

February 17, 2022

**VIA ELECTRONIC MAIL**

Luly E. Massaro, Commission Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

**RE: Docket 3476 – Gas Service Quality Plan  
Petition to Modify Service Quality Measures in the Gas Service Quality Plan  
Responses to Data Requests – PUC Set 3**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a National Grid (“National Grid” or the “Company”), attached is the electronic version of the Company’s responses to the Public Utilities Commission’s Third Set of Data Requests in the above-referenced matter.<sup>1</sup>

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

Sincerely,



Andrew S. Marcaccio

Enclosures

cc: Docket 3476 Service List  
Leo Wold, Esq.  
Al Mancini, Division

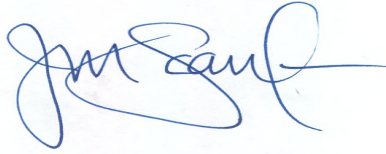
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<sup>1</sup> Per a communication from Commission counsel on October 4, 2021, the Company is submitting an electronic version of this filing followed by six (6) hard copies filed with the Clerk within 24 hours of the electronic filing.

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.



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Joanne M. Scanlon

February 17, 2022  
Date

**Docket No. 3476 – National Grid Gas - Service Quality Plan  
Service list updated on 8/28/2020**

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The Narragansett Electric Company  
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PUC 3-1

Request:

Referring to the proposed change in business hours, is there a corresponding benefit to ratepayers that will result from the reduced risk to the Company if the Commission approves the proposed change.

Response:

There is no corresponding benefit nor harm to ratepayers if the Commission approves the proposed change. The Company has proposed the change for the purpose of aligning the measure with its operational work schedule. Regardless of Commission approval of the change, National Grid will continue to respond to all gas odor calls as quickly as possible.

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PUC 3-2

Request:

How is the proposed change in business hours consistent with the Commission's principles set forth in the Guidance on Principles for the Development and Review of Performance Incentive Mechanisms adopted in Docket No. 4943?

Response:

The Company notes that the Guidance on Principles for the Development and Review of Performance Incentive Mechanisms ("PIM Guidance Document") adopted in Docket No. 4943 serves as guidance for reviewing performance incentive mechanisms and was not designed for evaluation of service quality performance measures for which the Company is not allowed to earn an incentive. As such, the Company's proposed change in business hours was not evaluated by the Company through the lens of the PIM Guidance Document.

The proposed change to business hours neither harms nor provides benefits to the Company's customers and is being proposed to align the measure with the Company's operational work schedule. Regardless of Commission approval of the change, the Company will continue to respond to all gas odor calls as quickly as possible to ensure the safety of our customers and the gas network.

PUC 3-3

Request:

In each of the New York companies and in Massachusetts what are service quality metrics and how do they correspond to the business hours?

Response:

**New York:**

- 75% in 30 minutes
- 90% in 45 minutes
- 95% in 60 minutes

The measurement period is annually

**Massachusetts:**

- 97% in 60 minutes

The measurement period is annually

Displaying RI emergency response service quality metrics for comparison purposes:

**Rhode Island:**

Business Hours: 94.02% % in 30 minutes (using existing measurement period)

Non-Business Hours: 94.38% % in 45 minutes

The measurement period is quarterly (four times per year)

- As compared to other utilities that have an annual measurement period, this quarterly measurement period is a large factor in increasing the level of difficulty in achieving the above emergency response targets because it reduces the measurement period (hence population) from which to recover.

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PUC 3-4

Request:

Will the proposed change reduce the Company's costs and if so, how much do you estimate the cost reduction?

Response:

The proposed change will not have a negligible impact on the Company's cost. The company's top priority is to continue to respond to emergencies. In shifting the existing measurement parameters from 0800hrs-1630hrs to 0800hrs-1600hrs it increases the pool of available resources to be able to respond to emergency calls through the engagement of geographically dispersed "1st shift" technicians prior to signing off for the day at the end of their shift, after-which a significantly smaller pool of technicians are available to respond to emergencies. From a cost perspective, those "1st shift" technicians that were dispatched on to an odor call investigation late in their shift will normally take anywhere from ½ hour to many hours to thoroughly investigate the reported emergency, these costs exist in either scenario.