

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

IN RE: NOTICE OF DESIGNATION TO THE PUBLIC	:	
UTILITIES COMMISSION TO RENDER AN ADVISORY	:	
OPINION TO EFSB REGARDING THE NARRAGANSETT	:	DOCKET NO. 25-41-EL
ELECTRIC COMPANY’S APPLICATION FOR THE	:	
WOONSOCKET SUBSTATION – NASONVILLE	:	
SUBSTATION REBUILD AND ALTERATION PROJECT	:	
FOR NORTH SMITHFIELD AND BURRILLVILLE,	:	
RHODE ISLAND	:	

**DIVISION’S OBJECTION TO THE NARRAGANSETT
ELECTRIC COMPANY’S MOTION FOR RECONSIDERATION AND RELIEF FROM
ADVISORY OPINION**

I. Introduction

Now comes the Rhode Island Division of Public Utilities and Carriers (“Division”) and hereby submits its objection to the Motion of The Narragansett Electric Company (“RI Energy” or “Company”) for Reconsideration and Relief from Advisory Opinion (“Motion” or “Motion for Reconsideration”). In support of said objection, the Division states that (a) RI Energy knew or should have known before the Public Utilities Commission (“Commission”) hearing about the potential Clear River Electric & Water District (“CREW”) load growth and emergency response times that it now alleges as “newly discovered evidence;” (b) the “newly discovered evidence,” even if considered by the Commission, would not change the result; and (c) voltage issues alleged in the CREW letter submitted to the Energy Facility Siting Board (“EFSB”) on July 22, 2026 (“CREW Letter”) are not significantly related to this proposed transmission project.

Additionally, RI Energy’s attempt to claim that the Commission’s Advisory Opinion to the EFSB was deficient because it failed to address certain issues is not a basis for reconsideration pursuant to the Commission’s Rules of Practice and Procedure.

Further, the Commission currently lacks jurisdiction over this matter, as the EFSB has not requested the Commission to revisit its Advisory Opinion.

II. Relevant Facts

On October 2, 2025, the EFSB issued a Preliminary Decision and Order in Docket No. SB-2025-01, designating the Commission as an agency to provide an advisory opinion on certain specific issues (“Preliminary Order”).¹ The EFSB has sole jurisdiction over the proposed Facility pursuant to R.I. Gen. Laws § 42-98-7.

The Commission docketed the instant matter as Docket No. 25-41-EL, set a schedule for testimony, interventions, and hearings, and conducted public comment and evidentiary hearings on April 9, 2026. No member of the public provided comment, and only the Division intervened.²

On April 29, 2026, the Commission held an open meeting and voted to advise the EFSB that the Company had not met its burden of proof to support a finding that the proposed project is needed. The Commission issued its written Advisory Opinion on May 12, 2026 and submitted it to the EFSB.

The EFSB held a public comment hearing on June 30, 2026, and scheduled the evidentiary hearing for July 29, 2026.

On July 22, 2026, one week before the EFSB evidentiary hearing, CREW submitted a two-page comment letter to the EFSB.

On July 23, 2026, the EFSB issued its Third Set of Data Requests to the Company in EFSB Docket No. SB-2025-01. EFSB 3-1 asked the Company to identify “any and all new information and evidence” that was not available to the Company when the advisory-opinion case was being

¹ EFSB Prelim. Order at 16.

² Of specific note is that CREW did not seek to intervene, file comments, or otherwise participate in Docket No. 25-41-EL.

litigated before the PUC and that is material to whether the project, as proposed, is needed. EFSB 3-2 asked the Company to identify “any and all technical engineering issues that were not raised before the Public Utilities Commission in Docket No. 25-41-EL that are now being raised by the Company before the Board in these proceedings.”

The EFSB commenced the evidentiary hearing on July 29, 2026 but was continued at the request of RI Energy.

On August 28, 2026, RI Energy filed the subject Motion for Reconsideration and Relief from Advisory Opinion, alleging “newly discovered evidence.”

RI Energy’s alleged “newly discovered evidence” consists of the information set forth in the Company’s July 23, 2026 responses to EFSB 3-1 and 3-2, and CREW’s July 22, 2026 letter to the EFSB, attached to the response to EFSB 3-1 as Attachment EFSB 3-1. RI Energy’s response to EFSB 3-1 states:

Request:

Please identify any and all new information and evidence that (i) was not available to the Company at the time that the advisory opinion case was being litigated before the Public Utilities Commission in Docket No. 25-41-EL; and (ii) is material to the question of whether the project, as proposed, is needed.

Response:

At the time of the Public Utilities Commission’s evidentiary hearing in Docket No. 25-41-EL, Clear River Energy & Water District (“CREW”) had not released a statement on the proposed project and had not identified the reliability issues its customers are presently experiencing when the existing facilities are being serviced and CREW’s load is being supplied through the Company’s Woonsocket substation. Please see Attachment EFSB 3-1 for a copy of CREW’s letter dated July 22, 2026 regarding the project and existing reliability issues.

In addition to these current reliability issues, the Company has been engaged in recent discussions with CREW and has been informed 5MW of load growth is anticipated in CREW’s service area over the next 10 years. This anticipated additional load would represent an almost thirty percent increase in the current load at risk due to the existing N-1 contingency that the project is intended to address.

RI Energy's response to EFSB 3-2 states:

Request:

Please identify any and all technical engineering issues that were not raised before the Public Utilities Commission in Docket No. 25-41-EL that are now being raised by the Company before the Board in these proceedings. For each issue, please explain why the issue(s) were not identified and raised by the Company during the Commission proceedings.

Response:

At the time of the Public Utilities Commission ("PUC") proceedings in Docket No. 25-41-EL, the Company's assessment of emergency response options was informed by 2022 experience at the Nasonville Substation, at which time mobile generation resources were procured and deployed in less than one week due to favorable market conditions and vendor availability.

Since the conclusion of the PUC's evidentiary hearings in Docket No. 25-41-EL, the Company has experienced a subsequent event involving the deployment of mobile generation resources on Jamestown that demonstrated substantially different conditions than those observed during the Nasonville response in 2022. Specifically, deployment of comparable mobile generation required approximately two weeks of lead time due to resource availability and mobilization challenges. In addition, the cost of obtaining similar generation capacity was more than five times higher than the cost incurred during the Nasonville event.

This operational experience was not available during the Commission proceedings and therefore was not presented in Docket No. 25-41-EL. The experience provided additional evidence regarding the variability of mobile generation availability, deployment timelines, and costs, and highlighted the risks associated with relying on third-party mobile generation resources to mitigate major substation or transmission outages. The Company's more recent experience calls into question: (1) the Company's ability to timely respond to an outage caused by the loss of the sole source of supply to the Nasonville substation, and (2) the PUC's incorrect assumption that the Company's prior response to contingency events should be considered predictive of the efficacy of future responses to contingency events.

Had similar deployment constraints existed during the Nasonville event, restoration would have been significantly more challenging and could have resulted in prolonged voltage reductions, manual load shedding, and several large industrial customers likely would have been forced to continue curtailing operations or cease production.

III. Burden of Proof

The Division agrees with the Company about the burden of proof for its Motion for Reconsideration under Rule 1.29(B)(2) of the Commission's Rules of Practice and Procedure (810-

RICR-00-00-1.29(B)(2)), which authorizes relief based on newly discovered evidence. The rule is analogous to Rule 60(b)(2) of the Rhode Island Superior Court Rules of Civil Procedure, which authorizes relief from a judgment or order based on newly discovered evidence that, with due diligence, could not have been discovered in time to move for a new trial, and is material enough that it probably would change the outcome of the proceedings.

Rhode Island courts treat Rule 60(b) relief as a remedy committed to the sound discretion of the tribunal. *See McBurney v. Roszkowski*, 875 A.2d 428 (R.I. 2005); *Pari v. Pari*, 558 A.2d 632, 635 (R.I. 1989). Rule 60(b) is not a substitute for appeal and should not be used to relitigate matters that were, or could have been, raised on the original record. *See Pari*, 558 A.2d at 635; *Gray v. Stillman White Co.*, 522 A.2d 737, 741 (R.I. 1987). Relief from a judgment or order is appropriate if newly discovered evidence that could not with due diligence have been discovered earlier, is material and not merely cumulative or impeaching, and is of such a nature that it probably would change the result. *See State v. Brown*, 528 A.2d 1098, 1104 (R.I. 1987); *State v. Firth*, 708 A.2d 526, 532 (R.I. 1998); *State v. Hazard*, 797 A.2d 448, 464 (R.I. 2002).

IV. Argument

RI Energy has not met the applicable burden of proof in this matter, as (a) the Company knew or should have known before the Commission hearing about the potential CREW load growth and emergency response times that it now alleges as “newly discovered evidence;” (b) the “newly discovered evidence,” even if considered by the Commission, would not change the result; and (c) voltage issues alleged in the CREW Letter are not significantly related to this proposed transmission project.

Additionally, RI Energy’s attempt to claim that the Commission’s Advisory Opinion to the EFSB was deficient because it failed to address certain issues is not a basis for reconsideration

pursuant to Rule 1.29(B)(2) of the Commission's Rules of Practice and Procedure (810-RICR-00-00-1.29(B)(2)).

Further, the Commission currently lacks jurisdiction over this matter, as the EFSB has not requested the Commission to revisit its Advisory Opinion.

- a. The Company Knew and Should Have known Before the Commission Hearing About the Potential CREW Load Growth and Emergency Response Times That It Now Alleges as "Newly Discovered Evidence;"

In its Motion for Reconsideration, the Company failed to address hearing testimony from its witness, Ryan Constable, wherein he acknowledged that RI Energy was aware of CREW's potential expansion in load growth. In particular, when questioned by the Division's counsel, Mr. Constable stated that ". . . we are aware of a potential proposal from [CREW], not in the next 12 months, but there may be additional circuits as a result of the municipal expansion" ³ Mr. Constable further clarified the issue of CREW's potential expansion in load growth. In response to questions from the Commission staff, Mr. Constable testified that he was aware of a "new request" from CREW, made within the "last six months," that could require new feeders out of Nasonville. ⁴ When further questioned about the timing of this potential CREW load growth, Mr. Constable testified: "I don't know if I'm able to say." ⁵

Mr. Constable's testimony clearly contradicts RI Energy's statements in its Motion and its response to EFSB 3-1 that it only became aware of CREW's potential load growth after the Commission's issuance of its Advisory Opinion.

Even without Mr. Constable's testimony, the Company should have known about CREW's potential load growth. For example, as part of the Company's preparation of its annual

³ Hr'ng testy. at 61-62, attached hereto as Exhibit A.

⁴ *Id.* at 93-94.

⁵ *Id.* at 93.

Infrastructure, Safety, and Reliability (“ISR”) plan, RI Energy undertakes a comprehensive annual review and considers all new loads and changes. Additionally, the RI Energy Service Agreement with CREW (No. TSA-NEP-67) requires CREW, as a transmission customer, to provide potential new load information which RI Energy would then rely upon in its area study assessments. The evidence is clear that RI Energy knew or should have known about CREW’s potential new load prior to the Commission hearing.

In addition to RI Energy’s clear knowledge of CREW’s potential load growth, the Company knew or should have known about changes in timing of emergency response options that it now claims as new information in its response to EFSB 3-2. In particular, RI Energy knew or should have known that the deployment of mobile generation resources in 2026 could be substantially different than in 2022. This information was or could have been obtained simply by reaching out to known suppliers of the Company or other affiliates of PPL. The Company, with even a low level of due diligence, could have easily determined changes in emergency response times for deployment of mobile generators.

As shown above, RI Energy’s “newly discovered evidence” outlined in its response to EFSB 3-1 and 3-2 was either known or should have been known through due diligence by Company prior to the Commission hearing. As such, RI Energy’s Motion should be denied.

b. The “Newly Discovered Evidence,” Even if Considered by the Commission, Would Not Change the Result.

The potential of 5 MW of new load added to an existing line 115 kV line with some 100 MW of capacity is, at most, a 5 percent load growth possibly in 10 years. This does not rise to the level of changing the facts or outcome of the existing line transmission service capability.

- c. Voltage Issues Alleged in the CREW Letter are Not Significantly Related to this Proposed Transmission Project.

The potential of an additional 5 MW of load added to the existing 4.7 miles of B23 circuit that was under consideration for being rebuilt would result in a virtually undetectable reduction in delivery voltage. The added reduction in voltage on the existing 4.7 miles of B23 115 kV line would be less than 0.06 volts. The proposed B23 upgrade and addition of the U170 new line would result in no improvement in the CREW alleged low voltage condition. Furthermore, the line currently has a load carrying capability of approximately 100 MW which is far in excess of any potential or hypothetical CREW load service requirements.

- d. RI Energy's Attempt to Claim that the Commission's Advisory Opinion to the EFSB was Deficient Because it Failed to Address Certain Issues is Not a Basis for Reconsideration Pursuant to the Commission's Rules of Practice and Procedure.

Rule 1.29(B)(2) of the Commission's Rules of Practice and Procedure (810-RICR-00-00-1.29(B)(2)) allows for relief from a final Commission Order upon "[n]ewly discovered evidence, which by due diligence could not have been discovered in time to move to reopen the proceedings under Rule 1.27. . . ,"

In its Motion for Reconsideration, RI Energy argues that the Commission should reconsider its Advisory Opinion because it did not consider the issues of cost justification, consistency with the Act on Climate, or consistency with the State Energy Plan.⁶ Rule 1.29(B)(2) does not allow for reconsideration of the Advisory Opinion based on these facts, and the Commission should not grant the requested relief.

⁶ Motion at 1.

- e. The Commission Lacks Jurisdiction Over this Matter, as the EFSB has Not Requested an Amended Advisory Opinion.

The EFSB has sole jurisdiction over the proposed Facility pursuant to R.I. Gen. Laws Chapter 42-98, especially § 42-98-7. The Commission's sole authority to review this matter is based on the EFSB's Preliminary Order, which designated the Commission as an agency to provide an advisory opinion to the EFSB.⁷ The Commission issued its written Advisory Opinion on May 12, 2026 and submitted it to the EFSB. The EFSB has not requested an amended Advisory Opinion from the Commission. Therefore, the Commission lacks authority to amend its Advisory Opinion.

V. Conclusion

WHEREFORE, the Division requests that the Commission deny RI Energy's Motion for Reconsideration.

RHODE ISLAND DIVISION OF
PUBLIC UTILITIES AND
CARRIERS

By its Attorney,

/s/ Gregory S. Schultz

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CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of September 2026, I delivered a true and accurate copy of the within Objection via electronic mail to the parties on the Service List for Commission Docket No. 25-41-EL.

/s/ Gregory S. Schultz

⁷ EFSB Prelim. Order at 16.

**HEARING
IN RE: RI PUBLIC UTILITIES COMMISSION**
April 09, 2026
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1 STATE OF RHODE ISLAND 2 PUBLIC UTILITIES COMMISSION 3 4 5 Thursday, April 9, 2026 6 9:29 a.m. 7 8 89 Jefferson Boulevard, 2nd Floor, Hearing Room A 9 Warwick, Rhode Island 02888 10 11 12 13 14 In Re: Issuance of Advisory Opinion to the Energy 15 Facility Siting Board Regarding the Narragansett 16 Electric Company's Application for the Woonsocket 17 Substation - Nasonville Substation Rebuild and 18 Alteration Project for North Smithfield and 19 Burrillville, Rhode Island - Docket No. 25-41-EL 20 21 22 23 24 25 Casey Storrs Digital Reporter	1 Also Present: 2 Gregory Booth 3 Luke Cioffi 4 Ryan Constable 5 Mark Safi 6 Steven Selkregg 7 Amy Willoughby 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25
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1 APPEARANCES 2 Commissioner Abigail Anthony 3 Commissioner Karen Bradbury 4 Dr. Todd Bianco 5 Christopher Caramello 6 Cindy Wilson-Frias, Esquire 7 8 On Behalf of Rhode Island Energy: 9 STEVEN J. BOYAJIAN, ESQ. 10 GEORGE W. WATSON, III, ESQ. 11 ROBINSON & COLE 12 1 Financial Plaza, Suite 1430 13 Providence, Rhode Island 02903 14 401-709-3359 15 sboyajian@rc.com 16 gwatson@rc.com 17 18 JENNIFER B. HUTCHINSON, ESQ. 19 HINKLEY ALLEN & SNYDER, LLP 20 280 Melrose Street 21 Providence, Rhode Island 02907 22 401-274-2000 23 jhutchinson@hinckleyallen.com 24 On Behalf of Rhode Island Public Utilities Commission: 25 GREGORY S. SCHULTZ, ESQ. DIVISION OF PUBLIC UTILITIES AND CARRIERS 89 Jefferson Boulevard Warwick, Rhode Island 02888 401-941-4500 gregory.schultz@dpuc.ri.gov	1 INDEX 2 PAGE 3 WITNESSES FOR RHODE ISLAND ENERGY 4 AMY WILLOUGHBY 5 Direct Examination by Mr. Watson 9 6 Cross-Examination by Mr. Schultz 20 7 STEVEN SELKREGG 8 Direct Examination by Mr. Watson 29 9 Further Direct Examination by Mr. Watson 36 10 Further Direct Examination by Mr. Watson 42 11 12 RYAN CONSTABLE 13 Direct Examination by Mr. Watson 30 14 Further Direct Examination by Mr. Watson 37 15 Further Direct Examination by Mr. Watson 45 16 Cross-Examination by Mr. Schultz 54 17 LUKE CIOFFI 18 Direct Examination by Mr. Boyajian 140 19 MARK SAFI 20 Direct Examination by Mr. Boyajian 141 21 WITNESSES FOR PUC 22 GREGORY BOOTH 23 Direct Examination by Mr. Schultz 158 24 Cross-Examination by Mr. Boyajian 167 25 Redirect Examination by Mr. Schultz 218

Page 61 1 fail, correct? 2 MR. CONSTABLE: Yes. 3 MR. SCHULTZ: And having that second 4 transformer would solve that problem, correct? 5 MR. CONSTABLE: It addresses the transformer 6 contingency, yes. 7 MR. SCHULTZ: So that solves -- that's a 8 significant solution to the issues in this area of Rhode 9 Island with regards to the electrical distribution? 10 MR. CONSTABLE: It's half of the solution. 11 MR. SCHULTZ: Okay. And the Company is going 12 to be installing that second transformer at Nasonville 13 soon; is that correct? 14 MR. CONSTABLE: Yes. 15 MR. SCHULTZ: Do you know, is it -- I forget 16 the exact timeline, within the next 12 months? 17 MR. CONSTABLE: Yes. I believe it's in the 18 next 12 months. We can check on a break. 19 MR. SCHULTZ: That's fine. It's going to be 20 installed and in service soon. 21 And will there also be additional distribution 22 circuits online in the next 12 months? 23 MR. CONSTABLE: No. 24 MR. SCHULTZ: Well, will there -- is the 25 Company planning on installing additional distribution	Page 63 1 MR. SELKREGG: Correct. 2 MR. SCHULTZ: Mr. Constable, did you also help 3 in the preparation of this response? 4 MR. CONSTABLE: No, I did not. 5 MR. SCHULTZ: Okay. If I could just -- it's a 6 very brief request at Division 4-1, correct me if I'm 7 reading this wrong, "Using the IOA Curve Method to 8 provide the remaining life of the existing transmission 9 line, which RIE proposes to rebuild" -- there is a 10 question mark, but it should just be a period, I 11 believe, my apologies -- "as a portion of this response, 12 provide all the detailed calculations, including which 13 IOA curve, or curves, the company used." 14 Did I read that correctly? 15 MR. SELKREGG: Yes. 16 MR. SCHULTZ: Okay. Are you familiar with the 17 IOA curve method? 18 MR. SELKREGG: I'm vaguely familiar with it. 19 We do not use it in transmission for asset management 20 engineering or operational purposes. 21 MR. SCHULTZ: But the company does use it, 22 correct? 23 MR. SELKREGG: They use it specifically in 24 accounting and rate making. 25 MR. SCHULTZ: With regards to depreciation
Page 62 1 circuits? 2 MR. CONSTABLE: So I'm going to say no, but 3 I'll -- so just because we're aware of a potential 4 proposal from Clear River Electric & Water, there may be 5 additional circuits, not in the next 12 months, but 6 there may be additional circuits as a result of the 7 municipal expansion, but there are no new circuits 8 associated with this issue. We reconfigure the existing 9 circuits to balance them across the two transformers, 10 but there's no new feeders. 11 MR. SCHULTZ: Okay. If I could direct your 12 attention to the Company's responses to a Division Data 13 Request Set 4, specifically the response to 4-1, and I 14 believe that Mr. Selkregg, you sponsored that response? 15 MR. SELKREGG: Yes. 16 MR. SCHULTZ: And correct me if -- let me know 17 when you're at 4-1. 18 MR. WATSON: You need help? 19 MR. CONSTABLE: I'm getting there. I'm 20 getting there. It's a big binder. 21 MR. SCHULTZ: Take your time. 22 MR. CONSTABLE: 4-1, right here. 23 MR. SELKREGG: Yes. 24 MR. SCHULTZ: And Mr. Selkregg, you prepared 25 or by or under supervision of -- this response?	Page 64 1 studies? 2 MR. SELKREGG: Correct. 3 MR. SCHULTZ: And in fact, in Docket 25-45- 4 GE, the company has used the IOA curve method? 5 MR. SELKREGG: Correct. 6 MR. SCHULTZ: Okay. So the first part of the 7 Division's Request 4-1 actually requests that the 8 Company do a calculation using the -- so it says, "Using 9 the IOA curve method, provide the remaining life of the 10 existing transmission, which RIE proposes to rebuild." 11 Is it possible that the Company could do that 12 calculation? 13 MR. SELKREGG: I suppose it's possible. So 14 how we use the IOA Curve, loosely speaking, is we do it 15 across the, by FERC account, across the system, based on 16 the type of asset, and it's merely time-based and has 17 nothing to do with condition-based, as we use it as an 18 engineering and operational assessment when we're 19 scoping work. I'm not sure how we accurately apply it 20 to just the transmission line, other than breaking it 21 down by the FERC accounts, as we have already done. 22 MR. SCHULTZ: The IOA Curve Method takes into 23 account the useful life of an asset; is that correct? 24 MR. SELKREGG: It takes into a few factors. I 25 do believe it takes into -- it's a time-based curve that

Page 93 1 Northwest Rhode Island? 2 MR. CONSTABLE: No. 3 MR. BIANCO: Now, there was not too long ago 4 that Clear River has some load growth, I believe, over 5 the last few years; is that fair? 6 MR. CONSTABLE: I believe so. 7 MR. BIANCO: Well, you mentioned additional 8 proposal related to Clear River, related and 9 potentially, the way I heard it, was maybe more feeders. 10 MR. CONSTABLE: That was new. So that's just 11 -- so I just wanted to make sure that I was answering 12 the question based on best available information, so 13 there's a new request from crew. 14 MR. BIANCO: You have a new request? 15 MR. CONSTABLE: We have a new request that 16 could -- and that new request could result in new 17 feeders out of Nasonville. 18 MR. BIANCO: Okay. Now, when you say new, are 19 you able to say approximately when? What's new? 20 MR. CONSTABLE: I don't know if I'm able to 21 say. 22 MR. BIANCO: Okay. 23 MR. CONSTABLE: I guess we could talk on a 24 break. Like, am I allowed to say what the proposal is 25 if it's not official or the ask?	Page 95 1 MR. CONSTABLE: Yeah, it depends, right? So 2 the issue is a 17-megawatt issue for 24 hours, right? 3 So that's a three-megawatt contribution for three hours. 4 The way that crew manages the battery too, as with all 5 batteries, you're either keeping the battery charged for 6 the contingency, or you're using it for other reasons, 7 and then, when the contingency happens, it may or may 8 not be charged. 9 MR. BIANCO: Yeah. 10 MR. CONSTABLE: So that's always a 11 possibility. So during the 2022 event, it took a couple 12 of days before we could use the three megawatts for the 13 three hours. 14 MR. BIANCO: Yeah. Okay. I just wanted to 15 understand, though, that there is some resource local on 16 those feeders that could operate when one of the two 17 feeders goes down. 18 MR. CONSTABLE: Yeah. Insufficient for the 19 risk, but it can do the three megawatts. 20 MR. BIANCO: And can it operate and do three 21 megawatts for up to three hours, I suppose? Can it do 22 that if there is a loss of the B23 line? 23 MR. CONSTABLE: Yes, if it's charged. Again, 24 if it's charged at the time. 25 MR. BIANCO: Yeah. We're going to -- fair
Page 94 1 MR. BIANCO: How about this, is your awareness 2 of a proposal just in the last five years or are we 3 talking last one year? 4 MR. CONSTABLE: No, last six months. 5 MR. BIANCO: Okay. Thank you. That's it. I 6 don't need any details about specific requests, but if 7 we went back about five years, my recollection was that 8 the two feeders that do serve Clear River would 9 potentially be insufficient, should one of them go down 10 to serve the customers of Clear River. 11 MR. CONSTABLE: Yes. 12 MR. BIANCO: That's true, right? 13 MR. CONSTABLE: Yes. 14 MR. BIANCO: And Clear River found what some 15 might call it an alternative solution of a -- they now 16 have a three-megawatt, nine-megawatt hour battery in 17 their area. 18 MR. CONSTABLE: Yes. 19 MR. BIANCO: Are you familiar with that? 20 MR. CONSTABLE: Yes. 21 MR. BIANCO: Is that right, that it would help 22 serve those customers that -- not future, I'm saying, 23 let's not talk about B23, I just mean should one of the 24 feeders go down, the storage facility can help pick up 25 and maintain service?	Page 96 1 enough. It's good to point out. When you say there's 2 17 megawatts for 24 hours that would be at risk, I think 3 you included 17 megawatts that could still be served by 4 Woonsocket; is that right? I didn't understand. You 5 said there was 34 megawatts, and then, later, I 6 understood you said we might be able to get 17 megawatts 7 on -- 8 MR. CONSTABLE: Yeah. So there's 34 megawatts 9 on the station. You're going to switch as much as 10 possible to Woonsocket, 17 megawatts -- 11 MR. BIANCO: Okay. 12 MR. CONSTABLE: -- and then, those are being 13 served, right? 14 MR. BIANCO: Right. 15 MR. CONSTABLE: There's voltage issues, but 16 let's not go there. Now, the remaining 17 megawatts is 17 what we're talking about. 18 MR. BIANCO: Right. 19 MR. CONSTABLE: So it doesn't include the 20 megawatts served from Woonsocket. 21 MR. BIANCO: That's my understanding. And 22 then, in addition, there's three megawatts, potentially, 23 for some amount of time, assuming there's -- the battery 24 is charged, that could also assist serving additional 25 megawatts?