,164	 Jun-19	Oct-19	FY 2029 FY 2025	
12		Auburn 115/12.4kV Substation (D-Sub)	321	321	00	_	-	832	1.663	4,989	Study Phase	\$11,244	\$6,590	Juli-19 	FY 2028	FY 2029	
13	Cubtotal Caparat	tely Track Major Projects	19,873	28,663	24,380	6,498	15,589	23,583	10.919	9,790	Study Phase		\$0,390		F1 2028	F1 2029	\$0
14	Other	Underground Cable Replacement	4,231	4,281	5,500	5,500	6,000	6,000	6,000	6,500							
15	Other	URD Cable Replacement	5,321	6,496	6,276	5,000	5,411	5,723	5,823	5,500							
16		Blanket Projects	4,298	5,686	5,220	6,177	6,338	6,504	6,676	6,850							
17		I&M	257	476	3,000	1,530	1,530	1,530	1,530	1,530							
18		Substation Spare Transformers	231	470	3,000	540	2,480	7,436	8,186	6,825							
19		Substation Breakers & Reclosers	1,231	1,231	437	196	440	- 1,430	0,100	0,823							
20		Other Area Study Projects - BSVS	1,058	1,058	437	781	1,556	2,457	2,280	1,156							
20		Other Area Study Projects - CRIE	1,038	27	-	50	75	35	2,280	315							
22		Other Area Study Projects - CRIW	- 21	-	-	1.883	6,317	10,196	3,730	390							
23		Other Area Study Projects - CRYW  Other Area Study Projects - East Bay	-	-	-	1,885	505	570	570	190							
24		Other Area Study Projects - East Bay Other Area Study Projects - Newport	194	194	-	446	1,189	802	-	-							
25		Other Area Study Projects - NWRI	135	135	_	500	3,007	2,725	1,432	250							
26		Other Area Study Projects - Providence	133	-	_	492	5,396	6,575	4,630	4,630							
27		Other Area Study Projects - Providence		_	_	4,72	-	-	1,029	2,297							
28		Tiverton Substation	60	60	_	75	393	786	786	393							
29		Providence Area LT Supply & Distrib Study	-	-	_	20,382	10,580	7,064	-	-							
30		Reserve	_	_	_	20,562	1,000	1,000	1.000	1,000							
31		Batteries / Chargers	31	227	230	195	387	319	100	-							
32		Recloser Replacements	1,209	1,209	1.300	-	-	-	-	_							
33		UG Improvements and Other	2,732	2,809	1,383	700	565	_	_	_							
34	Subtotal - Other F	Projects and Programs	20,783	23,889	23,346	44,547	53,169	59,722	44,065	37,826							
35	Total Asset Conditi	7	40,656	52,552	47,726	51,045	68,758	83,305	54,984	47,617							
36	Non-Infrastucture		,500	,	,20	22,310	,-50	,- 50		,							
37	mnustuetute	General Equip & Telecom Blanket	(805)	536	700	712	724	737	750	764							
38		Verizon Copper to Fiber	11	26	1,000	180	75	-	-	-							
39	Total Non-Infrastru		(793)		1,700	892	799	737	750	764							

The Narragansett Electric Company d/b/a Rhode Island Energy Compliance Filing - Effective Rates April 1, 2024 Docket No. 23-48-EL - Electric ISR FY2025 - Attachment 3 Page 3 of 4

			Е	ocket 22-53-E	L	5 Yea	r Investme	ıt Plan - Caj	pital Spendi	ing			Major Proj	ject - Detail	ls		
Line Number	Spending Rationale	Category	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	System Capacity & Performance Separately																
2	Tracked Major	East Providence Substation (D Sub + D Line)	720	976	1,330	-	_	_	-	-							
3	,	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
4		Warren Substation (D Sub + D Line)	1,915	2,381	1,969	-	-	-	-	-							
5		Chase Hill Second Half of Station	-	-	-	-	1,006	2,012	1,006	1,006	Study Phase		\$5,030		FY 2027	FY 2029	\$0
6		Nasonville #127 Sub (D-Sub)	-	-	-	3,566	3,100	489	-	-	Study Phase	\$10,786	\$13,325	Jul-23	FY 2026	FY 2027	\$0
7	Subtotal - Separat	tely Track Major Projects	2,635	3,357	3,299	6,251	6,415	5,453	1,006	1,006							
8	Other	Aquidneck Island	1,189	1,327	1,038	-	-	-	-	-							
9		New Lafayette Substation	197	361	750	910	5,886	151	-	-							
10		Warren Substation	-	-	-	1,800	2,943	747	111	-							
11		Nasonville Substation (D Sub + D Line)	1,346	2,338	1,912	-	-	-	-	-							
12		East Providence Substation (D Line)	-	-	-	3,600	2,700	2,051	-	-							
13		Weaver Hill Road Substation	419	665	1,507	1,105	3,054	3,475	2,496	1,229							
14		3V0	201	217	1,095	186	540	-	-	-							
15		EMS/RTU	(15)	(15)	658	135	1,147	2,350	750	-							
16		Overloaded Transformer Replcmts	1,118	1,500	1,500	1,500	1,500	1,500	1,500	1,500							
17		Blanket Projects	5,209	5,639	2,490	2,605	2,725	2,851	2,983	3,072							
18		Other Area Study Projects - BSVS	120	120	400	680	681	968	-	-							
19		Other Area Study Projects - CRIW	366	845	1,371	1,441	1,125	1,125	675	-							
20		Other Area Study Projects - East Bay	-	-	-	84	378	378	-	-							
21		Other Area Study Projects - Newport	-	-	-	793	976	461	-	-							
22		Other Area Study Projects - NWRI	775	1,185	1,933	108	128	-	-	-							
23		Other Area Study Projects - SCE	-	=	-	1,684	6,404	333	-	-							
24		Other Area Study Projects - SCW	101	137	364	927	4,101	3,909	2,576	1,147							
25		Tiverton D-Line	130	130	109	328	656	656	328	440							
26		Reserve	-	-	-	-	1,000	1,000	1,000	1,000							
27		CEMI-4	1,072	1,221	1,230	1,230	1,230	1,230	1,230	-							
28		ERR	-	-	-	-	-	-	-	-							
29		Distrib Automation Recloser Program	-	-	-	-	-	-	-	-							
30		ADMS/DERMS Advanced	-	-	-	-	-	3,159	1,568	-							
31		DER Monitor/Manage	-	-	-	-	-	2,288	4,043	-							
32		Electromech Relay Upgrades	-	-	-	1,234	603	1,267	2,513	1,263							
33		Fiber Network	-	-	-	200	-	-	-	-							
34		VVO - Smart Capacitors and Regulators	235	235	-	400	8,439	6,701	6,701	6,701							
35		Mobile Substation	-	-	-	1,278	3,834	7,668	-	-							
36		Other projects and programs	(1,686)	(1,451)	541	478	100	100	100	100							
37	Subtotal - Other I	Projects and Programs	10,776	14,453	16,898	22,706	50,150	44,369	28,575	16,452							
38	Total System Capac	city & Performance	13,411	17,810	20,197	28,957	56,565	49,822	29,581	17,458							

The Narragansett Electric Company d/b/a Rhode Island Energy Compliance Filing - Effective Rates April 1, 2024 Docket No. 23-48-EL - Electric ISR FY2025 - Attachment 3 Page 4 of 4

		D	ocket 22-53-El	L	5 Yea	r Investme	nt Plan - Ca	pital Spend	ing			Major Pro	ject - Detail	s		
Line Number	Spending Rationale Category	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	- Estimate -	Date of Last Sanction	Est'd Constr Start	Est'd Constr End	Capital Spending through FY 2023
1	Total Discretionary excluding AMF	53,275	70,924	69,623	80,894	126,122	133,864	85,315	65,839							
	Advanced Metering															
2	Functionality															
3	Meter Costs	-	-	-	28,725	61,795	4,212	-	-							
4	Network Costs	-	-	-	4,479	8,374	1,985	-	-							
5	System Costs Program Costs	-	-	-	11,487	13,280	7,597	-	-							
6	Program Costs	-	-	-	3,502	3,502	1,751	-	-							
7	Total AMF	-	-	-	48,192	86,950	15,544	-	-							
8	Total Discretionary including AMF	53,275	70,924	69,623	129,086	213,073	149,408	85,315	65,839							
9	Total Capital Spending including AMF	98,700	124,040	112,329	179,761	262,088	197,160	134,137	115,759							
10	Total Capital Spending excluding AMF	98,700	124,040	112,329	131,569	175,137	181,616	134,137	115,759							
11	O&M Spend															
12	Vegetation Management	8,304	13,950	13,950	13,075											
13	VVO/CVR	173	400	400	365											
	I&M - Opex Related to Capex	173	400	400	200											
14	I&M - Inspections & Replairs Related Costs	459	550	338	500											
15	Total O&M	9,109	15,300	15,088	14,140											

#### Record Request No. 5

#### Request:

Was a Docket 4600 analysis performed for columns (i) and (j) work. If so, please provide a copy.

#### Response:

A Docket 4600 analysis was not performed for the Tiverton work using reimbursement amounts shown in columns (i) and (j) of PUC 2-3.

#### Record Request No. 6

#### Request:

Please provide an updated and improved schedule SAB-1 using the breakout from PUC 2-3 and appropriate numbers. Show how costs would be depreciated and show a final amount to be refunded.

#### Response:

Please see Attachment RR-6 for a revised Schedule SAB-1 which uses the amounts and breakouts from PUC 2-3 as updated in Attachment RR-2-2.

The Narragansett Electric Company d/b/a Rhode Island Energy RIPUC Docket No. 23-37-EL Record Request 6 Attachment RR-6 Page 1 of 1

# The Narragansett Electric Company d/b/a Rhode Island Energy Petition for Acceleration Due to DG Project - Tiverton Project Illustrative Depreciated Value at FY 2029

		(a)	(b)	(c)
(1)	Accelerated Modification Cost (AMC	C)		10,380,726
(2)	FY 2025 Book Depreciation	3.16%	164,015	
	FY 2026 Book Depreciation	3.16%	328,031	
	FY 2027 Book Depreciation	3.16%	328,031	
	FY 2028 Book Depreciation	3.16%	328,031	
(3)	Cumulative Book Depreciation		_	1,148,108
(4)	AMC @ Depreciated Value @ FY 20	)29		9,232,618
(5)	System Improvement Cost		_	3,609,463
(6)	Total Reimbursable Cost to Develope	er		12,842,081
Notes:				
(1)	Attachment PUC 2-3, Column (I), To	tal		
(2)(a)	Annual Book depreciation rate in FY	2024 ISR Plan		
	Annual depreciation rate x Line (1)(c	), FY 2025 is hal	f year in year	
(2)(b)	placed in service, FY 2026 forward u	, , , , , , , , , , , , , , , , , , ,		
(3)	Sum of FY 2025 through FY 2028 De	epreciation		
(4)	Line 1(c) less Line 3(c)	1		
(5)	Attachment PUC 2-3, Column (J), To	otal		
1. 1				

Line 4(c) plus Line 5(c)

(6)

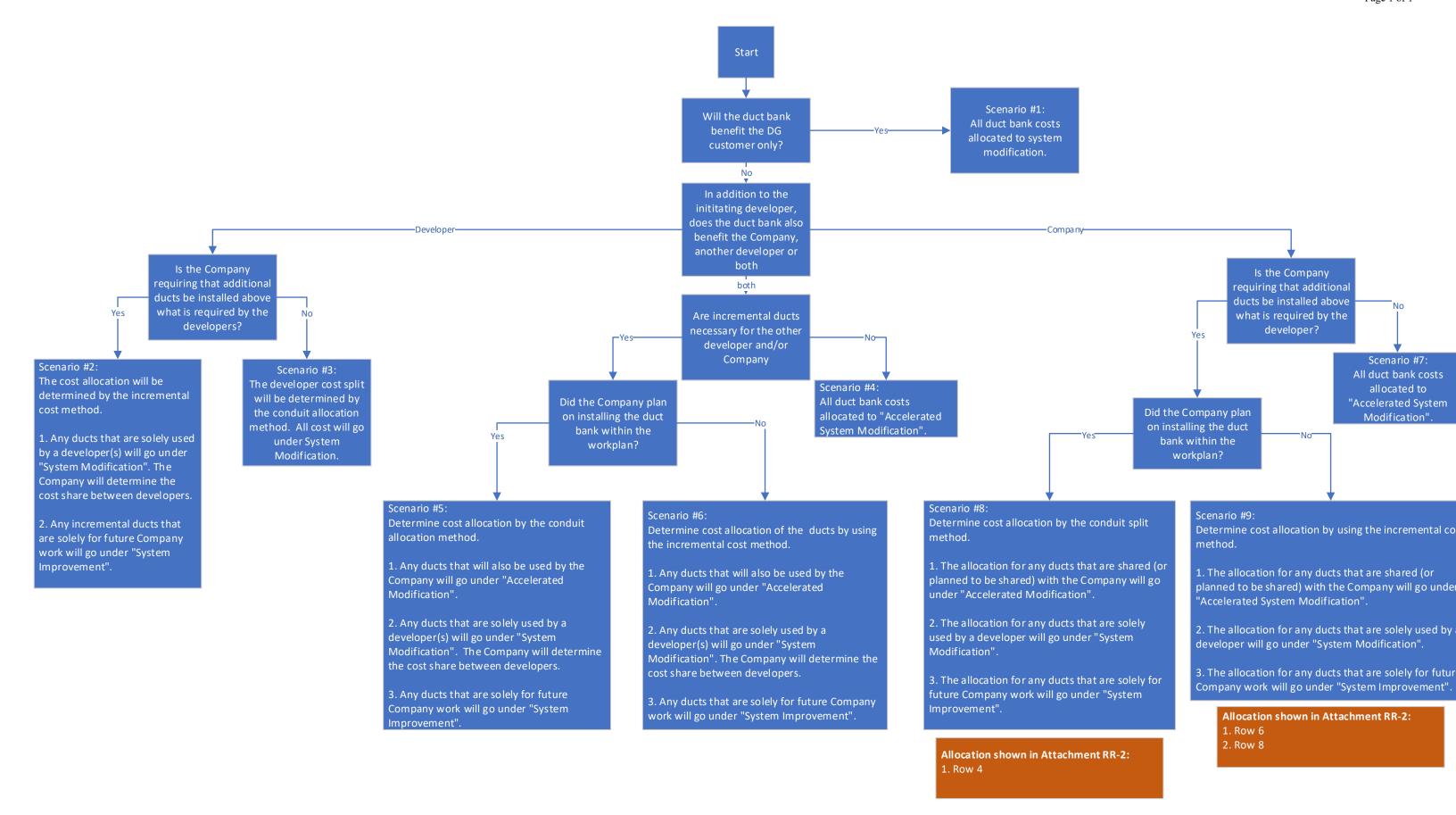
#### Record Request No. 7

#### Request:

Please provide a decision tree or matrix showing how the Company determines cost sharing between interconnecting customers and the company.

#### Response:

Please see Attachment RR-7 showing how the Company determines cost sharing between interconnecting customers and the company and how cost sharing was applied to the Tiverton project.



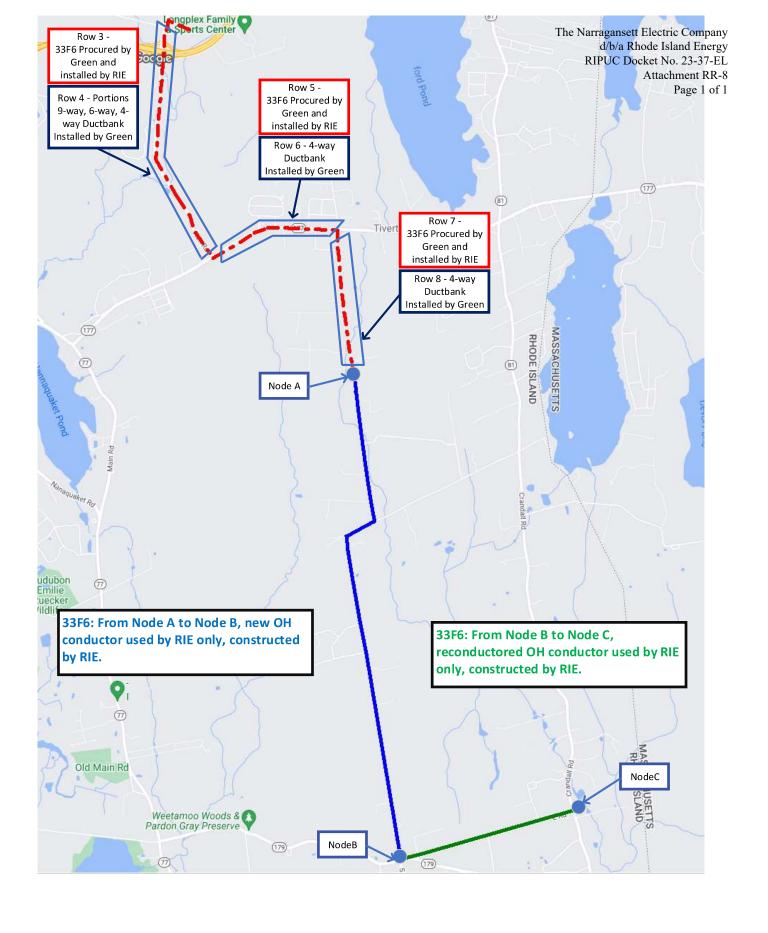
#### Record Request No. 8

#### Request:

Update the map (Exhibit RIE 14) to include references to the rows on the PUC 2-3 spreadsheet. Show number of duct banks as well.

#### Response:

Attachment RR-8 includes references to the rows on the PUC 2-3 spreadsheet with the number of ducts.



#### Record Request No. 9

#### Request:

Provide a summary of all ISAs and any amendments. Include the purpose of each amendment or change in the summary.

#### Response:

Please see Attachment RR-9 for a summary of the ISAs and related amendments.

Interconnecting Customer	Application Number	Date	Location of DG Facility	Size of DG Facility	Description of Modifications to RIE Distribution System	Est. Cost owed to the Company by the Interconnecting Customer	Amendment Date(s), If Any	Purpose of Amendment	Description of System Changes	Revised Estimated Costs owed to the Company by the Interconnecting Customer
Green Development	27970789	7/22/2021	394 Brayton Road, Tiverton	8,423 kW	On the Customer's property:  Install primary riser Install approximately seven (7) poles and 600 circuit feet of 3-477 AAC overhead conductor and associated equipment Install one (1) load break switch Install one (1) recloser Install one (1) primary metering assembly  On the Company's distribution system: Install approximately 21,000 circuit feet of 3-1/C 1000 kemil SCU EPR Cable from the Tiverton Substation (located near Fish Road) to the Point of Common Coupling on Brayton Point Road.  At the Company's substation: Install one breaker position at the Tiverton substation Change protective devices	\$3,642,822	12/7/2023	(1)Reflect assignment of DG Project to Rhode Island Solar Renewable Energy IV, LLC (2)Modify Description of Facilities, Description of Modifications to RIE Distribution System, and Estimated Costs of Such Modifications	On the Company's distribution system:  1. Install approximately 21,000 circuit feet of 3-1/C 1000 kcmil SCU EPR Cable from the Tiverton Substation (located near Fish Road) to the Point of Common Coupling on Brayton Point Road. The Customer has requested responsibility for the required installation of approximately 1,100 feet of 9-way 5", 1,100 feet 6-way 5" and 17,800 feet of 4-way 5" (~21,000 feet total) concrete-encased manhole & duct system. The Customer will be required to comply with Company Construction Standards and obtain approval by the Company prior to covering.  2. Customer will procure, store, and assume responsibility of cable until transfer of ownership to Rhode Island Energy.  3. Procurement of cable by the customer will adhere to all terms and conditions and associated standards provided on 08/05/2022.  At the Company's substation:  1.Add one 12.47kV express circuit position, on the No.2 bus (33F6) a.Install one (1) 12.47 kV breaker  b.3 single-phase regulators and additional substation equipment required c.Install new getaway man-hole and duct system inside of the Tiverton Substation	
Green Development	27970782	7/14/2021	394 Brayton Road, Tiverton	3,368 kW	On the Customer's property:  Install primary riser Install approximately seven (7) poles and 600 circuit feet of 3-477 AAC overhead conductor and associated equipment Install one (1) load break switch Install one (1) recloser Install one (1) primary metering assembly On the Company's distribution system: Install approximately 21,000 circuit feet of 3-1/C 1000 kcmil SCU EPR Cable from the Tiverton Substation (located near Fish Road) to the Point of Common Coupling on Brayton Point Road.  At the Company's substation: Install one breaker position at the Tiverton substation Change protective devices	\$1,520,129	12/7/2023	(1)Reflect assignment of DG Project to Rhode Island Solar Renewable Energy IV, LLC (2)Modify Description of Facilities, Description of Modifications to RIE Distribution System, and Estimated Costs of Such Modifications	On the Company's distribution system:  1. Install approximately 21,000 circuit feet of 3-l/C 1000 kcmil SCU EPR Cable from the Tiverton Substation (located near Fish Road) to the Point of Common Coupling on Brayton Point Road. The Customer has requested responsibility for the required installation of approximately 1,100 feet of 9-way 5", 1,100 feet 6-way 5" and 17,800 feet of 4-way 5" (~21,000 feet total) concrete-encased manhole & duct system. The Customer will be required to comply with Company Construction Standards and obtain approval by the Company prior to covering.  2. Customer will procure, store, and assume responsibility of cable until transfer of ownership to Rhode Island Energy.  3. Procurement of cable by the customer will adhere to all terms and conditions and associated standards provided on 08/05/2022.  At the Company's substation:  1. Add one 12.47kV express circuit position, on the No.2 bus (33F6) a.Install one (1) 12.47 kV breaker b.3 single-phase regulators and additional substation equipment required c.Install new getaway man-hole and duct system inside of the Tiverton Substation	

#### Record Request No. 10

#### Request:

Please provide a copy of all meetings minutes for any meetings related to the [Tiverton] projects. Please also identify who was present at each meeting.

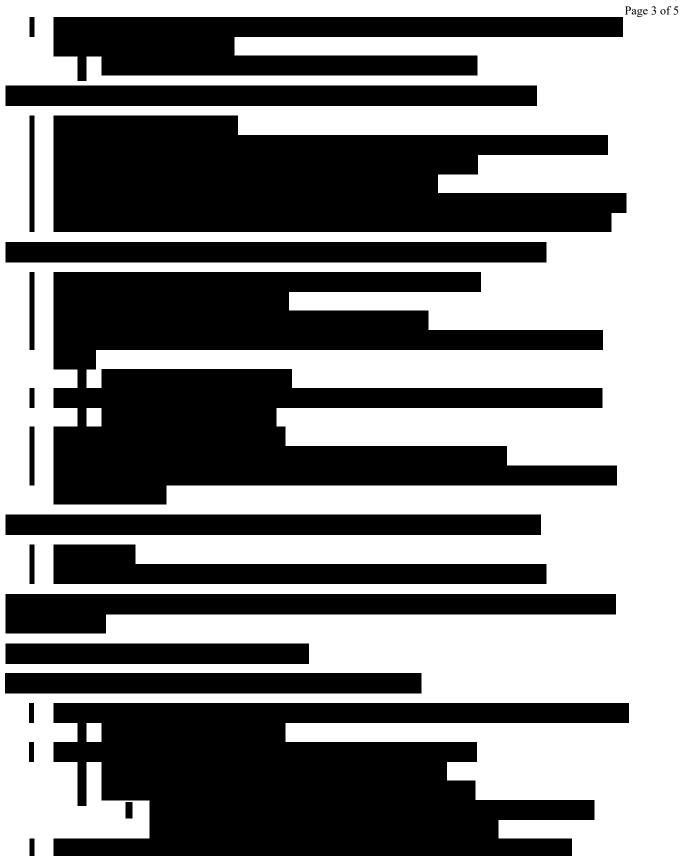
#### Response:

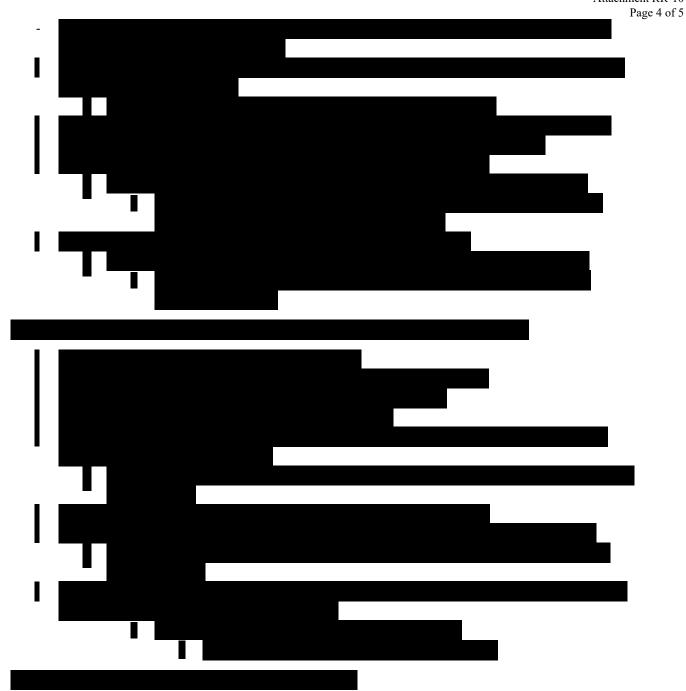
The Company retrieved meeting minutes for a meeting with Green Development, LLC ("Green") that occurred on July 17, 2022. Please see Attachment RR-10.

Green Business Meeting on July 17, 2022

Action Items	Owner	Date to Provide Status	Completion Date of
		Update to Green	Task
To discuss and determine best course of action for when cost sharing the Tiverton duct bank would begin	RIE: Erica	TBD	TBD
To update Green on Terms and Conditions regarding ordering the cable from AWG	RIE: Dan/Nelson	Week of 8/1/2022	TBD
To provide RIE with drawing that highlights which manhole Green proposes to remove in order for DPAM to review and determine options.	Green	7/28/2022	Complete – Green confirmed 7/28 they will reset both







#### c. Cost sharing for the Nooseneck and Tiverton Projects

- Competitive bid discussion
- Meeting next week with Project Management to discuss cost sharing Green Construction & Finance team will be there
- Green would like an explanation of when cost sharing can begin
  - o RIE said after audit is complete (Nooseneck)
- Third party work will always be audited to ensure fairness
- Cost sharing for Tiverton duct bank

Page 5 of 5

#### REDACTED

- Green states this is a system improvement for RIE RIE agrees
- o RIE will pay towards upgrade as it is a system improvement
  - We need to determine if we pay right away after audit or do we wait until the duct bank is usable/useful for customers
  - RIE will take item back to discuss and determine best course of action
    - Will need to be to be addressed with PUC
      - Note, we are not allowed to build ahead of need
- Green is possibly willing to assume risk of ordering cable with chance of it not passing test (~\$4 million risk)
  - If we proceed with this plan and decide to ever cost share, cost sharing will be based on what our cost would have been to obtain cable rather than the premium cost that Green is paying to expedite process
  - If Green does not interconnect this year, they state it is at least a \$2 million hit
  - More updates to follow next week (terms & conditions)
    - Green is leaning towards going with longer lead time/lower cost and pushing the project to next year
- Nooseneck Manholes
  - Green would like a structural engineer from RIE to meet on site with structural engineer that certified manhole prior to removing/reinstalling manhole
  - RIE: Inspectors must ensure items are built to standard (exceptions cannot be made)
  - We need to ensure that manhole is not moving and will not move in the future
  - RIE civil engineers have stated that there is no nationwide test to validate manhole and determine if settling will occur or not
  - o RIE reinforced the need for following all standards/policies during construction
    - If an issue arises while on site, reaching out to RIE during time of issue is encouraged. Dan/Nelson will be available to assist.
  - Green to provide RIE with drawing that highlights which manhole they propose to remove
    - RIE to look at manholes and determine if a manhole can or cannot be eliminated
      - DPAM to follow up



#### 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

June 21, 2024

Date

Docket No. 23-37-EL Rhode Island Energy – Petition for Acceleration Due to DG Project – Tiverton Projects - Service List updated 5/21/2024

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