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August 20, 2025

VIA HAND DELIVERY AND ELECTRONIC MAIL

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

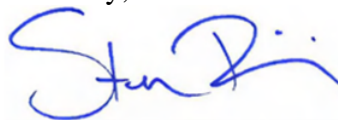
**Re: Docket No. 24-55-NG FY2025 Gas Infrastructure, Safety, and Reliability Plan
Rhode Island Energy Segment Decommissioning Framework**

Dear Ms. De La Rosa:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”), I have enclosed an electronic copy of the Company’s Segment Decommissioning Integrated System Planning Framework (the “Framework”). This filing is being made in accordance with Report and Order No. 25485 which was issued by Public Utilities Commission on August 18, 2025 in the above-referenced docket. This Framework provides technical criteria, both quantitative and qualitative, that would enable the evaluation of segments of the Company’s gas distribution system for potential decommissioning.

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

Sincerely,



Steven J. Boyajian

Enclosure

cc: Docket No. 24-55-NG Service List

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

August 20, 2025

Date

Docket No. 24-55-NG- RI Energy's Gas Infrastructure, Safety and Reliability (ISR) Plan 2026 – Service List 1/7/2025

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RIE Segment Decommissioning Integrated System Planning

August 20, 2025



- At its March 26, 2024, Open Meeting in Docket No. 23-49-NG regarding the Rhode Island Energy (“RIE” or the “Company”) FY2025 Gas Infrastructure, Safety and Reliability (“ISR”) Plan, the Public Utilities Commission (the “Commission”) directed the Company to propose criteria for segment decommissioning that potentially could be used to rank or risk score segments of the gas distribution system.
- On July 24, 2024, RIE submitted the Response to Commission’s Directive on the Decarbonization Framework regarding Gas Segment Decommissioning.
- At its March 17, 2025, Open Meeting in Docket No. 24-55-NG regarding the Company’s FY2026 Gas ISR Plan, the Commission directed the Company to clarify the criteria for segment decommissioning. The clarifications were required include:
 - Technical criteria that are measurable and actionable
 - Clear explanation of criteria that are not quantitative
 - Weigh/Prioritize the criteria and provide justification for the definitions and prioritization
 - Test the criteria on a sample gas distribution segment



- This presentation provides details on the Company's efforts to define quantifiable technical criteria for evaluating gas segment decommissioning, assuming electrification as the energy alternative.
- The technical criteria herein provide guidance on where gas segment decommissioning would be feasible and could provide potential benefits to the existing customers by reducing gas system safety and reliability risks from a *gas and electric technical perspective*.
- The criteria provided herein do not include other key criteria, which will require further investigation and assessment through work with external stakeholders, research and/or pilots.
 - Customer demographics (e.g., customer type, counts)
 - Customer affordability (e.g., upfront investments and on-going energy costs)
 - Customer gas use (e.g., customer appliances and processes, gas use volume)
 - Regulatory/legislative policy changes (e.g., changes to existing tariffs)
 - Economic impacts of decommissioning a segment
 - Equity (e.g., environmental justice communities)
 - Customer engagement and communication

1. Integrated System Planning team meetings

- Develop technical criteria
- Discussion for potential scoring system
- Review potential sites and site selection for pilot
- Analyze load usage and potential gas to electric conversion factors

2. Gas & Electric Potential Scoring System

- *Quantified Score = Critical Criteria x (Gas Considerations + Electric Consideration + Customer Count)*
- Critical Criteria (Gas and Electric) determines feasibility of site selection
- Gas Customer Considerations Added to Scoring Equation
 - Significant factor to consider for site selection and size of scope
 - Expect additional weighted factors over time
- *Establish Project Drivers*
 - Non-critical criteria and considerations factored into scoring system
 - Align with Gas and Electric ISR programs to address system reliability and risk assessment
 - Avoidable gas capital investments' influence on site selection

3. Next Steps

- Development of a process flow chart to identify future potential sites
 - How to implement system wide review for segment selection and scoring
 - Identify program manager, sponsors, and other key stakeholders
- Determine next steps for potential site selections



■ **Gas Technical Criteria:**

- Any gas segment decommissioning project must:
 - Be hydraulically feasible; and
 - Not jeopardize the safety and reliability of the overall RIE gas system.
- Risk Reduction/System Vulnerability Considerations
 - Leak Prone Pipe
 - Low Pressure Systems
 - Capacity Constrained Systems
 - Single Feed Gas Systems
- Geography Considerations
 - System Extremities
 - Flood Prone Areas
- Program Integration Considerations
 - Gas ISR
 - On-going Gas Operations

■ **Electric Technical Criteria:**

- Any gas segment decommissioning project must:
 - Consider the level and shape of the incremental electric load, as well as the associated timing; and
 - Not jeopardize safety and reliability of the overall RIE electric system.
- Risk Reduction/System Vulnerability Considerations
 - Scale and Scope
 - Overhead Lines
 - System Design
 - Available Capacity
- Geography Considerations
 - High Reliability/High Voltage Performance Areas
 - Proximity to Mainline/Substations
- Program Integration Considerations
 - Electric ISR
 - On-going Electric Operations

Source: July 24, 2024, RIE submitted the Response to Commission's Directive on the Decarbonization Framework regarding Gas Segment Decommissioning



- **Gas Technical Criteria:**
 - Hydraulically Feasible **Y/N – Critical (See Definition)**
 - Leak Prone Pipe **Y/N (Quantifiable leak score if available)**
 - Operation Pressure **Low Pressure/High Pressure**
 - Capacity Constrained Systems **Y/N**
 - Single Feed Gas Systems **Y/N**
 - System Extremities **Y/N**
 - Flood Prone Areas **Y/N**
 - # of customers within a segment – **Quantifiable**

- **Electric Technical Criteria:**
 - Not jeopardize safety and reliability of the overall RIE electric system. **Y/N - Critical**
 - Scale and Scope **Y/N**
 - Overhead/Underground Lines **Y/N**
 - Available Capacity **Y/N**
 - Reliability Performance Areas **Y/N**
 - Proximity to Mainline/Substations **Y/N – Single Phase or Three Phase Area**



Criteria Definitions – Gas Hydraulic Feasibility

- Gas Technical Criteria:

- Hydraulically Feasible

- Any gas segment decommissioning project must be hydraulically feasible which will be determined by a Gas System Planning Engineer.
 - Utilize Synergy Gas Hydraulic Modeling Software to determine feasibility of taking a gas main segment out of service.
 - Does not cause or increase risk of unintentional supply interruption to nearby gas customers outside of the scope of work.
 - Acceptable tolerances to Company policy pertaining to allowable pressure drop and infrastructure design parameters.
 - Decommissioning a segment of gas main shall not:
 - Increase expected velocity through existing infrastructure based on the allowable limits of the gas system's Maximum Allowable Operating Pressure ("MAOP").
 - Increase reliance on a single asset to maintain feed to more than five customers.
 - Decrease expected pressure of the gas subsystems affected by taking segment out of service or cause system pressure at a "low point extremity" to drop below allowable design minimum pressure based on a gas system's MAOP.
 - Create an operational hardship in the transportation of natural gas from any citygate station to customers based on day to day Gas Operations and Supply Procurement strategies.
 - Create operational hardship in responding to any gas emergency event.
 - Create operational hardship for planned gas work such that extra capital dollars must be spent.
 - Limit the ability to "loop" a single feed gas main that is not subject to decommissioning
 - Restrict other customers' option to remain on the gas system.

| System Pressure | Recommended Maximum Pressure Drop* | Maximum Suggested Gas Velocities |
|-----------------|------------------------------------|----------------------------------|
| Low Pressure | 0.5 "W.C. | 15 ft./sec. |
| 3-24 psig | 0.5 psi | 60 ft./sec. |
| 25-124 psig | 2.0 psi | |



- The scoring system on the subsequent slides provides clarification of potential site selection, which also enables a prioritization of sites to investigate based on feasibility, system risk reduction, and the chances of successful project implementation. Most of the criteria are simple yes or no responses, but there are quantifiable variables within the criteria that allow a scoring system to be established.
- The score is broken up into three parts: Gas & Electric Critical Criteria, Gas & Electric Risk Reduction, and Customer Count.
- The critical criteria:
 - The feasibility of the potential gas segment decommissioning without negative impacts to the remaining customers, on both the gas and electric systems, or creation of safety or reliability concerns for system operations.
- The gas risk reduction and customer count portions of the score can be viewed as non-critical criteria, but they are necessary to provide structure for scoring of project drivers that will influence site selection and prioritization.
- The scale at which segments are converting load from gas to electric will influence the need to expand the criteria. This current structure is not intended to target large areas but to implement projects on a smaller scale throughout the various systems, as a starting point.



Gas Scoring Criteria

- **Quantitative Score = Gas Critical Criteria * (Other Gas Criteria) + Gas Customer Count Criteria + Electric Critical Criteria * (Other Electric Criteria)**
- *HIGHER* scores indicate segments with higher potential.

Risk reduction and geography considerations are weighted factors highlighting the project drivers for site selection and provide some flexibility for engineers in the review of potential segments.

(#) – point score

Gas Critical Criteria:

Hydraulically Feasible

Single Feed: **Y/N (1,0)**

Avoiding looped systems and potentially creating reliability concerns for customers outside of the scope of work that benefit from the loop.

Could potentially be updated with a weighted factor with single feeds having a higher score than looped systems

“Can it be a project?”

Other Gas Criteria

- Leak Prone Pipe **(3,2,1)**
- Constrained System **(1,0)**
- MAOP **(2,1,0)**
- Single Feed System **(2,1,0)**
- Complex culvert crossing elimination **(2, 1, 0)**
- Flood Prone Area/Water Intrusion Risk **(2,1,0)**

Provides system benefits and potentially avoids further infrastructure investment to address risks. Could be considered main project drivers for site selection.

“Why is the segment being targeted?”

Gas Customer Count Criteria:

Customers within scope Requiring Commitment:

- 1 customer – **(5)**
- 2 customers – **(4)**
- 3 customers – **(3)**
- 4 customers – **(2)**
- 5 customers – **(1)**
- >5 customers – **(0)**

-Fewer customers = greater chance of project success
-More customers raises concern of limited control over Company’s ability to initiate project
-Expect customer criteria to grow – types, rates, appliances, renovation cost, commitment etc.

“What are the chances of success for the project and customer willingness to convert?”



Electric Scoring Criteria

- **Quantitative Score = Gas Critical Criteria * (Other Gas Criteria) + Gas Customer Count Criteria + Electric Critical Criteria * (Other Electric Criteria)**

(#) – point score

Electric Critical Criteria:

Feasible – Safety/Reliability Y/N

-High Risk (>5MW winter load) **(0)**

-Low risk (<5MW winter load) **(1)**

Conversion would create an unsafe or unreliable system. Conversion size is greater than 5MW winter loading.

“Can it be a project?”

Other Electric Criteria

- Added Load-<100kW,<500kW,>500kW **(3,2,1)**
- Hosting Capacity->500, >100, <100 **(3,2,1)**
- Overhead/Underground-OH **(2)**, UG **(0)**
- Mainline Proximity-Yes **(2)**, No **(1)**
- Reliability- CKAIFI & CKAIDI<1.05,71.9 **(2)**
 - CKAIFI or CKAIDI>1.05,71.9 **(1)**

-Provides further justification for future reliability projects to expand areas of potential site selection
-Focus on areas with minimal outage risk

“Why is the segment being targeted?”

Example of Scoring Criteria



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Chevy Court, Warwick

Gas Factors

Is feasible: Yes **(1)**
Leak Prone Pipe: Yes **(2)**
Low Pressure: No **(0)**
Single Feed: Yes **(1)**
Constrained System: Yes **(1)**
Flood Zone: Yes **(1)**
of customers: 3 **(3)**

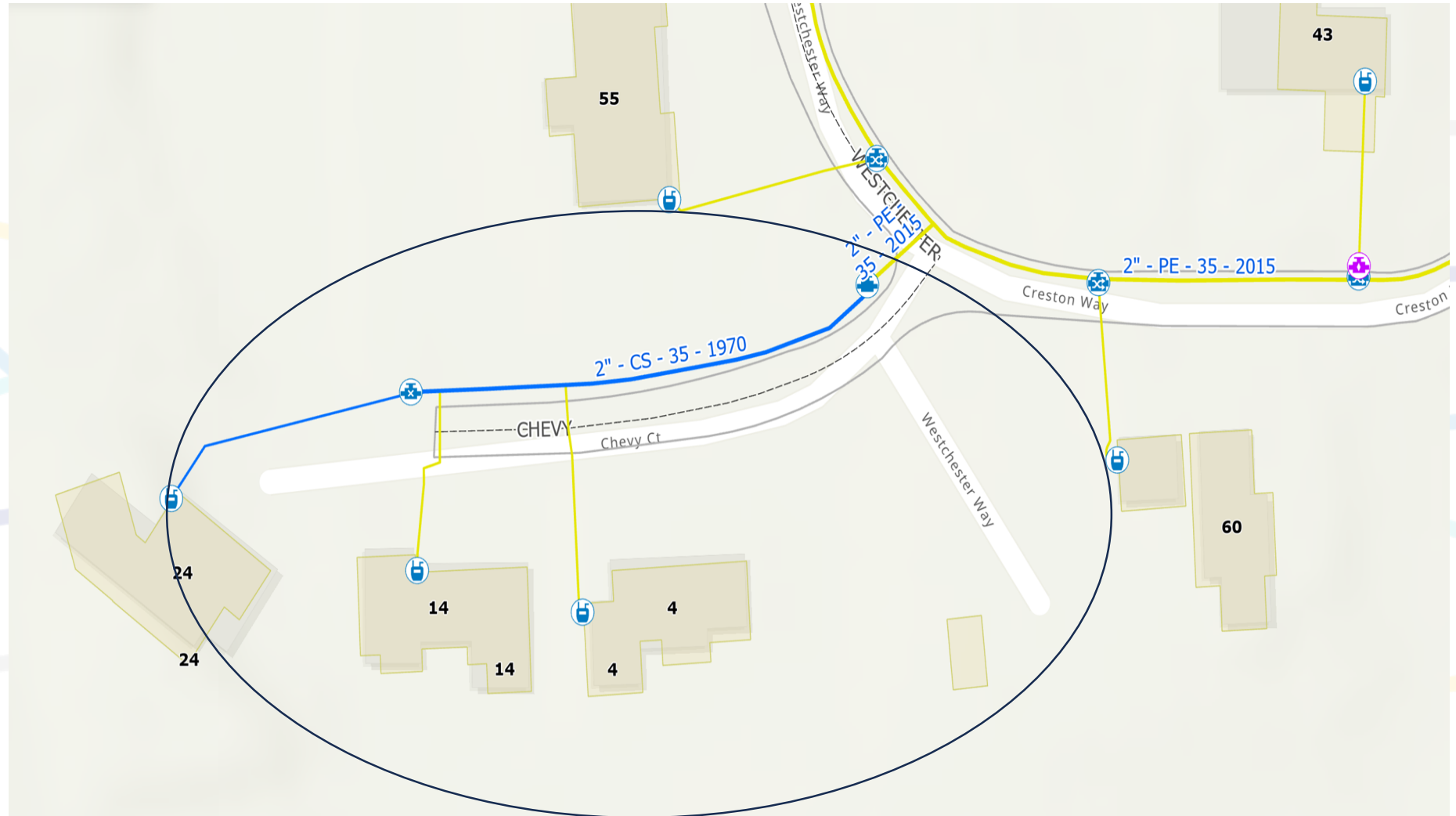
Gas Project Score = 9

Electric Factors

Is Feasible (<5MW): Yes (1)
Added Load-<100kW (3)
Feeder Loading- <75% (2)
Overhead/Underground-OH (2)
Mainline Proximity-No (1)
Reliability- (2)

Electric Project Score = 12

Total Project Score = 21





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Example of Scoring Criteria

S. Olney Street, Johnston

Gas Factors

Is feasible: Yes **(1)**

Leak Prone Pipe: Yes **(3)**

Low Pressure: Yes **(2)**

Single Feed: Yes **(1)**

Constrained System: No **(1)**

Flood Zone: No **(0)**

of customers: 3 **(3)**

Gas Project Score = 11

Electric Factors

Is Feasible (<5MW): Yes (1)

Added Load-<100kW (3)

Feeder Loading- <75% (3)

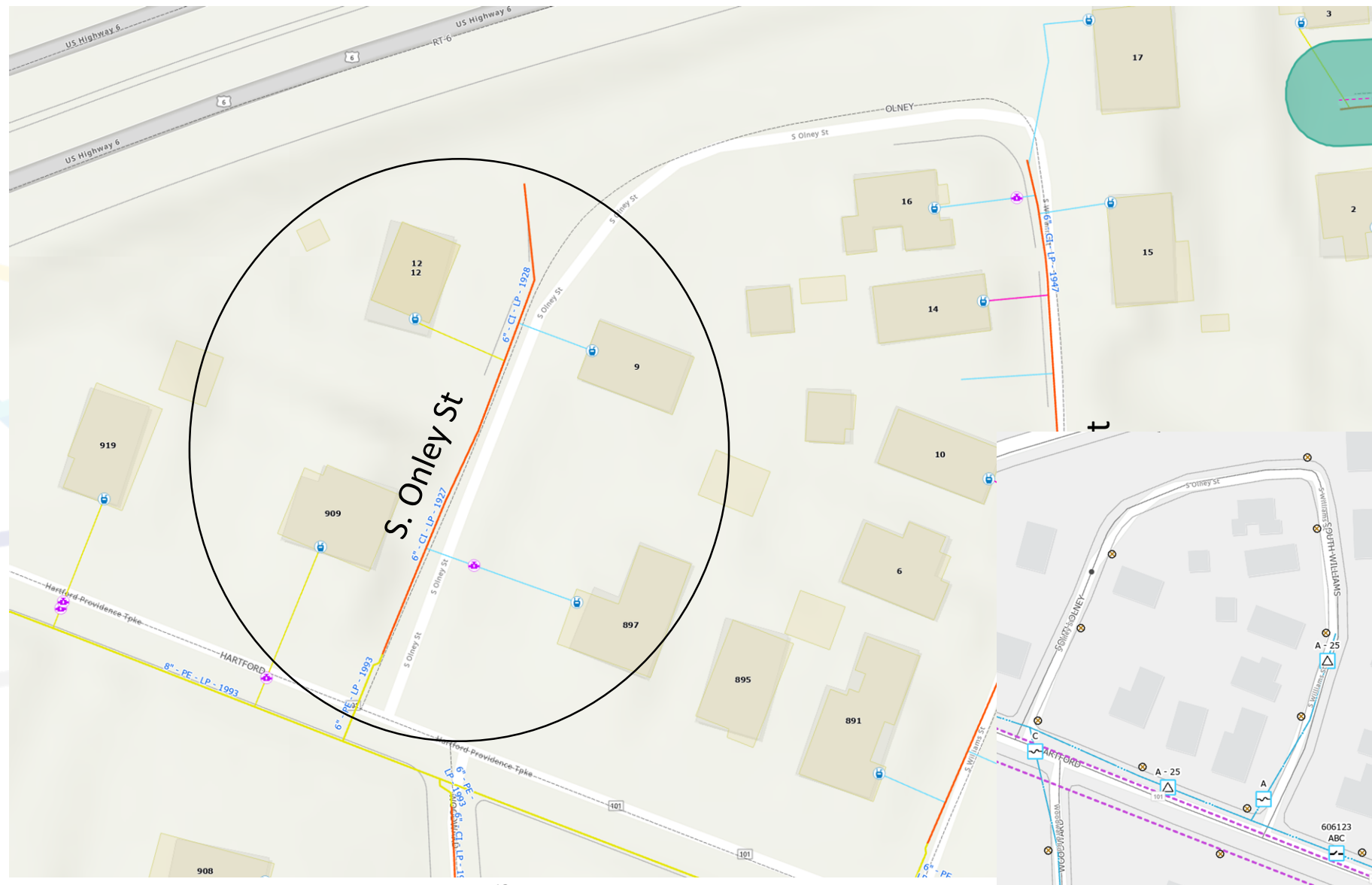
Overhead/Underground-OH (2)

Mainline Proximity-No (1)

Reliability- (1)

Electric Project Score = 11

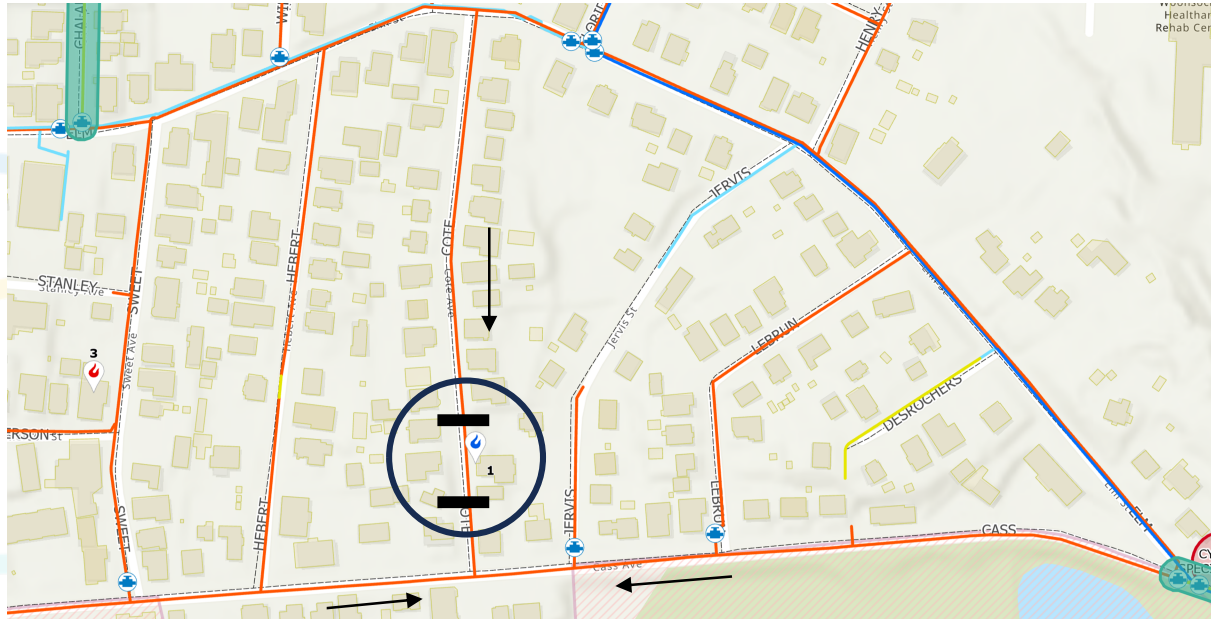
Total Project Score = 22



Criteria Definitions – Hydraulic Feasibility Example



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- **IS Hydraulically Feasible** to take the existing LP main out of service in a modeled design day (i.e., 68 HDD or -3 deg F).
- BUT*
- Abandoning section in Cote Avenue would create a long single feed from the north to more than 10 customers
 - Unknown blockages or restrictions from vintage material surrounding the area could make this segment more important as a “loop” than might be shown in a model.
 - Engineering judgement would not recommend this segment for decommissioning.