

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

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



August 26, 2024

VIA HAND DELIVERY AND ELECTRONIC MAIL

Stephanie De La Rosa, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: Docket No. 22-53-EL - FY 2024 Electric Infrastructure, Safety, and Reliability Plan - Reconciliation Filing
Responses to Division Data Requests – Set 1

Dear Ms. De La Rosa:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”), enclosed please find the Company’s responses to the First Set of Data Requests issued by the Division of Public Utilities and Carriers (“Division”) concerning the Company’s Fiscal Year 2024 Electric Infrastructure, Safety, and Reliability Plan Reconciliation in the above-referenced docket.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrew S. Marcaccio".

Andrew S. Marcaccio

Enclosures

cc: Docket No. 22-53-EL Service List

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-53-EL

In Re: FY 2024 Electric Infrastructure, Safety and Reliability Plan
Reconciliation Filing
Responses to the Division’s First Set of Data Requests
Issued on August 9, 2024

Division 1-1

Request:

Please reconcile the Asset Condition Other Area Study Project spend in the Company’s FY 2025 Five -Year Budget with Details and FY 2024 Actuals (Bates page 41, lines 20-27) which indicates \$1.51 million of overspend with the Asset Condition Other Area Study Projects shown in line 16 of Table 7 (Bates page 29) which indicates \$0.67 million of overspend.

Response:

Please see the table below for projects and capital spending included in the Asset Condition Other Area Study Projects of the FY 2025 Five Year Budget with Details and in the Other Area Study Projects of Table 7 Asset Condition – Other Area Study Projects.

The capital spending associated with the Asset Condition Area Study projects on Bates page 41, lines 20-27 is shown in Column (b). This total excludes the capital spending associated with Tiverton Substation project shown on line 28, Tiverton Substation.

The capital spending associated with the Other Area Study Projects on Bates page 29, line 16 is shown in Column (c). This total did not include the Valley and Farnum 23kV Conversion project because, although this project originated from the Blackstone Valley South Area Study, it is a project that began in previous years and is included on line 17, Other Programs and Projects.

<u>Line Number</u>	<u>Project Description</u>	(a)	(b)	(c)
			Sec VII-Five Year Budget with Details, FY 24 Actuals	Table 7 Asset Condition - Other Area Study, Actuals
		Bates page 41, lines 20-27	Bates page 29, line 16	
1	Valley and Farnum 23kV Conversion		\$905,537	\$0
2	Tiverton Sub (D-Sub)		0	61,159
3	Centredale #50 Sub (D-Sub)		137,071	137,071
4	Apponaug Substation D Sub)		27,315	27,315
5	Central Falls #104 Sub (D-Line)		121,983	121,983
6	Crossman St #111 4kV Conversion D-L		121,983	121,983
7	Hospital #146 Equipment Replacement		99,541	99,541
8	Kingston #131 Equipment Replacement		97,645	97,645
9	Total per Bates page 29, line 16 - Asset Condition Other Area Study Projects			\$666,697
10	Total per Bates page 41, lines 20-27 - Five Year Budget with Details, FY 24 Actuals		\$1,511,075	

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-53-EL
In Re: FY 2024 Electric Infrastructure, Safety and Reliability Plan
Reconciliation Filing
Responses to the Division’s First Set of Data Requests
Issued on August 9, 2024

Division 1-2

Request:

Describe the work performed for each Other Area Study project in FY 2024 that incurred spend (both Asset Condition and System Capacity & Performance) and indicate the status of each project.

Response:

Please see the tables below for the work completed under the Other Area Study Projects and the status.

Asset Condition

	(a)	(b)	(c)
	Project Description	ISR Actuals (000s)	FY 2024 Activity
1	Tiverton Sub (D-Sub)	61	PS&I Transfer
2	Centredale #50 Sub (D-Sub)	137	PS&I Transfer
3	Apponaug Substation D Sub)	27	PS&I Transfer
4	Central Falls #104 Sub (D-Line)	122	PS&I Transfer
5	Crossman St #111 4kV Conversion D-L	122	PS&I Transfer
6	Hospital #146 Equipment Replacement	100	PS&I Transfer
7	Kingston #131 Equipment Replacement	98	PS&I Transfer
8	Total	667	

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-53-EL
In Re: FY 2024 Electric Infrastructure, Safety and Reliability Plan
Reconciliation Filing
Responses to the Division’s First Set of Data Requests
Issued on August 9, 2024

Division 1-2, page 2

System Capacity & Performance

	(a)	(b)	(c)
	Project Name	ISR Actuals (000s)	FY 2024 Activity
1	Chopmist 34F3 Stepdown Conversion	436	Engineering and partial construction.
2	NWRI Common Items	479	Engineering and construction - project completed in FY 2024.
3	Natick 29F1 Reconductoring	152	Engineering and partial construction.
4	2232 Panto Rd. ERR	480	Engineering and construction - project completed in FY 2024.
5	2232 Industrial Dr. ERR	35	Engineering - project delayed to complete 2232 Panto Rd. ERR.
6	Coventry 54F1 Reconductoring	127	PS&I Transfer and Preliminary Engineering
7	Kenyon 68F5 Extension	104	PS&I Transfer
8	Staples #112 Reliability 112W43	5	Preparation for the Non-Wires Solution Analysis
9	Staples #112 Reliability 112W44	122	PS&I Transfer
	Total	1,939	

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-53-EL
In Re: FY 2024 Electric Infrastructure, Safety and Reliability Plan
Reconciliation Filing
Responses to the Division's First Set of Data Requests
Issued on August 9, 2024

Division 1-3

Request:

Was any Area Study project work performed in other spending categories? If so, provide the projects, budget, actual spend, and description of the work performed. Explain why the work was performed outside of an Area Study project.

Response:

Attachment DIV 1-3 shows the projects originating from Area Studies included in other spending categories in Column (a), a description of the work or reference to a description in the Annual Reconciliation filing in Column (h), and an explanation of why the work was not on the Other Area Study Projects line of Table 7 – Asset Condition Capital Spending (Bates page 29) or Table 9 - System Capacity & Performance Capital Spending (Bates page 35) in column (i). In general, the Company disagrees with the characterization of this work as “performed outside of an area study project.” The projects on Attachment DIV 1-3 are projects originating from area studies as shown in Column (c). The Company listed them as separate line items in Table 7 and Table 9 to provide greater transparency related to the projects and the work performed during the year.

(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	
Line Number	Project Description	Spending Rationale	Area Study	Shown in Annual Reconciliation	Budget Classification	Budget	Actuals	Description of Work Performed	Why Performed Outside of an Area Study Project
1	ProvStudy Admiral St 4&11kV Convert	Asset Condition	Providence	Bates page 29, Table 7, Line 3	Providence LT Study - Phase 1A	\$0	\$200,318	See description of work on Bates page 28.	Separately Tracked Large Project in FY 2024
2	ProvStudy New Admiral St 12kV D-Sub	Asset Condition	Providence	Bates page 29, Table 7, Line 5	Providence LT Study - Phase 1B	2,784,000	337,907	See description of work on Bates page 28.	Separately Tracked Large Project in FY 2024
3	ProvStudy Admiral St-Rochamb D-Line	Asset Condition	Providence	Bates page 29, Table 7, Line 5	Providence LT Study - Phase 1B	0	305,424	See description of work on Bates page 28.	Separately Tracked Large Project in FY 2024
4	ProvStudy Admiral St-Rochamb D-Sub	Asset Condition	Providence	Bates page 29, Table 7, Line 5	Providence LT Study - Phase 1B	600,000	2,560,239	See description of work on Bates page 28.	Separately Tracked Large Project in FY 2024
5	ProvStudy Admiral St Demolition	Asset Condition	Providence	Bates page 29, Table 7, Line 5	Providence LT Study - Phase 1B	0	87,905	See description of work on Bates page 28.	Separately Tracked Large Project in FY 2024
6	ProvStudy Olneyville 4kV D-Line	Asset Condition	Providence	Bates page 29, Table 7, Line 5	Providence LT Study - Phase 1B	720,000	379,692	See description of work on Bates page 28.	Separately Tracked Large Project in FY 2024
7	ProvStudy Admiral St 12kV MH&Duct	Asset Condition	Providence	Bates page 29, Table 7, Line 5	Providence LT Study - Phase 1B	8,037,000	8,078,470	See description of work on Bates page 28.	Separately Tracked Large Project in FY 2024
8	ProvStudy Admiral St 12kV Cables	Asset Condition	Providence	Bates page 29, Table 7, Line 5	Providence LT Study - Phase 1B	1,800,000	2,479,612	See description of work on Bates page 28.	Separately Tracked Large Project in FY 2024
9	ProvStudy Knightsville 4kV Convert	Asset Condition	Providence	Bates page 29, Table 7, Line 6	Providence LT Study - Phase 2,3,and 4	7,187,000	9,085,026	See description of work on Bates page 28.	Separately Tracked Large Project in FY 2024
10	ProvStudy Knightsville 4kV D-Sub	Asset Condition	Providence	Bates page 29, Table 7, Line 6	Providence LT Study - Phase 2,3,and 4	1,589,000	674,184	See description of work on Bates page 28.	Separately Tracked Large Project in FY 2024
11	ProvStudy Harris Ave 4&11kV Retire	Asset Condition	Providence	Bates page 29, Table 7, Line 6	Providence LT Study - Phase 2,3,and 4	922,500	87,552	See description of work on Bates page 28.	Separately Tracked Large Project in FY 2024
12	Valley and Farnum 23kV Conversion	Asset Condition	Blackstone Valley South	Bates page 29, Table 7, Line 17	Other Programs and Projects	0	905,537	Ongoing construction.	Project continued from previous year
13	ProvStudy Geneva,Olnyville,Rocham4kV	Asset Condition	Providence	Bates page 29, Table 7, Line 6	Providence LT Study - Phase 2,3,and 4	553,000	127,905	See description of work on Bates page 28.	Separately Tracked Large Project in FY 2024
14	ProvStudy HarrisAve 11kV(1129&1137)	Asset Condition	Providence	Bates page 29, Table 7, Line 6	Providence LT Study - Phase 2,3,and 4	121,500	0	See description of work on Bates page 28.	Separately Tracked Large Project in FY 2024
15	PS&I	SC&P	Initial Area Study work - all	Bates page 35, Table 9, Line 17	PS&I	100,000	(1,859,648)	See description of activity on Bates page 32-33.	Distribution of area study costs to projects
16	East Providence Substation (D-Sub)	SC&P	East Bay	Bates page 35, Table 9, Line 2	East Providence Substation	847,000	703,320	See description of work on Bates page 34.	Separately Tracked Large Project in FY 2024
17	East Providence Substation (D-Line)	SC&P	East Bay	Bates page 35, Table 9, Line 2	East Providence Substation	483,000	202,623	See description of work on Bates page 34.	Separately Tracked Large Project in FY 2024
18	Warren Sub Expansion (D-Sub)	SC&P	East Bay	Bates page 35, Table 9, Line 3	Warren Substation	632,000	426,503	See description of work on Bates page 34.	Separately Tracked Large Project in FY 2024
19	Warren Sub Expansion (D-Line)	SC&P	East Bay	Bates page 35, Table 9, Line 3	Warren Substation	1,337,000	2,091,711	See description of work on Bates page 34.	Separately Tracked Large Project in FY 2024
20	New Lafayette 115/12kV (D-Sub)	SC&P	South County East	Bates page 35, Table 9, Line 6	New Lafayette Substation	500,000	242,409	See description of work on Bates page 31.	Separately Tracked Large Project in FY 2024
21	New Lafayette 115/12kV (D-Line)	SC&P	South County East	Bates page 35, Table 9, Line 6	New Lafayette Substation	0	15,004	See description of work on Bates page 31.	Separately Tracked Large Project in FY 2024
22	84T3 ROW Removals (D-Line)	SC&P	South County East	Bates page 35, Table 9, Line 6	New Lafayette Substation	250,000	1,548	See description of work on Bates page 31.	Separately Tracked Large Project in FY 2024
23	Tiverton Sub (D-Line)	SC&P	Tiverton	Bates page 35, Table 9, Line 8	Tiverton Substation	108,999	215,121	Engineering and procurement.	Separately identified on Table 9
24	Weaver Hill Rd Substation (D-Sub)	SC&P	Central Rhode Island East	Bates page 35, Table 9, Line 9	Weaver Hill Road Substation	570,000	334,937	See description of work on Bates page 31.	Separately identified on Table 9
25	Weaver Hill Rd Feeder (D-Line)	SC&P	Central Rhode Island East	Bates page 35, Table 9, Line 9	Weaver Hill Road Substation	120,000	144,119	See description of work on Bates page 31.	Separately identified on Table 9
26	Nasonville Substation (D-Sub)	SC&P	Northwest Rhode Island	Bates page 35, Table 9, Line 7	Nasonville Substation	1,875,000	2,557,888	See description of work on Bates page 31.	Separately Tracked Major Project in FY 2025
27	Nasonville Substation (D-Line)	SC&P	Northwest Rhode Island	Bates page 35, Table 9, Line 7	Nasonville Substation	37,000	27,600	See description of work on Bates page 31.	Separately Tracked Major Project in FY 2025
28	Weaver Hill Rd. Dline SubT Ext	SC&P	Central Rhode Island East	Bates page 35, Table 9, Line 9	Weaver Hill Road Substation	816,997	113,658	See description of work on Bates page 31.	Separately identified on Table 9
29	New London 150F6 Reconductoring	SC&P	Central Rhode Island West	Bates page 35, Table 9, Line 13	Blanket Projects	80,000	39,105	Engineering, procurement and construction.	Below blanket threshold.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-53-EL
In Re: FY 2024 Electric Infrastructure, Safety and Reliability Plan
Reconciliation Filing
Responses to the Division’s First Set of Data Requests
Issued on August 9, 2024

Division 1-4

Request:

Describe the need for and work performed under the ACNW Vault Vent Blowers category. Explain if this is a recurring program with targeted levels of annual work and if so, how the work is planned and/or prioritized. Provide the budget and actual spend for this category for the previous five years, and the budget for the prospective five years.

Response:

The ACNW Vault Vent Blowers category is a program that eliminates or replaces network vault blower motors with arc resistant motors. This is a recurring program, where the Company plans and prioritizes the work based on local engineering knowledge of the targeted areas and the amount of pedestrian traffic. There are 98 replacements to be done as part of the program; 76 have been completed, both under the budgeted program and as separate asset condition projects. 22 are remaining, some of these locations are more complex than previously completed replacements due to the civil work needed to install the blower.

See below for the budget and actual capital spend (in thousands) for the program for the previous five years, and the budget for the prospective five years.

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	
	(000s)	FY19	FY20	FY21	FY22	FY23	FY24	FY25	FY26	FY27	FY28
1	Budget	250	375	375	400	525	600	700	675	695	716
2	Actuals	170	247	379	375	571	729				

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-53-EL
In Re: FY 2024 Electric Infrastructure, Safety and Reliability Plan
Reconciliation Filing
Responses to the Division's First Set of Data Requests
Issued on August 9, 2024

Division 1-5

Request:

Where was the spare transformer used to replace the failed Westerly #2 located prior to being put into service? Why is the replacement spare being located at Kent County Substation?

Response:

The spare transformer that was used to replace the failed T2 Westerly transformer was located at Kent County Substation.

The replacement spare transformer is being located at Kent County Substation because it has existing facilities that are needed to store a transformer such as a foundation, oil containment, low voltage AC and SCADA monitoring for oil level.

Division 1-6

Request:

The testimony provides annual plant in service and cost of removal amounts against “targets”. (Bates page 3) What is the purpose of creating a “target”? How does the Company develop targeted levels for both plant in service and cost of removal? Please explain the difference, if any, between the use of the terms “target” and “budget”, and whether the use of “target” has any impact on the budgetary framework or managing to a budget?

Response:

The terms “target” and “budget” both represent estimates included in ISR filings. The term “target” has been applied to the annual estimate of plant in service (plant additions) and cost of removal spending used in the ISR Plan and in the revenue requirement. The “targeted” plant additions and cost of removal spending are trued up to actual plant additions and actual cost of removal spending in Annual Reconciliation filings. The term “budget” has been applied to the annual estimate of capital spending used in the ISR Plan. The “budgeted” capital spending is trued up to actual capital spending in Annual Reconciliation filings.

The Plant In Service target is based on the amount of capital spending that the Company anticipates will go into service during the year. Different types of projects use different in-service assumptions to create the Plant in Service target. Examples are:

- 50% of programs and specific project capital spending is assumed to go into service during the year.
- 75% of blanket project capital spending is assumed to go into service in the year.
- Capital spending for multi-year substation, distribution line, and certain other projects are reviewed with project managers to establish the in service targets.
- 100% of budgeted transformer and meter purchases as assumed to go into service in the ISR year because they are capitalized upon purchase.

The Cost of Removal target is based on the removal component of each project's estimated total spend.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-53-EL
In Re: FY 2024 Electric Infrastructure, Safety and Reliability Plan
Reconciliation Filing
Responses to the Division's First Set of Data Requests
Issued on August 9, 2024

Division 1-7

Request:

Please clarify if spend associated with Transformers (Bates page 7) is for distribution or substation (power transformers). Provide the total number of overhead and underground distribution transformers purchased and current inventory. What is typical historical inventory? Is a transformer considered plant in service when purchased or when installed?

Response:

The spend associated with Transformers on Bates page 7 relates to distribution transformers, as well as a small number of voltage regulators, capacitors, and network protectors.

The table below shows the breakdown of overhead and underground transformers purchased during FY 2024.

	(a)	(b)
	Type	Purchased in FY2024
1	Overhead	2,076
2	Underground	279
3	Total	2,355

Historically, the Company has maintained an inventory of approximately 2,000 overhead and underground transformer units. Inventory levels dropped by approximately 20% in 2021 due to increased lead times and supply chain constraints. By the end of FY 2024, the transformer inventory returned to approximately 2,000 units. The Company plans to maintain this level of inventory.

Transformers are pre-capitalized assets and are placed into service when purchased.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-53-EL
In Re: FY 2024 Electric Infrastructure, Safety and Reliability Plan
Reconciliation Filing
Responses to the Division's First Set of Data Requests
Issued on August 9, 2024

Division 1-8

Request:

Did the Company incur costs for spare power transformer purchases in FY 2024 related to the Substation Spare projects discussed in the FY 2025 ISR Plan? If so, explain the costs and provide the category of spend, amount, transformer specifications and status

Response:

The Company did not incur costs for spare power transformer purchases in FY 2024 related to the Substation Spare projects discussed in the FY 2025 ISR Plan.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-53-EL
In Re: FY 2024 Electric Infrastructure, Safety and Reliability Plan
Reconciliation Filing
Responses to the Division's First Set of Data Requests
Issued on August 9, 2024

Division 1-9

Request:

Please provide a more detailed explanation for the Nasonville excess spend of \$3.1 million in the Damage/Failure category and \$0.67 million in the System Capacity & Performance Category.

Response:

The scope of work for the Damage/Failure project was significantly greater than the Company originally anticipated and resulted in the \$3.1 million in additional spending. This failure event was difficult to predict, estimate and budget. When the Company works on Damage/Failure projects, it does not have the opportunity to develop then execute projects in a serial fashion. To ensure it provides customers with safe and reliable service after a Damage/Failure, like the event at Nasonville, the Company must perform project development activities in parallel with execution activities. The initial thought was that little below grade work would be required. For the Nasonville project, the additional \$3.1 million in spending arises from the unanticipated civil work such as retaining walls, foundations and manholes required to reconfigure the substation to work around and accommodate the placement of the mobile substation and cables running through the yard.

Regarding the System Capacity & Performance Category (Expansion project), the overspend can be attributed to the distribution of costs to the project from the Preliminary Survey & Investigation (PS&I) account and the procurement land behind the substation.

Of that \$670,000, approximately \$400,000 came from the PS&I account; the net charges at the portfolio level are zero when these debits and credits are considered together.

The Company also spent \$415,000 to procure the land behind the substation, \$270,000 of which contributed to the \$670,000 in additional spending in FY 2024. This purchase eliminated the requirement to design, permit, and build a sound wall. A consultant report on the project stated, "Based on the sound emissions from the proposed transformers, it was determined that mitigation was necessary to lower the sound levels at the residential receptor to the to the northeast of the Site. Four different scenarios of mitigation were modeled. All scenarios include a wall along the entire northeast property line of the Site." Based on the consultant's recommendation and the town's noise ordinance requirements, the conceptual design of the sound wall was more than 200 feet long and 20 feet high. Procuring the land was the more cost-effective solution.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-53-EL
In Re: FY 2024 Electric Infrastructure, Safety and Reliability Plan
Reconciliation Filing
Responses to the Division's First Set of Data Requests
Issued on August 9, 2024

Division 1-10

Request:

In executable format, provide historical and projected spend, by year, for each Nasonville related project including work under Damage/Failure. Please separately identify costs for initial restoration due to the metalclad switchgear failure (restoration, mobile installation, damaged equipment removal, etc.) from costs to prepare and improve the site for replacement equipment. Provide the original cost estimate for the preferred solution derived in the Area Study.

Response:

Please see Attachment DIV 1-10 for historical and projected spend, by year, for each Nasonville related project including work under Damage/Failure as well as the cost estimate for the preferred solution derived in the Area Study.

The costs for the initial restoration due to the metal clad switchgear failure was \$488,000, as shown in Attachment DIV 1-10. These costs initially were captured in a Damage/Failure blanket funding project and later transferred to the Damage/Failure category project in December 2022. All costs in the Damage/Failure category from December 2022 are for preparing the site for the replacement equipment.

Capital Costs (000s)

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	
	FY 2023 Actuals	FY 2024 Actuals	FY 2025 Forecast	FY 2026 Forecast	FY 2027 Forecast	FY 2028 Forecast	FY 2029 Forecast	FY 2030 Forecast	Total	
1	Damage/Failure - initial restoration due to metalclad switchgear failure	488							488	
2	Damage/Failure - costs to prepare and improve the site for replacement equipment	213	4,198	2,584	981				7,976	
3	Total Damage/Failure	701	4,198	2,584	981				8,464	
4	System Capacity & Performance - Distribution Substation for Expansion		2,558	4,500	6,420	1,307	14,785		22,512	
5	System Capacity & Performance - Distribution Line for Expansion		28	106	123	36	293		452	
6	Total System Capacity & Performance	-	2,586	4,606	6,543	1,343	15,078		22,964	
7	Area Study Estimate - Distribution Substation Expansion		875	750	1,170	2,340	4,680	2,340	1,170	13,325
8	Area Study Estimate - Distribution Line Expansion		37	54	107	54	27	0	0	279
9	Total Area Study Estimate		912	804	1,277	2,394	4,707	2,340	1,170	13,604

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-53-EL
In Re: FY 2024 Electric Infrastructure, Safety and Reliability Plan
Reconciliation Filing
Responses to the Division's First Set of Data Requests
Issued on August 9, 2024

Division 1-11

Request:

Explain in detail the Nasonville scope changes between the Area Study preferred solution and the current project and why the changes have occurred (open-air substation vs. the original metalclad switchgear design). Provide an estimate of any increased costs due to scope changes describing the components contributing to the increase. What are the quantifiable benefits of the open air design beyond a metalclad design?

Response:

The Damage/Failure at Nasonville occurred as the Area Study was being finalized. The Area Study solution was to build out the second half of the station. Initially, the scope was adding a second metal clad switchgear. Due to the pandemic's supply chain impacts, the lead-time for metal clad switchgear was unusually long. Coupling the long lead times with the call back possibility for the rented mobile switchgear that was needed due to the Damage/Failure, the Company decided to change to an open-air design to protect against the risk that the Company would not be able to continue using the rented mobile switchgear. At the time, the open-air solution had better material availability, which allowed the Company to reduce the overall project schedule. The Company estimates that the schedule was reduced by a year by changing the design and has not seen a substantial cost change due to this decision.

As the supply chain returns to normal, the Company will continue to monitor the supply chain and will continue to evaluate the optimal solutions for each substation.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-53-EL
In Re: FY 2024 Electric Infrastructure, Safety and Reliability Plan
Reconciliation Filing
Responses to the Division's First Set of Data Requests
Issued on August 9, 2024

Division 1-12

Request:

It is the Division's understanding that 49 breakers were replaced at Franklin Square Substation at a cost of \$9.8 million. Please confirm this information and in executable format, provide the planned and actual breaker replacements by year, with budget and actual costs.

Response:

The Company has spent \$9.4 million on the breaker replacements at the Franklin Square Substation. Please see Attachment DIV 1-12 for the planned and actual breaker replacements by year, with budget and actual costs.

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)
	FY15	FY16	FY17	FY18	FY19	FY20	FY21	FY22	FY23	FY24	FY25	Total
1 Budget (000s)	\$0	\$17	\$0	\$1,450	\$0	\$900	\$1,135	\$1,804	\$1,837	\$437	\$0	\$7,580
2 Actual Capital Cost (000s) - Asset Replacement	\$0	\$0	\$408	\$1,947	\$878	\$305	\$605	\$1,102	\$2,128	\$1,362	\$159	\$8,895
3 Actual Capital Cost (000s) - Damage/Failure	\$334	\$14	\$179	\$3	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$530
4 Breakers Replaced	2	0	4	14	0	7	0	5	6	11	0	49

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-53-EL
In Re: FY 2024 Electric Infrastructure, Safety and Reliability Plan
Reconciliation Filing
Responses to the Division's First Set of Data Requests
Issued on August 9, 2024

Division 1-13

Request:

In executable format, provide each project with budget and actuals comprising the following categories:

- a. Asset Condition - Other Area Study Projects (Bates page 29)
- b. Asset Condition - Other Programs and Projects (Bates page 29)
- c. System Capacity & Performance - Other Area Study Projects (Bates page 35)
- d. System Capacity & Performance - Other (Bates page 35)

Response:

Please see Attachment DIV 1-13 for projects with budget and actual spending. The Company has also provided this information in executable format as requested.

Line Number	(a)	(b)	(c)	(d)	(e)
1	a. Asset Condition - Other Area Study Projects (Bates page 29, line 16)				
2			<u>Budget</u>	<u>Actuals</u>	
3		Tiverton Substation (D-Sub)	\$0	\$61,159	
4		Centredale Substation (D-Sub)	-	137,071	
5		Apponaug Substation (D-Sub)	-	27,315	
6		Central Falls Substation (D-Line)	-	121,983	
7		Crossman St 4kV Conversion (D-Line)	-	121,983	
8		Hospital Substation Equipment Replacement	-	99,541	
9		Kingston Substation Equipment Replacement	-	97,645	
10		Total - Asset Condition - Other Area Study Projects	<u>\$0</u>	<u>\$666,697</u>	
11	b. Asset Condition - Other Programs and Projects (Bates page 29, line 17)				
12			<u>Budget</u>	<u>Actuals</u>	
13		Batteries/Chargers	\$230,000	\$54,788	
14		South St repl indoor subst D-SUB	0	(53,595)	
15		HMI RI Replacements	0	7,607	
16		Franklin Sq Sub_1105 & 1109 NW	0	487,229	
17		Franklin Sq-Replace 11kV Sub Equip	0	8,923	
18		Repl ACNW Vault Vent Blowers	0	1,368	
19		ACNW Vlt 72 Reconstruction, Prov.	0	33,090	
20		Valley and Farnum 23kV Conversion	0	905,537	
21		Repl UG Fault Ind Dyer St/Ea Geo	0	251,956	
22		CLX Cable Replacement-Water Street	0	(22,506)	
23		NW Vault 19 Boston Store, Prov.	0	16,822	
24		ACNW Vault 46 Structural Repairs, Pawt	0	(2,640)	
25		Network Vlt 296 Broadway/Main, Pawt	0	5,807	
26		Total - Asset Condition - Other Programs and Projects	<u>\$230,000</u>	<u>\$1,694,386</u>	

Line Number	(a)	(b)	(c)	(d)	(e)
27	c. System Capacity & Performance - Other Area Study Projects (Bates page 35, line 16)				
28			<u>Budget</u>	<u>Actuals</u>	
29		New London 150F6 Reconductoring	\$80,000	\$0	
30		Kilvert 87F1 Line Extension	82,000	0	
31		Chopmist 34F3 Stepdown Conversion	1,065,996	435,607	
32		NWRI Common Items	0	478,734	<i>a</i>
33		Staples #112 Reliability 112W43	400,000	0	
34		Natick 29F1 Reconductoring	190,000	151,941	
35		2232 Panto Rd. ERR	181,000	480,176	
36		2232 Industrial Dr. ERR	163,000	35,123	
37		Coventry 54F1 Reconductoring	675,000	126,792	
38		Kenyon 68F5 Extension	266,004	103,501	
39		Staples #112 Reliability 112W43	0	5,229	
40		Staples #112 Reliability 112W44	0	121,983	
41		Farnum Pike 23F3 Reconductor	144,999	0	<i>a</i>
42		Putnam Pike 38F3 Reconductor	289,998	0	<i>a</i>
43		Smart Capacitor Installations	250,000	0	<i>a</i>
44		West Greenville 45F2 Line Regulator	90,999	0	<i>a</i>
45		Chopmist 34F2 Line Regulator	90,999	0	<i>a</i>
46		Kenyon Common Items	98,001	0	
47		Total - System Cap & Perf - Other Area Study Projects	<u>\$4,067,996</u>	<u>\$1,939,086</u>	

48 *a* These projects were included as individual line items in the budget and actual spending was recorded in one project.

Line Number	(a)	(b)	(c)	(d)	(e)
49	d. System Capacity & Performance - Other (Bates page 35, line 18)				
50			<u>Budget</u>	<u>Actuals</u>	
51		Cutout Mounted Recloser Program	\$0	\$3,276	
52		Covid Scenario Analysis Work	0	56,173	
53		Shippee Ave Voltage Conversion	0	58,794	
54		72F3 Reconductor - COVID Analysis	0	(28,454)	
55		72F5 Reconductoring COVID Analysis	0	(12,205)	
56		COVID Re-conductoring 59F3	0	866	
57		Chopmist 34F2 Breaker Rplmt	0	1,494	
58		Prudence Island Backup Gen Site	0	454	
59		Lafayette 30F4 - Narrow Ln 3-Phase	441,000	15,639	
60		155F8 Inst Line Regs & Smart Caps	0	50,220	
61		Animal Fence Installations	0	57,199	
62		105K1 & 102K22 D-Line Retirement	0	11,739	
63		Total - System Capacity & Performance - Other	<u><u>\$441,000</u></u>	<u><u>\$215,195</u></u>	

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-53-EL

In Re: FY 2024 Electric Infrastructure, Safety and Reliability Plan
Reconciliation Filing
Responses to the Division's First Set of Data Requests
Issued on August 9, 2024

Division 1-14

Request:

For each of the ten projects totaling \$2.2 million that the Company considers System Improvements (Bates page 48), please provide:

- a. project name and detailed description of the investment;
- b. capital investment amount;
- c. year of investment and year asset was placed in service;
- d. the system need that warranted the improvement with support (e.g. if resolving a capacity constraint; provide system rating and actual load);
- e. the year that the system improvement would have been installed absent the DG interconnection; and
- f. the factors considered by the Company in making a determination to advance the improvement

Response:

- a. Projects 19 and 20, as referenced in PUC 1-1, are the two projects the Company considers System Improvements. These projects have the same Interconnection Service Agreement, and therefore, the Company reviewed them together.

The Company installed two reclosers to interconnect the customer. Originally, the Company had planned to upgrade a circuit board in the existing reclosers at a cost of approximately \$20,000 per recloser, but, because of additional asset issues, the Company determined that it needed to replace the existing reclosers with the Company's latest standard advanced reclosers. The Company considers the recloser replacements a System Improvement because of these additional issues with the dated reclosers.

- b. The capital investment amount, net of customer contributions, is \$80,601.
- c. The Company installed the reclosers and placed them into service in fiscal year 2018.
- d. The existing equipment was obsolete.
- e. These reclosers were not specifically targeted for replacement in any project or program, however, it is reasonable to assume they would have been replaced in three to five years based on their obsolescence.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-53-EL
In Re: FY 2024 Electric Infrastructure, Safety and Reliability Plan
Reconciliation Filing
Responses to the Division's First Set of Data Requests
Issued on August 9, 2024

Division 1-14, page 2

- f. As mentioned in part a of the response, the Company would not replace a circuit board in obsolete equipment.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-53-EL
In Re: FY 2024 Electric Infrastructure, Safety and Reliability Plan
Reconciliation Filing
Responses to the Division's First Set of Data Requests
Issued on August 9, 2024

Division 1-15

Request:

Regarding the System Capacity & Performance Blanket that was \$3.7 million over budget, the Company states that it “has reprioritized work to reduce outage exposure and address reliability and load issues while still focusing on delivering the discretionary portfolio on budget.” (Bates page 57) Please explain actions the Company took in FY 2024 to reprioritize work to deliver to a budget that resulted in a \$3.7 million overspend.

Response:

The total discretionary budget for System Capacity & Performance (“SC&P”) was \$20.2 million, and the Company’s actual costs incurred for SC&P projects was \$18.3 million. Thus, although the Company exceeded budget costs for the System Capacity & Performance Blanket component of the total SC&P budget, the Company managed the overall SC&P budget to come in under budget. The actions the Company took to reprioritize work to achieve this overall budget result are set forth below.

In the Load Relief Blanket, for which actual spending exceeded budget by approximately \$1.838 million, the Company’s additional spending was driven by approximately \$1.28 million for load transfers driven by the Company’s annual planning efforts. Previous planning efforts and studies had not predicted the loading issues that the Company addressed through these transfers. Additionally, the Company had additional costs of approximately \$.05 million for capacitor installations and \$.06 million for transformer replacements.

In the Reliability Blanket, for which actual spending exceeded budget by approximately \$1.8 million, the Company’s additional spending was driven by approximately \$0.54 million to address vault issues with recent failures causing reliability issues. Due to the complex underground nature of these facilities, costs can be high. The Company also spent approximately \$0.31 million on four reclosers to address reliability issues not associated with other projects or programs. Additionally, the Company spent approximately \$1.2 million on reconductoring to address reliability issues not associated with other projects or programs.

The Company manages the budget in light of changing circumstances throughout a given fiscal year. There are often projects that get delayed as a result of material, labor, or permitting issues and there are often immediate issues that arise that can result in the need for unplanned work. The Company continually manages these increases and decreases to the budget and takes reprioritization action when a budget imbalance happens. For FY 2024, the increases and decreases were close and no specific reprioritization was necessary.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-53-EL
In Re: FY 2024 Electric Infrastructure, Safety and Reliability Plan
Reconciliation Filing
Responses to the Division's First Set of Data Requests
Issued on August 9, 2024

Division 1-15, page 2

For example, as a result of permitting issues with the Weaver Hill Substation, the Weaver Hill projects were delayed resulting in a deferral of \$0.94 million. Also, the Staples #112 Reliability 112W43 project was delayed due to extra time to develop the non-wires alternative request for proposal resulting in a deferral of \$0.4 million. The Lafayette projects were delayed due to outage transmission outage coordination with a large wind generation project resulting in a deferral of \$0.93 million. Lastly, approximately \$1.08 million was deferred in the 3V0 program for reevaluation at Clark Street Substation and the Natick Substation 3V0 work was deferred to be included with pending asset condition work for efficiency reasons.

The costs above are not intended to exactly reconcile, but show how the Company diligently manages the budget across the many changing factors and events in a given budget period.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-53-EL
In Re: FY 2024 Electric Infrastructure, Safety and Reliability Plan
Reconciliation Filing
Responses to the Division's First Set of Data Requests
Issued on August 9, 2024

Division 1-16

Request:

The Company reviewed \$13.7 million in DG related plant additions from FY 2013 through FY 2024. Confirm that the \$13.7 million is net of DG customer contributions. During this same period of time, the Company spent \$30.7 million in the non-discretionary Distributed Generation category of the ISR Plans. Is the \$30.7 million net of DG customer contributions? Please explain the difference between the amounts and whether the gap totaling \$17 million will be offset by CIAC, proposed for recovery under one of the four scenarios (Bates page 47), or something else

Response:

The Company confirms the \$2.2 million that it is proposing to include in the ISR revenue requirement is net of customer contributions. During its review of the full \$13.7 million of plant additions, the Company did find that some CIACs were incorrectly allocated on some projects (Finding #2 on Bates Page 47). These projects were removed from the ISR revenue requirement and expensed.

The difference between the \$13.7 million in plant additions and the \$30.7 million of capital spending can be attributed to projects that are still in flight and not placed into service or to timing delays in posting customer contributions against capital spending.

As part of process improvements from the review, the Company will now not be including plant additions into an ISR revenue requirement until the project has been reconciled and it has been found that there was a system improvement, or costs exceeded the estimate (Finding #3 or #4 on Bates Page 47).

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

August 26, 2024

Date

**Docket No. 22-53-EL – RI Energy’s Electric ISR Plan FY 2024
Service List as of 8/2/2024**

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 Stephanie Briggs Nicole A. Gooding Susan M. Toronto Alan LaBarre Ryan Constable Kathy Castro Jeffrey Oliveira	amarcaccio@pplweb.com ;	401-784-4263
	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 ;	
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 ;	
	Margaret.l.hogan@dpuc.ri.gov ;	
	Paul.roberti@dpuc.ri.gov ;	
	Linda.george@dpuc.ri.gov ;	
joliveira@pplweb.com ;		

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 ;	
	William.Owen@energy.ri.gov ;	
	Shauna.Beland@energy.ri.gov ;	
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	Stephanie.DeLaRosa@puc.ri.gov ;	401-780-2107
	Cynthia.WilsonFrias@puc.ri.gov ;	
	Todd.bianco@puc.ri.gov ;	
	Alan.nault@puc.ri.gov ;	
Matt Sullivan, Green Development LLC	ms@green-ri.com ;	