

Andrew S. Marcaccio, Counsel  
PPL Services Corporation  
[AMarcaccio@pplweb.com](mailto:AMarcaccio@pplweb.com)

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



August 28, 2025

**VIA ELECTRONIC MAIL AND HAND DELIVERY**

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

**RE: Docket No. 23-48-EL - FY 2025 Electric Infrastructure, Safety, and Reliability Plan  
Reconciliation Filing  
Responses to Division Data Requests – Set 1 (Batch 2)**

Dear Ms. De La Rosa:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”), attached are the Company’s second batch of responses to the First Set of Data Requests issued by the Division of Public Utilities and Carriers (“Division”) in the above-referenced matter.

Batch 2 includes responses to Division 1-2; 1-3; 1-7; 1-12; 1-15; 1-16; 1-18; 1-19; 1-26; 1-28; and 1-30. The Company anticipates submitting its final batch of responses on or by September 3, 2025. The Division indicated they did not object to this approach.

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

Sincerely,

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

Andrew S. Marcaccio

Enclosures

cc: Docket No. 23-48-EL Service List

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
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Division 1-2  
**DG & DER**

Request:

How much of the \$2.6 million underspend for DG was attributable to the correction of a prior year entry for duplicative material costs?

Response:

Actual FY 2025 capital spending related to Distributed Generation projects was a credit of (\$1,646,717), \$2,646,717 under the budget of \$1,000,000. The credit was driven by the reversal of material costs that had been recorded twice in the previous year. Total material costs reversed were \$2,540,361.

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Division 1-3  
**DG & DER**

Request:

What is the \$2,370 investment for Strategic DER and why is it considered non-discretionary?

Response:

The Strategic DER Investments capital spending of \$2,370 on Table 5, Line 10 of the FY 2025 Electric ISR Annual Reconciliation relates to tree trimming charges for Project #C086892 - Strategic DER Advancement-Chopmist. This project was designated as a non-discretionary project in the FY 2021 ISR. The work was performed in FY 2024 (October through November 2023) and bills were received in FY 2025.

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Division 1-7  
**New Business**

Request:

Are there any specific large projects contributing to the commercial overspend?

Response:

The following projects had capital spending greater than \$500,000 and contributed to the New Business-Commercial overspend.

	(a)	(b)	(c)
<u>Line Number</u>	<u>Project #</u>	<u>Project Description</u>	<u>FY 2025 Capital Spending</u>
1	C091645	Omni Combined Providence	\$966,186
2	CRI3071	Rogers High School Newport	\$1,717,708
3	CRI3082	Green Development LLC Manufacturing	\$2,107,126
4	COS0011- 10030697877	150 Richmond St, Providence - DSVCCOM-Install 3-1/C 500 Cu, 1000	\$1,125,250

Division 1-12  
**(Distribution) Transformers and Related Equipment**

Request:

Provide an update on the root cause of the transformer overspend (\$17.5 million against \$8 million budget).

Response:

There are multiple root causes for the overspend. However, the reported overspend of \$17.5 million was inaccurate and should have been reported as \$14.9 million.

**Root Cause 1:**

When the Company transitioned to PPL Corporation ("PPL") systems in August 2024, there was a change in inventory management philosophy to start tracking all materials located at Rhode Island Energy Service Centers. This change allows the Company to have greater control, visibility, and ability to minimize inventory on hand. As part of this change, material that was currently on hand at the Service Centers needed to be added to inventory in the Company's system. During this process, as part of the accounting, the "NEC Suspense" account was credited and the "transformer blanket" account was debited. This created an additional \$2.6 million in charges to the transformer blanket for materials that already had been received into service. Accordingly, the Company is now removing that \$2.6 million. The Company has since validated all other transactions have appropriately been credited and debited to the correct accounts and can confirm this was a one-off issue.

**Root Cause 2:**

During the COVID-19 pandemic, many manufacturers' lead times increased up to two to three times. In FY 2025, suppliers had stabilized closer to levels of lead times prior to COVID-19, which meant more material was being delivered in FY2025 that the Company had not expected to arrive until FY 2026 or later. Also, old purchase orders from 2022 were still being delivered in FY 2025. Purchase orders that arrived in FY 2025 with an expected delivery date of a different FY increased the spending on the transformer blanket by \$2 million.

**Root Cause 3:**

As the Company officially integrated into parent company PPL, accounting philosophies were adjusted to align with PPL practices. While doing a review of stores clearing, the Company's accounting team identified that the stores clearing rate of 16 percent that was being used from April through November was too low. An adjustment was made to increase the stores clearing rate to 30 percent, which led to an increase of \$1.6 million in spending on the transformer blanket.

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**Root Cause 4:**

Under the Transition Service Agreement, National Grid USA Service Company, Inc. ("National Grid") was required to provide the Company with a fair share of material to not disrupt normal operations. The conditions of this agreement were that whatever percentage of material used by the Company over the past 10 years, National Grid had to honor. For example, if 100 units of a specific material were used, 70 units by the Company and 30 units by National Grid affiliated entities (other than the Company), then National Grid had to provide the Company with 70 percent of the inventory they had on hand and on order. The fact the this formula covered so many historical years could have caused some excess inventory to be purchased by the Company.

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Division 1-15  
**(Distribution) Transformers and Related Equipment**

Request:

Are all equipment purchases in the Transformers and Related Equipment category treated the same in terms of incurring spend under the ISR Plan versus placed in service?

Response:

Yes.

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Division 1-16  
**(Distribution) Transformers and Related Equipment**

Request:

In executable format, please complete the following table for each type of equipment purchase in the Non-Discretionary Transformers and Related Equipment category. Provide data for FY 2023, FY 2024, FY 2025, and FY 2026 proposed:

**ISR Plan Non-Discretionary: Transformer & Equipment Category**

Equipment Type	FY 2022 Starting Inventory	FY23 Purchased		FY23 Received		FY23 Inventory Reduction	FY23 Ending Inventory
		# Units	Cost	# Units	Cost	#	#
Overhead Transf.							
Underground Transf.							
Voltage Regulators							
Capacitors							
Etc.							

Response:

Please refer to the Excel version of Attachment Division 1-16 for data. Below is commentary around the file as well as a description of each column for reference and understanding.

All data for FY 2022, FY 2023, and the quantities received for FY 2024 were provided by National Grid. FY 2025 data was pulled directly from the Company's system. FY 2024 and FY 2025 ending year data include materials that were transferred from National Grid to Rhode Island Energy in those respective fiscal years. No costs are associated with these transfers because there is not a clear way to differentiate in which fiscal year the material was received.

Below is a description of each column in each of the three tabs.

**For FY 2023 tab:**

Column (a) – Equipment Type – The category of the equipment that is on the transformer blanket.



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Division 1-16, page 2

Column (b) – FY 2022 Starting Inventory – Inventory that was held by National Grid in their Sutton, MA yard that was specifically designated for Rhode Island Energy.

Column (c) – FY23 Purchased # – The number of units that National Grid purchased for Rhode Island Energy.

Column (d) – FY23 Purchased Cost – The cost of the total number of units purchased by National Grid for Rhode Island Energy.

Column (e) – FY23 Received # – The number of units systematically received by National Grid for Rhode Island Energy.

Column (f) – FY23 Received Cost – The cost of the number of units systematically received by National Grid for Rhode Island Energy.

**For FY 2024 tab:**

Column (a) – Equipment Type – The category of the equipment that is on the transformer blanket.

Column (b) – FY24 Purchased # – The number of units that National Grid purchased for Rhode Island Energy.

Column (c) – FY24 Purchased Cost – The cost of the total number of units purchased by National Grid for Rhode Island Energy.

Column (d) – FY24 Received # – The number of units systematically received by National Grid for Rhode Island Energy.

Column (e) – FY24 Received Cost – The cost of the number of units systematically received by National Grid for Rhode Island Energy.

Column (f) – FY24 Received # – Additional units received by National Grid for Rhode Island Energy in FY 2024. Data was provided by National Grid and it is unclear why this is broken out separately from information in Column (i) with no costs.

Column (g) – FY24 Transferred – The number of units that were transferred from National Grid to Rhode Island Energy.

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Column (h) – FY24 Inventory Reduction – The number of units installed during the fiscal year. This number was calculated by subtracting Column (i) by the sum of Column (d), Column (f), and Column (g). It is unknown what the starting balance of FY 2024 was.

Column (i) – FY 2024 Ending – This number represents what was on hand in Rhode Island Energy's inventory on 3/31/24.

**For FY 2025 tab:**

Column (a) – Equipment Type – The category of the equipment that is on the transformer blanket.

Column (b) – FY25 Starting Inventory – The number of units on hand on 4/1/24.

Column (c) – FY25 Purchased # – The number of units that National Grid purchased for Rhode Island Energy.

Column (d) – FY25 Purchased Cost – The cost of the total number of units purchased by National Grid for Rhode Island Energy.

Column (e) – FY25 Received # – The number of units systematically received by National Grid for Rhode Island Energy.

Column (f) – FY25 Received Cost – The cost of the number of units systematically received by National Grid for Rhode Island Energy.

Column (g) – FY25 Transferred – The number of units that were transferred from National Grid to Rhode Island Energy.

Column (h) – FY25 Inventory Add – The number of units that were at Service Centers that were uploaded into Rhode Island Energy's inventory.

Column (i) – FY25 Inventory Reduction – The number of units installed during the FY. This number was calculated by subtracting Column (j) by the sum of Column (b), Column (f), Column (g), and Column (h).

Column (j) – FY 2025 Ending – This number represents what was on hand in Rhode Island Energy's inventory on 3/31/25.

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Division 1-18  
**(Distribution) Transformers and Related Equipment**

Request:

When does the Company purchase distribution transformers for conversions identified in Area Studies? Is spend included under a separate project or within the non-discretionary transformer category? Are those transformers pre-capitalized and placed in service when purchased, received, or some other method?

Response:

Conversions identified in Area Studies use distribution transformers purchased in the same manner as non-conversion work. Spend is not included under a separate project and is within the non-discretionary transformer category. The transformers are pre-capitalized and placed in service when received.

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Division 1-19  
**(Distribution) Transformers and Related Equipment**

Request:

RIE previously forecasted \$12M annually for FY 2026-FY 2030 but has budgeted \$8M in FY26. Explain the basis for the FY26 forecast.

Response:

The Company established its FY 2026 budget based on a revised forecast that incorporates known outstanding transformer orders and a demand plan that incorporates estimated usage, unit pricing and inventory as of September 2024. The demand plan is updated quarterly.

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Division 1-26  
**Fiber Study**

Request:

Provide details for the \$100,000 expenditure for the Fiber Study. Is the study considered complete? What are next steps?

Response:

The Fiber Study is completed. The study identified the necessary communication routes between substations. The routes were then reviewed against current and pending projects to refine the scope. Specifically, routes to stations that will be retired in the near future were eliminated. The Company intends to conduct an economic evaluation of continuing with third party communication systems versus expansion of Company owned fiber lines.

Division 1-28  
**Other Area Study Projects-Attachment E**

Request:

Attachment E indicates that many projects have delayed engineering and/or procurement resulting in reduced spend. What is causing the engineering delays? What is the Company doing to improve engineering production? Are engineering and procurement delays expected to persist in FY 2026?

Response:

The majority of projects that have delayed engineering are a result of the Company's resequencing of projects associated with ISR Plan budget constraints. The deferral is initiated by an engineering department and is then termed an engineering delay. Because these delays do not arise from deficiency in engineering production, the Company has no plans to improve engineering production to address them. These delays are expected to persist into FY 2026 and beyond.

A few projects are related to actual engineering delays where the specific project required additional analysis. Additional analysis can be required to refine the scope documents for project handoff, further or new issue identification or economic evaluation are required through regulatory discussions or orders, an opportunity arises to gain efficiencies by combining project or programs, the project is held to reconsider a new alternative, and other reasons. The Company currently has no plans to add additional engineering resources for these limited occurrences. However, for projects such as volt-var optimization, where regulatory discussions are leading towards a more labor intensive feeder specific analysis versus the current station level analysis, additional resources may be necessary.

Procurement delays associated with longer manufacturing timelines than previous years are expected to continue into future fiscal years.

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Division 1-30  
**Accelerated Projects**

Request:

Why was the Crossman Sub D-Line project accelerated? What work was completed in FY 2025 (\$592,000)? Was plant placed in service? What is remaining work?

Response:

The FY 2025 budget for Crossman Sub D-Line was \$350,000 which included design and some construction. The actual cost was \$592,000. This is a minor change in the overall work the Company conducts on a yearly basis, and such changes occur every year and are frequent. The Company will make such changes as a result of resource availability, permitting activities of this project and other projects, equipment availability of this project and other projects, and other work progression details.

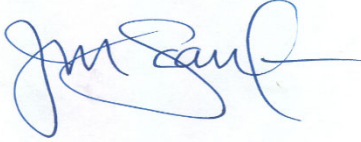
The specific work completed was conversion on Moshassuck Ind Highway.

The plant placed in service was approximately \$187,000.

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



Joanne M. Scanlon

August 28, 2025  
Date

**Docket No. 23-48-EL – RI Energy’s Electric ISR Plan FY 2025**  
**Service List as of 8/21/2025**

Name/Address	E-mail Distribution	Phone
<b>The Narragansett Electric Company</b> <b>d/b/a Rhode Island Energy</b> Andrew Marcaccio, Esq. 280 Melrose St. Providence, RI 02907  Adam S. Ramos, Esq. <b>Hinckley Allen</b> 100 Westminster Street, Suite 1500 Providence, RI 02903-2319	<a href="mailto:AMarcaccio@pplweb.com">AMarcaccio@pplweb.com</a> ;	401-784-4263
	<a href="mailto:COBrien@pplweb.com">COBrien@pplweb.com</a> ;	
	<a href="mailto:JScanlon@pplweb.com">JScanlon@pplweb.com</a> ;	
	<a href="mailto:ARamos@hinckleyallen.com">ARamos@hinckleyallen.com</a> ;	
	<a href="mailto:AGiron@hinckleyallen.com">AGiron@hinckleyallen.com</a> ;	
	<a href="mailto:SBriggs@pplweb.com">SBriggs@pplweb.com</a> ;	
	<a href="mailto:NABegnal@RIEnergy.com">NABegnal@RIEnergy.com</a> ;	
	<a href="mailto:PLaFond@RIEnergy.com">PLaFond@RIEnergy.com</a> ;	
	<a href="mailto:NKocon@RIEnergy.com">NKocon@RIEnergy.com</a> ;	
	<a href="mailto:SMToronto@RIEnergy.com">SMToronto@RIEnergy.com</a> ;	
	<a href="mailto:ATLaBarre@RIEnergy.com">ATLaBarre@RIEnergy.com</a> ;	
	<a href="mailto:RConstable@RIEnergy.com">RConstable@RIEnergy.com</a> ;	
	<a href="mailto:EJWiesner@RIEnergy.com">EJWiesner@RIEnergy.com</a> ;	
	<a href="mailto&gt;KRCastro@RIEnergy.com">KRCastro@RIEnergy.com</a> ;	
	<a href="mailto:CJRooney@RIEnergy.com">CJRooney@RIEnergy.com</a> ;	
	<a href="mailto:JOliveira@pplweb.com">JOliveira@pplweb.com</a> ;	
	<a href="mailto:TGShields@pplweb.com">TGShields@pplweb.com</a> ;	
	<a href="mailto:NHawk@pplweb.com">NHawk@pplweb.com</a> ;	
<b>Division of Public Utilities (Division)</b>	<a href="mailto:Christy.hetherington@dpuc.ri.gov">Christy.hetherington@dpuc.ri.gov</a> ;	
	<a href="mailto:Margaret.L.Hogan@dpuc.ri.gov">Margaret.L.Hogan@dpuc.ri.gov</a> ;	
	<a href="mailto:Kyle.J.Lynch@dpuc.ri.gov">Kyle.J.Lynch@dpuc.ri.gov</a> ;	
	<a href="mailto:gregory.schultz@dpuc.ri.gov">gregory.schultz@dpuc.ri.gov</a> ;	



	<a href="mailto:Mark.A.Simpkins@dpuc.ri.gov">Mark.A.Simpkins@dpuc.ri.gov</a> ;	
	<a href="mailto:Leo.Wold@dpuc.ri.gov">Leo.Wold@dpuc.ri.gov</a> ;	
	<a href="mailto:john.r.harrington@dpuc.ri.gov">john.r.harrington@dpuc.ri.gov</a> ;	
	<a href="mailto:nicole.m.corbin@dpuc.ri.gov">nicole.m.corbin@dpuc.ri.gov</a> ;	
	<a href="mailto:Ellen.golde@dpuc.ri.gov">Ellen.golde@dpuc.ri.gov</a> ;	
	<a href="mailto:John.bell@dpuc.ri.gov">John.bell@dpuc.ri.gov</a> ;	
	<a href="mailto:Al.contente@dpuc.ri.gov">Al.contente@dpuc.ri.gov</a> ;	
	<a href="mailto:Robert.Bailey@dpuc.ri.gov">Robert.Bailey@dpuc.ri.gov</a> ;	
David Effron Berkshire Consulting 12 Pond Path North Hampton, NH 03862-2243	<a href="mailto:Djeffron@aol.com">Djeffron@aol.com</a> ;	603-964-6526
Gregory L. Booth, PLLC 14460 Falls of Neuse Rd. Suite 149-110 Raleigh, N. C. 27614	<a href="mailto:gboothpe@gmail.com">gboothpe@gmail.com</a> ;	919-441-6440
Linda Kushner L. Kushner Consulting, LLC 514 Daniels St. #254 Raleigh, NC 27605	<a href="mailto:Lkushner33@gmail.com">Lkushner33@gmail.com</a> ;	919-810-1616
<b>Office of Energy Resources</b> Adam fague, Esq.	<a href="mailto:adam.fague@doa.ri.gov">adam.fague@doa.ri.gov</a> ;	
	<a href="mailto:nancy.russolino@doa.ri.gov">nancy.russolino@doa.ri.gov</a> ;	
	<a href="mailto:Christopher.Kearns@energy.ri.gov">Christopher.Kearns@energy.ri.gov</a> ;	
	<a href="mailto:Shauna.Beland@energy.ri.gov">Shauna.Beland@energy.ri.gov</a> ;	
	<a href="mailto:William.Owen@energy.ri.gov">William.Owen@energy.ri.gov</a> ;	
<b>Office of Attorney General</b> Nick Vaz, Esq. 150 South Main St. Providence, RI 02903	<a href="mailto:nvaz@riag.ri.gov">nvaz@riag.ri.gov</a> ;	401-274-4400 x 2297
	<a href="mailto:mbedell@riag.ri.gov">mbedell@riag.ri.gov</a> ;	
<b>Conservation Law Foundation (CLF)</b> James Rhodes, Esq. Conservation Law Foundation 235 Promenade Street Suite 560, Mailbox 28 Providence, RI 02908	<a href="mailto:jrhodes@clf.org">jrhodes@clf.org</a> ;	401-225-3441
<b>File an original &amp; 9 copies w/ PUC:</b> Stephanie De La Rosa, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:stephanie.delarosa@puc.ri.gov">stephanie.delarosa@puc.ri.gov</a> ;	401-780-2107
	<a href="mailto:Cynthia.WilsonFrias@puc.ri.gov">Cynthia.WilsonFrias@puc.ri.gov</a> ;	
	<a href="mailto:Todd.bianco@puc.ri.gov">Todd.bianco@puc.ri.gov</a> ;	
	<a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov</a> ;	
	<a href="mailto:Kristen.L.Masse@puc.ri.gov">Kristen.L.Masse@puc.ri.gov</a> ;	
Matt Sullivan, Green Development LLC	<a href="mailto:ms@green-ri.com">ms@green-ri.com</a> ;	

Emily Koo, Director, Acadia Center	<a href="mailto:EKoo@acadiacenter.org">EKoo@acadiacenter.org</a> ;	
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