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January 10, 2025

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 7

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 Division of Public Utilities and Carriers’ Seventh Set of Data Requests concerning the Company’s Fiscal Year 2024 Electric Infrastructure, Safety, and Reliability Plan Reconciliation in the above-referenced docket.

Please note that the Company is providing the Excel files referenced in response to Division 7-1 (Attachments DIV 7-1-2, DIV 7-1-14, DIV 7-1-16, DIV 7-1-34, DIV 7-1-39, DIV 7-1-40, DIV 7-1-48, and DIV 7-1-53) to the Division of Public Utilities and Carriers (“Division”). The Company is still reviewing whether there is any confidential information in those Excel files. Following its review, the Company will file the Excel files publicly with the PUC or under a request for confidential treatment with accompanying motion.

Please also note that the Company is continuing to retrieve the supporting documentation associated with data request Division 7-1. The Company will supplement this response upon retrieval of the supporting documentation.

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 Seventh Set of Data Requests
Issued on December 19, 2024

Division 7-1

Request:

For the transactions listed in the attached Excel file (Transaction Selections.xlsx), please provide supporting evidence for costs incurred, such as: vendor invoices, timekeeping & payroll records, supporting calculations, etc.

Response:

Please see Attachment DIV 7-1, which lists each transaction contained in the Excel file that was provided to the Company by the Division. For each transaction, in Column (m) of Attachment DIV 7-1, there is a reference to the corresponding attachment containing supporting documentation.

Please note that transaction numbers 27, 28, 29, 30, 31, and 37 consist of sub-transactions, which are labeled with letters (i.e. Attachment DIV 7-1-27a, Attachment DIV 7-1-27b, etc.).

For transactions with the status of "Pending" in Column (m), the Company is continuing to retrieve the supporting documentation and has not provided any at this time. The Company will supplement this response upon retrieval of the supporting documentation.

Due to the voluminous nature of Attachments DIV 7-1-2, DIV 7-1-14, DIV 7-1-16, DIV 7-1-34, DIV 7-1-39, DIV 7-1-40, DIV 7-1-48, and DIV 7-1-53, the Company is providing the supporting information as an Excel file.

Line Number	(a) Transaction Selection #	(b) FY	(c) Month	(d) Project	(e) Project Description	(f) Super Project #	(g) Super Project Description	(h) Budget Item Description	(i) Amount	(j) Material	(k) Material Description	(l) Amount	(m) Attachment Number or Status
1	1	FY 2024	202312	90000223280	3763 Line Structure Replacements	C087912	3763 Pole Replacements	Work By Outsiders	\$ 854,796.46				Attachment DIV 7-1-1
2	2	FY 2024	202312	90000223280	3763 Line Structure Replacements	C087912	3763 Pole Replacements	RI Distribution Clearing	\$ 341,918.58				Attachment DIV 7-1-2
3	3	FY 2023	202303	90000223280	3763 Line Structure Replacements	C087912	3763 Pole Replacements	Materials Purchased	\$ 36,734.00				Attachment DIV 7-1-3
4	4	FY 2024	202306	90000223280	3763 Line Structure Replacements	C087912	3763 Pole Replacements	Materials Purchased	\$ 25,678.00				Attachment DIV 7-1-4
5	5	FY 2024	202306	90000223280	3763 Line Structure Replacements	C087912	3763 Pole Replacements	Materials Purchased	\$ 24,649.00				Attachment DIV 7-1-5
6	6	FY 2024	202306	90000223280	3763 Line Structure Replacements	C087912	3763 Pole Replacements	Materials Purchased	\$ 24,649.00				Attachment DIV 7-1-6
7	7	FY 2023	202206	10027593782	URD Cable Replacement - Signal Ridg	C049462	IRURD SIGNAL RIDGE	Work By Outsiders	\$ 1,105,583.64				Attachment DIV 7-1-7
8	8	FY 2022	202203	10027593782	URD Cable Replacement - Signal Ridg	C049462	IRURD SIGNAL RIDGE	Work By Outsiders	\$ 1,087,773.03				Attachment DIV 7-1-8
9	9	FY 2022	202203	10027593782	URD Cable Replacement - Signal Ridg	C049462	IRURD SIGNAL RIDGE	RI Distribution Clearing	\$ 239,310.07				Pending
10	10	FY 2023	202206	10027593782	URD Cable Replacement - Signal Ridg	C049462	IRURD SIGNAL RIDGE	RI Distribution Clearing	\$ 202,150.88				Pending
11	11	FY 2023	202207	10027593782	URD Cable Replacement - Signal Ridg	C049462	IRURD SIGNAL RIDGE	Work By Outsiders	\$ 115,970.18				Attachment DIV 7-1-11
12	12	FY 2022	202202	10027593782	URD Cable Replacement - Signal Ridg	C049462	IRURD SIGNAL RIDGE	Work By Outsiders	\$ 48,402.89				Pending
13	13	FY 2024	202311	90000215338	Kingston # 131 Scope Review AIRP	C058404	Kingston Sub Improvements (D-Sub)	Work By Outsiders	\$ 248,643.35				Attachment DIV 7-1-13
14	14	FY 2024	202312	90000215338	Kingston # 131 Scope Review AIRP	C058404	Kingston Sub Improvements (D-Sub)	RI Distribution Clearing	\$ 191,586.22				Attachment DIV 7-1-14
15	15	FY 2023	202204	90000215338	Kingston # 131 Scope Review AIRP	C058404	Kingston Sub Improvements (D-Sub)	Miscellaneous	\$ 185,749.47				Pending
16	16	FY 2024	202311	90000215338	Kingston # 131 Scope Review AIRP	C058404	Kingston Sub Improvements (D-Sub)	RI Distribution Clearing	\$ 99,457.34				Attachment DIV 7-1-16
17	17	FY 2024	202312	90000215338	Kingston # 131 Scope Review AIRP	C058404	Kingston Sub Improvements (D-Sub)	Work By Outsiders	\$ 96,148.05				Attachment DIV 7-1-17
18	18	FY 2024	202305	90000215338	Kingston # 131 Scope Review AIRP	C058404	Kingston Sub Improvements (D-Sub)	Stores Issues & Returns	\$ 40,421.54				Pending
19	19	FY 2024	202308	90000215338	Kingston # 131 Scope Review AIRP	C058404	Kingston Sub Improvements (D-Sub)	Materials Purchased	\$ 28,601.00				Pending
20	20	FY 2024	202403	90000215338	Kingston # 131 Scope Review AIRP	C058404	Kingston Sub Improvements (D-Sub)	Materials Purchased	\$ 26,671.05				Pending
21	21	FY 2024	202403	90000215338	Kingston # 131 Scope Review AIRP	C058404	Kingston Sub Improvements (D-Sub)	Materials Purchased	\$ 26,671.05				Pending
22	22	FY 2024	202308	90000215338	Kingston # 131 Scope Review AIRP	C058404	Kingston Sub Improvements (D-Sub)	Materials Purchased	\$ 12,360.00				Pending
23	23	FY 2024	202309	90000215338	Kingston # 131 Scope Review AIRP	C058404	Kingston Sub Improvements (D-Sub)	Consultants-Other	\$ 9,508.95				Pending
24	24	FY 2022	202202	90000215338	Kingston # 131 Scope Review AIRP	C058404	Kingston Sub Improvements (D-Sub)	Wages	\$ 3,226.16				Pending
25	25	FY 2023	202212	90000215338	Kingston # 131 Scope Review AIRP	C058404	Kingston Sub Improvements (D-Sub)	Wages	\$ 2,325.96				Pending
26	26	FY 2024	202312	90000215338	Kingston # 131 Scope Review AIRP	C058404	Kingston Sub Improvements (D-Sub)	RI Distribution Clearing	\$ (177,819.46)				Pending
27	27	FY2024	202310	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased	\$ 971,702.10				
28	27a	FY2024	202310	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased		9300518	XFMR, 1PH 50KVA 277V	\$ 6,384.00	Attachment DIV 7-1-27a
29	27b	FY2024	202310	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased		9301115	XFMR, PAD MTD 50KVA 240/120V	\$ 17,115.00	Attachment DIV 7-1-27b
30	27c	FY2024	202310	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased			FY24 Q4 Magnetron RI Down Payments	\$ 384,485.10	Attachment DIV 7-1-27c
31	27d	FY2024	202310	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased			FY25 Q1 Down Payments RI Magnetron	\$ 563,718.00	Attachment DIV 7-1-27d
32	28	FY2024	202307	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased	\$ 847,642.03				
33	28a	FY2024	202307	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased		9300872	XFMR, PADMOUNT 1PH 50KVA 240/	\$ 1,700.00	Attachment DIV 7-1-28a
34	28b	FY2024	202307	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased		9300872	XFMR, PADMOUNT 1PH 50KVA 240/	\$ 1,700.00	Attachment DIV 7-1-28b
35	28c	FY2024	202307	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased		9301015	XFMR, 3PH 500KVA 277V	\$ 10,500.00	Attachment DIV 7-1-28c
36	28d	FY2024	202307	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased		9301016	XFMR, 3PH 300KVA 277V	\$ 8,750.00	Attachment DIV 7-1-28d
37	28e	FY2024	202307	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased		9301190	XFMR, PADMOUNT 3PH 750KVA 277	\$ 1,300.00	Attachment DIV 7-1-28e
38	28f	FY2024	202307	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased		9393505	XFMR, SUBWAY 3PH 500KVA 11.5K'	\$ 63,695.00	Attachment DIV 7-1-28f
39	28g	FY2024	202307	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased			Xfmr DGrndMnt<2KkVA	\$ 620,236.20	Pending
40	28h	FY2024	202307	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased			Xfmr DGrndMnt<2KkVA	\$ 139,760.83	Pending
41	29	FY2024	202305	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased	\$ 788,774.39				
42	29a	FY2024	202305	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased		9300373	XFMR, SS 1PH 50KVA 120/240V	\$ 9,420.70	Pending
43	29b	FY2024	202305	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased		9300602	XFMR, 1PH 50KVA 120/240V	\$ 1,624.69	Pending
44	29c	FY2024	202305	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased		9301192	XFMR, PADMOUNT TAP 3PH 1000KV	\$ 358,852.00	Attachment DIV 7-1-29c
45	29d	FY2024	202305	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased		9301192	XFMR, PADMOUNT TAP 3PH 1000KV	\$ 358,852.00	Attachment DIV 7-1-29d
46	29e	FY2024	202305	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased		9301073	CAPACITOR, BANK SW 1200KVAR 6	\$ 13,993.00	Attachment DIV 7-1-29e

Line Number	(a) Transaction Selection #	(b) FY	(c) Month	(d) Project	(e) Project Description	(f) Super Project #	(g) Super Project Description	(h) Budget Item Description	(i) Amount	(j) Material	(k) Material Description	(l) Amount	(m) Attachment Number or Status
47	29f	FY2024	202305	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased		9386566	CAPACITOR, BANK SW 600KVAR 13	\$ 46,032.00	Attachment DIV 7-1-29f
48	30	FY2024	202306	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased	\$ 719,105.32				
49	30a	FY2024	202306	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased		9300383	XFMR, PADMOUNT SSTANK 1PH 50I	\$ 5,516.00	Attachment DIV 7-1-30a
50	30b	FY2024	202306	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased		9300526	XFMR, 1PH 50KVA 120/240V	\$ 10,435.00	Attachment DIV 7-1-30b
51	30c	FY2024	202306	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased		9300555	XFMR, 1PH 50KVA 120/240V	\$ 3,874.00	Attachment DIV 7-1-30c
52	30d	FY2024	202306	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased		9300576	XFMR, 1PH 25KVA 277V	\$ 4,492.00	Attachment DIV 7-1-30d
53	30e	FY2024	202306	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased			Magnetron Magnetron9300555 30% DP	\$ 456,750.00	Pending
54	30f	FY2024	202306	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased			Xfmr DGrndMnt<2KkVA	\$ 238,038.32	Pending
55	31	FY2024	202306	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased	\$ 663,690.31				
56	31a	FY2024	202306	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased		9300555	XFMR, 1PH 50KVA 120/240V	\$ 118,650.00	Attachment DIV 7-1-31a
57	31b	FY2024	202306	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased		9300555	XFMR, 1PH 50KVA 120/240V	\$ 33,187.70	Attachment DIV 7-1-31b
58	31c	FY2024	202306	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased		9300555	XFMR, 1PH 50KVA 120/240V	\$ 85,339.80	Attachment DIV 7-1-31c
59	31d	FY2024	202306	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased		9300555	XFMR, 1PH 50KVA 120/240V	\$ 284,466.00	Attachment DIV 7-1-31d
60	31e	FY2024	202306	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased		9300574	XFMR, 1PH 25KVA 120/240V	\$ 40,195.48	Pending
61	31f	FY2024	202306	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased			Tx Accr-Use Tax - May 31-June 28 Accr	\$ 101,851.33	Pending
62	32	FY2024	202402	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased	\$ 585,583.58				Pending
63	33	FY2024	202312	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased	\$ 577,102.38				Pending
64	34	FY2023	202303	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	RI Distribution Clearing	\$ 174,876.62			\$ 174,876.62	Attachment DIV 7-1-34
65	35	FY2024	202312	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Budget Item Not Required	\$ 165,000.00			\$ 165,000.00	Pending
66	36	FY2024	202402	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased	\$ (592,990.08)				Pending
67	37	FY2024	202309	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased	\$ (694,788.32)				
68	37a	FY2024	202309	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased			Xfmr DGrndMnt<2KkVA	\$ (238,038.32)	Pending
69	37b	FY2024	202309	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased			XfmrDst PMnt<315KVA	\$ (456,750.00)	Pending
70	38	FY2024	202312	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Materials Purchased	\$ (742,102.38)				Pending
71	39	FY2024	202403	99000000129	Transformer Purchase - Narr Elec	CN04920	Narragansett Transformer Purchases	Budget Item Not Required	\$ (1,685,711.85)			\$ (1,685,711.85)	Attachment DIV 7-1-39
72	40	FY 2024	202306	10029724457	Remove poles 2-30 & 3 per customer	COS0013	Ocean St-Dist-Public Require Blnkt	Contr in Aid of Construction	\$ 19,100.67				Attachment DIV 7-1-40
73	41	FY 2024	202311	10030822785	RELOCATING UG PRIMARY LINES T	COS0013	Ocean St-Dist-Public Require Blnkt	Stores Issues & Returns	\$ 18,318.61				Pending
74	42	FY 2023	202301	10030624576	RELOCATE POLE LINE CLOSER TO '	COS0013	Ocean St-Dist-Public Require Blnkt	Wages	\$ 11,461.30				Pending
75	43	FY 2024	202308	10030291727	8/14/22 CUSTOMER HAS REACHED C	COS0013	Ocean St-Dist-Public Require Blnkt	Stores Issues & Returns	\$ 11,221.32				Pending
76	44	FY 2023	202301	10030624576	RELOCATE POLE LINE CLOSER TO '	COS0013	Ocean St-Dist-Public Require Blnkt	Wages	\$ 11,132.32				Pending
77	45	FY 2024	202312	10030822785	RELOCATING UG PRIMARY LINES T	COS0013	Ocean St-Dist-Public Require Blnkt	Wages - Overtime	\$ 10,842.56				Pending
78	46	FY 2023	202301	10030624576	RELOCATE POLE LINE CLOSER TO '	COS0013	Ocean St-Dist-Public Require Blnkt	Wages	\$ 10,147.11				Pending
79	47	FY 2024	202307	10030788011	CIVIL TO USE FOR RIP RAP REPAIR	COS0013	Ocean St-Dist-Public Require Blnkt	Work By Outsiders	\$ 10,096.32				Pending
80	48	FY 2024	202312	10030830380	Customer to install conduit and han	COS0013	Ocean St-Dist-Public Require Blnkt	RI Distribution Clearing	\$ 9,625.00				Attachment DIV 7-1-48
81	49	FY 2024	202304	10030291727	8/14/22 CUSTOMER HAS REACHED C	COS0013	Ocean St-Dist-Public Require Blnkt	Wages	\$ 8,561.53				Pending
82	50	FY 2024	202309	10030291727	8/14/22 CUSTOMER HAS REACHED C	COS0013	Ocean St-Dist-Public Require Blnkt	Wages	\$ 8,490.33				Pending
83	51	FY 2023	202211	10030291727	8/14/22 CUSTOMER HAS REACHED C	COS0013	Ocean St-Dist-Public Require Blnkt	Work By Outsiders	\$ 6,820.00				Pending
84	52	FY 2024	202307	10030291727	8/14/22 CUSTOMER HAS REACHED C	COS0013	Ocean St-Dist-Public Require Blnkt	Work By Outsiders	\$ 5,205.51				Pending
85	53	FY 2024	202403	10029077075	UPGRADE TO 50 KVA PAD FROM 25	COS0013	Ocean St-Dist-Public Require Blnkt	Contr in Aid of Construction	\$ 3,208.46				Attachment DIV 7-1-53
86	54	FY 2024	202312	10030822785	RELOCATING UG PRIMARY LINES T	COS0013	Ocean St-Dist-Public Require Blnkt	Stores Issues & Returns	\$ (10,811.66)				Pending

Attachments DIV 7-1-1 through DIV 7-1-54

Due to the large electronic size of Attachments DIV 7-1-1 through DIV 7-1-54, the Company is sending these attachments via a link.

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 Seventh Set of Data Requests
Issued on December 19, 2024

Division 7-2

Request:

For COS0013 - Public Req Customer #6 (Public Requirements Blanket Project):

- A. For the following projects, please provide a description of the project and explain how it was determined that no CIAC was required.
- i. Project #10029041069
 - ii. Project #10030291727
 - iii. Project #10030782896
- B. For the following project, please provide a description of the project and explain why CIAC does not cover the entire cost of the project.
- i. Project #10030599403

Response:

- A.
- i. The description for Project #10029041069 is "Relocate pole line due to building". The scope includes installing five poles (#11, 12, 13, 14, and 15) on Airport Road in Middletown; installing anchor guys on poles 12 and 15; installing 630 feet of 4-1/0 al bare primary and neutral from pole 10 to pole 16 on Airport Road; removing 290 feet of 3-1/0 al bare primary, 190 ft of 1-1/0 al bare neutral, and 100 feet of 3c1/0 al triplex from pole 10 to pole 13 on Airport Road; and removing a 3-25kVA transformer bank at pole 11 on Airport Road.

The Company determined that a CIAC was not required because the Company did not have an easement for this line.
 - ii. The description for Project #10030291727 is "8/14/22 CUSTOMER HAS REACHED OUT TO". The scope was to relocate and re-feed a customer off Mitchells Lane in Middletown. The original feed was inaccessible and crossed private property for which the Company did not have an easement. The property owner insisted that the line be removed from the property. The line was relocated to the customer's driveway.

The Company determined that a CIAC was not required because the Company did not have an easement for this line.

The Narragansett Electric Company
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Division 7-2, page 2

- iii. The description for Project #10030782896 is “install P#2-1, 2-3, 2-5 & 2-7 W/ 40”. The scope of work included the replacement and relocation of poles to improve access. The pole line feeding the customer was inaccessible and many of the poles needed replacement.

The Company determined that a CIAC was not required because the work was done as a system improvement to improve reliability and accessibility of poles. The project related to a customer complaint. Under the Company's Construction Estimate Guidelines, a system improvement is defined as “costs for economically justified capital improvements associated with increasing the capacity or reliability of the system above what may be required to provide service to the Customer. These costs are not included in the cost of construction” when calculating a CIAC.

- B. The description for Project #10030599403 is “145 Commerce Drive, Warwick – Reloc”. The Scope of Work/Recommendations was to relocate two poles at the customer's request. Poles must be replaced, framed, and adequately guyed. A section of primary and a bare neutral must be cut in because the existing wire was not long enough to reach the transition points. In addition, a system improvement was identified to replace pole #11-1 due to age and condition. The pole must be framed and adequately guyed.

The CIAC was calculated for the relocation of the two poles requested by the customer. A third pole was replaced due to poor condition. The costs associated with the replacement of the third pole were not included in the calculation of the CIAC because the customer did not request this work. The pole was replaced based on a Company assessment of the condition of the pole done at the time the customer requested work was estimated and performed.

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Issued on December 19, 2024

Division 7-3

Request:

The policy for capitalization of AFUDC that the Company followed as a subsidiary of National Grid indicated that Blanket Projects/Work Orders were not eligible for capitalized AFUDC. COS0013 - Public Req Customer #6 (Public Requirements Blanket Project) has AFUDC. Please provide the updated accounting policy for AFUDC that shows that the Company now capitalizes AFUDC on Blanket Projects/Work Orders, including when the Company adopted this updated policy.

Response:

The Company has not changed its AFUDC policy with regards to AFUDC on blanket projects/work orders.

The Company confirms AFUDC was recorded in error in COS0013, as well as other blanket projects/work orders. The Company is investigating the blanket projects and following this, AFUDC on blanket project work will be reversed. The Company has also begun efforts to modify systems and processes to ensure work in blanket projects does not receive AFUDC going forward. This work will be completed in the first quarter of 2025 and additional AFUDC recorded on blanket work prior to those modifications being completed will be reversed.

Please see the table below for blanket projects and AFUDC recorded in fiscal year 2023 through 2025 (in \$ dollars) to those blankets, from 1/1/23 through 12/31/2024.

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 Seventh Set of Data Requests
Issued on December 19, 2024

Division 7-3, page 2

	(a)	(b)	(c)	(d)	(e)
	Blanket Projects	FY 2023	FY 2024	FY 2025	Total
1	COS0002 – Ocean St-Dis-Subs Blanket	7,740	41,962	23,153	72,854
2	COS0010 – Ocean St-Dist New Bus – Resid	16,842	75,066	80,999	172,908
3	COS0011-Ocean St.- Dist. New Bus- Comm Blanket	27,957	143,842	166,648	338,447
4	COS0012-Ocean St-St Light Blanket	560	902	2,905	4,367
5	COS0013-Ocean St-Dist-Public Require Blnt	3,466	8,782	3,787	16,034
6	COS0014-Ocean St-Dist-Damage&Failure Blnt	15,760	103,317	245,017	364,094
7	COS0015-Ocean St-Dist-Reliability Blanket	10,563	102,262	95,422	208,247
8	COS0016-Ocean St-Dist-Load Relief Blanket	217	28,205	13,421	41,844
9	COS0017-Ocean St-Dist-Asset Replace Blankt	13,188	50,848	117,133	181,168
10	COS0022-Ocean St-Dist-3 rd Party Atch Blnt	236	196	71	504
11	COS0025-OS-Dist-Substation LR/Rel Blnt	-	795	96	891
12	COS0026-OS-Dist-Substation Asset Repl Blnt	2,491	3,415	4,199	10,105
13	Grand Total	99,019	559,592	752,850	1,411,461

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 Seventh Set of Data Requests
Issued on December 19, 2024

Division 7-4

Request:

Please provide the Company’s current Capitalization Policy. If the following are not covered specifically in the Company’s capitalization policy, please provide applicable policy: sanctioning process, PS&I, overhead allocations (including what projects are eligible for allocations), and unitization. *Note: AFUDC policy was requested in Div 7-3 and CIAC was requested in Div 5-3.*

- a. Please provide the date the Company stopped using the NG capitalization policies and started to use its current capitalization policies.

Response

Please see the table below for a listing of the attachments requested in this response. Please note, the Company does not have a single Capitalization Policy document that is similar to the National Grid Work Order Lifecycle Playbook.

The below policies provide similar information, and the Company is continuing to expand and draft new policies including Preliminary Survey and Investigation (“PS&I”), Emergency Spares and Overhead Allocations Policies.

Policy Name	Attachment
ACCT-EU-605 - AFUDC	Attachment DIV 7-4-1
ACCT-RI-612 - Accounting for Capital Office Furniture, Tools and Equipment	Attachment DIV 7-4-2
ACCT-EU-615 - Accounting for Computer Software	Attachment DIV 7-4-3
ACCT-EU-617 - Accounting for Depreciation of Property, Plant & Equipment	Attachment DIV 7-4-4
ACCT-RI-623 - Retirement Unit Listing	Attachment DIV 7-4-5
Retirement Unit Listing – Excel Spreadsheet	Attachment DIV 7-4-6
Rhode Island Energy RI Electric Sanctioning Guidance Document	Attachment DIV 7-4-7

The Company moved from the National Grid capitalization policies to its current capitalization policies at the time of implementing the Company’s work management and financial systems, replacing the National Grid systems being used. This was completed on August 19, 2024.

PPL Corporation
Financial Department
Accounting Policies and Procedures

Section: Asset Accounting

Last Update/Reviewed: 12/31/2023

Subject: AFUDC

Contact: Robert Phillips

Number: 605

I. Purpose

To establish a policy for determining when AFUDC is applicable and how AFUDC is applied to capital projects.

II. Applicability

Applicable to all PPL Electric Utilities Corporation (PPL EU) and Rhode Island Energy (RIE) business lines that utilize PowerPlan project costing to account for capital expenditures.

III. Definitions

Allowance for funds used during construction (AFUDC) - the cost of funds expended for each regulated capital project during its period of construction.

IV. Accounting Practice

1. Background

Allowance for funds used during construction (AFUDC) represents the estimated cost of funds used to finance construction activity. When a capital project is completed and placed in service the application of AFUDC to the project terminates. This policy explains the Company's procedure for computing AFUDC and the means for determining application of AFUDC to projects.

The AFUDC rate is updated monthly based on the requirements in the FERC Uniform System of Accounts Electric Plant Instruction 17. See Appendix B for details.

2. Accounting

The AFUDC used during construction is computed for applicable projects each month as follows:

- **Computation of AFUDC During the Construction Period for Each Project**

$$AFUDC\ Rate \times \left[Beginning\ AFUDC\ Base + \left(\frac{Current\ Month's\ Charges}{2} \right) \right]$$

- For idle projects receiving no charges other than AFUDC for a period of six months or more for EU, and three months or more for RIE, application of AFUDC will be automatically terminated until the project receives further charges. Upon resuming application, AFUDC will not be applied retroactively for the idle period.
- AFUDC ceases in the month after the applicable project goes into service.
- Non-cash expenditures, primarily accruals, are excluded from the AFUDC base.

V. Procedures

- Generally, Asset Accounting calculates monthly the AFUDC rates based on construction work in progress balances as well as debt outstanding and interest rates received from Treasury. Once the rates are calculated, Asset Accounting inputs these rates into the PowerPlan system.

Application of AFUDC

Generally, projects issued for construction of facilities have AFUDC applied, whereas projects issued for pure purchase of capital assets not requiring substantial installation do not. The following types of projects do not receive AFUDC:

- Projects which are in service, canceled, temporarily closed or have a construction period of less than 30 days.
- Projects for purchases of computer equipment, furniture, tools, etc.
- All blanket projects including those for specific property.
- Future Use projects (classified in Account 10571)
- Projects where CWIP is included in rate base (the regulatory jurisdiction permits a return on CWIP, covering project financing costs).
- Projects which are billable to Independent Power Producers (IPPs).
- Projects for the acquisition of land or rights of way, subject to exception approval by Asset Accounting in the event that construction is required to secure possession.

Note that for cancelled projects, any AFUDC previously recorded should be reversed, consistent with FERC guidance.

The listing in "**Appendix A**" which parallels the "Project Numbers" section in the [Classification of Accounts](#), is provided as an aid in determining whether AFUDC should be applied.

VI. Responsibility

- A. PPL EU and RIE business lines are responsible for applying AFUDC to applicable capital projects and placing them in-service on a timely basis.
- B. Asset Accounting is responsible for ensuring that AFUDC is applied appropriately to capital projects deemed eligible for AFUDC.
- C. Treasury is responsible for supplying required information to Asset Accounting for AFUDC rates calculation.
- D. Asset Accounting is responsible for calculating and issuing the rates.
- E. Asset Accounting is responsible for loading the rates into the system.
- F. Asset Accounting is responsible for reviewing application of correct AFUDC rates processed monthly.

VII. Related Publications

ASC 980-10 - Accounting for the Effects of Certain Types of Regulation.

Code of Federal Regulations Title 18, Chapter 1, Part 101 - FERC Uniform System of Accounts Electric Plant Instruction 17

Appendix A
Guide To Determining Application Of AFUDC To Projects

	Apply AFUDC?
<i>Bulk Power Transmission</i>	
Substations	Yes
Lines (Over 69 KV)	Yes
Forced Relocations	Yes (1)
Fee-owned land	No (2)
Siting and rights of way	No (2)
<i>Regional Supply</i>	
Substations (230/69 KV)	
New Subs and Additional Capacity at Existing Subs (including terminals)	Yes
Improvements, Additions and Replacements	Yes
Power Transformers installation	Yes
Power Circuit Breakers installation	Yes
Lines:	
New Lines and Substation Terminals	Yes
Improvements, Additions and Replacements	Yes
Forced Relocations	Yes (1)
Fee-owned Land	No (2)
Siting and rights of way	No (2)
Revenue Extensions (69/138 KV)	Yes
<i>Area Supply</i>	
Substations (69/12 KV and below):	
New Substations and Additional Capacity at Existing Substations	Yes
Power Transformers installation	Yes
Power Circuit Breakers installation	Yes
Improvements, Additions and Replacements	Yes
Lines (if not charged to blankets):	
New Connecting Lines and Capacity Additions	Yes
Overhead Equipment Failure	Yes
Revenue Extensions	Yes
Electrical Systems Minor Improvements	Yes
12 KV Conversions	Yes
Forced Relocations:	
- Billing Required	Yes (1)
- At PPL Expense	Yes

Improvements, Additions and Replacements	Yes
Underground Equipment Failures	Yes
Substation Underground Getaways	Yes
Low Tension Network	Yes
Street Lighting	Yes
Fee-owned land	No (2)
Siting and rights of way	No (2)
General Projects	
Office Buildings and Service Facilities	Yes
Office Furniture and Equipment	No
Tools and Equipment	No
Communication Systems	Yes
Computer Software	Yes
Fee-owned Land	No (2)
Siting and rights of way	No (2)
Power Management System	Yes
Other Projects	
Retirements (not included under Other Budget Items)	No
Financial Department, Plant Accounting Use	(3)
Research & Development	(3)
Leasehold Improvements	(3)
Perpetual Projects	No
Special Billing	No
System Emergency	No
Independent Power Producer (IPP) Billable Projects	No
Storm Projects	No
ELECTRIC UTILITIES SUBORDINATE	
Bulk Power Transmission	(3)
Regional Supply	(3)
Area Supply	
Power Transformers - 69 KV or less (replacement only)	No
Substations (69/12 or 138/12 KV)	(3)
General Projects	(3)
BLANKET PROJECTS FOR MASS PROPERTY	No
NON-UTILITY PROPERTY PROJECTS	No
Non-Cash Accruals to Construction Work in Progress	No

1. Yes, when expenditures exceed advance payments received.

2. *In the event that substantial construction efforts are planned in association with the acquisition of land or rights of way, contact Asset Accounting for determining applicability of AFUDC.*
3. *Contact Asset Accounting for determining applicability of AFUDC.*

Appendix B

Code of Federal Regulations Title 18, Chapter 1, Part 101 - FERC Uniform System of Accounts Electric Plant Instruction 17:

(17) Allowance for funds used during construction (Major and Nonmajor Utilities) includes the net cost for the period of construction of borrowed funds used for construction purposes and a reasonable rate on other funds when so used, not to exceed, without prior approval of the Commission, allowances computed in accordance with the formula prescribed in paragraph (a) of this subparagraph. No allowance for funds used during construction charges shall be included in these accounts upon expenditures for construction projects which have been abandoned.

(a) The formula and elements for the computation of the allowance for funds used during construction shall be:

$$A_i = s \left(\frac{S}{W} \right) + d \left(\frac{D}{D + P + C} \right) \left(1 - \frac{S}{W} \right)$$
$$A_e = \left(1 - \frac{S}{W} \right) \left[p \left(\frac{P}{D + P + C} \right) + c \left(\frac{C}{D + P + C} \right) \right]$$

A_i = Gross allowance for borrowed funds used during construction rate.

A_e = Allowance for other funds used during construction rate.

S = Average short-term debt.

s = Short-term debt interest rate.

D = Long-term debt.

d = Long-term debt interest rate.

P = Preferred stock.

p = Preferred stock cost rate.

C = Common equity.

c = Common equity cost rate.

W = Average balance in construction work in progress plus nuclear fuel in process of refinement, conversion, enrichment and fabrication, less asset retirement costs (See General Instruction 25) related to plant under construction.

(b) The rates shall be determined annually. The balances for long-term debt, preferred stock and common equity shall be the actual book balances as of the end of the prior year. The cost rates for long-term debt and preferred stock shall be the weighted average cost determined in the manner indicated in §35.13 of the Commission's Regulations Under the Federal Power Act. The cost rate for common equity shall be the rate granted common equity in the last rate proceeding before the ratemaking body having primary rate jurisdictions. If such cost rate is not available, the average rate actually earned during the preceding three years shall be used. The short-term debt balances and related cost and the average balance for construction work in progress plus nuclear fuel in process of refinement, conversion, enrichment, and fabrication shall

be estimated for the current year with appropriate adjustments as actual data becomes available.

NOTE: When a part only of a plant or project is placed in operation or is completed and ready for service but the construction work as a whole is incomplete, that part of the cost of the property placed in operation or ready for service, shall be treated as Electric Plant in Service and allowance for funds used during construction thereon as a charge to construction shall cease. Allowance for funds used during construction on that part of the cost of the plant which is incomplete may be continued as a charge to construction until such time as it is placed in operation or is ready for service, except as limited in item 17, above.

**Rhode Island Energy
Financial Department
Accounting Policies and Procedures**

Section: Asset Accounting

Last Update/Reviewed: 8/21/2024

Subject: Accounting for Capital
Office Furniture, Tools,
and Equipment

Contact: Ashley Grantham

Number: ACCT-RI-612

I. Purpose

This policy explains the procedures and accounting for the purchasing, transferring, and retiring of capital office furniture, tools, and equipment required for the operation, maintenance, and construction of Company facilities.

II. Applicability

Applicable to Rhode Island Energy (RIE) business lines that utilize Infor Financial Supply Manager (FSM) for capital and expense purchases.

III. Definitions

The term "office furniture, tools, and equipment" includes the following categories. These categories are also known as "general property", in the FERC uniform system of accounts. Refer to ACCT-RI-623 *Retirement Unit Listing* policy for examples of specific retirement units included under the appropriate plant accounts.

- Office furniture, and equipment
- Stores equipment
- Tools
- Shop equipment
- Garage equipment
- Laboratory equipment
- Communication equipment
- Miscellaneous general plant equipment

IV. Accounting Practices

Determination of Capital or Expense:

The following **unit** costs (direct purchase price plus applicable sales tax) apply in determining whether purchases of individual items of office furniture, tools, and equipment are charged to capital:

	Electric Capital, <u>If Unit Cost Is:</u>	Gas Capital, <u>If Unit Cost Is:</u>
Office Furniture and Equipment:		
Furniture	\$2,500 or more	\$500 or more
Mechanical Equipment	\$2,500 or more	\$500 or more
Computer Equipment	\$2,500 or more	\$500 or more
Stores Equipment	\$2,500 or more	\$500 or more
Tools, Shop and Garage Equipment	\$2,500 or more	\$500 or more
Laboratory Equipment	\$2,500 or more	\$500 or more
Communication Equipment*	\$2,500 or more	\$500 or more
Misc. General Plant Equipment	\$2,500 or more	\$500 or more

NOTES: Exceptions to unit cost criteria:

- When the **initial** complement of office furniture, tools, and equipment to be used for operations is purchased concurrently with the construction of a service center, crew quarters, storeroom, substation, garage, or other facility, the cost of all such office furniture, tools, and equipment shall be charged to capital regardless of the unit cost of individual items. This is for construction of a new stand-alone facility only.

V. Procedures

Purchases:

All direct purchases of office furniture, tools and equipment determined to be capital shall be charged to a capital project Expenditure Request (ER).

The dollar amounts indicated under the caption **Determination of Capital or Expense** apply to the unit cost (direct purchase price plus applicable

sales tax) of an individual item of office furniture, tools, and equipment. However, a single purchase order may include the purchase of several items. Some may be capital and others may be expense. Only the capital items are to be charged to a capital project ID. Expense items are to be charged to the appropriate functional expense account. In addition, an initial supply of materials to be used with an item of capital equipment may be purchased with the item. Only the cost of the capital item shall be charged to a capital project ID. The cost of supplies purchased with the capital item shall be charged to the appropriate functional expense account.

Accounting For Retirements:

In order to minimize record keeping requirements, equipment in certain General Plant accounts is amortized:

- Office furniture and equipment
- Stores equipment
- Tools
- Shop equipment
- Garage equipment
- Laboratory equipment
- Communications equipment
- Miscellaneous general plant equipment

For equipment in these accounts, manual retirement of assets from the continuing property records is not necessary. Costs incurred to remove assets should be charged to the appropriate project ID under sub-project code 002 and salvage proceeds should be credited to sub-project code 003.

For other plant retirements:

- Capital property to be traded in on new replacement property or to be sold when purchasing new replacement property to be capitalized will be accounted for as follows:
 - Prepare a project ID to purchase the new replacement property and credit sub-project code 003 for the trade-in allowance or proceeds from the property that was sold or traded in.
- Capital property to be sold without replacement will be accounted for as follows:
 - Prepare a project ID crediting sub-project code 003 for the proceeds of the asset retired.

- Retirement of capitalized property to be either traded in or sold when replacing with new property acquired under a lease agreement will be accounted for as follows:
 - Prepare a Project ID to retire the old property crediting sub-project code 003 for the trade-in allowance or selling price of the retired property.

VI. Shipping costs – Computer Hardware

- For laptops shipped from the vendor to the General Office or a similar company location initially, the original shipping cost would be capital.
- If that same laptop is re-shipped to an employee, the second shipping cost would be expense. Shipments of laptops from employees back to the company would be expense.
- Laptops shipped directly from the vendor to an employee would be capital.

VII. Responsibilities

- A. RIE business lines are responsible for following Accounting guideline determinations (Capital & Expense) when initiating a capital project.
- B. Asset Accounting is responsible for reviewing and classifying capital additions and ensuring retirements are recorded accurately from the Continuing Property Records.

Prepared by: Sheryl Tighe

Reviewed by: Linda Augustin 08/21/2024

PPL Corporation
Financial Department
Accounting Policies and Procedures

Section: Asset Accounting

Last Update/Reviewed: 8/28/2024

Subject: Accounting for Computer
Software

Contact: Sean McCready

Number: 615

I. Purpose

The policy is to provide guidelines for determining the accounting treatment for computer software costs purchased and/or developed for Company internal use.

Applicability

Applicable to all PPL Corporation business lines and service groups that utilize PowerPlan projects to account for capital and expense expenditures.

II. Definitions

See **Appendix A** for specific references from accounting guidance. FERC has adopted the GAAP guidance for accounting for internal-use computer software.

Accounting Practice

Purchased Software:

All software purchased separately from hardware and having a useful life consistent with the depreciable life established in the most recently approved depreciation study and a cost in excess of \$5,000 shall be capitalized in accordance with ASC 350-40. Software will be recorded in FERC Account 303, Miscellaneous Intangible Plant, and amortized by charging FERC Account 404, Amortization of Limited-Term Plant, and crediting FERC Account 111, Accumulated Provision for Amortization of Utility Plant. Retirements of software will be recognized according to instructions for FERC Account 303 and ASC 350-40.

Internally Developed Software:

All software developed internally and having a useful life consistent with the depreciable life established in the most recently approved depreciation study and

a cost in excess of \$50,000 shall be capitalized in accordance with the guidelines set forth in ASC 350-40 and recorded per the rules stated above for purchased software. (Note: RI Energy has its own legacy software capital thresholds of \$250,000 for Electric and \$1,000,000 for Gas).

Note: Internally developed software generally consists mainly of labor. However, it is not limited to internal IT labor only but rather may also include external/contract labor and insignificant purchased software costs. The use of contractors or minor purchases of software on a project do not prevent the proper classification of internally developed software (i.e., the project is still subject to the \$50,000 threshold for internally developed software).

Hosted Software Agreements/Software as a Service (SaaS):

In connection with the licensing of software products, cloud/hosted software agreements are arrangements in which the Company does not take possession of the software. Instead, the software application resides on the vendor's or a third party's hardware, and the Company accesses and uses the software on an as-needed basis over the internet or via a dedicated line. Fees associated with hosted arrangements will be expensed as incurred, unless all of the following criteria are met:

- a. The license fees cover a multi-year term¹ and are prepaid in full.
- b. The Company has the contractual right to take possession of the software at any time during the hosting period without significant penalty(defined below).
- c. It is feasible for the Company to either run the software on its own hardware or contract with another party unrelated to the vendor to host the software.

The term "without significant penalty" contains two distinct concepts:

- a. The ability to take delivery of the software without incurring significant costs (i.e. costs greater than \$100,000 or 10% of the contract costs, including license, hosting and maintenance).
- b. The ability to use the software separately without significant diminution in utility or value.

For purposes of the penalty calculation, "costs" include any contractual penalty payment, incremental costs to the company to either self-host (such as data storage equipment) or move to a third-party hosting platform (such as implementation costs), and incremental costs of maintenance (such as the need to hire or contract for maintenance services). The purpose of the calculation is to identify the total incremental cost to the

company to either move the application on premise or to a third party host and compare the costs to the total contract costs. If greater than 10%, the license fees are not eligible to be capitalized.

If the above criteria is met for capitalization, the fees for the product must be split into license fees(capital), hosting fees(O&M) and maintenance and support(O&M).

Hosting arrangements that do not meet the criteria above are service contracts and do not constitute a purchase of or convey a license to software and thus all fees should be expensed. Other costs associated with the software project will either be expensed or capitalized as described below in the Accounting for Related Costs section—provided that there is a commitment that long-term benefits are to be gained from the capitalized costs. Long term benefits must be evidenced by a hosted arrangement contractual agreement with a term consistent with the depreciable software life established in the most recently approved depreciation study. Projects involving hosting arrangements should be discussed in advance with Asset Accounting. See **Appendix B** for a guide on determining if costs associated with a SaaS arrangement should be capital or expense.

For hosting arrangements where PPL has determined that the Company has the contractual right and ability to take delivery of software without incurring significant penalty, Asset Accounting will inquire on a quarterly basis as to whether there have been significant changes to circumstances which would impact such assertions. For technologies which undergo a significant change in circumstances regarding right or ability to take delivery without significant penalty, accounting judgments related to such technologies will be applied on a prospective basis for any new software implementation/enhancement/upgrade efforts undertaken.

Implementation Costs of Hosting Arrangements: In August 2018, the FASB issued ASU 2018-15, which provided definitive guidance on how implementation costs of a computing arrangement (i.e., hosting arrangement), which is a service contract should be recorded and reported. Under the new guidance, the implementation costs of a hosting arrangement that is considered a service contract will be capitalized as a prepayment and those costs will be amortized over the term of the underlying hosting arrangement. This amortization will be recorded as “Other operating and maintenance” expense. This guidance was effective as of 1/1/2020.

While ASU 2018-15 will impact the treatment of implementation costs of a hosting arrangement, which is considered a service contract for SEC

purposes, there has been no change to the treatment of these costs for FERC reporting purposes. For FERC reporting, PPL will continue to capitalize these costs as property, plant and equipment and record depreciation expense over the useful life for software assets, as defined in the most recent service life study. As such, PPL will have a FERC to GAAP difference. Adjustments to reflect SEC presentation requirements are recorded quarterly. See link at the end of policy to a full version of the Whitepaper document on the implementation of the new cloud accounting guidance.

An entity (customer) shall determine the term of the hosting arrangement that is a service contract as the fixed noncancellable term of the hosting arrangement plus all of the following: (ASC 350-40-35-14)

- a. Periods covered by an option to extend the hosting arrangement if the entity (customer) is reasonably certain to exercise that option
- b. Periods covered by an option to terminate the hosting arrangement if the entity (customer) is reasonably certain not to exercise that option
- c. Periods covered by an option to extend (or not to terminate) the hosting arrangement in which exercise of the option is controlled by the vendor.

Upgrades/Enhancements to Software:

Upgrades and enhancements made when software is originally purchased will be capitalized as part of the software cost in accordance with ASC 350-40.

Upgrades and enhancements made after the initial purchase or development will be capitalized in accordance with ASC 350-40 if they represent modifications to the original asset to enable the software to perform tasks that it was previously incapable of performing.

Accounting for related costs:

Guidance on capitalization of costs incurred for computer hardware/software is provided below:

1. Costs incurred during the preliminary stages of a hardware/software project should be expensed as incurred include the following:
 - a. initial development of scope
 - b. documenting high-level business requirements and performance/system requirements (used in the evaluation of alternatives)
 - c. conceptual formulation of alternatives
 - d. evaluation of alternatives
 - e. determination of existence of needed technology

- f. final selection of alternatives/vendors
 - g. initial development of cost estimates
2. Costs incurred during the application stage to develop software should be capitalized. Capitalization of costs shall begin when a.) the preliminary project stage is completed and b.) management, with the relevant authority, implicitly or explicitly authorizes and commits to funding a computer software project and it is probable that the project will be completed and the software will be used to perform the function intended. Examples of authorization include the execution of a contract with a third party to develop the software. Application stage costs include the following:
- a. design activities including documentation of process changes required (to-be process documentation), detailed application requirements, analysis of system functionality and identification of required changes/customizations (gap-analysis), functional design documents, visualization or prototyping of solution, business rules, configuration requirements/rules, data requirements and reporting requirements
 - b. build activities including documentation of technical requirements, development, coding, software configuration, interfaces, and installation to hardware
 - c. testing including the development of user stories, use cases, testing scenarios and test scripts, and defect management
 - d. implementation activities

Costs shall include the actual cost of purchased hardware and software, consultant fees, travel expenses and payroll costs of the Information Technology Department. User (i.e., line of business) department costs may be charged to a project, but are limited to charges incurred by persons actively working on the project. Examples of employee activities include, but are not limited to design, coding and testing during the application development stage. Charges of persons serving on steering or advisory committees are excluded from capital costs.

3. Costs to develop or obtain software to access or convert old data using new systems should be capitalized. However, the actual cost of data conversion (purging or cleansing existing data, reconciling or balancing old data versus the data in the new system) should be expensed as incurred.
4. Perpetual license fees can be capitalized along with the costs to purchase software.

5. All training costs should be expensed as incurred.
6. Documentation of as-is business processes should be expensed as incurred.
7. Business process reengineering (not specific to the implementation of specific technology solution) should be expensed as incurred.

Meals related to Company business and incurred as part of the capitalized activities described above may be charged to the capital project. Meals related to Company business and incurred as part of the expensed activities described above must be expensed. Meals, golf outings, room rentals, food for celebrations and other expenses incurred as employee recognition for participation on a capital project shall be charged to a below-the-line expense account.

8. In some cases, software contract fees may include multiple-arrangements, such as training for the software, maintenance fees for routine maintenance work to be performed by the third party, data conversion costs, reengineering costs, and rights to future upgrades and enhancements. Costs should be allocated among all individual elements.
9. Capitalization shall cease no later than the point at which a computer software project is substantially complete and ready for its intended use. Substantially complete is generally defined as when all substantial testing is completed and automated systems are operational. The post go-live period for software projects is 60 days, after which capitalization should cease. During the 60-day post go-live period, costs that may be capitalized are those that are fixing or addressing issues with the product that went live and should not include completely new work efforts (such as a new module), change management costs or training costs. While the project may be held open to ensure invoices are paid, the invoices should not include services or costs incurred after the 60-day post go-live period. New efforts on the software should be captured with a new project number. In addition, costs incurred to operate and maintain software shall be expensed.
10. Maintenance costs, including the first year of maintenance, should be expensed as incurred.
11. **Upgrades and enhancements** to existing software (modifications that result in the software being able to perform tasks that it was previously

incapable of performing) should be expensed or capitalized in accordance with the rules listed above. Upgrades without additional functionality should be expensed. Costs that cannot be separated on a reasonably cost-effective basis between maintenance and relatively minor upgrades and enhancements should be expensed (i.e. security patches or bug fixes). The threshold for software upgrades/modifications to be capitalized is \$5,000.

Note: PPL does capitalize enhancements made to software after the initial software in-service in order to fix issues immediately after the go-live date or to modify the software to make it functional for our particular needs. After post go-live issues have been addressed, work performed to correct issues and perform routine maintenance is expensed.

12. When a software project will not be completed, no further costs may be capitalized and the project should be canceled and a PowerPlan CR journal entry prepared to reclassify the costs to expense.

V. Procedures

Procedure To Be Followed In Capitalizing Software:

Refer to IT Chapter 4001 procedure for specific procedures.

Classification/Amortization of Capitalized Software:

After a software project is completed and placed in service, the costs of the project are recorded as intangible plant in Account 10607 - Complete Construction Not Classified - General and Intangible. When unitized, the costs are transferred from 10607 into 10107 - General and Intangible - Plant In Service.

The accumulated amortization is credited to Account 11117 - Accumulated Provision for Amortization of Electric Utility Plant-General. When a software project is completely amortized, Plant Accounting retires the project by crediting the original cost of the project to Account 10107 and charging Account 11117.

VI. Responsibility

PPL business lines are responsible for following guidelines as defined in the policy, which includes filling out the "Capital Computer Software Project Authorization".

Asset Accounting is responsible for reviewing project set up and ensuring capital additions and retirements are recorded accurately to/from the Continuing Property Records.

VII. Related Publication

- FASB ASC 350-40, Internal Use Software (Intangibles – Goodwill and Other) (formerly SOP 98-1, Accounting for the Costs of Computer Software Developed or Obtained for Internal Use)
- FASB Accounting Standards Update No. 2015-05, Customer's Accounting for Fees Paid in a Cloud Computing Arrangement
-

Links

Reference the [Cloud Accounting White Paper](#) on the Property Accounting SharePoint site.

Appendix A

Appendix A provides specific references and exact language from Financial Accounting Standards Board ASC 350-40, Internal Use Software (Intangibles – Goodwill and Other) (formerly SOP 98-1, Accounting for the Costs of Computer Software Developed or Obtained for Internal Use). Appendix A is included here in support of the guidance provided above in Policy 615 and for easy reference.

Preliminary Project Stage

Internal and external costs incurred during the preliminary project stage shall be expensed as they are incurred. (ASC 350-40-25-1)

Activities include (ASC 350-40-55-3):

1. Conceptual formulation of alternatives
2. Evaluation of alternatives
3. Determination of existence of needed technology
4. Final selection of alternatives.

Application Development Stage

Internal and external costs incurred to develop internal-use computer software during the application development stage shall be capitalized. (ASC 350-40-25-2)

Activities include (ASC 350-40-55-3):

1. Design of chosen path, including software configuration and software interfaces
2. Coding
3. Installation to hardware
4. Testing, including parallel processing phase.

Costs include (ASC 350-40-30-1):

- a. External direct costs of materials and services consumed in developing or obtaining internal-use computer software:
 1. Fees paid to third parties for services provided to develop the software during the application development stage
 2. Costs incurred to obtain computer software from third parties
 3. Travel expenses incurred by employees in their duties directly associated with developing software.
- b. Payroll and payroll-related costs (for example, costs of employee benefits) for employees who are directly associated with and who devote time to the internal-use computer software project, to the extent of the time spent directly on the project. Examples of employee activities include but

are not limited to coding and testing during the application development stage.

Timing (ASC 350-40-25-12):

Capitalization of costs shall begin when both of the following occur:

- a. Preliminary project stage is completed.
- b. Management, with the relevant authority, implicitly or explicitly authorizes and commits to funding a computer software project and it is probable that the project will be completed and the software will be used to perform the function intended. Examples of authorization include the execution of a contract with a third party to develop the software, approval of expenditures related to internal development, or a commitment to obtain the software from a third party.

Capitalization shall cease no later than the point at which a computer software project is substantially complete and ready for its intended use, that is, after all substantial testing is completed. (ASC 350-40-25-14)

The process of data conversion from old to new systems may include purging or cleansing of existing data, reconciliation or balancing of the old data and the data in the new system, creation of new or additional data, and conversion of old data to the new system. Data conversion often occurs during the application development stage. (ASC 350-40-05-8)

Costs to develop or obtain software that allows for access to or conversion of old data by new systems shall also be capitalized. (ASC 350-40-25-3)

Actual data conversion costs, except as noted in paragraph 350-40-25-3, shall be expensed as incurred. (ASC 350-40-25-5)

Training costs are not internal-use software development costs and, if incurred during this stage, shall be expensed as incurred. (ASC 350-40-25-4)

Post implementation-Operation Stage

Internal and external training costs and maintenance costs during the post implementation-operation stage shall be expensed as incurred. (ASC 350-40-25-6)

Activities include (ASC 350-40-55-3):

1. Training
2. Application maintenance.

Impairment

When it is no longer probable that the computer software project will be completed and placed in service, no further costs shall be capitalized, and guidance in paragraphs 350-40-35-1 through 35-3 on impairment shall be applied to existing balances. (ASC 350-40-25-13)

Hosting Arrangements

Hosting Arrangement - In connection with the licensing of software products, an arrangement in which an end user of the software does not take possession of the software; rather, the software application resides on the vendor's or a third party's hardware, and the customer (i.e., PPL) accesses and uses the software on an as-needed basis over the Internet or via a dedicated line. (ASC 350-40 Master Glossary)

The guidance in this Subtopic applies only to internal-use software that a customer (i.e. our Company) obtains access to in a hosting arrangement if **both** of the following criteria are met (ASC 350-40-15-4):

1. The customer has the contractual right to take possession of the software at any time during the hosting period without significant penalty. The term without significant penalty contains two distinct concepts:
 - a. The ability to take delivery of the software without incurring significant costs.
 - b. The ability to use the software separately without significant diminution in utility or value.
2. It is feasible for the customer to either run the software on its own hardware or contract with another party unrelated to the vendor to host the software.

Hosting arrangements that do not meet both criteria are service contracts and do not constitute a purchase of, or convey a license to, software. (ASC 350-40-15-4)

Upgrades and Enhancements

Upgrades and enhancements are defined as modifications to existing internal-use software that result in additional functionality—that is, modifications to enable the software to perform tasks that it was previously incapable of performing. Upgrades and enhancements normally require new software specifications and may also require a change to all or part of the existing software specifications. (ASC 350-40-05-9)

In order for costs of specified upgrades and enhancements to internal-use computer software to be capitalized in accordance with paragraphs 350-40-25-8 through 25-10 (*see immediately below*), it must be probable that those expenditures will result in additional functionality. (ASC 350-40-25-7)

Internal costs incurred for upgrades and enhancements shall be expensed or capitalized in accordance with paragraphs 350-40-25-1 through 25-6 (see *preliminary project and application development stages above*). (ASC 350-40-25-8)

Internal costs incurred for maintenance shall be expensed as incurred. (ASC 350-40-25-9)

Entities that cannot separate internal costs on a reasonably cost-effective basis between maintenance and relatively minor upgrades and enhancements shall expense such costs as incurred. (ASC 350-40-25-10)

External costs incurred under agreements related to specified upgrades and enhancements shall be expensed or capitalized in accordance with paragraphs 350-40-25-1 through 25-6 (see *preliminary project and application development stages above*). If maintenance is combined with specified upgrades and enhancements in a single contract, the cost shall be allocated between the elements as discussed in paragraph 350-40-30-4 (see *immediately below*) and the maintenance costs shall be expensed over the contract period. However, external costs related to maintenance, unspecified upgrades and enhancements, and costs under agreements that combine the costs of maintenance and unspecified upgrades and enhancements shall be recognized in expense over the contract period on a straight-line basis unless another systematic and rational basis is more representative of the services received. (ASC 350-40-25-11)

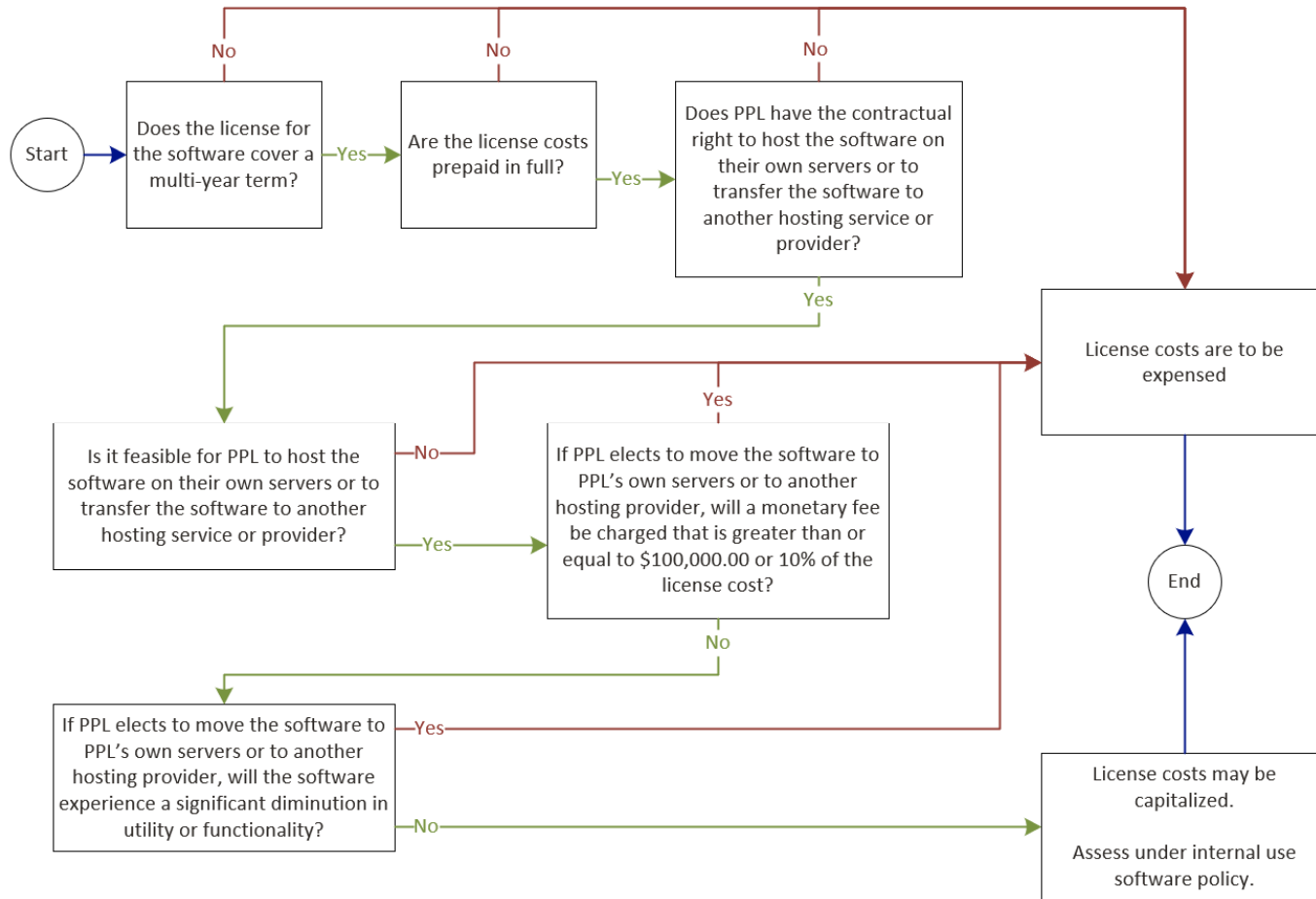
Multiple-Element Arrangements Included in Purchase Price

Entities may purchase internal-use computer software from a third party. In some cases, the purchase price includes multiple elements, such as training for the software, maintenance fees for routine maintenance work to be performed by the third party, data conversion costs, reengineering costs, and rights to future upgrades and enhancements. Entities shall allocate the cost among all individual elements. The allocation shall be based on objective evidence of fair value of the elements in the contract, not necessarily separate prices stated within the contract for each element. Those elements included in the scope of this Subtopic shall be accounted for in accordance with the provisions of this Subtopic. (ASC 350-40-30-4)

Notes

1. The term of the software agreement should be equal to the software depreciable life, but PPL will permit capitalization if the SAAS contract term is no more than two years less than the depreciable life. For example, the minimum contract (license) term for a five-year life software project is three years, in order to be eligible for capitalization.

Appendix B:
Evaluation of SaaS/Cloud Assets for Capitalization



Treatment of Implementation Costs
(irrespective of treatment for SaaS fees)

For regulatory/ratemaking purposes:
Implementation costs (including AFUDC) may be eligible for capitalization. Once placed in service these costs will be depreciated as property, plant, and equipment over the applicable software life.

For GAAP purposes:
Capitalized implementation costs (excluding AFUDC) will be reclassified to prepaids. Once placed in service, these costs will be amortized to O&M over the remaining contract term.

Hosting fees and maintenance/support fees are O&M costs in all cases.

PPL Corporation
Financial Department
Accounting Policies and Procedures

Section: Asset Accounting

Last Update/Reviewed: 12/31/2023

Subject: Accounting for Depreciation
of Property, Plant & Equipment

Contact: Robert Phillips

Number: ACCT-EU-617

I. Purpose

The purpose of this policy is to provide guidance for determining depreciation expense related to tangible property, plant and equipment (PP&E).

Applicability

This policy is applicable to all PPL Electric Utilities Corporation (PPL EU) and Rhode Island Energy (RIE) business lines.

III. Definitions

Automatic End of Life Retirement Method – this accounting method is typically used for fixed asset accounts that have a large number of small dollar value items. Retirements are only recorded when a given asset vintage is fully depreciated/amortized whether or not the assets are still in service. Each group of assets is assigned a life over which the assets will provide a full benefit.

Average Service Life – The average life of a group of assets which is determined using actuarial techniques. These techniques look at historical and estimated future trends to produce a pattern of life characteristics from which the average service life can be determined.

Composite Depreciation Method – A method of grouping assets that are dissimilar in nature and may have different lives but are part of a larger asset group. The asset group is depreciated over an estimated service life for the group.

Depreciation Expense – the systematic and rational allocation of the cost of tangible PP&E to expense over the estimated useful life of the asset.

Depreciation Group – the grouping of assets to which a depreciation method and applicable rate calculation is applied. Typically, a depreciation group is set at a FERC account level for a given location.

End of Life or Remaining Life Depreciation Method – A depreciation methodology which depreciates related assets to an end of life date. The end of life method calculates a “depreciable base” amount (gross plant cost less accumulated depreciation) and depreciates this value over the remaining life of the asset. The remaining life of the “depreciable base” becomes shorter and shorter as the end of life of the asset group is reached. If the original plant balance remains the same to the end of life date, this depreciation method will produce the same periodic depreciation expense as the straight line method of depreciation.

Group Depreciation Method – A method of grouping assets that are similar in nature and have approximately the same average service life. Each group of assets is depreciated over a common average service life and uses a similar retirement curve to calculate depreciation expense.

Mid-Period Convention - The mid-period convention controls how current year activity impacts the depreciable base. It works in coordination with the mid-period method. It weights the impact of activity on the depreciable base. For example, if the mid-period method is ‘Monthly’, a ‘0’ would mean that activity does not impact the current month depreciable balance; a ‘0.5’ would mean that an average monthly balance would be used. If the factor were ‘1’, the ending balance for the month would be used. In general, most tangible assets use a factor of ‘0.5’ and most intangible assets use a factor of ‘1’.

Straight Line Depreciation Expense Method – Depreciation expense is recognized evenly over the estimated useful life of the asset or group of assets.

Survivor Curve / Mortality Curve (Interim Survivor Curve) – The survivor curve is a curve which shows the number of units of property that survives in service at given ages. The use of survivor curves, which reflect experienced and expected dispersion of service lives, is a systematic and rational means of estimating average service lives to be used to calculate depreciation expense. The terms survivor curve and mortality curve are sometimes used interchangeably. Interim survivor curves as used by PPL are survivor/mortality curves that are associated with another primary depreciation method such as the end of life depreciation method (defined above). The interim retirement curve becomes a secondary factor in determining depreciation expense.

IV. Accounting Practice

1. Background

PPL EU’s calculation of depreciation expense, including the service lives of the respective assets as well as the depreciation methodology, is controlled by the

Pennsylvania Public Utility Commission (PaPUC). PPL EU is required to file a depreciation life study every five years with the PaPUC under 52 Pa. Code Section 73.5. This study provides statistical information related to the life of assets which allows a retirement curve and estimated service life of the assets to be determined. The PaPUC must approve the depreciation life study before the applicable data from the study can be used. The depreciation life study must be filed no later than August 31, with results effective for accounting purposes as of:

- 120 days from filing date if the report is based upon previously approved service lives, depreciation parameters, or methods, unless the PaPUC takes other action; or
- 180 days from filing date if the report contains proposed changes to service lives, depreciation parameters, or methods, unless the PaPUC takes other action.

The most recent depreciation life study for PPL EU was conducted based upon data as of 12/31/2021 and was filed with the PaPUC on 08/31/2022.

The same information is also filed with FERC every 5 years as a Section 205 filing.

RIE's calculation of depreciation expense, including the service lives of the respective assets as well as the depreciation methodology will only be updated upon entering a rate case, during which a service life study will be performed simultaneously.

2. Accounting

Depreciation expense begins when an asset is placed into service and is ready for its intended use. Depreciation expense ceases when an asset becomes fully reserved, is retired, or is reclassified as held for sale. For most tangible assets, a half-month convention is used to calculate depreciation expense, whereby one-half of the monthly depreciation expense is incurred in the months that the asset is placed into service and is retired, while for most intangible assets, a full month's expense is incurred in the months that the asset goes into service and is retired.

When an asset which uses a group or composite depreciation method is retired during the normal course of business operations, no gain or loss is recorded. The asset's corresponding depreciation reserve is reduced by the gross book value of the retirement. These retirements will ultimately affect the group's mortality/survivor curve and affect the group's depreciation expense prospectively. When all or a significant portion of an operating unit that was depreciated under the composite or group method is retired or sold, the property and related accumulated depreciation account is reduced and any gain or loss is included primarily in O&M, unless otherwise required by regulators.

Depreciable groups using a straight-line (vintage year) depreciation methodology (e.g., most general plant, meters, transformers) are subject to guidance under FERC Accounting Release 15 (AR-15), which specifies that such groups may be exempt from detailed unitization and record-keeping requirements provided that:

- the individual classes of assets for which vintage year accounting is followed are high volume, low value items;
- there is no change in existing retirement unit designations, for purposes of determining when expenditures are capital or expense;
- the cost of the vintage groups is amortized to depreciation expense over their useful lives and there is no change in depreciation rates resulting from the adoption of the vintage year accounting;
- interim retirements are not recognized;
- salvage and removal cost relative to items in the vintage categories are included in the accumulated depreciation account and assigned to the oldest vintage first; and
- properties are retired from the affected accounts that, at the date of the adoption of vintage year accounting, meet or exceed the average service life of properties in that account.

Assets that are considered leasehold improvements or assets that are part of a capital lease are segregated into separate general ledger accounts. These assets are depreciated over the shorter of their useful life or the life of the respective lease.

Software assets are depreciated at an individual asset level, meaning that each software asset has its own depreciation expense, accumulated depreciation, and remaining life. To the extent that Asset Accounting becomes aware that it is probable that the actual remaining life of a particular software asset is shorter than remaining life recorded on the books for accounting purposes, Asset Accounting has the ability to manually shorten the remaining life recorded on the books in order to accelerate the depreciation expense on that software asset to more closely align with its actual life.

For PPL EU, cost of removal and salvage proceeds accumulated in connection with the removal or disposition of assets are deferred and amortized to expense over a rolling five-year period, beginning in January of the year following unitization (Penn Sheraton Hotel v. PA PUC, 1962). Cost of removal and salvage proceeds are eligible for unitization once the associated project has been placed into service. For GAAP reporting purposes, the net amount of cost of removal and salvage proceeds are re-classified on a quarterly basis as a regulatory asset instead of as an offset to accumulated depreciation. The incurred cost methodology used for cost of removal is filed the same with the PUC and the FERC.

For RIE, recovery of cost of removal is provided within base rates which are set during rate cases. RIE records cost of removal expense monthly. For GAAP

purposes, the net amount of cost of removal expense and COR incurred are recorded within a regulatory liability.

The Company uses the PowerPlan Asset Management System to maintain continuing property records as well as calculate depreciation expense. The attached matrix shows how, generally, depreciation methods are applied.

Changes to depreciation rates are approved by the PaPUC and are also filed with the FERC. Depreciation rates shall change only as the result of a depreciation study, rate case, or by filing directly for approval with the appropriate commissions. Depreciation rates are input into the PowerPlan system to become effective the earlier of:

- 120 days from filing date if the report is based upon previously approved service lives, depreciation parameters, or methods, unless the PaPUC takes other action; or
- 180 days from filing date if the report contains proposed changes to service lives, depreciation parameters, or methods, unless the PaPUC takes other action.

V. Procedures

At least every five years, PPL EU requests that its depreciation consultant prepare a depreciation study to meet the requirements of the Pa. PUC Code specified above. Once the depreciation study is complete and approved by PPL EU, it is filed with the PaPUC and FERC by the Office of General Counsel.

During rate case proceedings for RIE, Asset Accounting requests that its depreciation consultants prepare a depreciation study to meet the requirements of the Rhode Island Public Utilities Commission. Separate studies are performed for RIE's electric and gas assets.

Any changes to data affecting depreciation rates or the establishment of new depreciation groups/rates within the PowerPlan system must be approved by the Supervisor or Manager of Asset Accounting. All changes affecting rates must be approved by the Director of Accounting and Financial Reporting.

VI. Responsibility

Asset Accounting is responsible for documenting all changes to depreciation rates in the PowerPlan system as well as inputting applied rates, survivor curves, and asset end of lives in the Asset depreciation module.

PPL EU and RIE business lines are responsible for informing Asset Accounting of any changes to the lives of assets or any planned significant abnormal retirement activity.

V. References

Pa PUC Code - Title 52 Chapter 73: Annual Depreciation Reports, Service Life
Studies, and Capital Investment Plans

http://www.pacode.com/secure/data/052/chapter73/052_0073.pdf

FERC Accounting Release 15

<https://www.ferc.gov/enforcement/acct-matts/docs/ar-15.asp>

Rhode Island Energy
Financial Department
Accounting Policies and Procedures

Section: Asset Accounting **Last Update/Reviewed:** 8/28/2024

Subject: Retirement Unit Listing **Contact:** Linda Augustin

Number: ACCT-RI-623

I. Purpose

This policy discusses the accounting for retirement units and minor items and attached to the policy is the full retirement unit listing.

II. Applicability

Applicable to all Rhode Island Energy (RIE) business lines that utilize PowerPlan projects to account for capital expenditures.

Note that the retirement unit listing is the same one that existed pre-acquisition of RIE and may include references to previous owner National Grid (NG) or NG-specific locations or accounts. Such NG company or location references can be disregarded, except for identify whether the listing is referring to Electric or Gas.

III. Definitions

The definitions and usage for retirement units and minor items of property are from the Uniform System of Accounts issued by the Federal Energy Regulatory Commission and adopted by the Rhode Island Public Utility Commission.

Retirement Units and Minor Items of Property

In determining whether costs shall be capitalized or expensed, it is first necessary to understand the meaning of the terms:

- Retirement Units
- Minor Items of Property

For the purpose of accounting for additions to, retirements from, and replacements of plant, all property shall be considered as consisting of (1) retirement units; and (2) minor items of property. The costs of minor items included in a retirement unit are included in the cost of the retirement unit in the Continuing Property Records (CPR) and are not separately itemized.

The Company's list of retirement units for Distribution Plant is included in the Plant Section of the Classification of Accounts.

Retirement Units - The lowest level of detail recorded in the CPR for individual items of utility plant. Costs associated with additions, retirements, or replacements of retirement units are accounted for as capital. When a retirement unit is added to plant, the cost must be added to the CPR. Conversely, when a retirement unit is retired from plant, with or without replacement, the original cost must be removed from the CPR and the cost of removal and salvage must be accounted for under capital accounting.

Minor Items of Property - The associated parts or components which form a retirement unit. Costs associated with additions, retirements or replacements of minor items of property independent of the complete retirement unit are generally accounted for by charging expense. Exceptions to this general rule occur when the addition of a minor item, which did not previously exist, constitutes a substantial addition to the retirement unit. When a minor item is retired and not replaced, the book cost will be retired when the retirement unit, of which it is a part, is removed or replaced.

PowerPlan – RIE's current fixed asset system.

Compatible units (CU) – Fields (objects) within a work management system which designate some model of work, including estimated labor and materials to be installed, removed or transferred. Typically, the compatible units assist in creating a bill of materials and enables a list of retirement units to be sent to the fixed asset system.

IV. Procedures

Each business line is responsible for ensuring capital projects involving replacement of existing assets is consistent with this policy (the project is only capital if at least one or more retirement units is being replaced).

CUs in work management systems can either be configured with the retirement unit information as part of the CU or mapping can be created between the work management system and PowerPlan to derive the retirement unit information. Either way, CU-designed projects typically rely on the CU configuration or mapping to send the retirement unit information to PowerPlan.

For non-CU designed projects, an alternative process to obtaining the retirement unit information must be developed in order to permit capitalization of the project(s).

If a proposed project does not involve replacement of retirement units, such as addition(s) of a minor item that constitutes a substantial betterment, the project must be reviewed and approved by Property Accounting and ordinarily requires a file memo to document the exception.

V. Responsibilities

- A. RIE business lines are responsible for following accounting requirements for retirement units when initiating a capital project.
- B. Asset Accounting is responsible for reviewing and classifying capital additions and ensuring retirements are recorded accurately from the CPR.

VI. Attachment A

Attached is the full retirement unit listing for RIE, as well as associated minor items, by FERC Plant account.

Prepared by: Linda Augustin

Reviewed by: John Schwartz

Attachment DIV 7-4-6

Due to the voluminous nature of Attachment DIV 7-4-6, the Company is providing the Excel version of this attachment.



**RI Electric Engineering Sanctioning
Guidance Document**

Custom ID: XXX
Revision: 1
Effective Date: 02/16/2023
Page 1 of 9

TABLE OF CONTENTS

1. PURPOSE / SCOPE	1
2. RESPONSIBILITY	2
3. APPLICABILITY	3
4. TERMS AND DEFINITIONS	3
5. MAIN BODY	3
6. RECORD RETENTION	8
7. REVISION HISTORY	9

1. PURPOSE / SCOPE

- 1.1. This procedure documents The Narragansett Electric Company d/b/a Rhode Island Energy (RIE)'s process for documenting and obtaining approval for distribution capital projects.
- 1.2. All capital projects and programs that are proposed shall follow this process to justify, document, and gain internal approval for the proposed work. This document will ensure all projects and programs are following the same approval process and that approvals are being given at the appropriate level.
- 1.3. This procedure applies to:
 - 1.3.1. RIE Distribution Capital Projects
 - 1.3.2. RIE Distribution Capital Programs
 - 1.3.3. RIE Distributed Generation/New Load Projects
 - 1.3.4. RIE Damage Failure Projects
 - 1.3.5. RIE Public Requirement Projects



**RI Electric Engineering Sanctioning
Guidance Document**

Custom ID: XXX
Revision: 1
Effective Date: 02/16/2023
Page 2 of 9

2. RESPONSIBILITY

2.1. RIE Engineering

- 2.1.1. Identify project needs case resulting from an area study, reliability review, customer complaint, or some other engineering analysis.
- 2.1.2. Discuss the system concern and proposed solution with Distribution Planning and/or Distribution Field Engineering to review other ongoing/approved projects that might resolve the identified system concern.
- 2.1.3. Depending on the forecasted spend, complete a FACT sheet or sanction paper outlining the system issue, project scope, alternative analysis, and estimated cost.
 - 2.1.3.1. Alternative analysis may require non-wires solution review based on System Reliability Procurement (SRP) criteria.
- 2.1.4. Review the proposed scope with applicable supporting departments and obtain approval.
- 2.1.5. Complete and submit the Super Project request form to Plant Accounting.
- 2.1.6. Submit the FACT sheet or sanction paper to Plant Accounting to be attached to the Super Project in PowerPlan.

2.2. RIE Engineering Management

- 2.2.1. Review and approve/reject capital project or program via PowerPlan.

2.3. RIE Supporting Departments

- 2.3.1. Review FACT sheet or sanction paper and approve or provide comments as needed.

2.4. RIE Program Managers

- 2.4.1. Schedule an annual program review with engineers to obtain upcoming fiscal year budget estimates.
- 2.4.2. Re-sanction project or program if the difference between the amount most recently authorized and the revised amount for the capital project or program exceeds the greater of 20% or \$100,000.
- 2.4.3. Re-sanction ongoing program spend for upcoming fiscal year.

2.5. RIE Project Managers

- 2.5.1. Follow project throughout lifecycle and track actual spend against forecasted spend.
- 2.5.2. Re-sanction project if the difference between the amount most recently authorized and the revised amount for the capital project exceeds the greater of 20% or \$100,000.
 - 2.5.2.1. There should be a formal check-in at the end of detailed design to refresh the project estimate and re-sanction if the the new



RI Electric Engineering Sanctioning Guidance Document

Custom ID: XXX
Revision: 1
Effective Date: 02/16/2023
Page 3 of 9

estimate exceeds the greater of 20% or \$100,000 of the project DOA.

2.6. PPL Plant Accounting

- 2.6.1. Create Super Project via PowerPlan.
- 2.6.2. Upload FACT sheet or sanction paper into PowerPlan.

3. APPLICABILITY

- 3.1. This document applies to all Rhode Island Energy employees and contractors performing tasks directly for, or in support of, Rhode Island Energy.

4. TERMS AND DEFINITIONS

- 4.1. **Project Sanction** – Process to review and approve/reject proposed projects after careful review of project drivers, project scope, and cost summary.
- 4.2. **FACT sheet** – Document used to sanction projects up to \$5M.
- 4.3. **Sanction Paper** – Document used to sanction projects that are greater than \$5M.
- 4.4. **PowerPlan** – Database used to track projects and assets.
- 4.5. **Fiscal Year** – The period between April 1st and March 31st the following year (e.g. FY25 is between April 1, 2024 and March 31, 2025)
- 4.6. **Delegation of Authority (“DOA”)** – The budget that has been approved for a specific project. This does not include additional spending above the budget even if the incremental spend is within the estimate accuracy.
- 4.7. **Detailed Design** – The project milestone where upon completed, design drawings are created, construction bid events have occurred, environmental reviews have been completed, and permitting requirements have been identified.

5. MAIN BODY

5.1. Schedule

- 5.1.1. Projects can be sanctioned at any point throughout the fiscal year.
- 5.1.2. If proposing/continuing a project or program for the upcoming fiscal year, Engineering shall have a draft scope, cost, and schedule by June 1st of the current fiscal year.
 - 5.1.2.1. Draft scope, cost, and schedule should be documented via the FACT sheet template.
- 5.1.3. All projects and programs planned for the upcoming fiscal year should have an approved scope, cost, and schedule by August 1st, but no later than November 1st, of the current fiscal year.



**RI Electric Engineering Sanctioning
Guidance Document**

Custom ID: XXX
Revision: 1
Effective Date: 02/16/2023
Page 4 of 9

- 5.1.3.1. All projects that will be in the ISR shall have an approved FACT sheet for regulatory review. This will be in addition to any documents needed for project sanctioning.
- 5.1.3.2. Sanctioning approval for the upcoming fiscal year typically occurs during the 4th quarter of the current fiscal year. An approved FACT sheet or sanction paper shall be required for sanction approval.
- 5.1.4. If a project is being proposed for the current fiscal year, the project initiator shall complete the approved FACT sheet or sanction paper and create a new entry on the Super Project tracking sheet found on the Regional Engineering SharePoint site.
 - 5.1.4.1. Project walk-ins will only be allowed if one of the following are met:
 - 5.1.4.1.1. If the project is part of a pre-approved program.
 - 5.1.4.1.2. If the project is classified as a public requirement.
 - 5.1.4.1.3. If the project is classified as a damage/failure.
 - 5.1.4.1.4. If the project is customer driven and must be completed during the fiscal year.
 - 5.1.4.1.5. If there is an immediate need to commence the project within the current fiscal year in order to obtain a substantial benefit for ratepayers and the need to complete the project was not reasonably foreseeable at the time the Company filed the current year ISR spending plan.
 - 5.1.4.2. Only after approval shall the project be officially sanctioned via the outlined process.
- 5.2. Workflow (New Capital Project)
 - 5.2.1. RIE Engineering (Planning or Field Engineering) to identify a system need based on the outcome of an area study, reliability review, customer complaint, or some other engineering analysis.
 - 5.2.2. RIE Engineering to review potential solutions to correct the system need and confirm that other projects (or programs) haven't already been proposed to correct the need.
 - 5.2.2.1. RIE Engineering to consult with other engineering departments, operations, control center and project/program management while evaluating solutions.
 - 5.2.3. RIE Engineering shall complete a FACT sheet or sanction paper once a project scope has been identified.
 - 5.2.3.1. The FACT sheet template shall be used for projects estimated to cost greater than \$500k up to \$5M.




**RI Electric Engineering Sanctioning
Guidance Document**

Custom ID: XXX
Revision: 1
Effective Date: 02/16/2023
Page 5 of 9

- 5.2.3.2. The sanction paper template shall be used for projects estimated to cost greater than \$5M.
- 5.2.3.3. It is not required to use the FACT sheet template for projects estimated to cost less than \$500k. However, these projects should be justified and documented via an engineering memorandum and saved on the engineering SharePoint site.
- 5.2.4. RIE Engineering to share draft documents with impacted departments and gather feedback on the proposed project (e.g. Portfolio Manager, Project Management, Operations, control center, permitting).
 - 5.2.4.1. It is the responsibility of the RIE Engineer to resolve any differences of opinion that result from the feedback of impacted departments.
- 5.2.5. RIE Engineering shall send a draft copy of the FACT sheet or sanction paper to their direct supervisor for review and comment.
- 5.2.6. Once the FACT sheet and/or sanction paper has been approved by the RIE Engineering supervisor, RIE Engineering shall send a request to PPL PA Plant Accounting to create a new Super Project.
 - 5.2.6.1. RIE Engineering shall use the most recent revision of the Super Project Request Form found on the RIE Regional Engineering SharePoint site.
 - 5.2.6.2. RIE Engineering shall also attach the completed FACT sheet or sanction paper to the PPL PA Plant Accounting Request.
 - 5.2.6.3. RIE Engineering shall also upload the FACT sheet or sanction paper onto the RIE Engineering SharePoint site and identify that the revision has been approved.
- 5.2.7. Plant Accounting shall create a new Super Project and attach the FACT sheet and/or sanction paper to the Super Project in PowerPlan and send for approval.
- 5.2.8. RIE Management shall review and approve/reject the proposed project within 10 business days of receiving the notification via email.
 - 5.2.8.1. Approvers and delegation of authority (DOA) shall be as follows:

Job Code	RI Energy DOA	Authorization
Supervisors	\$50,000	Up to
Managers	\$1,000,000	Up to
Directors / Sr. Manager	\$10,000,000	Up to
Vice President / Sr. Director	\$30,000,000	Up to

 <p>Rhode Island Energy a PPL company</p>	RI Electric Engineering Sanctioning Guidance Document	Custom ID: XXX Revision: 1 Effective Date: 02/16/2023 Page 6 of 9
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COO / SVP / President	\$40,000,000	Up to
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- 5.2.8.2. If the project is estimated to cost greater than \$10M, the sanction paper will be reviewed by the RIE Leadership team via an ad hoc meeting to review the project need, scope, schedule, and cost.
- 5.2.8.3. If the project is estimated to cost greater than \$40M, the sanction paper will be reviewed by the PPL Leadership Committee consisting of the RIE President, COO, and CEO.
- 5.2.9. RIE Project/Program Management is responsible for re-sanctioning the project if the difference between the amount most recently authorized and the revised amount for the capital project exceeds the greater of 20% or \$100,000.
 - 5.2.9.1. RIE Project/Program Management to use the most recent revision of the Super Project Request Form found on the RIE Regional Engineering SharePoint site.
 - 5.2.9.2. RIE Project/Program Management and RIE Engineering to revise the existing FACT sheet or sanction paper to reflect the updated cost.
 - 5.2.9.3. RIE Project/Program Management to send both documents to the PPL PA Plant Accounting group mailbox for project re-sanction.
- 5.3. Workflow (Capital Program)
 - 5.3.1. RIE Engineering (Planning or Field Engineering) to identify a system need based on the outcome of an area study, reliability review, or some other engineering analysis that justifies a multi-year capital program.
 - 5.3.2. RIE Engineering to review system concern and proposed program with other engineering departments, operations, control center and program management to ensure no other projects, or programs, are already approved to resolve the concern.
 - 5.3.3. RIE Engineering shall create program justification including, but not limited to, a program strategy document, asset priority criteria, and estimated annual spend.
 - 5.3.4. For initial program approval, RIE Engineering shall complete a FACT sheet or sanction paper once a program has been identified.
 - 5.3.4.1. The FACT sheet template shall be used for programs estimated to cost greater than \$500k up to \$5M over the entire program duration.
 - 5.3.4.2. The sanction paper template shall be used for programs estimated to cost greater than \$5M over the entire program duration.
 - 5.3.4.3. The FACT sheet or sanction paper should summarize the overall system issue, recommended scope, schedule, and capital spend for the entire program.



**RI Electric Engineering Sanctioning
Guidance Document**

Custom ID: XXX
Revision: 1
Effective Date: 02/16/2023
Page 7 of 9

- 5.3.4.4. If the program contains projects at individual substations, or if the individual project costs are greater than \$500k, the program FACT sheet or sanction paper shall specifically define the scope and cost at each location for the upcoming FY.
- 5.3.5. For annual program re-sanctioning, RIE Engineering shall update the original sanctioning document (FACT sheet or sanction paper) to reflect the most accurate spending forecast for the program.
 - 5.3.5.1. If the program contains projects at individual substations, or if the individual project costs are greater than \$500k, the program FACT sheet or sanction paper shall be updated to specifically define the scope and cost at each location for the upcoming FY. (e.g. URD cable replacement program, substation battery replacement program).
 - 5.3.5.2. If the program consists of individual projects that cost less than \$500k each, no additional documentation is needed to re-sanction the project each year (e.g. recloser replacement program).
- 5.3.6. RIE Engineering to share draft documents with impacted departments and gather feedback on the proposed program (e.g. Portfolio Manager, Project Management, Operations, control center, permitting).
 - 5.3.6.1. It is the responsibility of the RIE Engineer to resolve any differences of opinion that result from the feedback of impacted departments.
- 5.3.7. RIE Engineering shall send a draft copy of the FACT sheet or sanction paper to their direct supervisor for review and comment.
- 5.3.8. Once the FACT sheet or sanction paper has been approved by the RIE Engineering supervisor, RIE Engineering shall send a request to PPL PA Plant Accounting to create a new Super Project.
 - 5.3.8.1. RIE Engineering shall use the most recent revision of the Super Project Request Form found on the RIE Regional Engineering SharePoint site.
 - 5.3.8.2. RIE Engineering shall also attach the completed FACT sheet or sanction paper to the PPL PA Plant Accounting Request.
 - 5.3.8.3. RIE Engineering shall also upload the FACT sheet or sanction paper onto the RIE Engineering SharePoint site and identify that the revision has been approved.
 - 5.3.8.4. One Super Project will be created for each program and will be re-sanctioned annually.
 - 5.3.8.5. Multiple work orders will be created under the Super Project for each unique work location.
- 5.3.9. Plant Accounting shall create a new Super Project and attach the FACT sheet or sanction paper to the Super Project in PowerPlan and send it for approval.



**RI Electric Engineering Sanctioning
Guidance Document**

Custom ID: XXX
Revision: 1
Effective Date: 02/16/2023
Page 8 of 9

5.3.10. RIE Management shall review and approve/reject the proposed program within 10 business days of receiving the notification via email.

5.3.10.1. Approvers and delegation of authority (DOA) shall be as follows:

Job Code	RI Energy DOA	Authorization
Supervisors	\$50,000	Up to
Managers	\$1,000,000	Up to
Directors / Sr. Manager	\$10,000,000	Up to
Vice President / Sr. Director	\$30,000,000	Up to
COO / SVP / President	\$40,000,000	Up to

5.3.10.2. If the program is estimated to cost greater than \$10M, the sanction paper will be reviewed by the RIE Leadership team via an ad hoc meeting to review the project need, scope, schedule, and cost.


5.3.10.3. If the program is estimated to cost greater than \$40M, the sanction paper will be reviewed by the PPL Leadership Committee consisting of the RIE President, COO, and CEO.

5.3.11. RIE Program Management to meet annually with RIE Engineering to review the status of the program and review estimated spend for the next Fiscal Year.

5.3.12. RIE Project/Program Management to submit the annual re-sanctioning request once RIE Engineering provides updated documents and estimates.

6. RECORD RETENTION

This document shall be reviewed every year, or as applicable, by the appropriate departments within Rhode Island Energy.

 <p>Rhode Island Energy™ <small>a PPL company</small></p>	<p align="center">RI Electric Engineering Sanctioning Guidance Document</p>	<p>Custom ID: XXX Revision: 1 Effective Date: 02/16/2023 Page 9 of 9</p>
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7. REVISION HISTORY

Prepared by:	
	Eric Wiesner Manager – Regional Engineering
Reviewed by:	
	Ryan Constable Manager – Distribution Planning
	Nicole Gooding Manager – Portfolio Management
Approved by:	
	Kathy Castro Director – Asset Management & Engineering
	Dan Glenning Director – Project & Construction Management
	Roger Cox Sr. Manager – Work Management

Revision	Date	Revision Comments
0	02/16/2023	Initial Revision.

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 Seventh Set of Data Requests
Issued on December 19, 2024

Division 7-5

Request:

The Company indicated that a sanction paper for the 3763 Pole Replacement project is not available. Please provide a description of this project.

Response:

The scope of work for the project included the replacement of ten structures and elimination of an eleventh, six of which are within the secure area of the Newport Navy base. The Company identified the need for this project through an assessment performed on the 3763 line, which identified structural deficiencies and asset condition issues. This is a 69 kV line that runs from the Jepson Substation in Middletown, through the Navy base, to the Gate 2 Substation on the base.

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 Seventh Set of Data Requests
Issued on December 19, 2024

Division 7-6

Request:

Please provide corroborating detail from the Company's operation systems, such as GIS, to evidence the existence of the following assets:

Company	Work Ord	Asset ID	Retirement Unit	Utility Account	Major Location	FERC	CPR	Quant	Cost
						Plant	Posting		
75300 RI Distribution Non Legal	10030624576	639207212 RI-POLE, WOOD, JO		36400-RIELEC-POLES,TOWERS AND FIXTU	MASS PLANT - RI (ELECT)	364	Sep-23	9.0	\$ 5,000.47
75300 RI Distribution Non Legal	10030291727	1341558467 RI-POLE, WOOD, JO		36400-RIELEC-POLES,TOWERS AND FIXTU	MASS PLANT - RI (ELECT)	364	Feb-24	11.0	\$ 45,213.13
75300 RI Distribution Non Legal	10030782896	1341555049 RI-POLE, WOOD, JO		36400-RIELEC-POLES,TOWERS AND FIXTU	MASS PLANT - RI (ELECT)	364	Mar-24	5.0	\$ 24,423.36

Response:

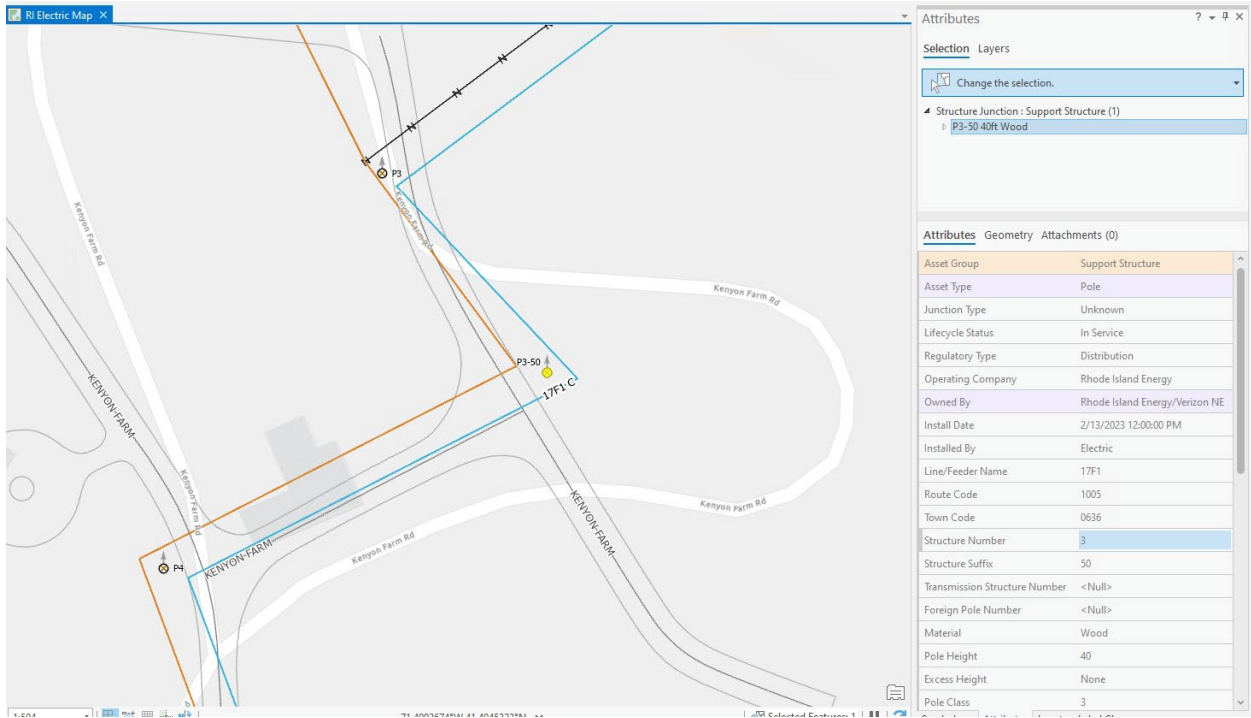
Please see the table below for the accompanying attachments for the data requested:

Work Order	GIS Screenshots	Design or As-Built Drawings
10030624576	Attachment DIV 7-6-1	Attachment DIV 7-6-4
10030291727	Attachment DIV 7-6-2	Attachment DIV 7-6-5
10030782896	Attachment DIV 7-6-3	Attachment DIV 7-6-6

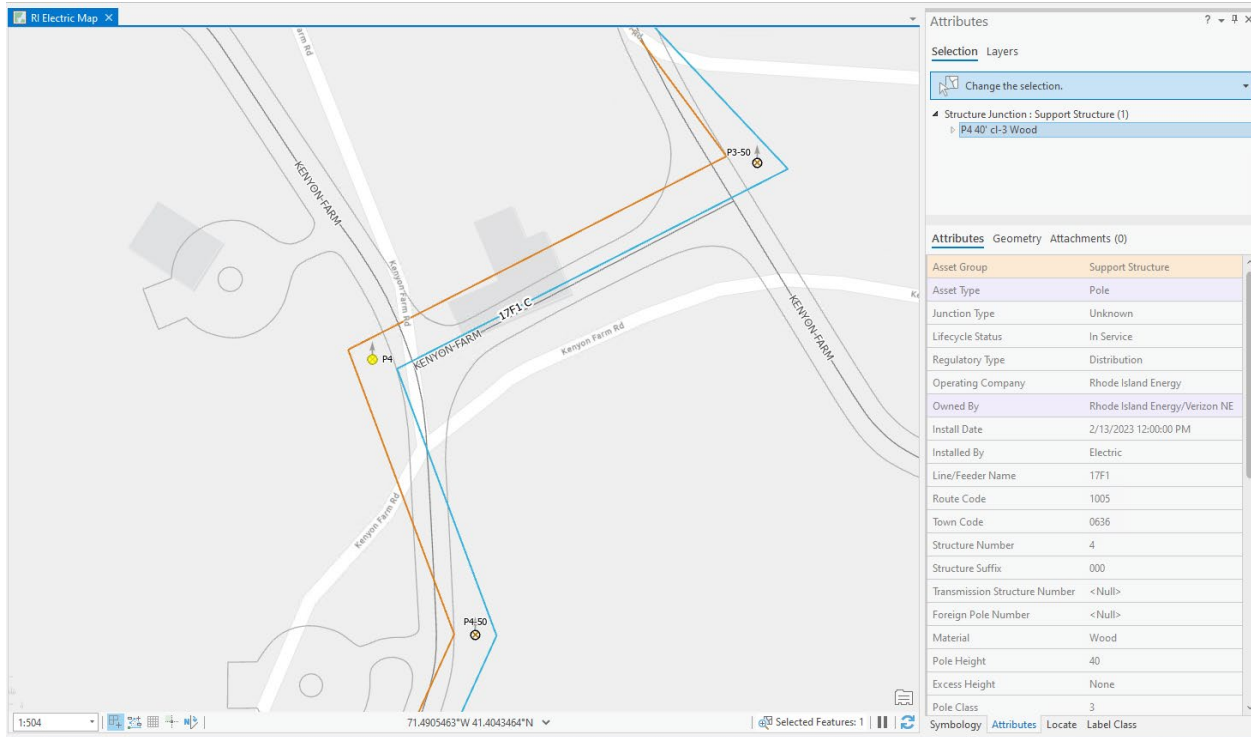
Please note, for WO# 10030624576, the Company installed an additional pole that was not initially in the design. This change can be seen on the last page of DIV 7-6-4.

WO 10030624576
RI-Pole, Wood, JO

P3-50 Kenyon Farm Rd



P4 Kenyon Farm Rd



P4-50 Kenyon Farm Rd

Attributes

Selection Layers

- Structure Junction : Support Structure (1)
 - P4-50 40ft Wood

Attributes Geometry Attachments (0)

Asset Group	Support Structure
Asset Type	Pole
Junction Type	Unknown
Lifecycle Status	In Service
Regulatory Type	Distribution
Operating Company	Rhode Island Energy
Owned By	Rhode Island Energy/Verizon NE
Install Date	2/13/2023 12:00:00 PM
Installed By	Electric
Line/Feeder Name	17F1
Route Code	1005
Town Code	0636
Structure Number	4
Structure Suffix	50
Transmission Structure Number	<Null>
Foreign Pole Number	<Null>
Material	Wood
Pole Height	40
Excess Height	None
Pole Class	3

P5 Kenyon Farm Rd

Attributes

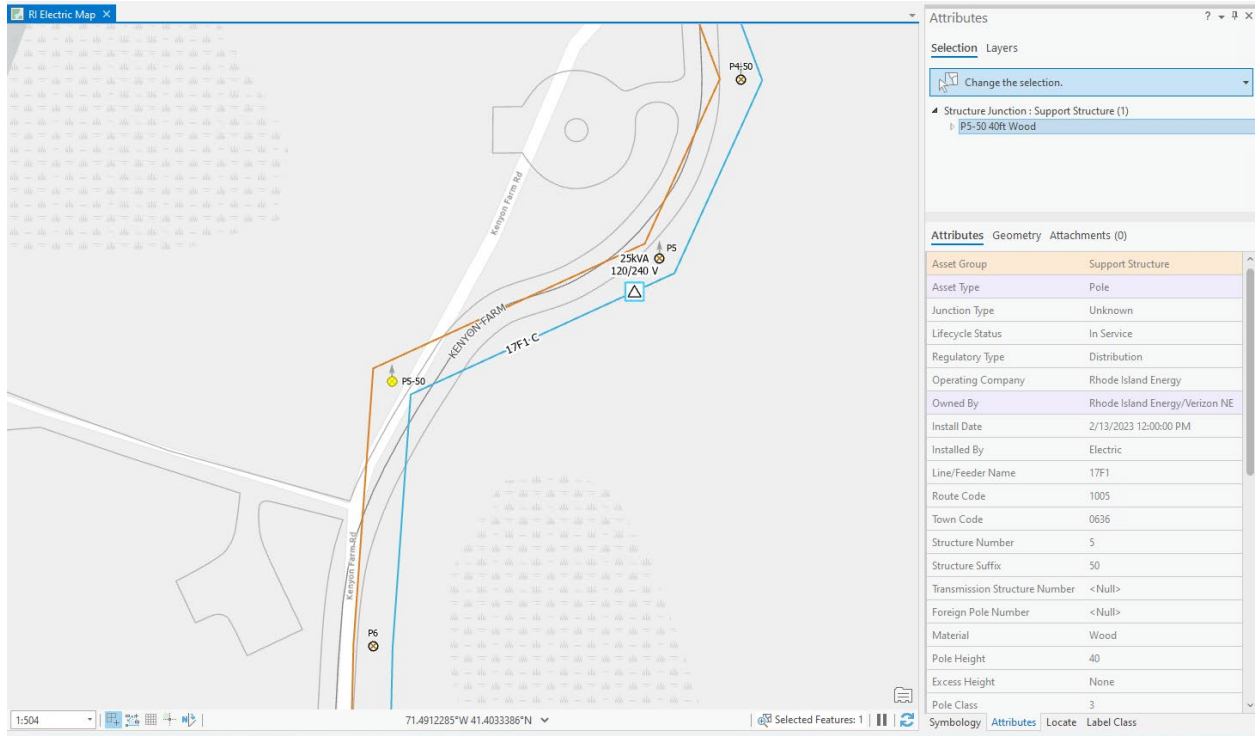
Selection Layers

- Structure Junction : Support Structure (1)
 - P5 40' ci-3 Wood

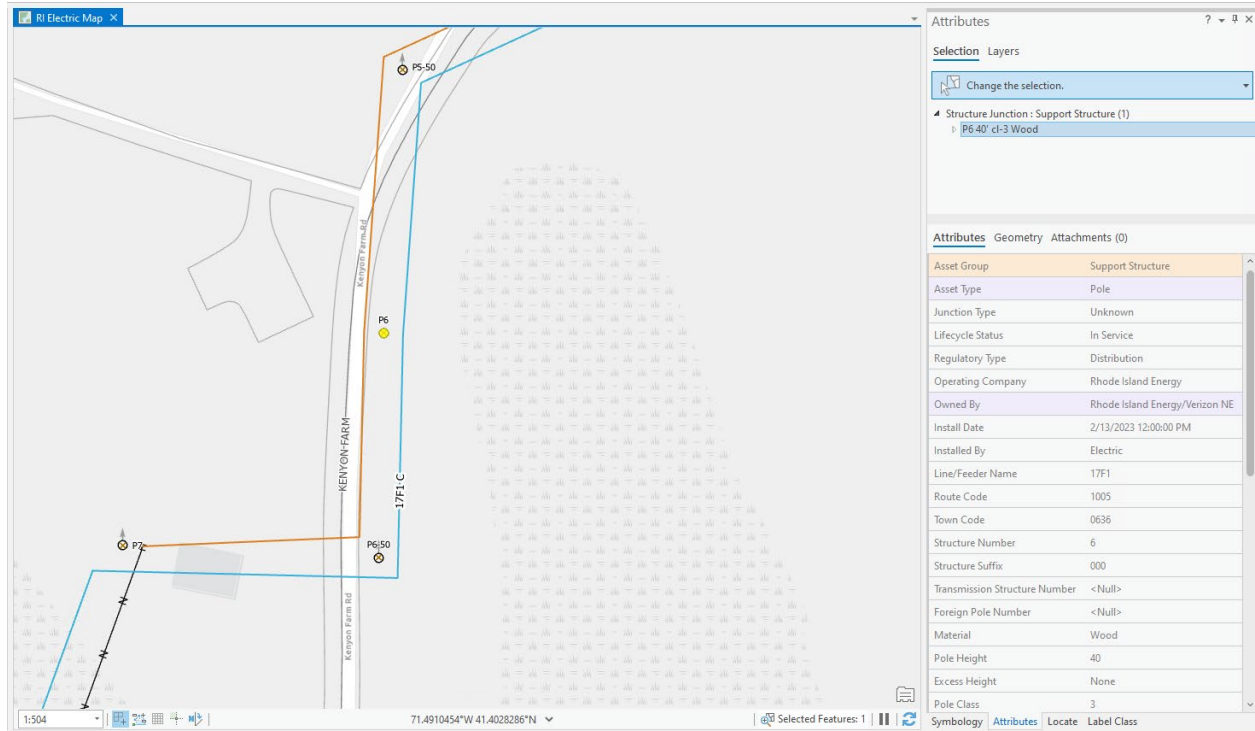
Attributes Geometry Attachments (0)

Asset Group	Support Structure
Asset Type	Pole
Junction Type	Unknown
Lifecycle Status	In Service
Regulatory Type	Distribution
Operating Company	Rhode Island Energy
Owned By	Rhode Island Energy/Verizon NE
Install Date	2/13/2023 12:00:00 PM
Installed By	Electric
Line/Feeder Name	17F1
Route Code	1005
Town Code	0636
Structure Number	5
Structure Suffix	000
Transmission Structure Number	<Null>
Foreign Pole Number	<Null>
Material	Wood
Pole Height	40
Excess Height	None
Pole Class	3

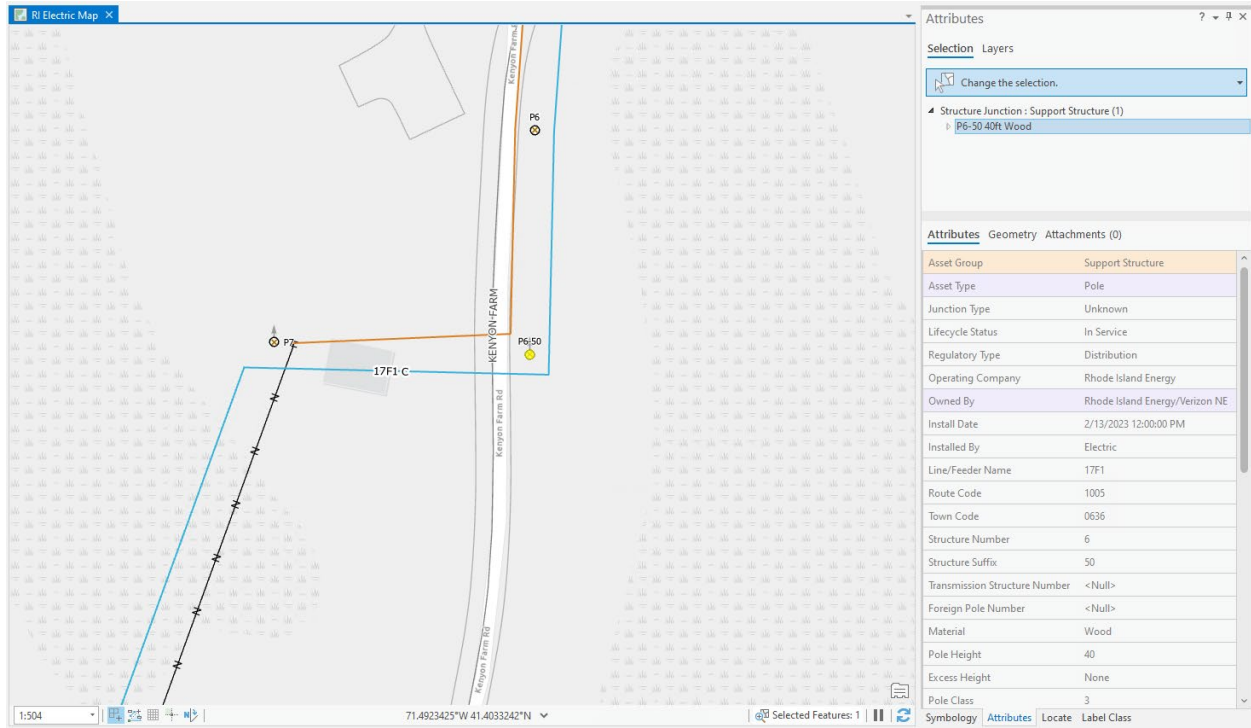
P5-50 Kenyon Farm Rd



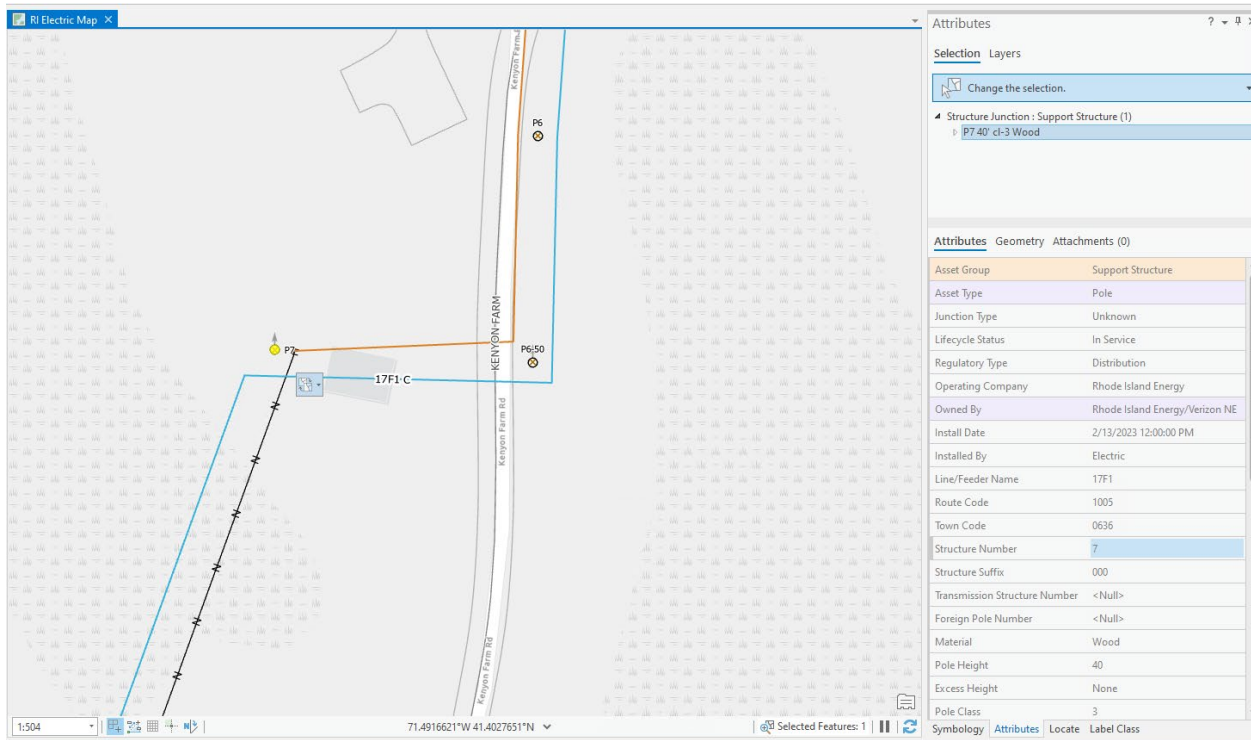
P6 Kenyon Farm Rd



P6-50 Kenyon Farm Rd



P7 Kenyon Farm Rd



P8 Kenyon Farm Rd

Attributes

Selection Layers

Change the selection.

- Structure Junction : Support Structure (1)
 - P8 40' ct-2 Wood

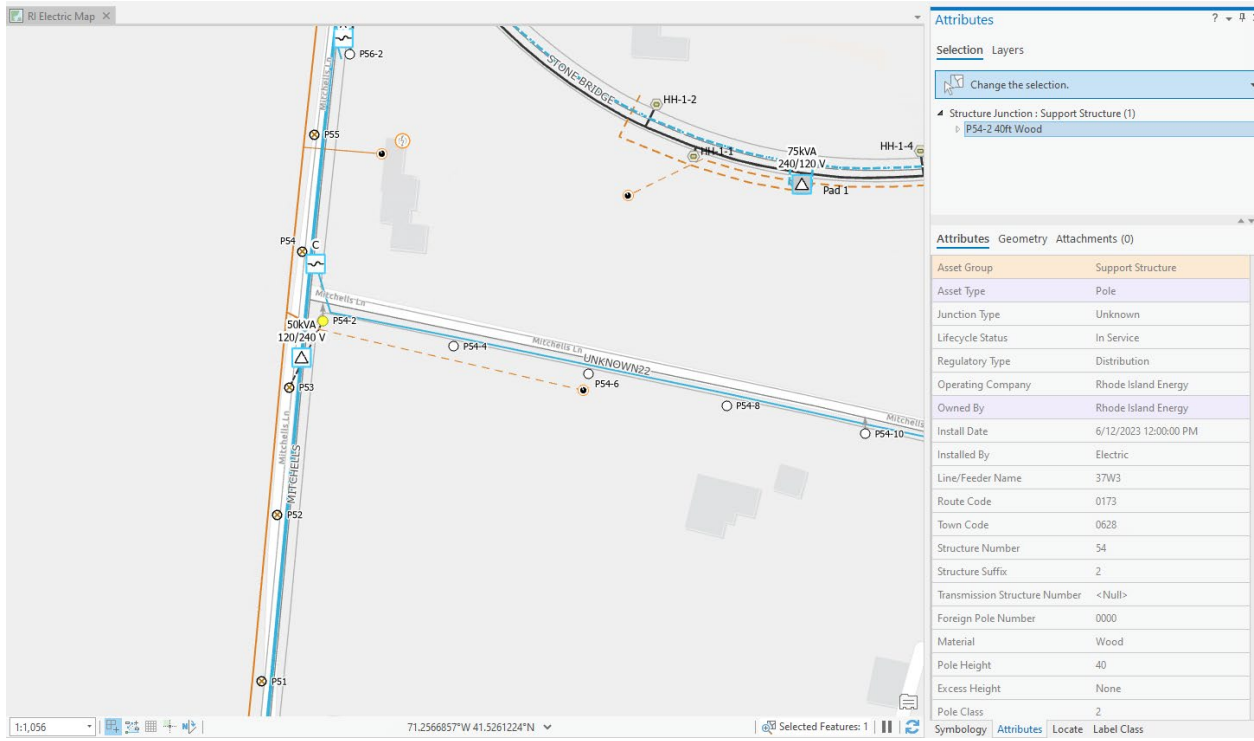
Attributes Geometry Attachments (0)

Asset Group	Support Structure
Asset Type	Pole
Junction Type	Unknown
Lifecycle Status	In Service
Regulatory Type	Distribution
Operating Company	Rhode Island Energy
Owned By	Rhode Island Energy/Verizon NE
Install Date	2/13/2023 12:00:00 PM
Installed By	Telephone
Line/Feeder Name	17F1
Route Code	1005
Town Code	0636
Structure Number	8
Structure Suffix	0
Transmission Structure Number	<Null>
Foreign Pole Number	<Null>
Material	Wood
Pole Height	40
Excess Height	None
Pole Class	2

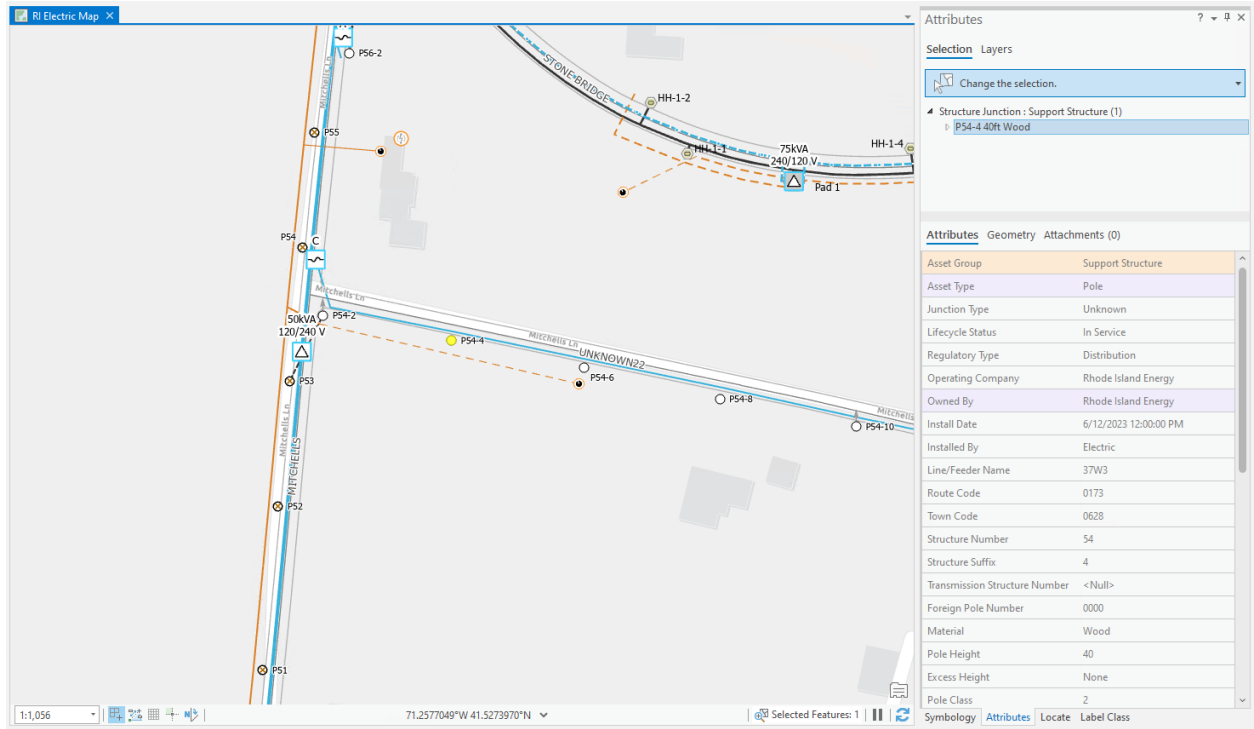
1:504 | 71.4920446°W 41.4021544°N | Selected Features: 1 | Symbology | Attributes | Locate | Label Class

WO 10030291727
RI-Pole, Wood, JO

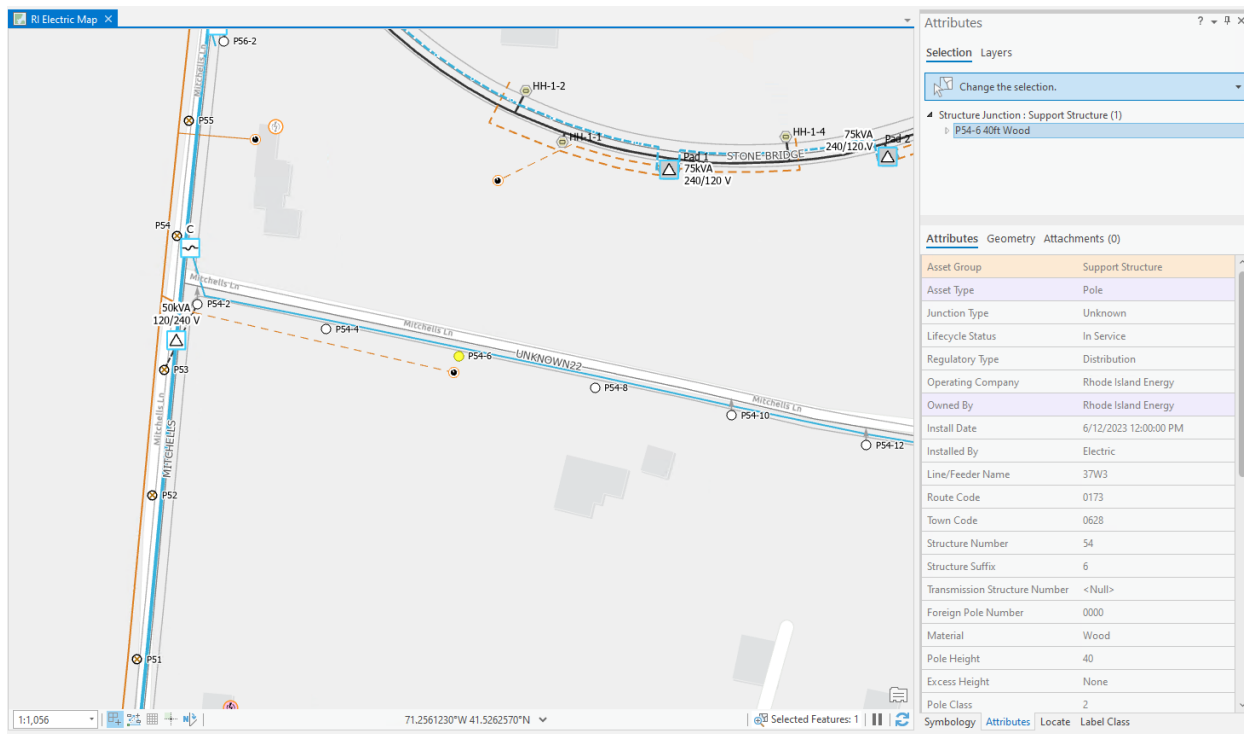
P54-2



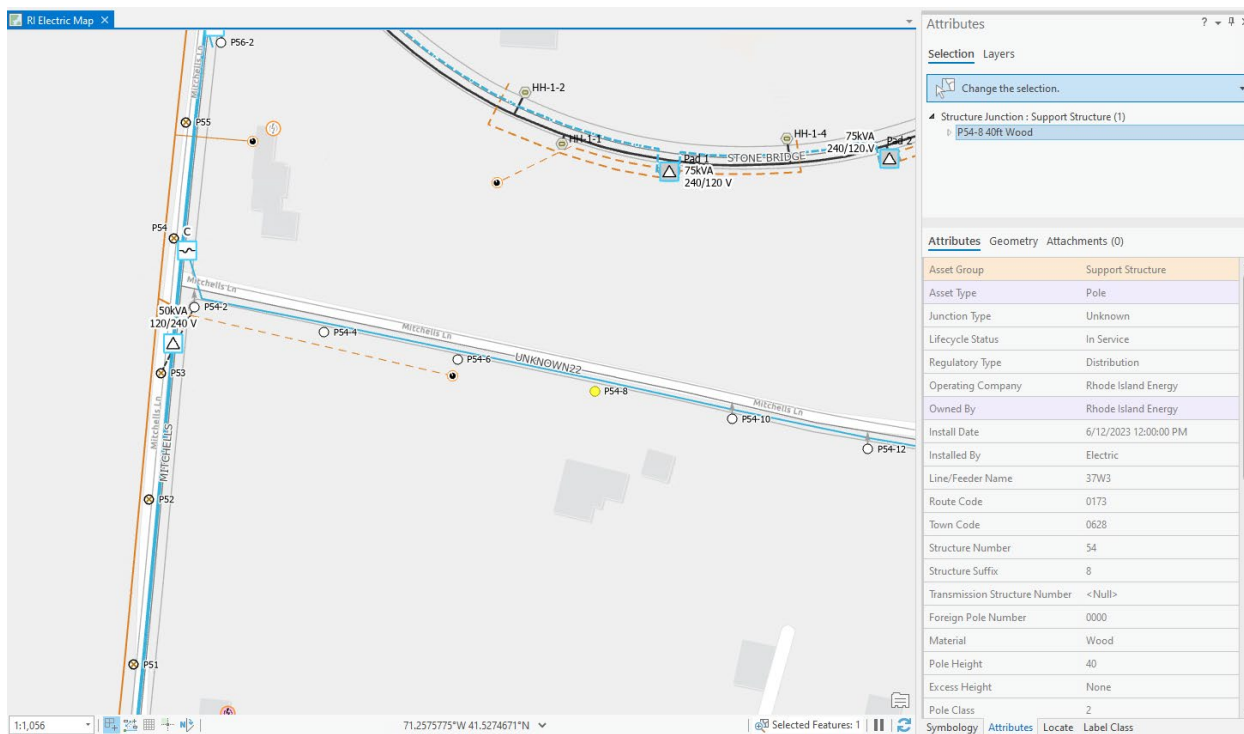
P54-4



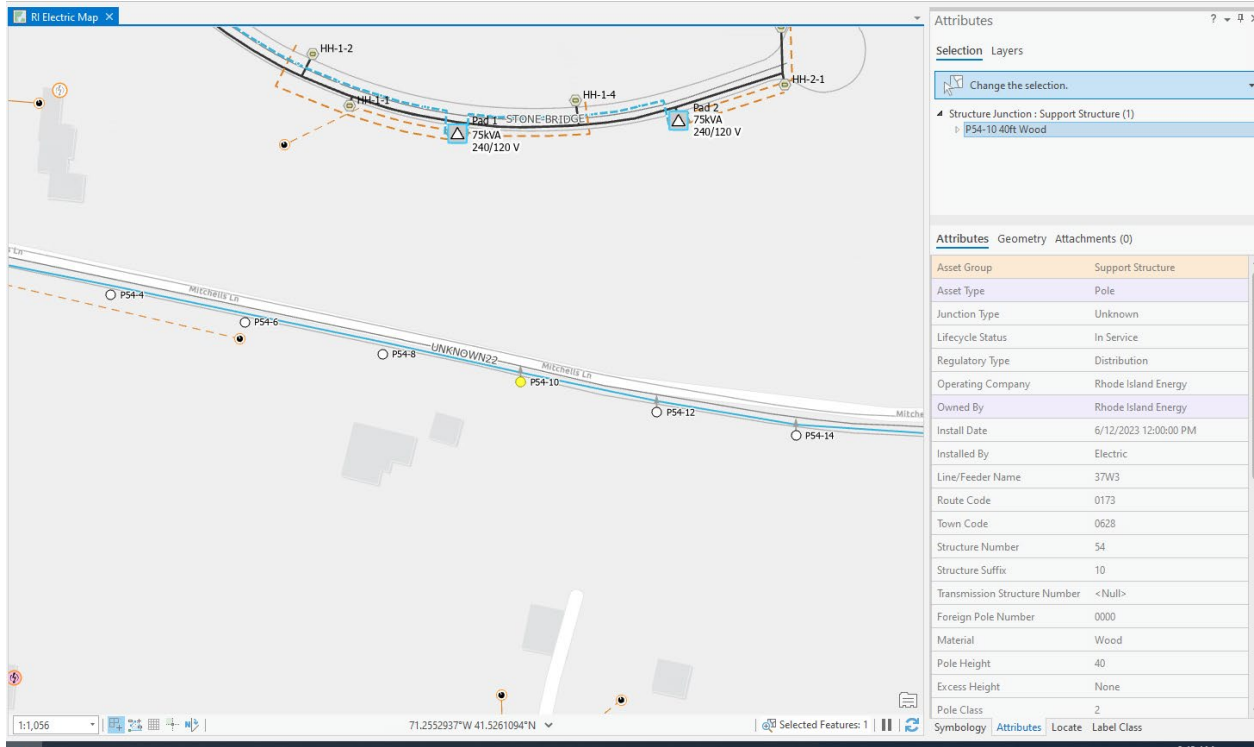
P54-6



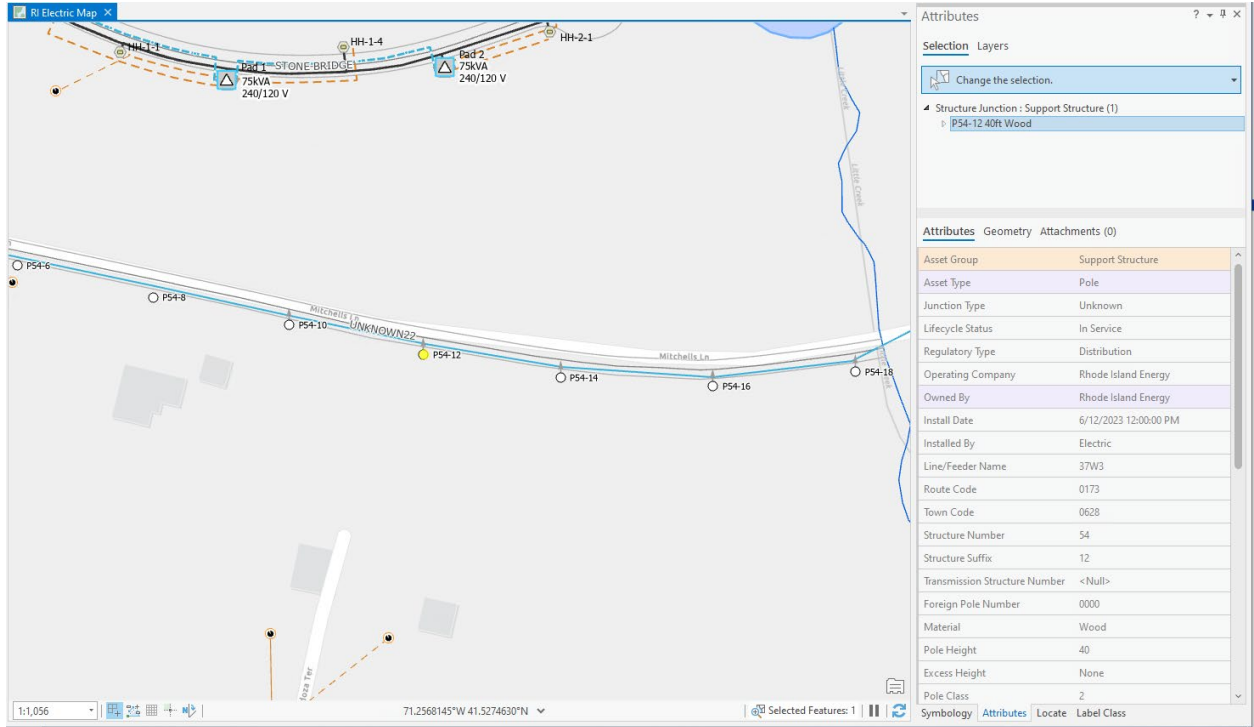
P54-8



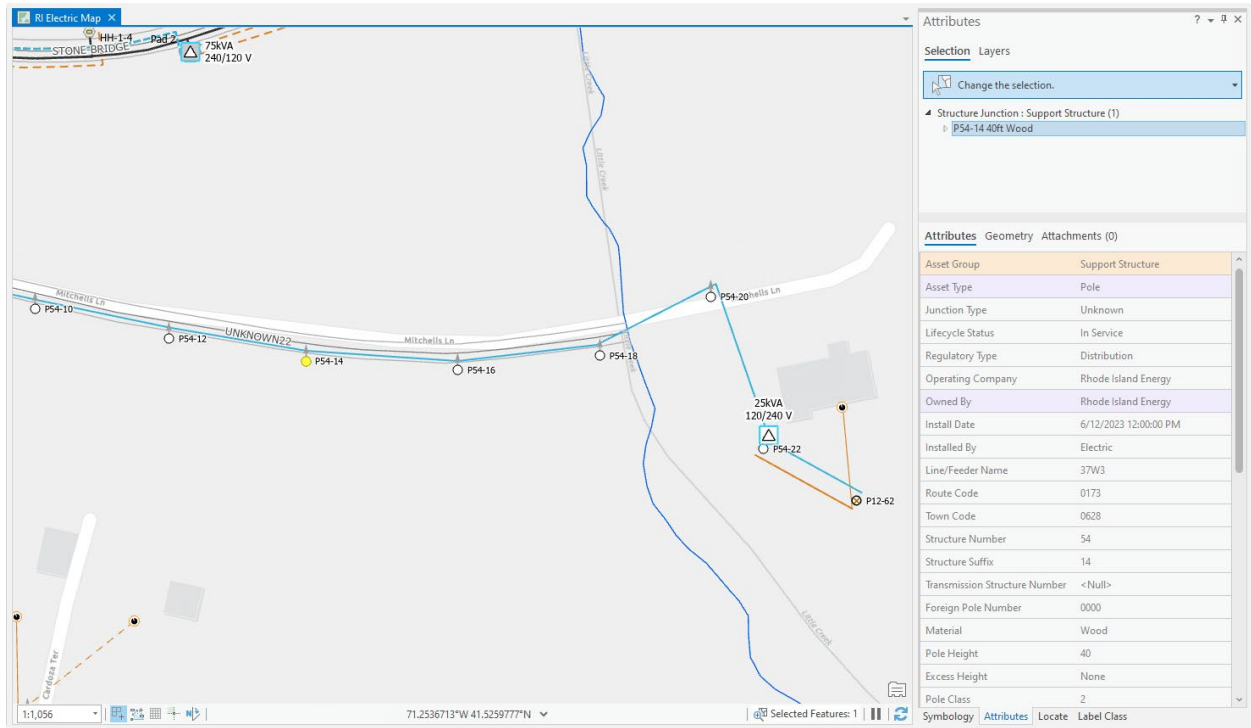
P54-10



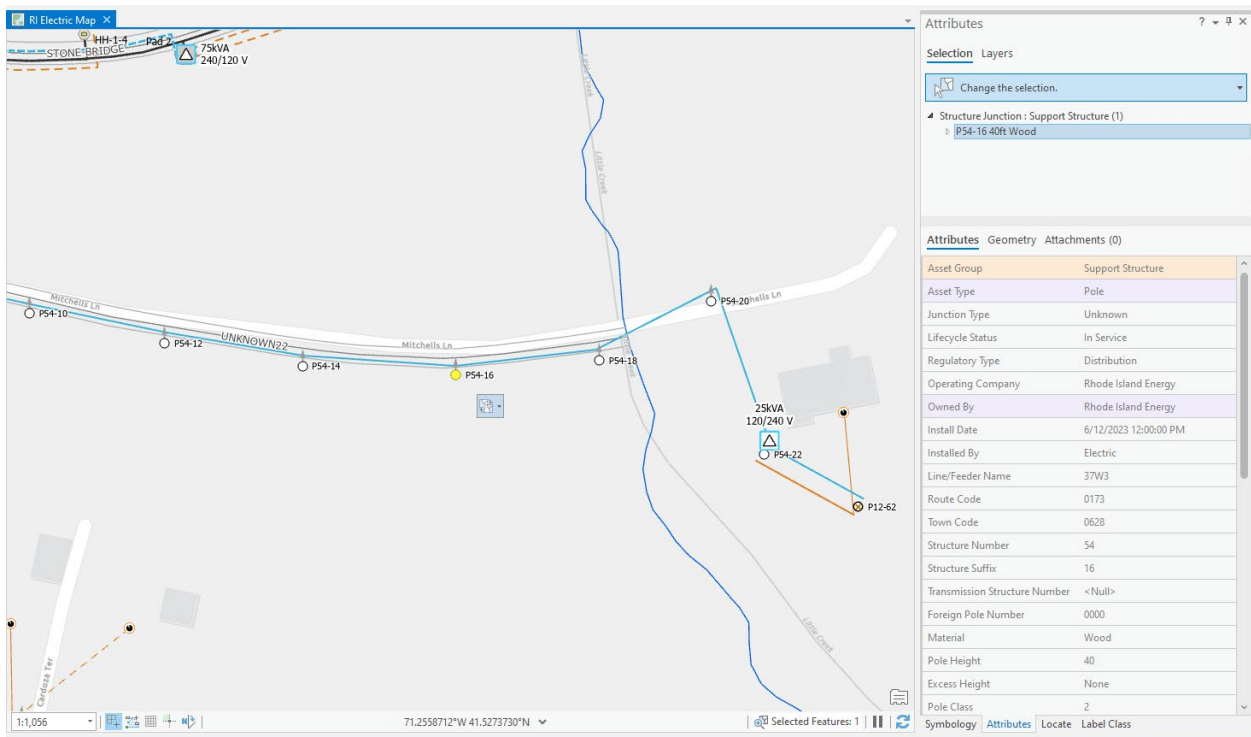
P54-12



P54-14



P54-16



P54-18

The screenshot displays a GIS interface for 'RI Electric Map'. The map shows a network of power lines and structures. A specific structure, P54-18, is highlighted in yellow. The map includes labels for 'Pad 2', '75kVA 240/120 V', 'UNKNOWN22', 'Mitchells Ln', 'P54-12', 'P54-14', 'P54-16', 'P54-18', 'P54-20 Hells Ln', '25kVA 120/240 V', 'P54-22', and 'P12-62'. The interface includes a scale of 1:1,056 and coordinates 71.2528628°W 41.5256189°N. The 'Attributes' panel on the right shows the following data:

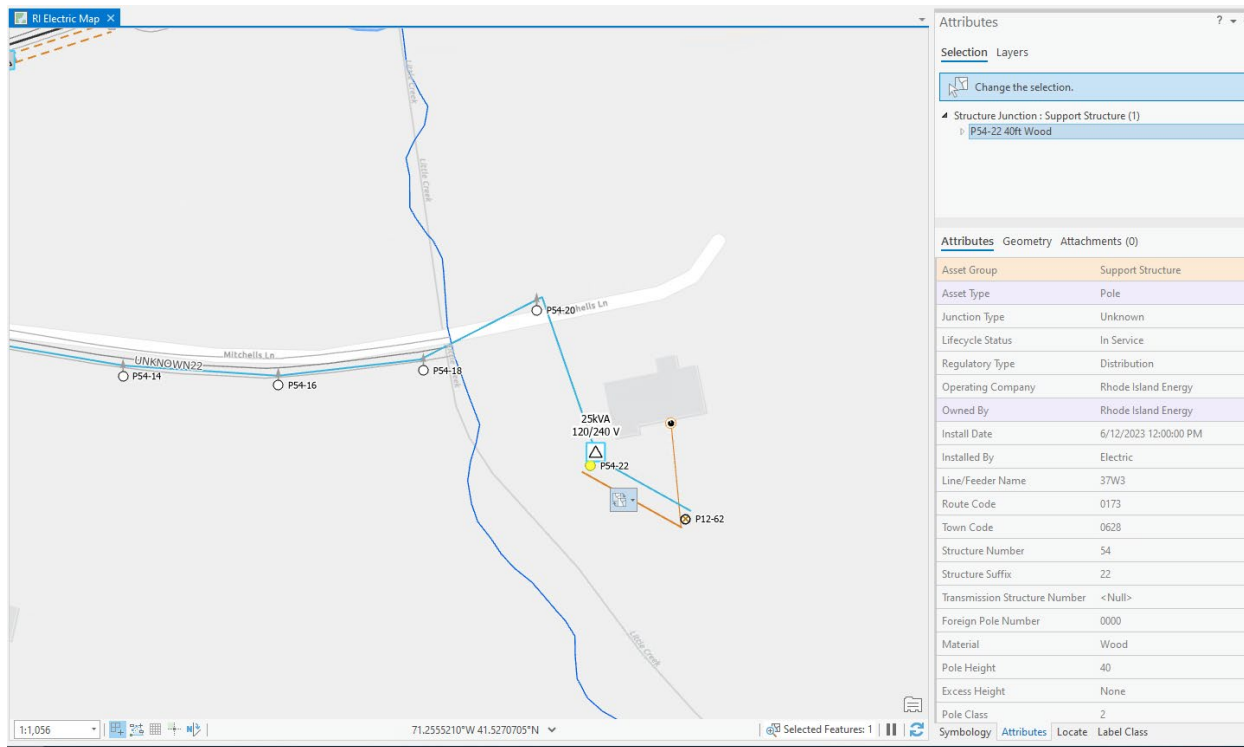
Attributes	
Selection Layers	
Change the selection.	
Structure Junction : Support Structure (1)	
P54-18 40ft Wood	
Attributes Geometry Attachments (0)	
Asset Group	Support Structure
Asset Type	Pole
Junction Type	Unknown
Lifecycle Status	In Service
Regulatory Type	Distribution
Operating Company	Rhode Island Energy
Owned By	Rhode Island Energy
Install Date	6/12/2023 12:00:00 PM
Installed By	Electric
Line/Feeder Name	37W3
Route Code	0173
Town Code	0628
Structure Number	54
Structure Suffix	18
Transmission Structure Number	<Null>
Foreign Pole Number	0000
Material	Wood
Pole Height	40
Excess Height	None
Pole Class	2

P54-20

The screenshot displays the same GIS interface as above, but with structure P54-20 highlighted in yellow. The map labels are identical to the previous screenshot. The 'Attributes' panel on the right shows the following data:

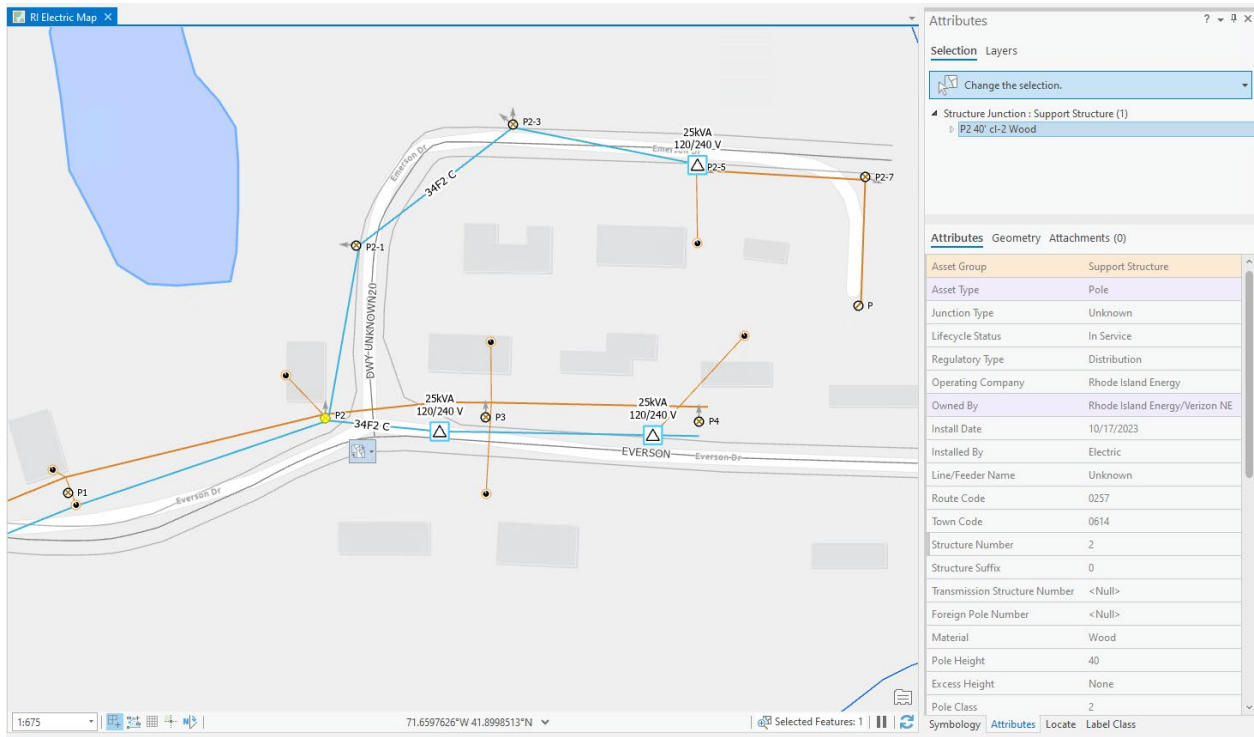
Attributes	
Selection Layers	
Change the selection.	
Structure Junction : Support Structure (1)	
P54-20 40ft Wood	
Attributes Geometry Attachments (0)	
Asset Group	Support Structure
Asset Type	Pole
Junction Type	Unknown
Lifecycle Status	In Service
Regulatory Type	Distribution
Operating Company	Rhode Island Energy
Owned By	Rhode Island Energy
Install Date	6/12/2023 12:00:00 PM
Installed By	Electric
Line/Feeder Name	37W3
Route Code	0173
Town Code	0628
Structure Number	54
Structure Suffix	20
Transmission Structure Number	<Null>
Foreign Pole Number	0000
Material	Wood
Pole Height	40
Excess Height	None
Pole Class	2

P54-22

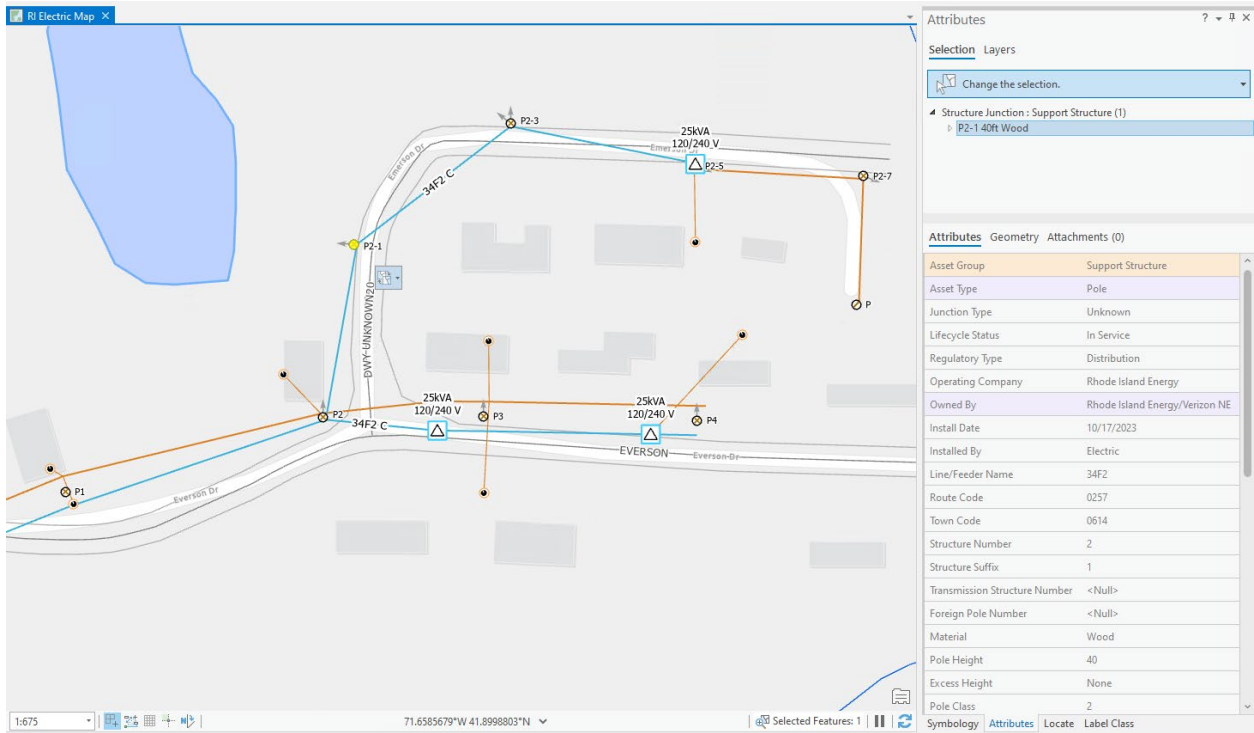


WO 10030782896
RI-Pole, Wood, JO

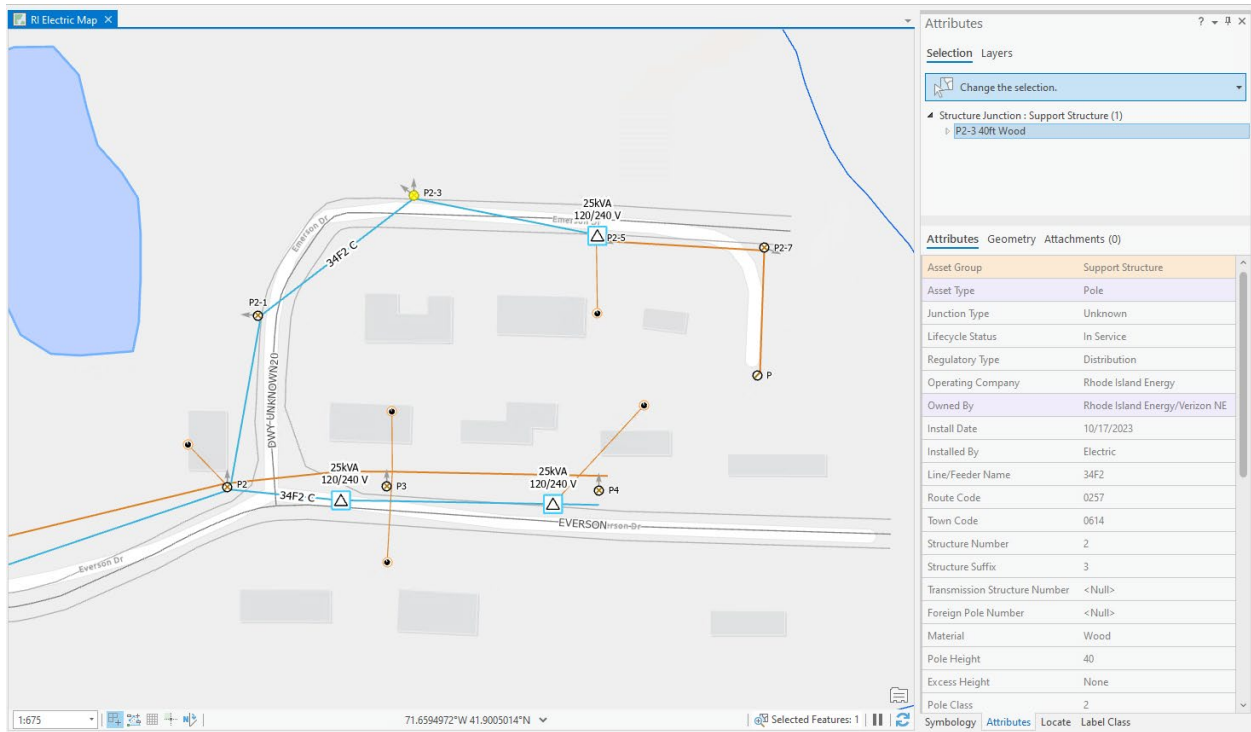
P2



P2-1



P2-3



Attributes

Selection Layers

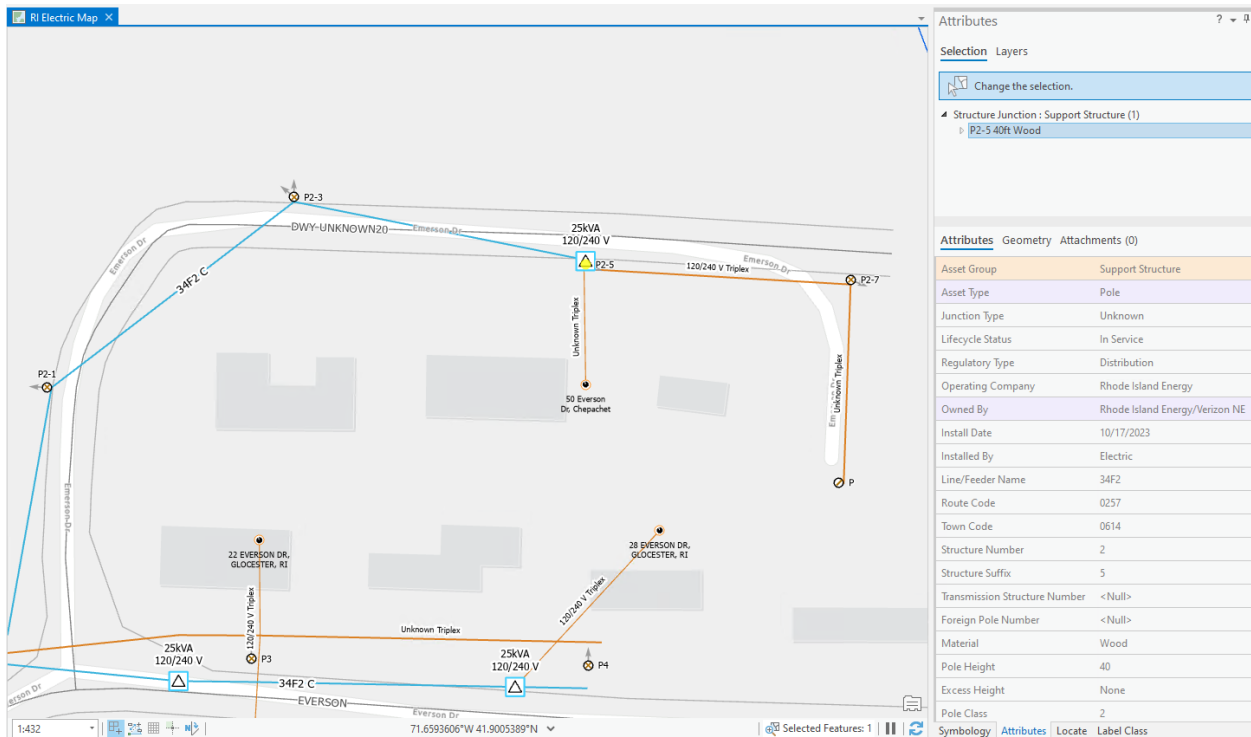
- Change the selection.
- Structure Junction : Support Structure (1)
 - P2-3 40ft Wood

Attributes Geometry Attachments (0)

Asset Group	Support Structure
Asset Type	Pole
Junction Type	Unknown
Lifecycle Status	In Service
Regulatory Type	Distribution
Operating Company	Rhode Island Energy
Owned By	Rhode Island Energy/Verizon NE
Install Date	10/17/2023
Installed By	Electric
Line/Feeder Name	34F2
Route Code	0257
Town Code	0614
Structure Number	2
Structure Suffix	3
Transmission Structure Number	<Null>
Foreign Pole Number	<Null>
Material	Wood
Pole Height	40
Excess Height	None
Pole Class	2

Symbology Attributes Locate Label Class

P2-5



Attributes

Selection Layers

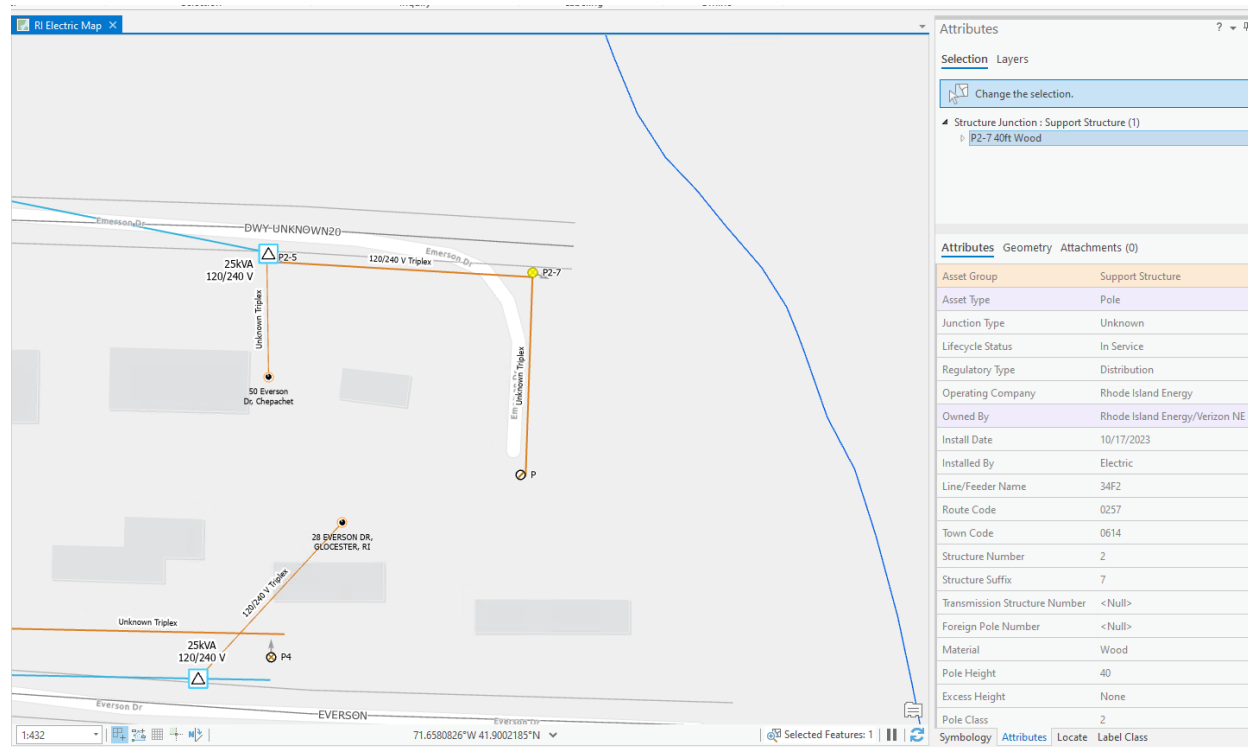
- Change the selection.
- Structure Junction : Support Structure (1)
 - P2-5 40ft Wood

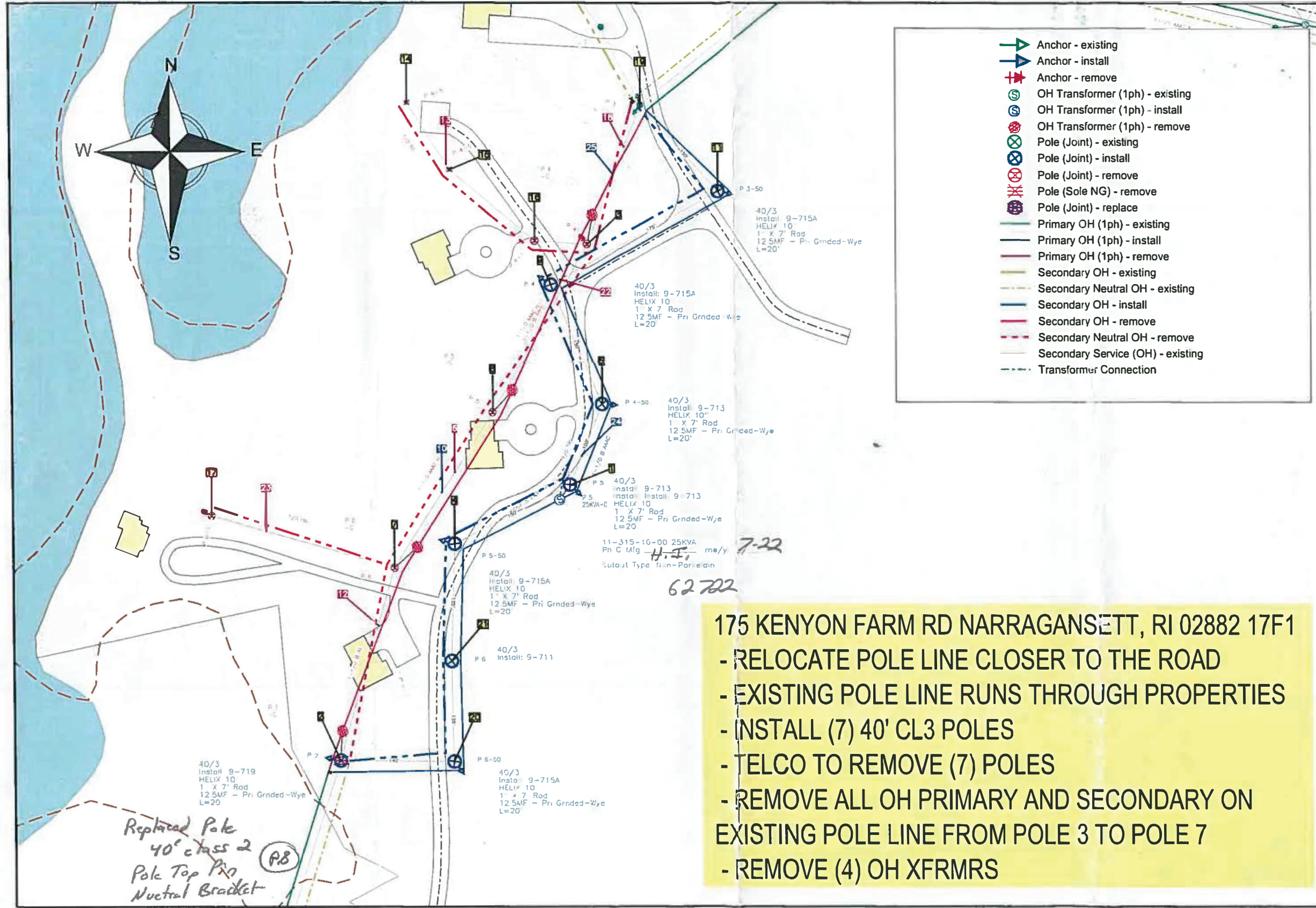
Attributes Geometry Attachments (0)

Asset Group	Support Structure
Asset Type	Pole
Junction Type	Unknown
Lifecycle Status	In Service
Regulatory Type	Distribution
Operating Company	Rhode Island Energy
Owned By	Rhode Island Energy/Verizon NE
Install Date	10/17/2023
Installed By	Electric
Line/Feeder Name	34F2
Route Code	0257
Town Code	0614
Structure Number	2
Structure Suffix	5
Transmission Structure Number	<Null>
Foreign Pole Number	<Null>
Material	Wood
Pole Height	40
Excess Height	None
Pole Class	2

Symbology Attributes Locate Label Class

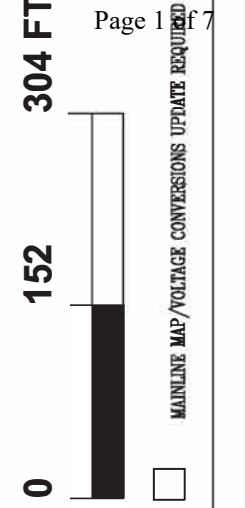
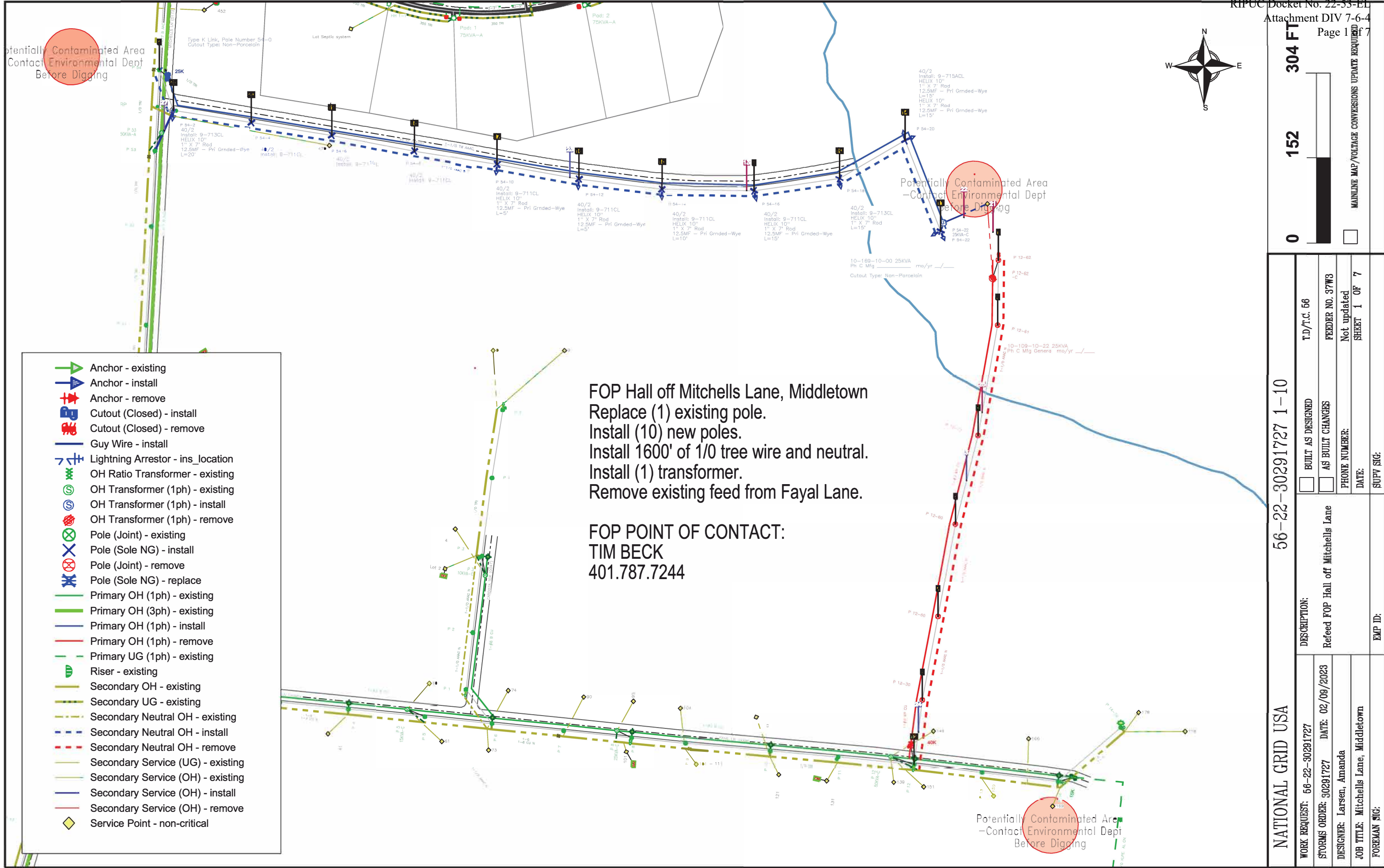
P2-7





175 KENYON FARM RD NARRAGANSETT, RI 02882 17F1
- RELOCATE POLE LINE CLOSER TO THE ROAD
- EXISTING POLE LINE RUNS THROUGH PROPERTIES
- INSTALL (7) 40' CL3 POLES
- TELCO TO REMOVE (7) POLES
- REMOVE ALL OH PRIMARY AND SECONDARY ON EXISTING POLE LINE FROM POLE 3 TO POLE 7
- REMOVE (4) OH XFRMRS

NATIONAL GRID USA		56-22-30624576 1-10	
WORK REQUEST: 56-22-30624576	DESCRIPTION: T.D./T.C. 56	<input type="checkbox"/> BUILT AS DESIGNED	FEEDER NO.
STORMS ORDER: 30624576	DATE: 10/07/2022	<input type="checkbox"/> AS BUILT CHANGES	Not updated
DESIGNER: Larsen, Amanda	PHONE NUMBER:	<input type="checkbox"/> PHONE NUMBER:	BUCKET 1 OF 5
JOB TITLE: Distribution Electric Public Req	DATE:	<input type="checkbox"/> DATE:	



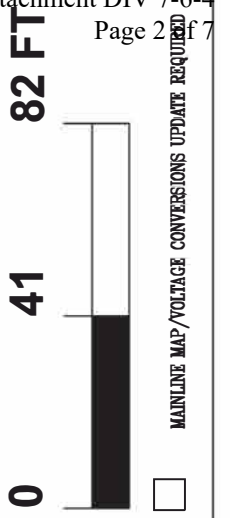
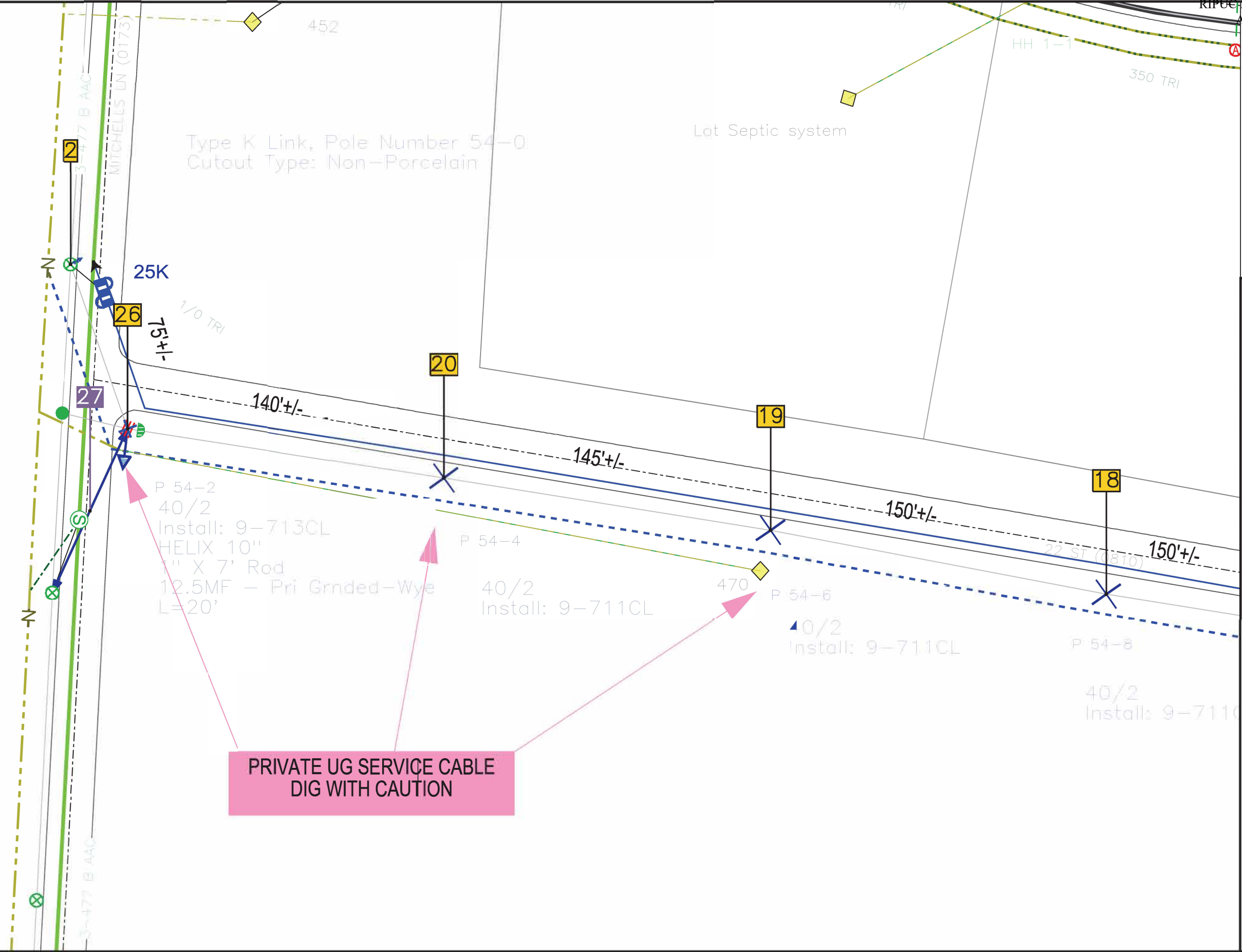
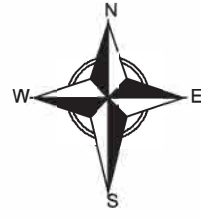
MAINLINE MAP/VOLTAGE CONVERSIONS UPDATE REQUIRED

- Anchor - existing
- Anchor - install
- Anchor - remove
- Cutout (Closed) - install
- Cutout (Closed) - remove
- Guy Wire - install
- Lightning Arrestor - ins_location
- OH Ratio Transformer - existing
- OH Transformer (1ph) - existing
- OH Transformer (1ph) - install
- OH Transformer (1ph) - remove
- Pole (Joint) - existing
- Pole (Sole NG) - install
- Pole (Joint) - remove
- Pole (Sole NG) - replace
- Primary OH (1ph) - existing
- Primary OH (3ph) - existing
- Primary OH (1ph) - install
- Primary OH (1ph) - remove
- Primary UG (1ph) - existing
- Riser - existing
- Secondary OH - existing
- Secondary UG - existing
- Secondary Neutral OH - existing
- Secondary Neutral OH - install
- Secondary Neutral OH - remove
- Secondary Service (UG) - existing
- Secondary Service (OH) - existing
- Secondary Service (OH) - install
- Secondary Service (OH) - remove
- Service Point - non-critical

FOP Hall off Mitchells Lane, Middletown
Replace (1) existing pole.
Install (10) new poles.
Install 1600' of 1/0 tree wire and neutral.
Install (1) transformer.
Remove existing feed from Fayal Lane.

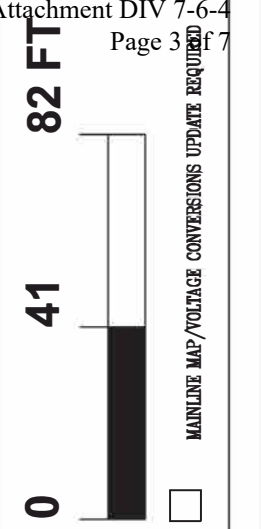
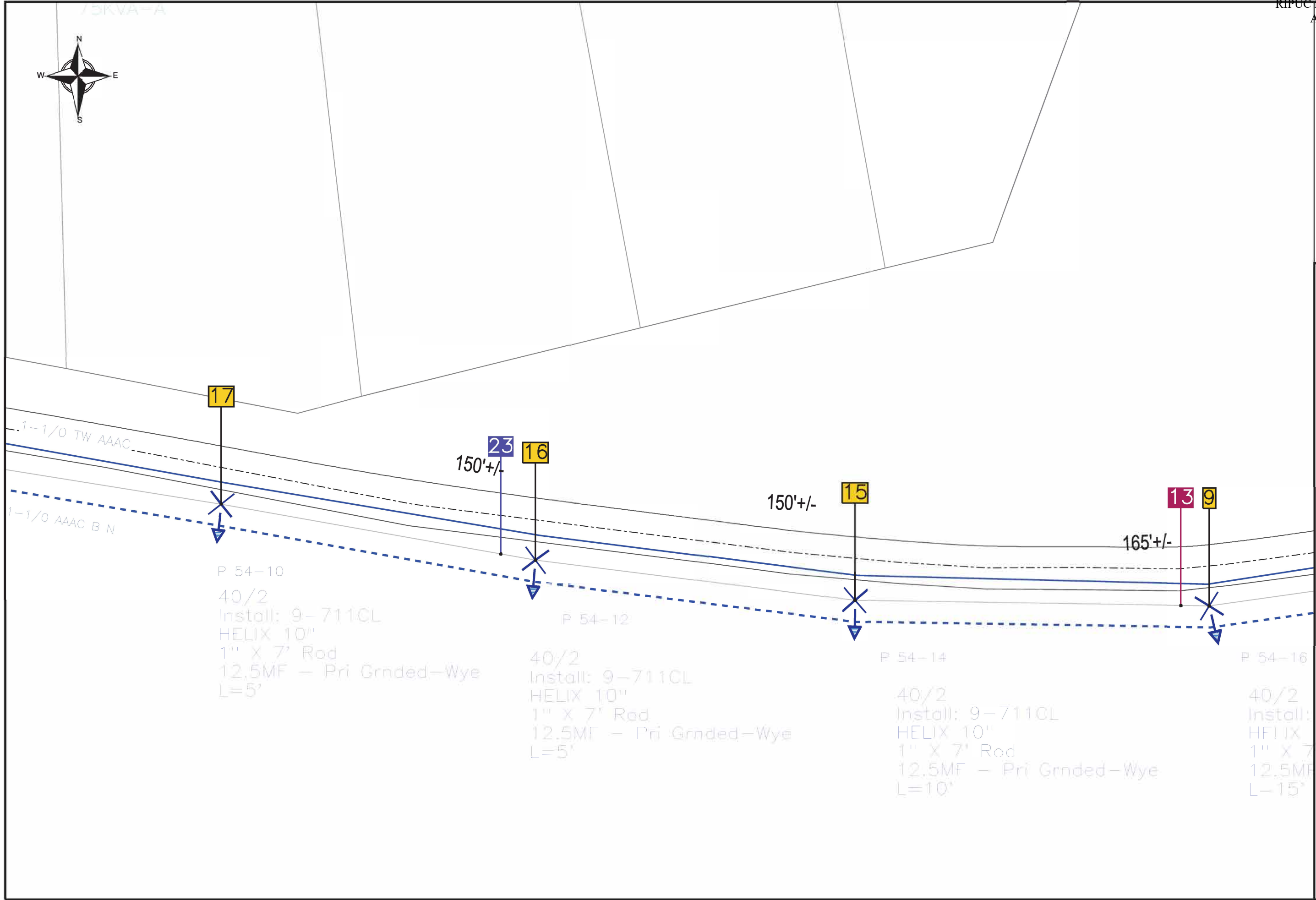
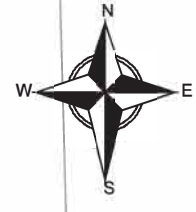
FOP POINT OF CONTACT:
TIM BECK
401.787.7244

NATIONAL GRID USA		56-22-30291727 1-10	
WORK REQUEST: 56-22-30291727	DESCRIPTION:	<input type="checkbox"/> BUILT AS DESIGNED	T.D./T.C. 56
STORMS ORDER: 30291727	Refeed FOP Hall off Mitchells Lane	<input type="checkbox"/> AS BUILT CHANGES	FEEDER NO. 37W3
DESIGNER: Larsen, Amanda		PHONE NUMBER:	Not updated
JOB TITLE: Mitchells Lane, Middletown		DATE:	SHEET 1 OF 7
FOREMAN SIG:		SUPV SIG:	

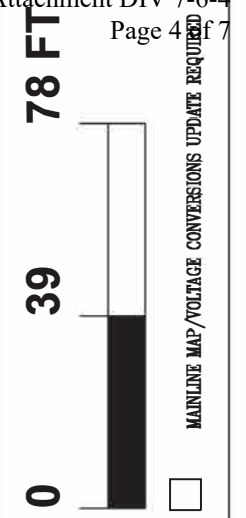
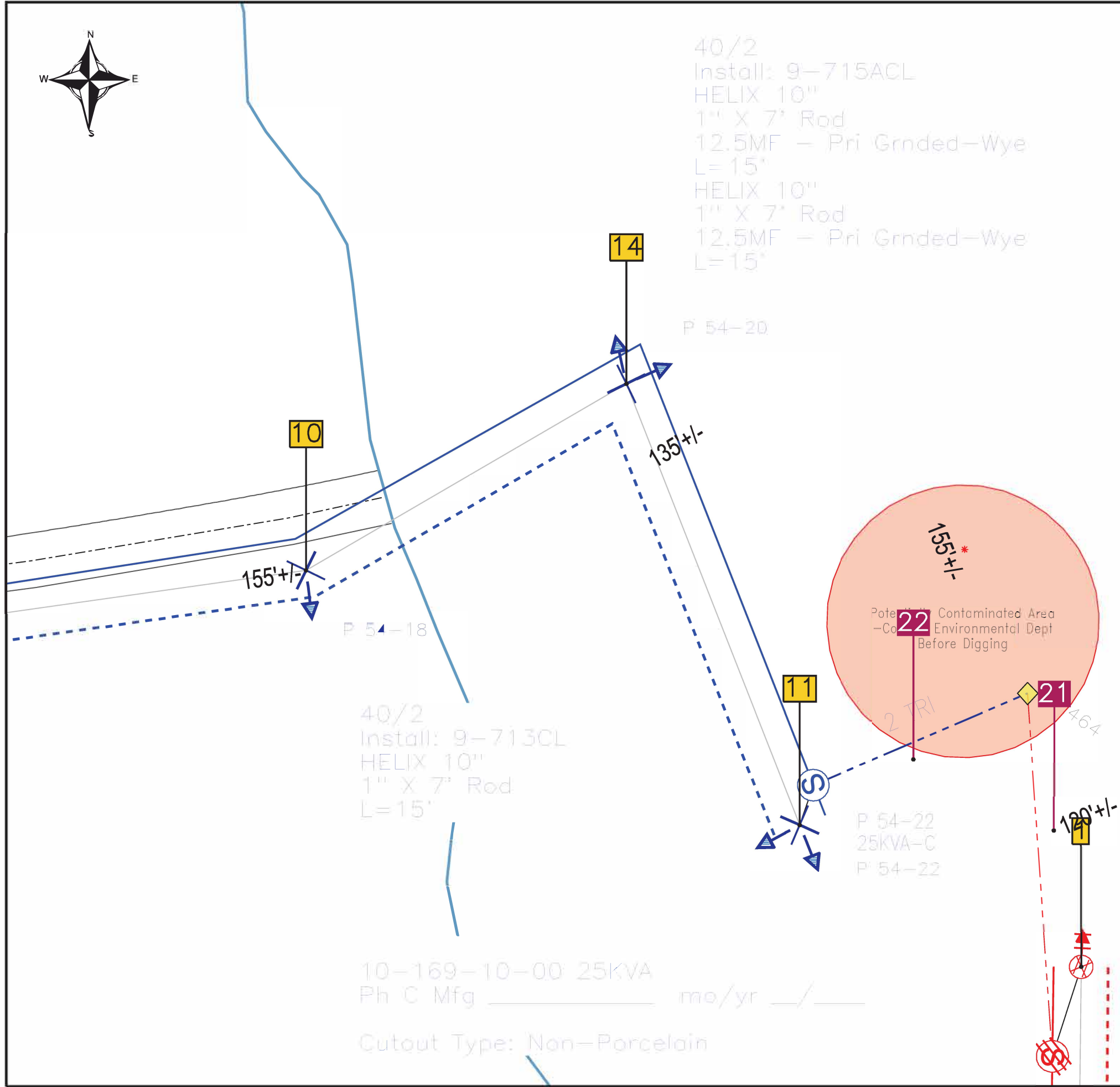


NATIONAL GRID USA		56-22-30291727 1-10	
WORK REQUEST: 56-22-30291727	DESCRIPTION:	<input type="checkbox"/> BUILT AS DESIGNED	T.D./T.C. 56
STORMS ORDER: 30291727	Refeed FOP Hall off Mitchells Lane	<input type="checkbox"/> AS BUILT CHANGES	FEEDER NO. 37W3
DESIGNER: Larsen, Amanda	DATE: 02/09/2023	PHONE NUMBER:	Not updated
JOB TITLE: Mitchells Lane, Middletown	DESIGNER: Larsen, Amanda	DATE:	SHEET 2 OF 7
FOREMAN SIG:	EMP ID:	SUPV SIG:	

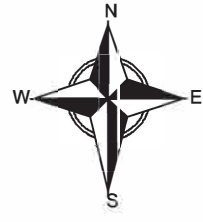
**PRIVATE UG SERVICE CABLE
 DIG WITH CAUTION**



NATIONAL GRID USA		56-22-30291727 1-10	
WORK REQUEST: 56-22-30291727	DESCRIPTION:	<input type="checkbox"/> BUILT AS DESIGNED	T.D./T.C. 56
STORMS ORDER: 30291727	Refeed FOP Hall off Mitchells Lane	<input type="checkbox"/> AS BUILT CHANGES	FEEDER NO. 37W3
DESIGNER: Larsen, Amanda		PHONE NUMBER:	Not updated
JOB TITLE: Mitchells Lane, Middletown		DATE:	SHEET 3 OF 7
FOREMAN SIG:	EMP ID:	SUPY SIG:	



NATIONAL GRID USA		56-22-30291727 1-10	
WORK REQUEST: 56-22-30291727	DESCRIPTION:	T.D./T.C. 56	
STORMS ORDER: 30291727	Refeed FOP Hall off Mitchells Lane	AS BUILT CHANGES	FEEDER NO. 37W3
DESIGNER: Larsen, Amanda		PHONE NUMBER:	Not updated
JOB TITLE: Mitchells Lane, Middletown		DATE:	SHEET 4 OF 7
FOREMAN SIG:	EMP ID:	SUPY SIG:	



40/2
 Install: 9-713CL
 HELIX 10"
 1" X 7' Rod
 L=15'

10-169-10-00 25KVA
 Ph C Mfg _____ mo/yr ___/___
 Cutout Type: Non-Porcelain

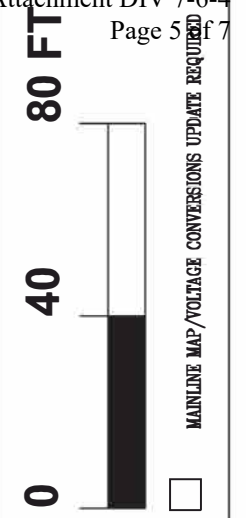
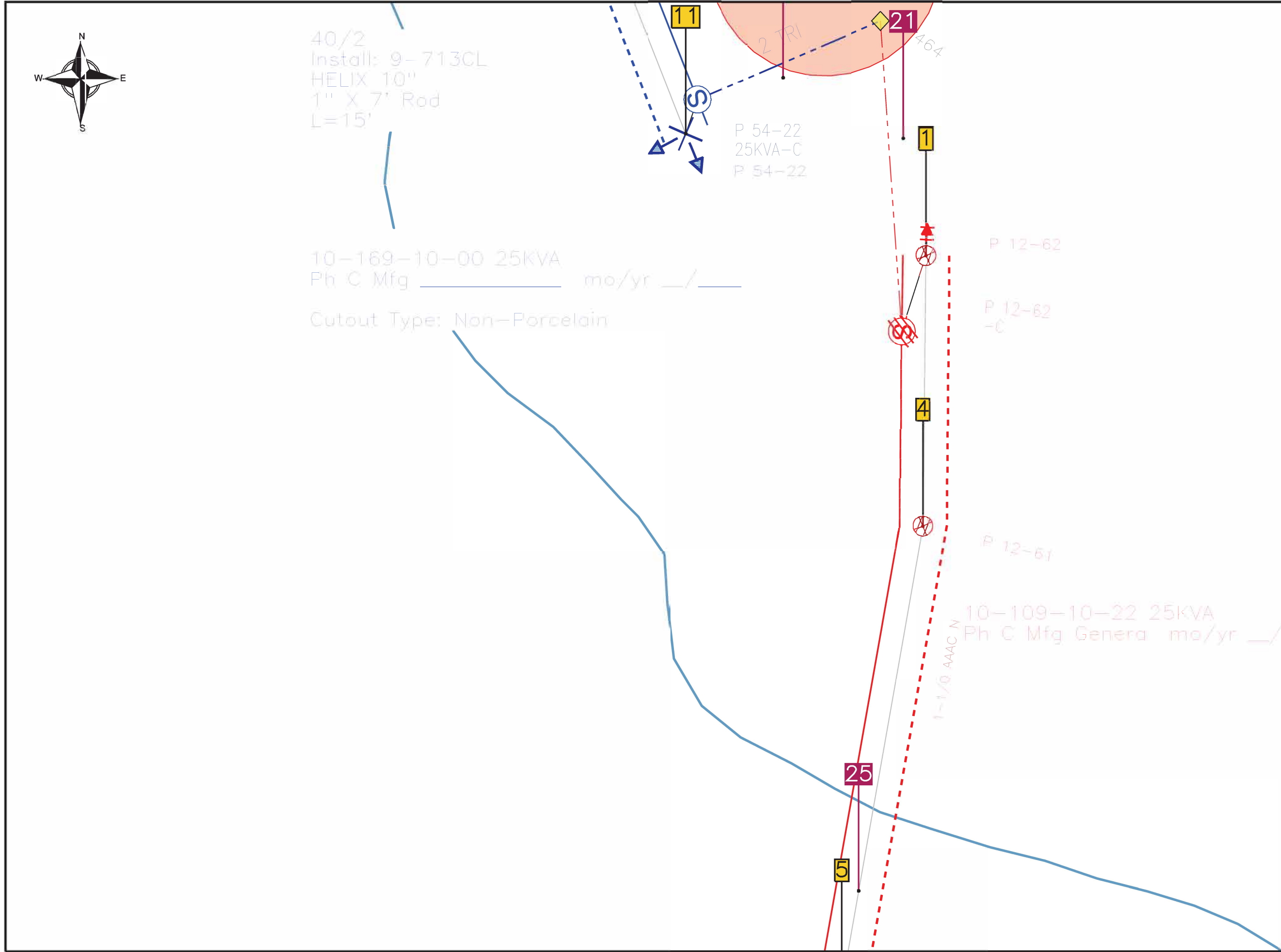
P 54-22
 25KVA-C
 P 54-22

P 12-62

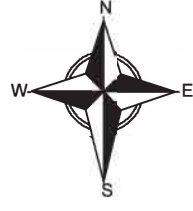
P 12-62
 -C

P 12-61

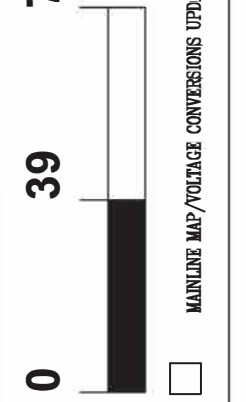
10-109-10-22 25KVA
 Ph C Mfg Genera mo/yr ___/___

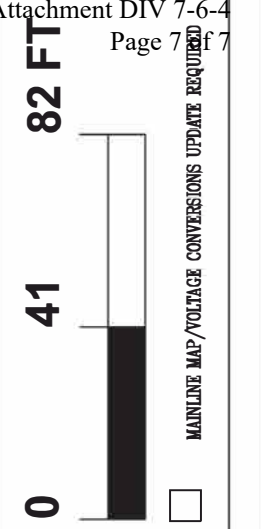
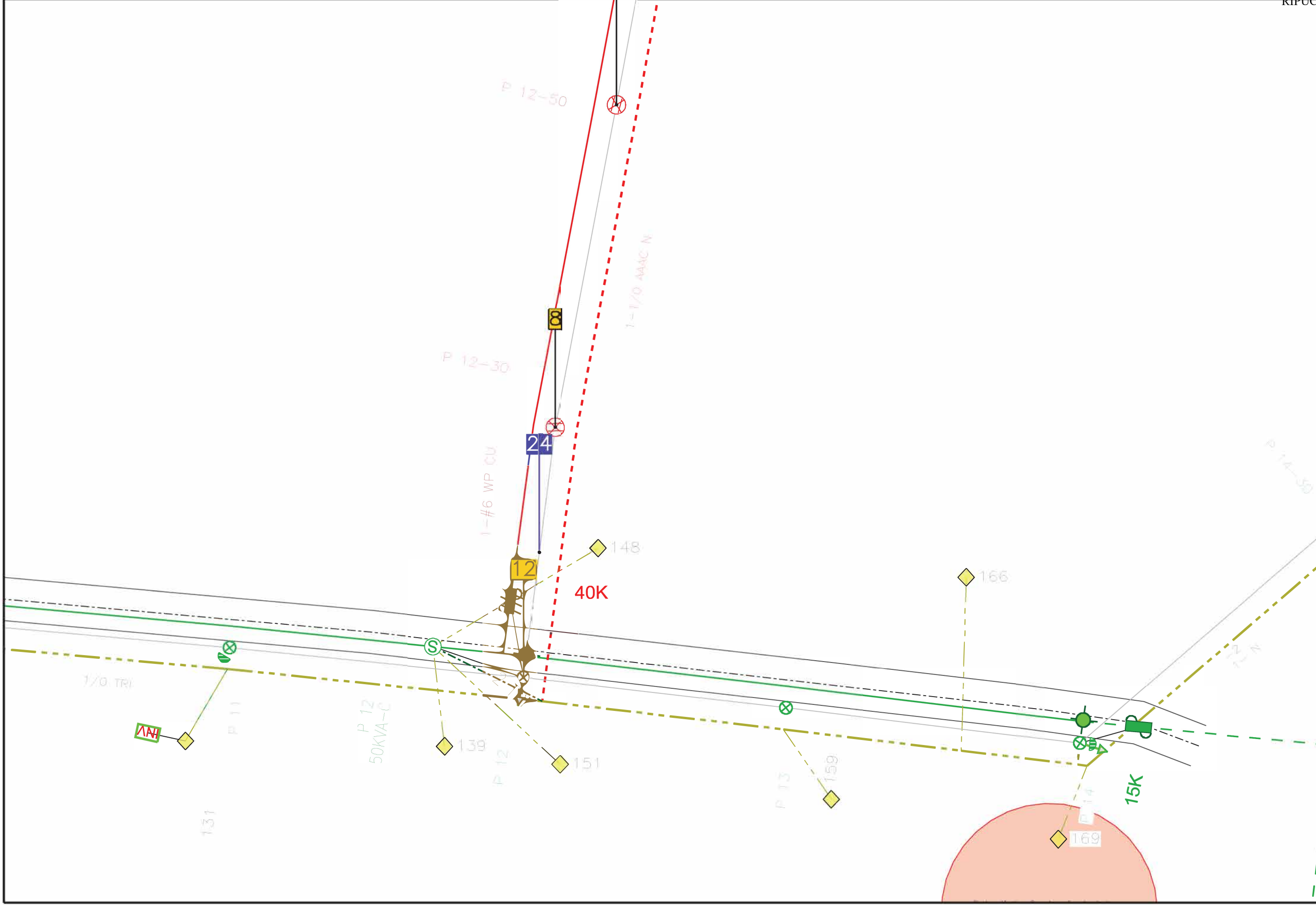


NATIONAL GRID USA		56-22-30291727 1-10	
WORK REQUEST: 56-22-30291727	DESCRIPTION:	<input type="checkbox"/> BUILT AS DESIGNED	T.D./T.C. 56
STORMS ORDER: 30291727	Refeed FOP Hall off Mitchells Lane	<input type="checkbox"/> AS BUILT CHANGES	FEEDER NO. 37W3
DESIGNER: Larsen, Amanda		PHONE NUMBER:	Not updated
JOB TITLE: Mitchells Lane, Middletown		DATE:	SHEET 5 OF 7
FOREMAN SIG:	EMP ID:	SUPV SIG:	

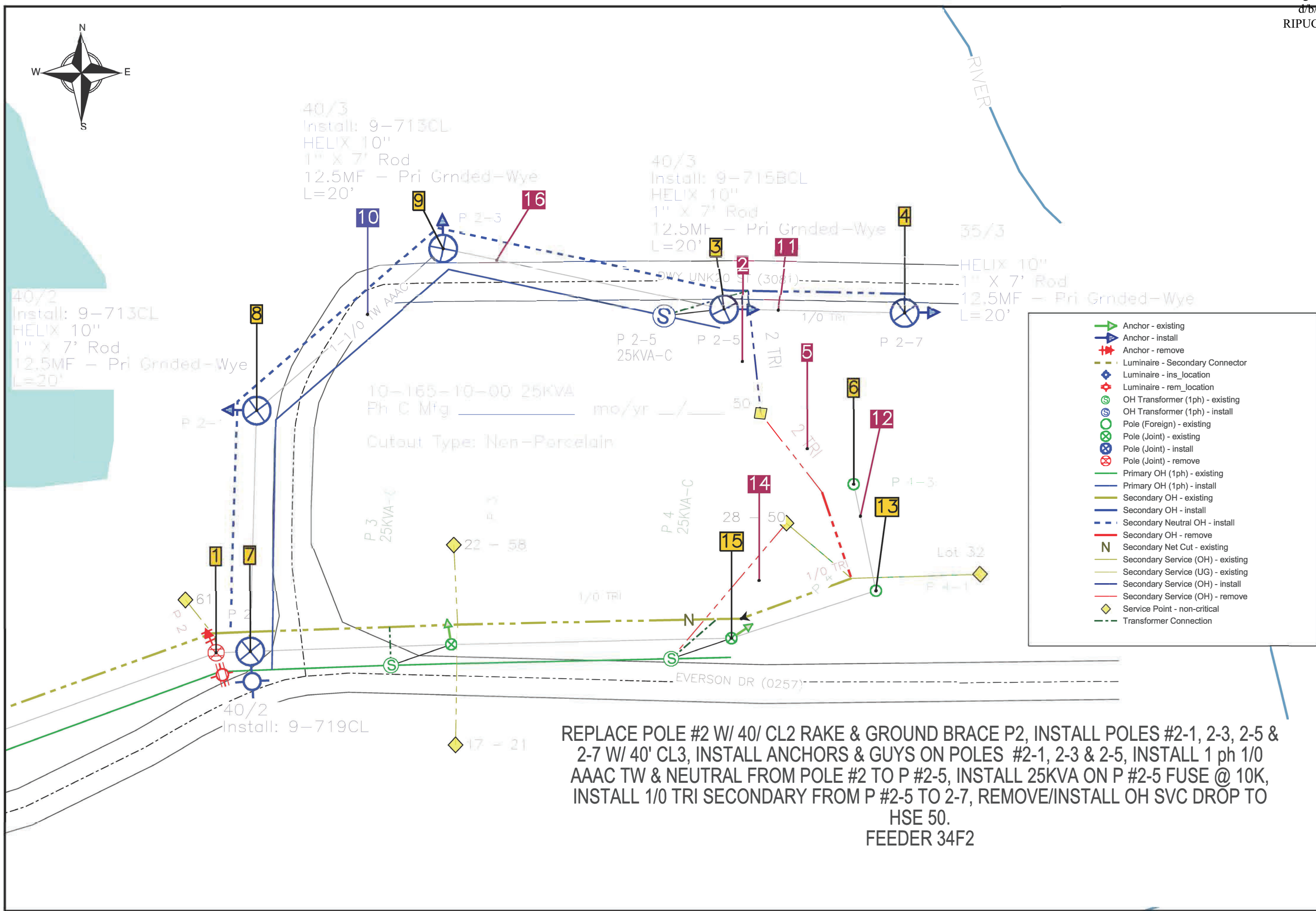


NATIONAL GRID USA		56-22-30291727 1-10	
WORK REQUEST: 56-22-30291727	DESCRIPTION:	<input type="checkbox"/> BUILT AS DESIGNED	T.D./T.C. 56
STORMS ORDER: 30291727	Refeed FOP Hall off Mitchells Lane	<input type="checkbox"/> AS BUILT CHANGES	FEEDER NO. 37W3
DESIGNER: Larsen, Amanda		PHONE NUMBER:	Not updated
JOB TITLE: Mitchells Lane, Middletown		DATE:	SHEET 6 OF 7
FOREMAN SIG:	EMP ID:	SUPV SIG:	

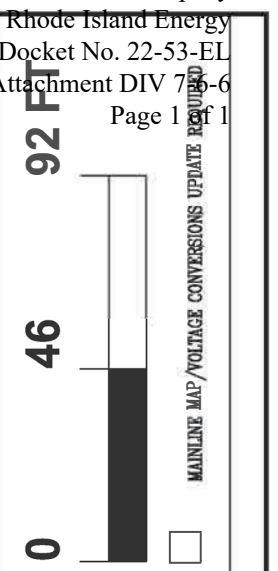




NATIONAL GRID USA		56-22-30291727 1-10	
WORK REQUEST: 56-22-30291727	DESCRIPTION:	<input type="checkbox"/> BUILT AS DESIGNED	T.D./T.C. 56
STORMS ORDER: 30291727	Refeed FOP Hall off Mitchells Lane	<input type="checkbox"/> AS BUILT CHANGES	FEEDER NO. 37W3
DESIGNER: Larsen, Amanda		PHONE NUMBER:	Not updated
JOB TITLE: Mitchells Lane, Middletown		DATE:	SHEET 7 OF 7
FOREMAN SIG:	EMP ID:	SUPV SIG:	



REPLACE POLE #2 W/ 40/ CL2 RAKE & GROUND BRACE P2, INSTALL POLES #2-1, 2-3, 2-5 & 2-7 W/ 40' CL3, INSTALL ANCHORS & GUYS ON POLES #2-1, 2-3 & 2-5, INSTALL 1 ph 1/0 AAAC TW & NEUTRAL FROM POLE #2 TO P #2-5, INSTALL 25KVA ON P #2-5 FUSE @ 10K, INSTALL 1/0 TRI SECONDARY FROM P #2-5 TO 2-7, REMOVE/INSTALL OH SVC DROP TO HSE 50.
 FEEDER 34F2



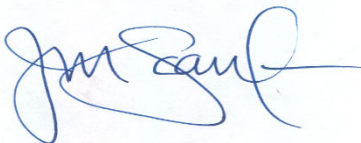
NATIONAL GRID USA		53-23-30782896 1-10	
WORK REQUEST: 53-23-30782896	T.D./T.C. 58	BUILT AS DESIGNED	FEEDER NO.
STORMS ORDER: 30782896	DATE: 08/08/2023	AS BUILT CHANGES	Not updated
DESIGNER: DM Admin	PHONE NUMBER:	PHONE NUMBER:	SHEET 1 OF 1
JOB TITLE: Distribution Electric Public Req	DATE:	DATE:	SUPV SIG:
FOREMAN SIG:			

DESCRIPTION:
 Rhode Island Energy would propose a new pole close to the customer-owned pole, about 5 feet, and pr

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

January 10, 2025

Date

**Docket No. 22-53-EL – RI Energy’s Electric ISR Plan FY 2024
Service List as of 11/25/2024**

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	AGiron@hinckleyallen.com ;	
	sbriggs@pplweb.com ;	
	NABegnal@RIEnergy.com ;	
	smtoronto@RIEnergy.com ;	
	ATLaBarre@RIEnergy.com ;	
	rconstable@RIEnergy.com ;	
	krcastro@RIEnergy.com ;	
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	Alan.nault@puc.ri.gov ;	
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Matt Sullivan, Green Development LLC	ms@green-ri.com ;	