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September 22, 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 2**

Dear Ms. De La Rosa:

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

In accordance with 810-RICR-00-00-1.3(H) and R.I. Gen. Laws § 38-2-2-(4)(B), the Company is seeking confidential treatment of portions of Attachment Division 2-1, which are considered confidential. The confidential version will be sent via a secured link and is subject to the universal Non-Disclosure Agreement between the Company and the Division.

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

**STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

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In Re: FY 2025 Electric Infrastructure, Safety, and Reliability	)	Docket No. 23-48-EL
Plan Reconciliation	)	
	)	
	)	

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**NARRAGANSETT ELECTRIC COMPANY d/b/a RHODE ISLAND ENERGY**  
**MOTION FOR PROTECTIVE TREATMENT OF**  
**CONFIDENTIAL INFORMATION**

The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”) hereby respectfully requests that the Public Utilities Commission (“PUC”) grant protection from public disclosure certain confidential information submitted by the Company in the above referenced docket. The reasons for the protective treatment are set forth herein. The Company also requests that, pending entry of that finding, the PUC preliminarily grant the Company’s request for confidential treatment pursuant to 810-RICR-00-00-1.3(H)(2)<sup>1</sup>.

The record that is the subject of this Motion that requires protective treatment from public disclosure is the confidential version of Attachment Division 2-1 (referred to herein as the “Confidential Attachment”) that was filed by the Company on September 22, 2025 as part of the Company’s responses to the second set of data requests issued by the Division of Public Utilities and Carriers (“Division”) in the above-referenced docket. The Company requests protective treatment of the Confidential Attachment in accordance with 810-RICR-00-00-1.3(H) and R.I. Gen. Laws § 38-2-2-(4)(B).

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<sup>1</sup> The PUC’s Rules of Practice and Procedure are codified as 810-RICR-00-00-1.

## **I. LEGAL STANDARD**

For matters before the PUC, a claim for protective treatment of information is governed by the policy underlying the Access to Public Records Act (“APRA”), R.I. Gen. Laws § 38-2-1 et seq. See 810-RICR-00-00-1.3(H)(1). Under APRA, any record received or maintained by a state or local governmental agency in connection with the transaction of official business is considered public unless such record falls into one of the exemptions specifically identified by APRA. See R.I. Gen. Laws §§ 38-2-3(a) and 38-2-2(4). Therefore, if a record provided to the PUC falls within one of the designated APRA exemptions, the PUC is authorized to deem such record confidential and withhold it from public disclosure.

## **II. BASIS FOR CONFIDENTIALITY**

The Confidential Attachment that is the subject of this Motion is exempt from public disclosure pursuant to R.I. Gen. Laws § 38-2-2(4)(B) as “[t]rade secrets and commercial or financial information obtained from a person, firm, or corporation that is of a privileged or confidential nature.” The Rhode Island Supreme Court has held that this confidential information exemption applies where the disclosure of information is likely either (1) to impair the government’s ability to obtain necessary information in the future; or (2) to cause substantial harm to the competitive position of the person from whom the information was obtained. *Providence Journal v. Convention Center Authority*, 774 A.2d 40 (R.I. 2001). The first prong of the test is satisfied when information is provided to the governmental agency and that information is of a kind that would customarily not be released to the public by the person from whom it was obtained. *Providence Journal*, 774 A.2d at 47.

The information in the Confidential Attachment for which the Company seeks protective treatment is confidential pricing information specifically negotiated by the Company and its parent

corporation, PPL Corporation (“PPL”) and third-party suppliers. One reason it is important for the Company and PPL to keep this information confidential is because doing so maintains the Company and PPL’s competitive advantage by preventing others from replicating their sourcing strategy and avoiding the risk of price collusion. That competitive advantage benefits the Company’s customers because it allows the Company to negotiate lower prices, which ultimately leads to lower rates.

Additionally, maintaining the confidentiality of this information is important for the Company and PPL to maintain positive supplier relationships. The Company and PPL are able to obtain preferential pricing and prioritized deliveries on the strength of these positive relationships. If PPL was to publicly reveal the pricing it receives, which would be contrary to Company and PPL procurement practices, other purchasers may request the same terms thus reducing the competitiveness of PPL, or the supplier may refuse to honor favorable terms with PPL on future deliveries.

Accordingly, the Company would not customarily release the sensitive pricing information contained in the Confidential Attachment to the public. The submission of the Confidential Attachment to the PUC and the Division, however, is needed to respond to the Division’s data requests in the above-referenced docket. Accordingly, the Company is providing the Confidential Attachment to fulfil its regulatory responsibilities.

In sum, the release of the Confidential Attachment is likely to cause substantial harm to the competitive position of the Company. The Confidential Attachment contains commercially sensitive market information including prices and quantities of transformers. The disclosure of which could negatively impact the Company’s ability to procure the best price for customers in the future.

### III. CONCLUSION

For the foregoing reasons, the Company respectfully requests that the PUC grant this motion for protective treatment of the Confidential Attachment.

Respectfully submitted,

**The Narragansett Electric Company  
d/b/a Rhode Island Energy**

By its attorney,



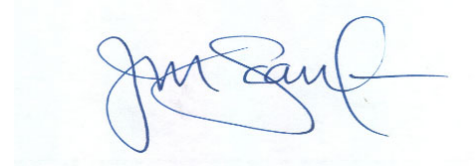
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Andrew S. Marcaccio (#8168)  
Rhode Island Energy  
280 Melrose Street  
Providence, RI 02907  
(401) 784-4263

Dated: September 22, 2025

**CERTIFICATE OF SERVICE**

I hereby certify that on September 22, 2025, I delivered a true copy of the foregoing Motion via electronic mail to the parties on the Service List for Docket No. 23-48-EL.



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Joanne M. Scanlon

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 23-48-EL  
In Re: FY 2025 Electric Infrastructure, Safety and Reliability Plan  
Reconciliation Filing  
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Issued on September 10, 2025

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Division 2-1  
**(Distribution) Transformers and Related Equipment**

Request:

The Company states for Root Cause 2 (DIV 1-12) that “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.” What equipment types are included in the transformer blanket? What was the budgeted amount and actual amount for each equipment type? Is the increased level of equipment arriving in FY 2025 reflected in the \$9,521,218.87 cost for units received in FY 2025 (reference Attachment DIV 1-16, FY 2025 tab, Total in column (f))? If not, explain.

Response:

The types of equipment that are included in the transformer blanket are distribution transformers, capacitor banks, network protectors, and voltage regulators. The Company does not break out each sub-category when it proposes the category budget within the electric Infrastructure, Safety, and Reliability plan; it is one total that contains the planned spend in all the categories. The additional \$2 million that arrived in FY 2025 is included in the \$9,521,218.87.

Please refer to Attachment Division 2-1 which shows a list of all material received under the transformer blanket in FY 2025 that was expected to be delivered either before FY 2025 or after FY 2025.

Attachment DIV 2-1 - REDACTED

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
	Purchase Order Number	Purchase Order Release Date	Expected Delivery Date	Purchase Order Receipt	Item	Item Description	Received Quantity	Extended Cost
1	40000000957	12/27/2023	3/21/2024	4/8/2024 13:19	9300565	XFMR, 1PH 25KVA 120/240V		
2	40000002660	5/1/2023	8/14/2023	7/8/2024 11:22	9300863	XFMR, 3PH 75KVA 120V		
3	40000002698	6/5/2023	9/18/2023	7/8/2024 11:24	9301017	XFMR, 3PH 150KVA 277V		
4	40000001865	3/11/2024	3/23/2024	7/23/2024 6:34	9301015	XFMR, 3PH 500KVA 277V		
5	40000002695	5/8/2023	8/16/2023	7/25/2024 8:15	9300565	XFMR, 1PH 25KVA 120/240V		
6	40000000668	11/3/2023	3/1/2024	7/26/2024 15:18	9300325	CAPACITOR, SGL PH 100KVAR 2400V 2BSHG		
7	40000000668	11/3/2023	3/1/2024	7/26/2024 15:18	9301060	CAPACITOR, LINE 300KVAR 7.2KVAC 95KV		
8	40000000668	11/3/2023	3/1/2024	7/26/2024 15:18	9301248	CAPACITOR, LINE 300KVAR 19.92KVAC 60HZ		
9	40000002677	10/31/2022	4/17/2025	8/22/2024 7:46	9300683	XFMR, 1PH 25KVA 240/480V		
10	40000002660	5/1/2023	8/14/2023	8/22/2024 7:49	9301017	XFMR, 3PH 150KVA 277V		
11	40000002647	12/13/2022	3/28/2023	8/22/2024 7:51	9300370	XFMR, SS 1PH 25KVA 120/240V		
12	40000002681	12/8/2022	11/20/2023	9/10/2024 16:24	9301230	XFMR, 3PH 1000KVA 11.5KV 277/480V		
13	40000002678	10/31/2022	10/31/2023	9/11/2024 14:40	9300784	XFMR, 1PH 100KVA 277V		
14	40000002695	5/8/2023	8/16/2023	9/11/2024 16:14	9300565	XFMR, 1PH 25KVA 120/240V		
15	40000002649	12/22/2022	4/14/2025	9/16/2024 16:18	9300583	XFMR, PADMOUNT 1PH 25KVA 240/120V		
16	40000002677	10/31/2022	4/17/2025	9/16/2024 16:18	9300683	XFMR, 1PH 25KVA 240/480V		
17	40000002682	12/15/2022	7/1/2023	9/23/2024 10:23	9300570	XFMR, 3PH 150KVA 277V		
18	40000002696	5/11/2023	3/20/2024	9/25/2024 11:02	9300975	XFMR, 3PH 2500KVA 277V		
19	40000002649	12/22/2022	4/14/2025	9/27/2024 12:05	9300583	XFMR, PADMOUNT 1PH 25KVA 240/120V		
20	40000002698	6/5/2023	9/18/2023	10/2/2024 7:31	9301213	XFMR, 3PH 300KVA 120V		
21	40000003800	8/2/2024	1/17/2026	10/7/2024 15:36	9300539	XFMR, 1PH 50KVA 120/240V		
22	40000002642	9/1/2022	12/15/2022	10/9/2024 12:27	9301072	XFMR, PADMOUNT 1PH 100KVA 240/120V		
23	40000002675	9/27/2022	7/1/2023	10/9/2024 12:29	9300914	XFMR, PADMOUNT 3PH 500KVA 277/480V SS		
24	40000002678	10/31/2022	10/31/2023	10/11/2024 7:24	9300784	XFMR, 1PH 100KVA 277V		
25	40000002644	9/26/2022	1/9/2023	10/14/2024 10:55	9300463	XFMR, 1PH 25KVA 277V		
26	40000003231	6/12/2024	11/27/2025	10/15/2024 15:35	9300518	XFMR, 1PH 50KVA 277V		
27	40000003231	6/12/2024	11/27/2025	10/15/2024 15:35	9300531	XFMR, 1PH 100KVA 120/240V		
28	40000003231	6/12/2024	11/27/2025	10/15/2024 15:35	9300555	XFMR, 1PH 50KVA 120/240V		

Attachment DIV 2-1 - REDACTED

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
	Purchase Order Number	Purchase Order Release Date	Expected Delivery Date	Purchase Order Receipt	Item	Item Description	Received Quantity	Extended Cost
29	40000003231	6/12/2024	11/27/2025	10/15/2024 15:35	9300565	XFMR, 1PH 25KVA 120/240V		
30	40000003231	6/12/2024	11/27/2025	10/15/2024 15:35	9300601	XFMR, 1PH 25KVA 120/240V		
31	40000003231	6/12/2024	11/27/2025	10/15/2024 15:35	9300610	XFMR, 3PH 150KVA 120V		
32	40000003231	6/12/2024	11/27/2025	10/15/2024 15:35	9301023	XFMR, 3PH 300KVA 120V		
33	40000003231	6/12/2024	11/27/2025	10/15/2024 15:35	9301190	XFMR, PADMOUNT 3PH 750KVA 277V		
34	40000001950	3/18/2024	9/5/2025	10/18/2024 16:13	9301044	XFMR, PADMOUNT 1PH 50KVA 240/120V		
35	40000003231	6/12/2024	11/27/2025	10/23/2024 12:38	9300210	XFMR, SUBWAY 1PH 167KVA		
36	40000003446	6/28/2024	4/1/2026	10/24/2024 15:48	9300367	XFMR, SS 1PH 25KVA 120/240V		
37	40000001949	3/18/2024	9/5/2025	10/28/2024 11:08	9301044	XFMR, PADMOUNT 1PH 50KVA 240/120V		
38	40000002702	10/3/2023	4/21/2025	10/31/2024 14:43	9300610	XFMR, 3PH 150KVA 120V		
39	40000002676	10/31/2022	4/17/2025	11/4/2024 12:34	9300683	XFMR, 1PH 25KVA 240/480V		
40	40000002677	10/31/2022	4/17/2025	11/4/2024 14:38	9300683	XFMR, 1PH 25KVA 240/480V		
41	40000001952	3/18/2024	9/5/2025	11/6/2024 11:18	9301044	XFMR, PADMOUNT 1PH 50KVA 240/120V		
42	40000008416	11/7/2024	11/7/2025	11/12/2024 15:15	9300065	XFMR, SUBWAY 1PH 100KVA		
43	40000008416	11/7/2024	11/7/2025	11/12/2024 15:15	9301044	XFMR, PADMOUNT 1PH 50KVA 240/120V		
44	40000008416	11/7/2024	11/7/2025	11/12/2024 15:15	9301212	XFMR, PADMOUNT TAP 500KVA 120V		
45	40000008416	11/7/2024	11/7/2025	11/12/2024 15:15	9301023	XFMR, 3PH 300KVA 120V		
46	40000002686	2/21/2023	2/10/2024	11/20/2024 11:45	9300883	XFMR, 3PH 500KVA 120V		
47	40000003727	7/26/2024	7/26/2025	11/20/2024 15:21	9300604	XFMR, 1PH 50KVA 277V		
48	40000002702	10/3/2023	4/21/2025	11/26/2024 7:31	9300610	XFMR, 3PH 150KVA 120V		
49	40000003446	6/28/2024	4/1/2026	11/26/2024 7:33	9300367	XFMR, SS 1PH 25KVA 120/240V		
50	40000002702	10/3/2023	4/21/2025	12/6/2024 10:58	9300610	XFMR, 3PH 150KVA 120V		
51	40000003727	7/26/2024	7/26/2025	12/10/2024 6:50	9300610	XFMR, 3PH 150KVA 120V		
52	40000002702	10/3/2023	4/21/2025	12/10/2024 16:00	9300610	XFMR, 3PH 150KVA 120V		
53	40000003727	7/26/2024	7/26/2025	12/18/2024 16:01	9300478	XFMR, 1PH 167KVA		
54	40000002669	6/23/2022	4/1/2026	12/20/2024 8:01	9300368	XFMR, SS 1PH 50KVA 120/240V		
55	40000002705	1/31/2024	4/21/2025	12/30/2024 15:48	9301209	XFMR, 3PH 300KVA 13.8KV 277/480V		

Attachment DIV 2-1 - REDACTED

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
	Purchase Order Number	Purchase Order Release Date	Expected Delivery Date	Purchase Order Receipt	Item	Item Description	Received Quantity	Extended Cost
56	40000003446	6/28/2024	4/1/2026	1/7/2025 9:56	9300367	XFMR, SS 1PH 25KVA 120/240V		
57	40000002646	11/18/2022	4/14/2025	1/17/2025 7:45	9300279	XFMR, PADMOUNT 1PH 75KVA		
58	40000002660	5/1/2023	8/14/2023	1/17/2025 7:51	9301203	XFMR, 3PH 150KVA 13.8KV 120/208V		
59	40000002647	12/13/2022	3/28/2023	1/23/2025 7:19	9300370	XFMR, SS 1PH 25KVA 120/240V		
60	40000002647	12/13/2022	3/28/2023	1/23/2025 7:19	9300370	XFMR, SS 1PH 25KVA 120/240V		
61	40000001952	3/18/2024	9/5/2025	1/23/2025 10:38	9301044	XFMR, PADMOUNT 1PH 50KVA 240/120V		
62	40000002766	11/8/2023	4/28/2025	1/23/2025 11:26	9301017	XFMR, 3PH 150KVA 277V		
63	40000002667	5/6/2022	4/14/2025	1/28/2025 7:30	9300584	XFMR, PADMOUNT 1PH 25KVA 240/120V		
64	40000002667	5/6/2022	4/14/2025	2/11/2025 12:57	9300584	XFMR, PADMOUNT 1PH 25KVA 240/120V		
65	40000002668	5/17/2022	4/14/2025	2/11/2025 14:04	9300584	XFMR, PADMOUNT 1PH 25KVA 240/120V		
66	40000002766	11/8/2023	4/28/2025	2/11/2025 14:46	9301017	XFMR, 3PH 150KVA 277V		
67	40000002768	11/27/2023	4/28/2025	2/11/2025 14:46	9300883	XFMR, 3PH 500KVA 120V		
68	40000001952	3/18/2024	9/5/2025	2/13/2025 7:44	9301044	XFMR, PADMOUNT 1PH 50KVA 240/120V		
69	40000002738	10/4/2023	4/28/2025	2/14/2025 10:42	9300863	XFMR, 3PH 75KVA 120V		
70	40000002635	6/23/2022	4/14/2025	2/14/2025 12:39	9300584	XFMR, PADMOUNT 1PH 25KVA 240/120V		
71	40000002738	10/4/2023	4/28/2025	2/17/2025 8:13	9300863	XFMR, 3PH 75KVA 120V		
72	40000002738	10/4/2023	4/28/2025	2/19/2025 14:08	9300863	XFMR, 3PH 75KVA 120V		
73	40000002738	10/4/2023	4/28/2025	2/21/2025 6:06	9300863	XFMR, 3PH 75KVA 120V		
74	40000002693	3/31/2023	4/21/2025	2/24/2025 8:03	9300914	XFMR, PADMOUNT 3PH 500KVA 277/480V SS		
75	40000002738	10/4/2023	4/28/2025	3/11/2025 6:49	9300863	XFMR, 3PH 75KVA 120V		
76	40000009161	12/3/2024	4/30/2025	3/12/2025 11:24	9300583	XFMR, PADMOUNT 1PH 25KVA 240/120V		
77	40000009161	12/3/2024	4/30/2025	3/12/2025 11:24	9300586	XFMR, PADMOUNT 1PH 25KVA 240/120V		
78	40000001952	3/18/2024	9/5/2025	3/19/2025 8:11	9301044	XFMR, PADMOUNT 1PH 50KVA 240/120V		
79	40000002645	11/15/2022	4/21/2025	3/19/2025 8:14	9301203	XFMR, 3PH 150KVA 13.8KV 120/208V		
80	40000002693	3/31/2023	4/21/2025	3/19/2025 8:15	9300914	XFMR, PADMOUNT 3PH 500KVA 277/480V SS		
81	40000009161	12/3/2024	4/30/2025	3/20/2025 9:07	9300309	XFMR, PADMOUNT SS TANK 1PH 25KVA		
82	40000009161	12/3/2024	4/30/2025	3/20/2025 9:07	9300382	XFMR, PADMOUNT SSTANK 1PH 25KVA 120/240V		
83								
84						<b>PO Receipts FY 2025</b>		<b>\$1,651,973</b>
85						<b>Stores Handling</b>		<b>30%</b>
86						<b>Total Cost to Transformer Blanket</b>		<b>\$2,147,565.42</b>

Division 2-2  
**(Distribution) Transformers and Related Equipment**

Request:

Regarding Root Cause 3 (DIV 1-12), please explain in more detail how an increase in the stores clearing rate for eight months increased ISR Plan spend in FY 2025. If the clearing rate increase caused more units to be purchased and received in FY 2025, wouldn't that be reflected in the \$9,521,218.87 cost for units received in FY 2025 (reference Attachment DIV 1-16, FY 2025 tab, Total in column (f))? If not, explain.

Response:

The stores handling rate, also known as stores clearing rate, relates to FERC account 163. This account includes internal and external costs associated with housing and managing inventory. It also includes costs for materials not charged directly to capital projects. All costs in the 163 account are cleared by applying an overhead rate (stores handling) to materials that are charged/issued to projects.

Stores handling charges do not have an impact on the quantity of units purchased.

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
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Issued on September 10, 2025

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Division 2-3  
**(Distribution) Transformers and Related Equipment**

Request:

Regarding Root Cause 4 (DIV 1-12); why would supplying a percentage of material based on 10 years of historical data cause excess inventory to be purchased by the Company? What is the basis for this conclusion? Isn't RIE utilizing more equipment under the Transformer and Related equipment category now than in the past? Is it just as likely that the formula could result in lower inventory than historically provided? Are the increases in inventory reflected in the \$9,521,218.87 cost for units received in FY 2025 (reference Attachment DIV 1-16, FY 2025 tab, Total in column (f))? If not, explain.

Response:

When the Company was under National Grid USA ("National Grid") ownership, inventory was shared between National Grid's Massachusetts affiliate and the Company. If the Massachusetts affiliate had a spike or critical job, National Grid would shift the inventory from the Company to the Massachusetts affiliate and vice versa. Therefore, the historical usage factor of 10 years could be skewed one way or the other.

The Company is utilizing more equipment under the Transformer and Related equipment category now than in the past.

The types of equipment that are forecasted to be needed are purchased and allocated based on ratios of past usage from 2013 through 2023. As an example, a 10 KVA transformer, where, between 2013 and 2019, the Company purchased 76 units (an average of 10.86 units per year), and in 2021 and 2023, another 6 and 7 units were purchased, respectively, does reflect a downward trend in the Company's use of this style transformer. However, because of the ratio of past usage compared to National Grid's Massachusetts affiliate from 2013 through 2019, National Grid allotted more inventory of this specific transformer to the Company, which increased the inventory received for FY2025.

If the material was received in FY2025, then it is included in the \$9,521,218.87.

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d/b/a Rhode Island Energy  
RIPUC Docket No. 23-48-EL  
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Division 2-4  
**(Distribution) Transformers and Related Equipment**

Request:

Regarding units purchased by National Grid and received by RIE in FY 2025:

- a. Attachment DIV 1-16 indicates that 2,162 units were received in FY 2025 at a cost of \$9,521,218.87. The response to PUC 1-3 indicates that 2,162 units were received in FY 2025 at a cost of \$12,377,585. Please reconcile the differences and provide the correct number of units received and/or correct cost with all supporting documentation.
- b. Were any of the materials received, including those with purchase orders prior to the acquisition closing, supposed to be part of the acquisition or transition costs which would not be charged to RIE customers?

Response:

- a. The number of units is accurate at 2,162. The difference between the costs is that Attachment Division 1-16 reflects only the pure material cost, excluding stores handling.

The response to PUC 1-3 includes the stores handling charge of 30% in addition to the material cost ( $\$9,521,218.87 \times 1.3 = \$12,377,584.53$ ) because the stores handling cost is part of what the Company includes as spending in the electric Infrastructure, Safety, and Reliability plan filings. The Company has prepared Attachment Division 2-4, which is a revised version of the spreadsheet submitted as Attachment Division 1-16 to include the stores handling on tab FY2025.

- b. No, none the materials received were supposed to be part of the acquisition or transition costs.

Attachment DIV 2-4, Tab FY2023

	(a)	(b)	(c)	(d)	(e)	(f)
	Equipment Type	FY 2022 Starting Inventory*	FY23 Purchased		FY23 Received	FY23 Received
			#	Cost	#	Cost
1	Overhead Tx	1,231	1158	\$ 3,151,206.19	1,458	\$2,071,056.29
2	Underground Tx	330	330	\$ 5,743,810.15	178	\$1,734,709.85
3	Voltage Regulators	22	25	\$ 494,135.00	30	\$536,866.00
4	Capacitors	113	58	\$ 533,267.00	14	\$80,763.00
5	Network Protectors					
6	Tx Downpayments		4	\$ 201,135.00		
Total		1,696	1,575	\$10,123,553.34	1,680	\$4,423,395.14

Attachment DIV 2-4, Tab FY2024

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
	Equipment Type	FY24 Purchased		FY24 Received	FY24 Received	FY24 Received	FY24 Transferred	FY24 Inventory Reduction	FY24 Ending
		#	Cost	#	Cost	#	#	#	#
1	Overhead Tx	1,976	\$ 6,036,540	1,613	\$4,042,549	900	1,397	-2,623	1,287
2	Underground Tx	434	\$ 6,839,573	282	\$4,538,010	190	219	-515	176
3	Voltage Regulators	18	\$ 405,975	20	\$418,789	9	64	-40	53
4	Capacitors	7	\$ 88,587	55	\$563,870	35	135	-122	103
5	Network Protectors						16	-1	15
6	Tx Downpayments	9	\$ 2,457,427						
Total		2,444	\$ 15,828,102	1,970	\$9,563,218	1,134	1,831	-3,301	1,634

Attachment DIV 2-4, Tab FY2025

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)
	Equipment Type	FY25 Starting Inventory	FY25 Purchased		FY25 Received	FY25 Received	FY25 Transferred	FY25 Inventory Add	FY25 Inventory Reduction	FY25 Ending Inventory
		#	#	Cost	#	Cost	#	#	#	#
1	Overhead Tx	1,287	730	\$1,916,809	1,588	\$4,070,552	708	599	-1,424	2,758
2	Underground Tx	176	460	\$4,733,544	525	\$4,739,265	167	142	-322	688
3	Voltage Regulators	53	1	\$23,216			8		0	61
4	Capacitors	103	18	\$189,164	43	\$419,643	32	27	-49	156
5	Network Protectors	15	15	\$736,462	6	\$291,759			-2	19
6	Stores Handling					30%				
<b>Total</b>		1,634	1,224	\$7,599,194	2,162	\$12,377,585	915	768	-1,797	3,682

Division 2-5<sup>1</sup>  
**(Distribution) Transformers and Related Equipment**

Request:

Regarding units transferred by National Grid to RIE, the Company's states that "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." (DIV 1-16 and also PUC 1-3). The Company characterizes FY 2024 transfers as "additional units received by National Grid for Rhode Island Energy " and FY 2025 transfers as "units that were transferred from National Grid to Rhode Island." (DIV 1-16)

- a. Provide a detailed explanation of the transfer of material. Which entity issued purchase orders for the material and when? Were the materials already received by National Grid in Massachusetts but designated for RIE, or some other arrangement? Were any of the materials received supposed to be part of the acquisition or transition costs which would not be charged to RIE customers? Did National Grid physically transfer material to Rhode Island? When did RIE receive the materials in its Service Centers? If the material was not physically transferred, what actually occurred when National Grid transferred material?
- b. How and when were the material costs recovered? Were costs recovered differently for additional units received by National Grid for Rhode Island as opposed to units that were transferred from National Grid to Rhode Island? Explain.
- c. How has RIE validated the transfers against purchase orders?
- d. Was the transferred material included in the Service Center inventory tracking that took place after the Company transitioned to PPL Corporation in August 2024?
- e. Are any of the material costs associated with the transfers included in RIE's FY 2025 ISR spend? If so, provide the total costs and underlying details used to determine those costs.
- f. Are any of the material costs associated with the FY 2024 transfers included in RIE's FY 2024 ISR spend? If so, provide the total costs and underlying details used to determine those costs.

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<sup>1</sup> The Company's response begins on page 2.

Division 2-5, page 2

- g. Elaborate on how there are no costs associated with material transfers if the materials were procured and received. If the Company's statement implies that costs were incurred but cannot be identified, explain how RIE validated that it received the underlying materials, has been appropriately charged for the materials, when and how the material costs were recovered, and that the Company is not double counting any of the material.

Response:

- a. All of the material that was transferred from National Grid to Rhode Island Energy was purchased by National Grid. In the Transition Services Agreements between the companies, it states that National Grid is responsible for continuing to purchase material on Rhode Island Energy's behalf through the full transition, which was completed in August 2024. Some of the materials that were transferred already were received by National Grid prior to FY 2025, and, at the time the material was received, it was allocated to Rhode Island Energy inventory.

There were reports built by National Grid that gave Rhode Island Energy visibility into how much of each specific part was going to be transferred. Rhode Island Energy's Supply Chain group broke the materials into different categories, i.e., transformers, splices, gas pipe, safety, etc. and worked with National Grid to create a plan to move the material. The transfers physically started in November 2023 with National Grid shipping two trucks a day Monday through Friday to Rhode Island Energy's third-party distributor, Power Line Supply. Power Line Supply also would send a truck to National Grid's warehouse in Sutton, Massachusetts every day to pick up material. This material did not go directly to the Service Centers. This continued until the end of July 2024.

During this transfer of material, until a category was exited, National Grid continued to send trucks to the Service Centers to fulfill replenishment orders and job specific orders. Once the category was exited, the Rhode Island Energy lines of business would then place orders through Power Line Supply to deplete the material transferred from National Grid.

This purchase of this material was not a transition cost resulting from the Acquisition. These purchases were part of business as usual and would have occurred regardless of whether the Acquisition occurred.

Division 2-5, page 3

- b. There was nothing done differently between how costs were recovered under National Grid versus when Rhode Island Energy took over purchasing. When the units were received at National Grid, the transformers were capitalized and booked to the transformer blanket.
- c. There is no correlation between the purchase orders and the transfers. When National Grid received material on the purchase orders, it was allocated to Rhode Island Energy's and National Grid's respective inventories in National Grid's ERP system based on historical usage.
- d. When the transfers arrived at Power Line Supply's warehouse, a physical count was done against the Bill of Lading and provided to PPL's Inventory Management team. PPL's Inventory Management team then uploaded those counts into the Company's ERP system. Between the time the material arrived at Power Line Supply and the official go-live in August 2024, Service Centers could request the material be sent to their yards. In August, physical counts were performed at each Service Center, and an upload was done at that time. This was not double counting because the material had been issued out of inventory at Power Line Supply when the Service Center requested the material.
- e. No, the transferred material in FY 2025 is not included in the ISR spend.
- f. No, the transferred material in FY 2024 is not included in the ISR spend.
- g. Because the material in the transformer blanket is capitalized when the material is received, National Grid transferred these materials to Rhode Island Energy at a \$0 cost. The previous response to Division 1-16 and PUC 1-3 refers to not knowing when National Grid received the material and then transferred to Rhode Island Energy. For example, a transformer could have been received on 3/25/24, FY 2024, and then transferred to Rhode Island Energy on 4/2/24, FY 2025. During the transition, National Grid sent an interface to Rhode Island Energy in order to identify the costs hitting the transformer blanket.

Please see the response to section d. of this question for the process on how material was validated that it was received.

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 23-48-EL  
In Re: FY 2025 Electric Infrastructure, Safety and Reliability Plan  
Reconciliation Filing  
Responses to the Division's Second Set of Data Requests  
Issued on September 10, 2025

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Division 2-6  
**(Distribution) Transformers and Related Equipment**

Request:

Explain why all inventory which was Narragansett Electric inventory before the acquisition did not become RIE inventory as part of the acquisition without any additional cost in excess of the total system purchase price.

Response:

All inventory owned by The Narragansett Electric Company (the "Company") at the time the Acquisition<sup>1</sup> closed on May 25, 2022, remained Company inventory after the transfer of ownership from National Grid USA ("National Grid") to PPL Rhode Island Holdings, LLC. Thereafter, the Company, now doing business as Rhode Island Energy, continued to receive support from National Grid and its affiliates, including support in planning and purchasing material for Rhode Island Energy. The Company continued to be responsible for these new costs for additional inventory purchased through National Grid and its affiliates after the Acquisition closed, but before the Company completely transitioned away from using National Grid's services for purchasing. These costs, however, are the same costs the Company would have incurred if it had remained under National Grid ownership.

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<sup>1</sup> On May 25, 2022, PPL Rhode Island Holdings, LLC, a wholly owned indirect subsidiary of PPL Corporation, acquired 100% of the outstanding shares of common stock of The Narragansett Electric Company (the "Company") from National Grid USA ("National Grid") (the "Acquisition").

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 23-48-EL  
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Issued on September 10, 2025

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Division 2-7  
**(Distribution) Transformers and Related Equipment**

Request:

Explain why the Company included an Adjusted ISR Capital Spending of \$14,944,036 in FY 2025 (DIV 1-17) but only incurred costs of \$9,521,218.87 (Attachment DIV 1-16) for units received in FY 2025. Provide all supporting documentation to support the ISR Capital Spending.

Response:

The \$9.5 million amount represents the value of invoices for transformers and related equipment received in FY 2025. The adjusted ISR Capital Spending amount of \$14.9 million also includes \$2.2 million for transformer down payments made in previous years (recorded as Prepaid Assets, not capital spending) and \$2.9 million for stores handling.

Please see the table below for a breakdown of capital spending.

	(a)	(b)
1	<b>PO Receipt Cost FY 2025</b>	\$9,521,219
2	<b>Stores Handling</b>	\$2,856,366
3	<b>Pre-Payment</b>	\$2,185,273
4	<b>Accrual</b>	\$346,401
5	<b>Misc.</b>	\$34,778
6	<b>Total</b>	\$14,944,036

Division 2-8  
**(Distribution) Transformers and Related Equipment**

Request:

Regarding the Company's response to DIV 1-17, why does the amount of Plant in Service for an ISR Plan year differ from the amount of ISR Capital Spending if Transformers and Related Equipment assets are placed into service when received?

Response:

The amount of Plant in Service for an ISR Plan year may differ from ISR Capital Spending due to timing differences. These differences arise from differences between when capital spend is recorded under the transformer purchase blanket and when accounting processes are run to place that spend into service. Such timing differences generally are resolved in the following month, when the spend is placed in service.

For FY25, the entire variance is attributable to a correcting journal entry recorded in March 2025 after the accounting closing processes that place spend into service. As a result, the journal entry amount remained classified as spend rather than being placed in service. This timing discrepancy was resolved in April 2025.

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 23-48-EL  
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Issued on September 10, 2025

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Division 2-9  
**Miscellaneous**

Request:

Explain the incorrect 3V0 charges that will be reclassified in FY26.

Response:

During FY 2025, contractor costs totaling \$28,000 were mischarged to this project. The amount was reclassified from this project to the correct ISR project in April 2025.

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 23-48-EL  
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Issued on September 10, 2025

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Division 2-10  
**Miscellaneous**

Request:

When will the final closeout report that includes “lessons learned” for Nasonville Substation be completed? If complete, please provide a copy.

Response:

The Nasonville Substation project will be completed in 2026. After project completion the lessons learned for the project will be developed.

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 23-48-EL  
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Responses to the Division's Second Set of Data Requests  
Issued on September 10, 2025

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Division 2-11  
**Miscellaneous**

Request:

Provide an explanation for the separately tracked Nasonville Substation expansion variance (\$3.57 million budget versus \$5.68 million actual).

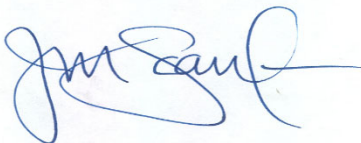
Response:

The reason for the spending variance for the Nasonville Substation Expansion project (CRI3027) in FY2025 was due to materials that were forecasted to be delivered in FY2026, but were delivered in FY2025, thus the charges were incurred in FY2025 instead of FY2026.

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

September 22, 2025  
Date

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

<b>Name/Address</b>	<b>E-mail Distribution</b>	<b>Phone</b>
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