

December 31, 2024

VIA HAND DELIVERY AND ELECTRONIC MAIL

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

**Re: Docket No. 4610 – The Narragansett Electric Company d/b/a Rhode Island Energy
Electric Environmental Response Cost Report
Fiscal Year 2024**

Dear Ms. De La Rosa:

In accordance with The Narragansett Electric Company d/b/a Rhode Island Energy's (the "Company") Environmental Response Fund Tariff, RIPUC No. 2254, Sheet 2, Subparagraph (C), enclosed for filing with the Public Utilities Commission is the Company's Environmental Response Cost Report for its electric operations for the period April 1, 2023, through March 31, 2024 ("Fiscal Year 2024") in the above-referenced docket.

Please note that in the course of preparing the Environmental Response Cost Report for Fiscal Year 2024, the Company discovered certain errors in prior years' reports related to oversight charges from the Rhode Island Department of Environmental Management, which had been categorized as miscellaneous costs when they should have been allocated to individual response sites. This issue appears to have occurred beginning in Fiscal Year 2020 and continued until its recent discovery. This Fiscal Year 2024 report is based upon adjusted figures that resulted from the Company's corrections. Specifically, the FY 2024 beginning balance highlighted on Page 5 within the Section I Summary reflects the adjustments made to the prior years' reports. The Company is preparing a filing that will explain each correction made, which will be submitted at a later date.

Robinson+Cole

Stephanie De La Rosa, Commission Clerk
Docket No. 4610 – Fiscal Year 2024 Environmental Response Cost Report
December 31, 2024
Page 2

Thank you for your attention to this filing. If you have any questions, please contact me at 401-709-3359.

Sincerely,



Steven J. Boyajian

Enclosures

cc: Docket No. 4610 Service List
Margaret Hogan, Division
Leo Wold, Division
Kyle Lynch, Division
Mark Simpkins, Division

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate were 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.



Heidi J. Seddon

December 31, 2024

Date

**Docket No. 4610 – National Grid – Electric Environmental Response Fund
Service List as of 12/12/2022**

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**THE NARRAGANSETT
ELECTRIC COMPANY**

**ENVIRONMENTAL RESPONSE
COST REPORT
FOR THE PERIOD
APRIL 1, 2023, THROUGH
MARCH 31, 2024**

Docket No. 4610

Submitted to:

**Rhode Island Public Utilities
Commission**

Submitted by:

The Narragansett Electric Company

EXECUTIVE SUMMARY

This document contains the Environmental Response Fund (the “Fund”) Report for The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”) for the period April 1, 2023, through March 31, 2024 (“fiscal year 2024”). This report is filed in accordance with RIPUC No. 2254, Page 2, subparagraph (C).

Section I contains a monthly summary of contributions to the Fund and payments from the Fund to calculate the Fund balance for fiscal year 2024, including lease payments and interest at the customer deposit rate.

Section II contains a summary of payments by expense type, as well as a breakdown of expenses for each environmental site listed in RIPUC No. 2254, Pages 2-3, subparagraph (D).

Section III includes Attachments 1 and 2 to this document. Attachment 1 contains additional detail regarding contractor costs associated with the various environmental sites during fiscal year 2024. Attachment 2 contains additional detail regarding consultant costs associated with the various environmental sites during fiscal year 2024.

Backup data for each environmental site such as invoices, purchase orders, and requests for checks are available for review upon request.

RHODE ISLAND PUBLIC UTILITIES COMMISSION
ENVIRONMENTAL RESPONSE COST REPORT
APRIL 1, 2023, THROUGH MARCH 31, 2024

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SECTION I

THE NARRAGANSETT ELECTRIC COMPANY

ENVIRONMENTAL RESPONSE COSTS

APRIL 1, 2023, THROUGH MARCH 31, 2024

ENVIRONMENTAL RESPONSE FUND AND RELATED INTEREST CALCULATION

The Narragansett Electric Company
Environmental Response Fund and Related Interest Calculation

04/01/2023 to 03/31/2024

Period	Beginning Balance (BB) ^(a)	Contributions ⁽¹⁾	Reimbursements ⁽²⁾	Payments ⁽³⁾	Ending Balance ^(e)	Interest Base ⁽⁴⁾	Interest Rate ⁽⁵⁾	Interest ⁽⁶⁾	Fund Balance ^(f)	Cumulative Fund Balance ^(j)
1 April-23	\$4,420,086	256,500	-	135,755	\$4,540,831	\$4,480,458	2.95%	\$11,014	\$4,540,831	\$4,551,845
2 May-23	\$4,540,831	256,500	-	696,685	\$4,100,645	\$4,320,738	2.95%	\$10,622	\$4,100,645	\$4,122,281
3 June-23	\$4,100,645	256,500	-	364,398	\$3,992,747	\$4,046,696	2.95%	\$9,948	\$3,992,747	\$4,024,331
4 July-23	\$3,992,747	256,500	-	504,763	\$3,744,484	\$3,868,615	2.95%	\$9,510	\$3,744,484	\$3,785,578
5 August-23	\$3,744,484	256,500	-	200,374	\$3,800,610	\$3,772,547	2.95%	\$9,274	\$3,800,610	\$3,850,978
6 September-23	\$3,800,610	256,500	-	203,981	\$3,853,129	\$3,826,870	2.95%	\$9,408	\$3,853,129	\$3,912,905
7 October-23	\$3,853,129	256,500	10,017	16,887	\$4,102,759	\$3,977,944	2.95%	\$9,779	\$4,102,759	\$4,172,314
8 November-23	\$4,102,759	256,500	10,017	484,613	\$3,884,663	\$3,993,711	2.95%	\$9,818	\$3,884,663	\$3,964,036
9 December-23	\$3,884,663	256,500	134,299	220,110	\$4,055,352	\$3,970,007	2.95%	\$9,760	\$4,055,352	\$4,144,485
10 January-24	\$4,055,352	256,500	10,017	723,082	\$3,598,787	\$3,827,069	2.95%	\$9,408	\$3,598,787	\$3,697,328
11 February-24	\$3,598,787	256,500	10,017	43,718	\$3,821,586	\$3,710,186	2.95%	\$9,121	\$3,821,586	\$3,929,248
12 March-24	\$3,821,586	256,500	10,017	53,016	\$4,035,087	\$3,928,337	3.96%	\$12,964	\$4,035,087	\$4,155,713
		<u>3,078,000</u>	<u>184,384</u>	<u>3,647,383</u>		<u>Fund balance plus current year interest</u>			<u>\$120,626</u>	<u>\$4,155,713</u>

(0) Adjustment to remove accounting discrepancies with National Grid I,NG, LLC FPLP project related RIDEM charges and record associated interest.

(1) Reflects the annual contributions of \$3,078 million pursuant to Commission Order 17354, issued January 29, 2003 in Docket 2930.

(2) Reimbursements will include lease payments, insurance recoveries and property sales.

(3) Payments against the fund represent monthly remediation spending.

(4) Interest base reflects a simple average of the beginning and ending balances.

(5) The interest rate and associated interest calculation are based upon the methodology for calculating interest on customer deposits. Interest is compounded annually and is credited only in months with a positive fund balance. The interest rate changed from 2.95% to 3.96% effective March 1, 2024.

(6) Simple interest is calculated and booked on a monthly basis (Interest rate * Interest Base).

(7) Positive fund balance indicates overfunded situation; negative fund balance indicates underfunded situation.

SECTION II

THE NARRAGANSETT ELECTRIC COMPANY

ENVIRONMENTAL RESPONSE COSTS

APRIL 1, 2023, THROUGH MARCH 31, 2024

MGP AND OTHER ENVIRONMENTAL SITES COST SUMMARY

Section II.
Site Specific Expenses
April 1, 2023 through March 31, 2024
(Fiscal Year 2024)

A. Washington Street, Bristol

This is the site of a former manufactured gas plant located at the corner of Hope and Washington Street in Bristol, Rhode Island. The plant was constructed in 1855 and operated until approximately 1903 before moving operations to a plant on Thames Street in Bristol. The site is less than an acre and is now the front lawn of the Guiteras Middle School. An engineered cap was placed on the site and it is monitored annually. Activities performed in fiscal year 2024 included inspection of the engineered cap and preparation of the regulatory submittal to the Rhode Island Department of Environmental Management.

		Payments During this Period	Payments to date
1	Consulting Costs	\$1,950.20	\$472,515.20
2	Construction/Disposal/Removal Costs	\$0.00	\$280,247.00
3	DEM/EPA Oversight Costs	\$244.74	\$5,120.74
4	Property Purchases/Settlements/Legal	\$0.00	\$14,756.00
5	Other Costs		
	Project Management	\$539.70	\$76,082.70
	Water Bill Payment for 15 Bay Street	\$0.00	\$3,270.00
	Permit Application Fees	\$0.00	\$1,750.00
	Miscellaneous	\$0.00	\$486.00
	RI General Treasurer Reimbursement	\$0.00	\$604.00
	Total	\$2,734.64	\$854,831.64

Section II.
Site Specific Expenses
April 1, 2023 through March 31, 2024
(Fiscal Year 2024)

B. Thames Street, Bristol

This is the site of a former manufactured gas plant located on Thames Street in Bristol, Rhode Island. The former gas plant is now a part of the parking lot and pool area of a residential condominium development (completed by others). During development, the condominium developer remediated the upland portion of the former gas plant via the construction of a containment wall and cap. The Company negotiated a settlement with the developer in which the Company reimbursed the developer for costs associated with the Rhode Island Department of Environmental Management (RIDEM)-required upland environmental remediation and secured an Environmental Land Usage Restriction (ELUR) and easement on the property. The settlement did not address impacted sediments off-shore of the condominium development. During fiscal year 2024, the Company performed the RIDEM-required annual inspection of the engineered cap for the ELUR and preparation of the regulatory submittal to RIDEM.

	Payments During this Period	Payments to date
1 Consulting Costs	\$1,648.67	\$1,173,239.67
2 Construction/Disposal/Removal Costs	\$0.00	\$36,877.00
3 DEM/EPA Oversight Costs	\$897.76	\$21,940.76
4 Property Purchases/Settlements/Legal	\$0.00	\$3,020,491.00
5 Other Costs		
Shellfish Transplant	\$0.00	\$858.00
Project Management	\$607.64	\$70,923.64
Miscellaneous	\$0.00	\$513.00
RI General Treasurer reimbursement	\$0.00	\$5,962.00
Total	\$3,154.07	\$4,330,805.07

Section II.
Site Specific Expenses
April 1, 2023 through March 31, 2024
(Fiscal Year 2024)

C. Main Street, Warren

This is the site of a former manufactured gas plant which began operation in the early 1930s. The property consists of approximately 1.38 acres which was most recently used as a Company service center. The Company completed site investigation activities and the Rhode Island Department of Environmental Management (RIDEM)-approved remedy consisted of installation of an engineered cap and recording an Environmental Land Use Restriction (ELUR). In fiscal year 2020, the Company sold the property to the Town of Warren and the proceeds from the property sale of \$429,192 were credited to the environmental cost fund in fiscal year 2021. No future activities are anticipated.

	Payments During this Period	Payments to date
1 Consulting Costs	\$0.00	\$143,498.00
2 Construction/Disposal/Removal Costs	\$0.00	\$161,462.00
3 DEM/EPA Oversight Costs	\$0.00	\$486.00
4 Property Purchases/Settlements/Legal	\$0.00	\$34,608.00
5 Other Costs		
Fence Installation	\$0.00	\$21,387.00
Project Management	\$0.00	\$56,025.00
RI General Treasurer Reimbursement	\$0.00	\$1,276.00
Total	\$0.00	\$418,742.00

Section II.
Site Specific Expenses
April 1, 2023 through March 31, 2024
(Fiscal Year 2024)

D. Canal Street, Westerly

This site is the location of a former manufactured gas plant which ceased operation in the 1950s or early 1960s. In fiscal year 2008, the Company and the Town of Westerly entered into an Environmental Land Usage Restriction (ELUR) and Grant of Easement Agreement regarding the Noyes Avenue Wellhead located in Stonington, Connecticut. This agreement provides that no groundwater shall be pumped from the Noyes Avenue Wellhead for use as potable water without the Company's approval. In fiscal year 2024, the Company performed the Rhode Island Department of Environmental Management (RIDEM)-required annual inspection of the engineered cap for the ELUR on the Canal Street property; removal of invasive plants; groundwater monitoring; waste disposal related to groundwater monitoring; regulatory reporting to RIDEM and site inspections. The property is now leased as a commercial parking lot by the Town of Westerly.

	Payments During this Period	Payments to date
1 Consulting Costs	\$41,828.75	\$1,553,088.75
2 Construction/Disposal/Removal Costs	\$5,425.40	\$1,534,855.40
3 DEM/EPA Oversight Costs	\$116.34	\$13,278.34
4 Property Purchases/Settlements/Legal	\$0.00	\$1,325,876.00
5 Other Costs		
Project Management	\$4,190.29	\$201,826.29
Lab Analysis Fees	\$0.00	\$150.00
PGC Reimbursement	\$0.00	-\$53,239.00
RI General Treasurer Reimbursement	\$0.00	\$950.00
Total	\$51,560.78	\$4,576,785.78

Section II.
Site Specific Expenses
April 1, 2023 through March 31, 2024
(Fiscal Year 2024)

E. Industrial Drive, Westerly

This property was previously utilized as the location of an above-ground gas storage holder for gas produced at the Canal Street manufactured gas plant. During fiscal year 2024, the Company performed the Rhode Island Department of Environmental Management (RIDEM)-required annual inspection of the engineered cap for the Environmental Land Usage Restriction and preparation of the regulatory submittal to RIDEM.

	Payments During this Period	Payments to date
1 Consulting Costs	\$534.43	\$262,179.43
2 Construction/Disposal/Removal Costs	\$0.00	\$369,431.00
3 DEM/EPA Oversight Costs	\$0.00	\$4,847.00
4 Property Purchases/Settlements/Legal	\$0.00	\$38,466.00
5 Other Costs	\$1,145.75	\$84,458.75
Total	\$1,680.18	\$759,382.18

Section II.
Site Specific Expenses
April 1, 2023 through March 31, 2024
(Fiscal Year 2024)

F. Tidewater Street, Pawtucket

This site is the location of a former manufactured gas plant situated along the western bank of the Seekonk River in Pawtucket, Rhode Island. The site is approximately 23 acres and includes a former electrical generating station, former manufactured gas plant (MGP) and two on-site fill areas. One of the larger MGPs in Rhode Island, the plant operated from approximately 1881 to 1954. After 1954, the plant produced oil gas for peak shaving purposes until 1968 when it was decommissioned. The site is currently used for electric and gas operations by the Company. Costs incurred during fiscal year 2024 associated with continuation of remedial construction oversight; continued environmental support associated with the City of Pawtucket Master Plan redevelopment project (future stadium) along with the Narragansett Bay Commission Combined Sewer Overflow upgrade project both located within the northern portion of the site; maintenance of publicly available sources of information regarding the Tidewater Environmental Project (including the Company hosted Tidewater website and two bulletin boards near the site) per the Rhode Island Department of Environmental Management (RIDEM)-approved Public Involvement Plan; operation, maintenance, and monitoring of the installed remedy including quarterly non-aqueous phase liquid gauging of site wells; fence repairs; permitting associated with invasive species management as part of cap maintenance and regulatory reporting to RIDEM. The northern portion of The Narragansett Electric Company owned property is leased to a third party for a future stadium. The lease revenues started in October 2023 and are shown in the Reimbursements Column of the Section I Summary.

	Payments During this Period	Payments to date
Balance Prior to TNEC/EUA Merger		\$147,637
1 Consulting Costs	\$132,776.68	\$7,763,259.68
2 Construction/Disposal/Removal Costs	\$6,670.42	\$16,960,688.42
3 DEM/EPA Oversight Costs	\$9,221.65	\$101,614.65
4 Property Purchases/Settlements/Legal	\$0.00	\$113,836.00
5 Other Costs		
RI General Treasurer Reimbursement	\$0.00	\$6,538.00
Project Management/Other	\$4,494.17	\$216,347.17
Preliminary Cost Estimate	\$0.00	\$2,641.00
Total	\$153,162.92	\$25,312,561.92

Proceeds from the lease of land to a third party during the reporting period have been credited to customers as a credit to the Environmental Response Fund and shown in "Reimbursements" column in Section I Summary.

Section II.
Site Specific Expenses
April 1, 2023 through March 31, 2024
(Fiscal Year 2024)

G. Exchange Street, Pawtucket

This approximately 2.5 acre site was used for remote gas storage sometime before 1902 until sometime between 1923 and 1949. The property is currently paved and used as a parking lot. Site investigations have not been conducted at this time. No activities were performed in fiscal year 2024.

	Payments During this Period	Payments to date
Balance Prior to TNEC/EUA Merger		\$0
1 Consulting Costs	\$0.00	\$0.00
2 Construction/Disposal/Removal Costs	\$0.00	\$0.00
3 DEM/EPA Oversight Costs	\$0.00	\$0.00
4 Property Purchases/Settlements/Legal	\$0.00	\$0.00
5 Other Costs	\$0.00	\$2,641.00
Total	\$0.00	\$2,641.00

Section II.
Site Specific Expenses
April 1, 2023 through March 31, 2024
(Fiscal Year 2024)

H. High Street, Central Falls

This is the site of a former manufactured gas plant that operated from 1850 until 1887. Site investigations have not been conducted at this site. The property is currently utilized for the manufacture of firearms components. No activities were performed in fiscal year 2024.

	Payments During this Period	Payments to date
Balance Prior to TNEC/EUA Merger		\$0
1 Consulting Costs	\$0.00	\$15,477.00
2 Construction/Disposal/Removal Costs	\$0.00	\$0.00
3 DEM/EPA Oversight Costs	\$0.00	\$0.00
4 Property Purchases/Settlements/Legal	\$0.00	\$5,498.00
5 Other Costs	\$0.00	\$2,766.00
Total	\$0.00	\$23,741.00

Section II.
Site Specific Expenses
April 1, 2023 through March 31, 2024
(Fiscal Year 2024)

I. Hamlet Avenue, Woonsocket

The site is the location of a former manufactured gas plant and former power plant in Woonsocket, Rhode Island. The site consists of five areas based on historical and current site usage, including the former power plant and manufactured gas plant areas. Portions of the former gas plant area are currently used for Company gas and electric operations. The former power plant area was separated from the other areas in 2001 to facilitate a Brownfield Redevelopment being performed by others. The Company was required to remediate and dispose of impacted soils during the redevelopment activities in this area. Remediation activities on the power plant area began in late 2008 and were completed in fiscal year 2010. A report documenting the implemented remedial activities was submitted to Rhode Island Department of Environmental Management (RIDEM) in July 2010. In February 2016, based on the results of site investigations, RIDEM assigned a new case number for the substation/access road area of the site. On August 16, 2019, the property owner of the former power plant area at 115 Front Street recorded the Environmental Land Usage Restriction with the Woonsocket City Clerk. In fiscal year 2024 activities included annual groundwater sampling; waste disposal related to groundwater monitoring; regulatory reporting to RIDEM; site inspections and legal support related to researching boundaries of the properties that are part of the site.

	Payments During this Period	Payments to date
Balance Prior to TNEC/EUA Merger		\$52,372
1 Consulting Costs	\$13,969.69	\$1,008,615.69
2 Construction/Disposal/Removal Costs	\$582.71	\$822,762.71
3 DEM/EPA Oversight Costs	\$87.80	\$18,365.80
4 Property Purchases/Settlements/Legal	\$1,340.00	\$36,223.00
5 Other Costs		
Preliminary cost estimate	\$0.00	\$2,641.00
Project Management/Other	\$72.16	\$131,455.16
RI General Treasurer Reimbursement	\$0.00	\$13,935.00
Total	\$16,052.36	\$2,086,370.36

Section II.
Site Specific Expenses
April 1, 2023 through March 31, 2024
(Fiscal Year 2024)

J. Pond Street, Woonsocket

This site was used for remote gas storage from 1865 until sometime between 1911 and 1950. Site investigations have not been conducted at this time. The property is currently in use as a housing authority office. No activities were performed in fiscal year 2024.

	Payments During this Period	Payments to date
Balance Prior to TNEC/EUA Merger		\$0
1 Consulting Costs	\$0.00	\$0.00
2 Construction/Disposal/Removal Costs	\$0.00	\$0.00
3 DEM/EPA Oversight Costs	\$0.00	\$0.00
4 Property Purchases/Settlements/Legal	\$0.00	\$0.00
5 Other Costs		
Preliminary Cost Estimate	\$0.00	\$2,641.00
Project Management	\$0.00	\$117.00
Total	\$0.00	\$2,758.00

Section II.
Site Specific Expenses
April 1, 2023 through March 31, 2024
(Fiscal Year 2024)

K. Cumberland (remote disposal location)

This property is currently owned by the Pawtucket Water Supply Board. During the 1930s and 1940s, the Blackstone Valley Gas Company transported oxide box waste from the Tidewater manufactured gas plant site to an area located within this property. Rhode Island Department of Environmental Management (RIDEM) excavated and disposed of the box wastes from this site in the late 1980s. Site investigation and remediation work was completed in 2005. In April 2011, RIDEM issued a No Further Action Letter for the work performed at the site. No future activities are anticipated.

	Payments During this Period	Payments to date ¹
Balance Prior to TNEC/EUA Merger		\$0
1 Consulting Costs	\$0.00	\$61,675.00
2 Construction/Disposal/Removal Cost	\$0.00	\$4,136.00
3 DEM/EPA Oversight Costs	\$0.00	\$296,382.00
4 Property Purchases/Settlements/Legal	\$0.00	\$0.00
5 Other Costs		
Other - Payment from Escrow Account Agreement	\$0.00	-\$46,562.00
Preliminary Cost Estimate	\$0.00	\$2,641.00
Project Management	\$0.00	\$1,695.00
RI General Treasurer Reimbursement	\$0.00	\$3,923.00
Total ¹	\$0.00	\$323,890.00

1. The "Payments to date" for the PWSB Site, Cumberland (remote disposal location) costs and the "Total" project cost include an additional \$296,382 in charges that relate to the Escrow Agreement with the Pawtucket Water Supply Board.

Section II.
Site Specific Expenses
April 1, 2023 through March 31, 2024
(Fiscal Year 2024)

L. Lawn Street, Attleboro, MA (remote disposal location)

This site has been identified as a remote disposal site for purifier box waste. The box waste has been removed and a Response Action Outcome Statement has been filed. This site is closed and no further work is anticipated.

	Payments During this Period	Payments to date
Balance Prior to TNEC/EUA Merger		\$1,619,940
1 Consulting Costs	\$0.00	\$0.00
2 Construction/Disposal/Removal Costs	\$0.00	\$22,936.00
3 DEM/EPA Oversight Costs	\$0.00	\$0.00
4 Property Purchases/Settlements/Legal	\$0.00	\$0.00
5 Other Costs	\$0.00	\$34.00
Total	\$0.00	\$1,642,910.00

Section II.
Site Specific Expenses
April 1, 2023 through March 31, 2024
(Fiscal Year 2024)

M. Mendon Road, Attleboro, MA (remote disposal location)

This site is approximately 5 acres in size and is comprised of two parcels of land located on Mendon Road in Attleboro, Massachusetts. This site was formerly used as a sand and gravel excavation and processing area from 1932 until the early 1960s. During that time, purifier box waste from the Blackstone Valley Gas and Electric Company's Tidewater manufactured gas plant in Pawtucket, RI was disposed of on the property. The waste was excavated and disposed of by the Massachusetts Department of Environmental Quality Engineering in the mid-1980s. This site is closed and no further work is anticipated.

	Payments During this Period	Payments to date
Balance Prior to TNEC/EUA Merger		\$670,893
1 Consulting Costs	\$0.00	\$0.00
2 Construction/Disposal/Removal Costs	\$0.00	\$0.00
3 DEM/EPA Oversight Costs	\$0.00	\$0.00
4 Property Purchases/Settlements/Legal	\$0.00	\$3,477,465.00
5 Other Costs	\$0.00	\$0.00
Total	\$0.00	\$4,148,358.00

Section II.
Site Specific Expenses
April 1, 2023 through March 31, 2024
(Fiscal Year 2024)

N. Melrose Street, Providence

The property at 280 Melrose Street, in Providence, Rhode Island, operated as a service center by The Narragansett Electric Company since 1923, is currently under investigation and remediation for the presence of contaminants associated with its historical usage. Among other contaminants, polychlorinated biphenyls (PCBs) have been detected in various media at the property, including in soil, concrete, asphalt, and building materials (floors, walls, etc.). The PCBs are present due to historical releases and spills of PCB-contaminated mineral oil dielectric fluid, a substance used in many types of electrical equipment. During fiscal year 2024, activities performed included supplemental sampling activities, planning and procurement support for PCB abatement of building materials in areas of the building and utilities to be renovated and installed, and oversight and documentation of PCB abatement during renovation and utility installation activities. Additional activities were related to the remedy for the exterior portion of the facility including performance of site monitoring visits; supplemental sampling activities; remedial design activities; permitting; preparation of technical specifications; contractor procurement support; public involvement activities; and regulatory reporting to Rhode Island Department of Environmental Management and US Environmental Protection Agency. Additional activities included implementation of remedial construction; implementation of the air and vibration monitoring program during construction of the approved remedy; construction oversight; removal and disposal of PCB impacted materials; tree work associated with installation of engineered cap and remedial construction.

	Payments During this Period	Payments to date
1 Consulting Costs	\$565,704.42	\$4,168,733.42
2 Construction/Disposal/Removal Costs	\$2,587,965.15	\$6,346,089.15
3 DEM/EPA Oversight Costs	\$0.00	\$2,809.00
4 Property Purchases/Settlements/Legal	\$0.00	\$26,649.00
5 Other Costs		
Project Management	\$54,671.16	\$472,723.16
Laboratory Analysis Fees	\$0.00	\$12,653.00
RI General Treasurer Reimbursement	\$0.00	\$953.00
Total	\$3,208,340.73	\$11,030,609.73

Section II.
Site Specific Expenses
April 1, 2023 through March 31, 2024
(Fiscal Year 2024)

O. Quonset Point

The Quonset Point Naval Air Station and the electrical system were built by the U.S. Navy before and during World War II. Being a military facility, large amounts of the electrical system contained polychlorinated biphenyls (PCBs) as a fire resistant additive. The U.S. Government declared the facility surplus to its needs in the early 1970s at which time the State of Rhode Island stepped in to acquire and manage the property as an economic development opportunity, under the Rhode Island Port Authority (RIPA). On November 4, 1986, the Company purchased and took title to the Quonset Point electrical system from RIPA. Through the purchase agreement, RIPA took responsibility for known releases and the Company took responsibility for potential future releases from electrical equipment. The Company expects to continue to incur future environmental costs as a result of PCB contamination discovered in the vicinity of oil-filled electrical distribution assets. No activities were performed in fiscal year 2024.

	Payments During this Period	Payments to date
1 Consulting Costs	\$0.00	\$5,295.00
2 Construction/Disposal/Removal Costs	\$0.00	\$255,862.00
3 DEM/EPA Oversight Costs	\$0.00	\$0.00
4 Property Purchases/Settlements/Legal	\$0.00	\$0.00
5 Other Costs		
Project Management	\$0.00	-\$55,685.00
RI General Treasurer Reimbursement	\$0.00	\$750.00
Total	\$0.00	\$206,222.00

Section II.
Site Specific Expenses
April 1, 2023 through March 31, 2024
(Fiscal Year 2024)

P. J.M. Mills

The J.M. Mills Landfill Site is part of the Peterson/Puritan, Inc. Superfund Site located along the Blackstone River between the towns of Cumberland and Lincoln in Providence County, Rhode Island. The site is over 500 acres and is split into two Operable Units (OUs). The now inactive J.M. Mills Landfill is part of OU2 and from 1954 until 1983 was used for the disposal of wastes, including industrial, municipal and hazardous wastes. Cleanup activities for OU2 by a group of Potentially Responsible Parties (PRPs) for the site began in the early 1990s under an agreement with the U.S. Environmental Protection Agency. In 2003, the Company was identified as a PRP for OU2. In fiscal year 2024, the Company continued to be involved with the PRP Group for this site.

	Payments During this Period	Payments to date
1 Consulting Costs	\$0.00	\$0.00
2 Construction/Disposal/Removal Costs	\$0.00	\$0.00
3 DEM/EPA Oversight Costs	\$0.00	\$0.00
4 Property Purchases/Settlements/Legal	\$5,361.59	\$338,240.59
5 Other Costs		
Project Management	\$622.09	\$50,529.09
Laboratory Analysis Fees	\$0.00	\$0.00
RI General Treasurer Reimbursement	\$0.00	\$0.00
Total	\$5,983.68	\$388,769.68

Section II.
Site Specific Expenses
April 1, 2023 through March 31, 2024
(Fiscal Year 2024)

Q. Miscellaneous

Costs for this project are associated with general environmental consulting costs and Company project management costs for the electric operations program.

	Payments During this Period	Payments to date
1 Consulting Costs	\$2,968.25	\$155,075.25
2 Construction/Disposal/Removal Costs	\$0.00	\$5,273.00
3 DEM/EPA Oversight Costs	\$0.00	\$0.00
4 Property Purchases/Settlements/Legal	\$980.00	\$23,475.00
5 Other Costs/Project Management	\$105,882.02	\$1,211,193.02
6 KeySpan Insurance Recovery Payment		\$555,057.00
Total	\$109,830.27	\$1,950,073.27

Section II.
Site Specific Expenses
April 1, 2023 through March 31, 2024
(Fiscal Year 2024)

R. Litigation/Legal

This project is for activities associated with environmental insurance recovery.

	Payments Made this Period	Payments made to date
Litigation Costs Prior to May 2000		
EUA Companies		\$326,832.00
NEES Companies		\$123,607.00
Litigation/Legal Costs	\$0.00	\$32,439,456.00
Total	\$0.00	\$32,889,895.00

Section II.
Site Specific Expenses
April 1, 2023 through March 31, 2024
(Fiscal Year 2024)

S. Great Lakes Container

Between 1961 and 1980, a series of owners operated the site as a drum reconditioning business, and accepted drums from various customers, including the Company. U.S. Environmental Protection Agency notified the Company in 2009 that it was designated as a Potentially Responsible Party (PRP), among several other parties. Since that time, the Company, along with numerous other PRPs, entered into a PRP Group Agreement to complete remediation work and share the costs associated with that work. The Company has an approximate 1% allocation share of the costs. In fiscal year 2024, no costs were incurred.

	Payments During this Period	Payments to date
1 Consulting Costs	\$0.00	\$0.00
2 Construction/Disposal/Removal Costs	\$0.00	\$0.00
3 DEM/EPA Oversight Costs	\$0.00	\$0.00
4 Property Purchases/Settlements/Legal	\$0.00	\$0.00
5 Other Costs		
Project Management	\$0.00	\$205.00
RI General Treasurer Reimbursement	\$0.00	\$0.00
PRP Payments/Legal Fees	\$0.00	\$69,776.00
Total	\$0.00	\$69,981.00

Section II.
Site Specific Expenses
April 1, 2023 through March 31, 2024
(Fiscal Year 2024)

T. Chandonnet Site

In or around 1962 until 1984, retired electrical equipment from Company operations was transported to the Chandonnet scrap metal reclamation business in Lowell, Massachusetts. The equipment often contained polychlorinated biphenyls (PCBs), which resulted in PCB contamination of the Chandonnet property and numerous adjacent properties, including the Pawtucket Canal. In 1986, the Company, together with additional utility companies, was identified by the Massachusetts Department of Environmental Protection (MassDEP) as a Potentially Responsible Party (PRP) at the site. The Company subsequently entered into a PRP cost-sharing agreement with National Grid responsible for the overall management of response actions. Per the cost-sharing agreement, National Grid performs the response actions and is subsequently reimbursed from the Company and other utilities based on the agreement allocations. Investigation activities were completed in fiscal year 2016 on multiple properties, including the Pawtucket Canal. In January 2016, a Revised Phase II Comprehensive Site Assessment/Phase III Remedial Action Plan Report was submitted to MassDEP. In fiscal year 2024, the Company continued to be involved with the PRP Group for this site.

	Payments During this Period	Payments to date
1 Consulting Costs	\$1,630.81	\$234,755.81
2 Construction/Disposal/Removal Costs	\$0.00	\$19,981.00
3 DEM/EPA Oversight Costs	\$0.00	\$535.00
4 Property Purchases/Settlements/Legal	\$0.00	\$9,021.00
5 Other Costs		
Project Management	\$703.60	\$8,057.60
Third Party Reimbursements ¹	\$0.00	-\$92,296.00
Total	\$2,334.41	\$180,054.41

1. Credit for contributions from other PRPs per cost sharing agreement.

Section II.
Site Specific Expenses
April 1, 2023 through March 31, 2024
(Fiscal Year 2024)

U. Admiral Street Cable Termination Yard, Providence

The Admiral Street site is an electric cable termination yard located at 129 Admiral Street in Providence, Rhode Island and is currently under investigation and remediation for the presence of contaminants associated with its historical usage. In 2011 through 2012, limited remediation of several releases of non-Polychlorinated Biphenyl (non-PCB) cable oil from overhead cable oil reservoirs and feeder cable foundations at the site was conducted. The releases were reported to the Rhode Island Department of Environmental Management (RIDEM) Office of Emergency Response (ER). No further remediation was conducted at that time due to logistical and cost constraints. In 2014, a subsurface electrical conduit was installed along the substation driveway, and excess soil generated was stockpiled and determined to contain concentrations of PCBs and total petroleum hydrocarbons. In early 2016, delineation activities resumed at the site and PCBs were identified in soil in excess of the RIDEM standards, and the condition was reported to the RIDEM Office of ER and the RIDEM Office of Waste Management. In fiscal year 2024, site activities were related to remedial design activities and preparation of regulatory submittals to RIDEM and US Environmental Protection Agency.

	Payments During this Period	Payments to date
1 Consulting Costs	\$33,379.83	\$213,511.83
2 Construction/Disposal/Removal Costs	\$0.00	\$64,146.00
3 DEM/EPA Oversight Costs	\$0.00	\$0.00
4 Property Purchases/Settlements/Legal	\$0.00	\$0.00
5 Other Costs		
Project Management	\$825.29	\$44,708.29
RI General Treasurer Reimbursement	\$0.00	\$0.00
PRP Payments/Legal Fees	\$0.00	\$0.00
Total	\$34,205.12	\$322,366.12

Section II.
Site Specific Expenses
April 1, 2023 through March 31, 2024
(Fiscal Year 2024)

V. Wakefield No. 17 Substation, South Kingstown

The Wakefield No. 17 Substation is located at 19 Old Tower Hill Road in South Kingstown, Rhode Island and has been used as an automated outdoor electric substation since the Company acquired the site in 1936. The site is currently under investigation and remediation for the presence of contaminants associated with its historical usage. Releases of mineral oil dielectric fluid have been identified at the site over the past several years and have been reported to Rhode Island Department of Environmental Management (RIDEM). In late 2015, limited soil and concrete pre-characterization activities were performed to support substation construction activities. Concentrations of polychlorinated biphenyls (PCBs) in excess of the applicable RIDEM and Toxic Substances Control Act (TSCA) standards were identified in soils throughout the proposed construction area, requiring notification to RIDEM prior to the initiation of substation construction activities. In fiscal year 2024, activities included installation and sampling of groundwater monitoring wells; implementation of remedial construction; implementation of the air monitoring program during construction of the approved remedy; oversight of remedial construction; removal and disposal of PCB impacted materials; and preparation of regulatory submittals to RIDEM and US Environmental Protection Agency.

	Payments During this Period	Payments to date
1 Consulting Costs	\$36,529.86	\$148,057.86
2 Construction/Disposal/Removal Costs	\$16,614.45	\$87,844.45
3 DEM/EPA Oversight Costs	\$0.00	\$404.00
4 Property Purchases/Settlements/Legal	\$0.00	\$0.00
5 Other Costs		
Project Management	\$3,051.94	\$17,763.94
RI General Treasurer Reimbursement	\$0.00	\$0.00
PRP Payments/Legal Fees	\$0.00	\$0.00
Total	\$56,196.25	\$254,070.25

Section II.
Site Specific Expenses
April 1, 2023 through March 31, 2024
(Fiscal Year 2024)

W. Lakewood No. 57 Substation, Warwick

The Lakewood No. 57 Substation is located at 18 Lakewood Avenue in Warwick, Rhode Island, was acquired by the Company through purchases in 1929 and 1995, and historically has been used as an outdoor electric substation. The Site is currently under investigation and remediation for the presence of contaminants associated with its historical usage. In 2016, limited soil and concrete pre-characterization activities were performed to support substation construction activities. Concentrations of polychlorinated biphenyls (PCBs) in excess of the applicable Toxic Substances Control Act standards were identified in concrete and soils throughout the proposed construction area. In fiscal year 2024, activities performed were related to site inspections and preparation of regulatory submittals for the US Environmental Protection Agency.

	Payments During this Period	Payments to date
1 Consulting Costs	\$2,000.61	\$96,011.61
2 Construction/Disposal/Removal Costs	\$0.00	\$125,711.00
3 DEM/EPA Oversight Costs	\$0.00	\$1,300.00
4 Property Purchases/Settlements/Legal	\$0.00	\$0.00
5 Other Costs		
Project Management	\$146.79	\$29,790.79
RI General Treasurer Reimbursement	\$0.00	\$0.00
PRP Payments/Legal Fees	\$0.00	\$0.00
Total	\$2,147.40	\$252,813.40

Section II.
Site Specific Expenses
April 1, 2023 through March 31, 2024
(Fiscal Year 2024)

X. Summary of Costs for All Sites

		Payments During this Period	Payments to date
1	Consulting Costs	\$834,922.20	\$17,475,006.20
2	Construction/Disposal/Removal Costs	\$2,617,258.13	\$27,098,304.13
3	DEM/EPA Oversight Costs	\$10,568.29	\$467,084.29
4	Property Purchases/Settlements	\$7,681.59	\$8,464,603.59
5	Other Costs	\$176,952.60	\$3,128,278.60
6	Litigation/Legal Costs	\$0.00	\$32,577,681.00
7	EUA Balance Prior to TNEC/EUA Merger		\$2,817,674.00
	Total	\$3,647,382.81	\$92,028,631.81
		Payments During this period	Payments to date
A.	Washington Street, Bristol	\$2,734.64	\$854,831.64
B.	Thames Street, Bristol	\$3,154.07	\$4,330,805.07
C.	Main Street, Warren	\$0.00	\$418,742.00
D.	Canal Street, Westerly	\$51,560.78	\$4,576,785.78
E.	Industrial Drive, Westerly	\$1,680.18	\$759,382.18
F.	Tidewater Street, Pawtucket	\$153,162.92	\$25,312,561.92
G.	Exchange Street, Pawtucket	\$0.00	\$2,641.00
H.	High Street, Central Falls	\$0.00	\$23,741.00
I.	Hamlet Avenue, Woonsocket	\$16,052.36	\$2,086,370.36
J.	Pond Street, Woonsocket	\$0.00	\$2,758.00
K.	Cumberland	\$0.00	\$323,890.00
L.	Lawn Street, Attleboro, MA	\$0.00	\$1,642,910.00
M.	Mendon Road, Attleboro, MA	\$0.00	\$4,148,358.00
N.	Melrose Street, Providence	\$3,208,340.73	\$11,030,609.73
O.	Quonset Point	\$0.00	\$206,222.00
P.	J.M. Mills	\$5,983.68	\$388,769.68
Q.	Miscellaneous MGP	\$109,830.27	\$1,950,073.27
R.	Litigation/Legal Costs	\$0.00	\$32,889,895.00
S.	Great Lakes Container	\$0.00	\$69,981.00
T.	Chandonnet Site	\$2,334.41	\$180,054.41
U.	129 Admiral Street Cable Termination Yard, Providence	\$34,205.12	\$322,366.12
V.	Wakefield No.17 Substation, South Kingstown	\$56,196.25	\$254,070.25

W.	Lakewood No.57 Substation, Warwick	\$2,147.40	\$252,813.40
X	Total	\$3,647,382.81	\$92,028,631.81

SECTION III

THE NARRAGANSETT ELECTRIC COMPANY

ENVIRONMENTAL RESPONSE COSTS

APRIL 1, 2023, THROUGH MARCH 31, 2024

ATTACHMENTS

**Attachment 1 to Environmental Response Cost Report
Contractor/Disposal Costs
For the Period
April 1, 2023 through March 31, 2024**

Site	Contractor Name	Physical activities taken to clean-up or remediate contaminated soil or contaminated debris	Costs
Washington Street, Bristol	N/A	N/A	N/A
Thames Street, Bristol	N/A	N/A	N/A
Canal Street, Westerly	Clean Harbors Environmental Services	Transportation and disposal of remediation waste	\$4,665.40
	Stanley Tree Services	Removal of invasive plants	\$760.00
Industrial Drive, Westerly	N/A	N/A	N/A
Tidewater Street, Pawtucket	Clean Harbors Environmental Services	Transportation and disposal of remediation waste	\$3,060.02
	Citiworks Corp	Fencing	\$3,610.40
Exchange Street, Pawtucket	N/A	N/A	N/A
High Street, Central Falls	N/A	N/A	N/A
Hamlet Avenue, Woonsocket	Clean Harbors Environmental Services	Transportation and disposal of remediation waste	\$582.71
Pond Street, Woonsocket	N/A	N/A	N/A
Cumberland	N/A	N/A	N/A
Lawn Street, Attleboro, MA	N/A	N/A	N/A
Mendon Road, Attleboro, MA	N/A	N/A	N/A
Melrose Street, Providence	Clean Harbors Environmental Services	Transportation and disposal of remediation waste	\$137,294.51
	Charter Contracting Co., LLC	Remedial construction implementation	\$2,415,327.60
	Universal Construction	Remedial construction support	\$961.77
	Moran Environmental Recovery	Removal of PCB-impacted material	\$34,381.27
Quonset Point	N/A	N/A	N/A
J.M. Mills	N/A	N/A	N/A
Miscellaneous MGP	N/A	N/A	N/A
Great Lakes Container	N/A	N/A	N/A
Chandonnet Site	N/A	N/A	N/A
Admiral Street Termination Yard, Providence	N/A	N/A	N/A
Wakefield No.17 Substation, South Kingstown	Clean Harbors Environmental Services	Remedial construction implementation and transportation and disposal of remediation waste	\$10,253.32
	Universal Construction	Remedial construction implementation	\$6,361.13
Lakewood No.57 Substation, Warwick	N/A	N/A	N/A

Attachment 2 to Environmental Response Cost Report
Consulting Costs
For the Period
April 1, 2023 through March 31, 2024

Site	Consultant Name	Purpose of Consultant Costs	Costs
Washington Street, Bristol	GZA GeoEnvironmental	Annual inspection of the engineered cap and regulatory reporting	\$1,950.20
Thames Street, Bristol	GZA GeoEnvironmental	Annual inspection of the engineered cap and regulatory reporting	\$1,648.67
Canal Street, Westerly	GZA GeoEnvironmental	Site inspections; groundwater monitoring; and regulatory reporting	\$41,828.75
Industrial Drive, Westerly	GZA GeoEnvironmental	Annual inspection of the engineered cap and regulatory reporting	\$534.43
Tidewater Street, Pawtucket	GZA GeoEnvironmental	Oversight of remedial construction; Public Involvement Plan support; air/vibration monitoring; quarterly NAPL gauging/recovery; regulatory reporting and environmental support associated with the City of Pawtucket Master Plan redevelopment project (future stadium)	\$116,085.11
	EECS	Project management	\$16,691.57
Exchange Street, Pawtucket	N/A	N/A	N/A
High Street, Central Falls	N/A	N/A	N/A
Hamlet Avenue, Woonsocket	GZA GeoEnvironmental	Annual groundwater sampling; site inspections; and regulatory reporting	\$12,115.94
	EECS	Project management	\$1,853.75
Pond Street, Woonsocket	N/A	N/A	N/A
Cumberland	N/A	N/A	N/A
Lawn Street, Attleboro, MA	N/A	N/A	N/A
Mendon Road, Attleboro, MA	N/A	N/A	N/A
Melrose Street, Providence	GZA GeoEnvironmental	Regulatory reporting; performance of supplemental sampling activities; permitting; site monitoring visits; remedial design activities; preparation of project specifications; contractor procurement support and air/vibration monitoring; and oversight of remedial construction	\$565,704.42
Quonset Point	N/A	N/A	N/A
J.M. Mills	N/A	N/A	N/A
Miscellaneous	GZA GeoEnvironmental	Site inspections; file reviews	\$2,968.25
Great Lakes Container	N/A	N/A	N/A
Chandonnet Site	Innovative Engineering Solutions	Site investigation activities; regulatory reporting	\$98.14
	National Grid	Site investigation activities; regulatory reporting	\$1,532.67
Admiral Street Termination Yard, Providence	GZA GeoEnvironmental	Regulatory reporting review	\$1,380.15
	Coneco Engineering & Scientists	Site inspections and regulatory reporting	\$29,705.60
	EECS	Project management	\$2,294.08
Wakefield No.17 Substation, South Kingstown	Coneco Engineering & Scientists	Installation and sampling of groundwater monitoring wells; implementation of remedial construction; air monitoring; oversight of remedial construction; and regulatory reporting	\$36,529.86
Lakewood No.57 Substation, Warwick	Coneco Engineering & Scientists	Site inspections and regulatory reporting	\$2,000.61