

February 8, 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 2**

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 Second 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

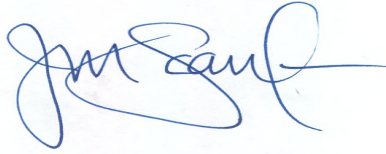
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<sup>1</sup> Per a communication from Commission counsel on October 4, 2021, the Company is submitting an electronic version of this filing followed by six (6) hard copies filed with the Clerk within 24 hours of the electronic filing.

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.



\_\_\_\_\_  
Joanne M. Scanlon

February 8, 2022  
Date

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

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<b>Original &amp; nine (9) copies file w/:</b> Luly E. Massaro, Commission Clerk	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a> ;	401-780-2107
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Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov</a> ;	
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The Narragansett Electric Company  
d/b/a National Grid  
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PUC 2-1

Request:

On pages 1 to 3 of Attachment 4B of the Company's FY 2021 Annual Report on Service Quality Plan (Gas Operations) filed on August 6, 2021, did the Company intend normal business hours to be shown as 8:00-16:00, or is there a typographical error?

Response:

Yes, 8:00-16:00 was a typographical error. The normal business hours should read 8:00-16:30. Please see Attachment PUC 2-1 for the corrected version of Attachment 4B of the Company's FY 2021 Annual Report on Service Quality Plan (Gas Operations).

NATIONAL GRID - GAS OPERATIONS  
SERVICE QUALITY BENCHMARKS  
CALCULATED USING HISTORICAL CRITERIA

National Grid - Gas  
RIPUC Docket No. 3476  
Service Quality Report  
Attachment 4B  
Page 1 of 3

SERVICE QUALITY MEASURES	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19
<b>CALL CENTER RESPONSIVENESS*</b>												
Total Calls Answered	40,870	40,835	36,221	48,145	39,262	37,992	56,966	40,197	41,073	39,506	43,168	25,343
Abandoned Calls	569	664	763	1,179	515	529	2,671	1,227	2,378	1,430	1,931	3,229
Total Calls Offered	41,439	41,499	36,984	49,324	39,777	38,521	59,637	41,424	43,451	40,936	45,099	28,572
% Abandoned Calls	1.37%	1.60%	2.06%	2.39%	1.29%	1.37%	4.48%	2.96%	5.47%	3.49%	4.28%	11.30%
Answered in 60 Seconds	38,086	37,579	32,049	40,131	35,973	34,756	48,154	35,305	35,388	34,934	38,122	20,134
% Calls Answered in 60 Seconds	93.19%	90.55%	86.66%	81.36%	90.44%	90.23%	80.75%	85.23%	81.44%	85.34%	84.53%	70.47%
<b>METER READS</b>												
Scheduled Meters	279,183	279,404	279,623	279,916	280,167	280,623	283,791	281,161	281,265	281,321	281,396	281,479
Meters Read	275,863	276,122	276,517	276,847	277,158	277,611	280,935	278,215	278,395	278,548	278,550	278,642
% On-Cycle Meter Reads	98.81%	98.83%	98.89%	98.90%	98.93%	98.93%	98.99%	98.95%	98.98%	99.01%	98.99%	98.99%
<b>METER TESTING**</b>												
<= 500 Cfh (180 month test interval)	1,457	1,058	904	605	445	500	733	1,207	1,477	1,553	1,362	571
> 500 Cfh (120 month test interval)	109	89	93	70	39	34	97	67	202	259	231	120
Total Meters Tested	1,566	1,147	997	675	484	534	830	1,274	1,679	1,812	1,593	691
Customer Requested Tests	0	0	0	0	0	0	1	3	2	0	1	1
Tests Completed in 15 Days	0	0	0	0	0	0	1	3	2	0	1	1
% Completed in 15 Days	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
<b>SERVICE APPOINTMENTS</b>												
Scheduled Service Appointments	2,973	2,980	2,249	3,072	2,619	2,045	2,244	2,840	3,162	2,965	2,762	2238
Completed Service Appointments	2,804	2,857	2,146	2,883	2,507	1,940	2,160	2,721	3,014	2,835	2,637	2167
% Service Appointments Met	94.32%	95.87%	95.42%	93.85%	95.72%	94.87%	96.26%	95.81%	95.32%	95.62%	95.47%	96.83%
<b>SAFETY</b>												
<b>Leak-Call Response:</b>												
<b>Normal Business Hours:</b>												
M-F 8:00-16:30 (excluding holidays)												
- Total Calls	318	331	383	549	465	435	538	365	390	432	400	292
- Response in 30 Minutes or Less	307	316	353	518	439	415	516	353	376	422	383	284
% in 30 Minutes or Less	96.54%	95.47%	92.17%	94.35%	94.41%	95.40%	95.91%	96.71%	96.41%	97.69%	95.75%	97.26%
<b>After Business Hours***:</b>												
- Total Calls	260	275	371	486	475	444	518	377	359	297	269	258
- Response in 45 Minutes or Less	251	267	353	471	446	429	508	363	355	284	268	250
% in 45 Minutes or Less	96.54%	97.09%	95.15%	96.91%	93.89%	96.62%	98.07%	96.29%	98.89%	95.62%	99.63%	96.90%

\*The following adjustments were made to the June 2019 results, as compared to the Q4 FY2019 Report, as a result of a data reconciliation with the Company's Contact Center Vendor. The adjustment is immaterial to prior period performance or the FY2020 benchmark. Total Calls Answered changed from 25,359 to 25,343; Abandoned Calls changed from 3,230 to 3,229; Total Calls Offered changed from 28,589 to 28,572; Calls Answered in 60 Seconds changed from 20,150 to 20,134.

\*\*The definition of commercial and residential meters changed in October 2012 to reflect the revised Division 2006 Regulations. Under those regulations meters with a capacity greater than 500 cubic feet per hour (Cfh) are classified as commercial, and meters with a capacity less than or equal to 500 Cfh are classified as residential. This measure is compiled on a calendar year basis.

\*\*\*The after business hours benchmarks were modified effective January 1, 2013 and are now fixed at a mean 95.27% with a penalty threshold of 94.38%.

NATIONAL GRID - GAS OPERATIONS  
SERVICE QUALITY BENCHMARKS  
CALCULATED USING HISTORICAL CRITERIA

National Grid - Gas  
RIPUC Docket No. 3476  
Service Quality Report  
Attachment 4B  
Page 2 of 3

SERVICE QUALITY MEASURES	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20
<b>CALL CENTER RESPONSIVENESS*</b>												
Total Calls Answered	27,492	34,188	31,350	37,127	35,019	34,172	36,477	33,039	30,022	24,710	22,125	22,657
Abandoned Calls	3,923	4,445	2,582	3,199	2,639	1,331	1,006	696	503	353	370	336
Total Calls Offered	31,415	38,633	33,932	40,326	37,658	35,503	37,483	33,735	30,525	25,063	22,495	22,993
% Abandoned Calls	12.49%	11.51%	7.61%	7.93%	7.01%	3.75%	2.68%	2.06%	1.65%	1.41%	1.64%	1.46%
Answered in 60 Seconds	22,086	25,673	25,004	25,987	26,929	29,706	32,797	30,549	28,137	22,979	20,785	21,584
% Calls Answered in 60 Seconds	70.30%	66.45%	73.69%	64.44%	71.51%	83.67%	87.50%	90.56%	92.18%	91.68%	92.40%	93.87%
<b>METER READS</b>												
Scheduled Meters	281,158	281,257	281,751	281,813	281,718	282,136	293,188	283,364	286,235	282,913	287,643	285,552
Meters Read	278,211	278,022	278,206	277,967	277,968	278,620	290,162	280,382	283,271	279,889	284,550	280,806
% On-Cycle Meter Reads	98.95%	98.85%	98.74%	98.64%	98.67%	98.75%	98.97%	98.95%	98.96%	98.93%	98.92%	98.34%
<b>METER TESTING**</b>												
<= 500 Cfh (180 month test interval)	1,007	783	1,398	578	370	763	0	0	560	41	17	31
> 500 Cfh (120 month test interval)	176	158	148	67	41	128	0	0	96	3	5	36
Total Meters Tested	1,183	941	1,546	645	411	891	0	0	656	44	22	67
Customer Requested Tests	0	0	0	1	2	2	1	0	0	0	0	0
Tests Completed in 15 Days	0	0	0	1	2	2	1	0	0	0	0	0
% Completed in 15 Days	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
<b>SERVICE APPOINTMENTS</b>												
Scheduled Service Appointments	1571	716	1225	1595	1698	1,637	1,692	1,383	1,464	730	319	510
Completed Service Appointments	1507	655	1110	1477	1629	1,576	1,649	1,343	1,417	720	312	494
% Service Appointments Met	95.93%	91.48%	90.61%	92.60%	95.94%	96.27%	97.46%	97.11%	96.79%	98.63%	97.81%	96.86%
<b>SAFETY</b>												
<b>Leak-Call Response:</b>												
<b>Normal Business Hours:</b>												
M-F 8:00-16:30 (excluding holidays)												
- Total Calls	333	329	391	436	427	421	474	357	312	272	337	313
- Response in 30 Minutes or Less	307	303	375	411	399	391	462	348	300	265	333	305
% in 30 Minutes or Less	92.19%	92.10%	95.91%	94.27%	93.44%	92.87%	97.47%	97.48%	96.15%	97.43%	98.81%	97.44%
<b>After Business Hours***:</b>												
- Total Calls	270	270	316	385	421	438	400	337	268	209	266	243
- Response in 45 Minutes or Less	261	254	302	359	399	406	381	326	262	207	260	240
% in 45 Minutes or Less	96.67%	94.07%	95.57%	93.25%	94.77%	92.69%	95.25%	96.74%	97.76%	99.04%	97.74%	98.77%

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\*\*The definition of commercial and residential meters changed in October 2012 to reflect the revised Division 2006 Regulations. Under those regulations meters with a capacity greater than 500 cubic feet per hour (Cfh) are classified as commercial, and meters with a capacity less than or equal to 500 Cfh are classified as residential. This measure is compiled on a calendar year basis.

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NATIONAL GRID - GAS OPERATIONS  
SERVICE QUALITY BENCHMARKS  
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National Grid - Gas  
RIPUC Docket No. 3476  
Service Quality Report  
Attachment 4B  
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SERVICE QUALITY MEASURES	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	36 Month Average	Standard Deviation	Penalty Threshold	Maximum Penalty
<b>CALL CENTER RESPONSIVENESS*</b>																
Total Calls Answered	20,846	23,360	21,616	26,533	22,478	25,804	31,349	25,421	29,984	23,897	26,204	31,292	32,409			
Abandoned Calls	397	1,294	725	3,863	516	397	672	600	436	372	678	2,168	1,405			
Total Calls Offered	21,243	24,654	22,341	30,396	22,994	26,201	32,021	26,021	30,420	24,269	26,882	33,460	33,815			
% Abandoned Calls	1.87%	5.25%	3.25%	12.71%	2.24%	1.52%	2.10%	2.31%	1.43%	1.53%	2.52%	6.48%	4.16%	3.40%	7.56%	10.96%
Answered in 60 Seconds	19,348	18,585	18,272	22,072	19,511	24,011	27,773	22,059	27,270	21,680	23,880	27,780	28,196			
% Calls Answered in 60 Seconds	91.08%	75.38%	81.79%	72.61%	84.85%	91.64%	86.73%	84.77%	89.64%	89.33%	88.83%	83.02%	83.39%	8.15%	75.24%	67.09%
<b>METER READS</b>																
Scheduled Meters	290,008	290,250	284,596	284,711	284,114	282,637	313,403	290,648	282,080	281,828	283,169	285,451	284,193			
Meters Read	286,307	285,068	280,715	280,659	280,107	278,595	309,357	286,364	278,136	277,833	278,788	280,705	280,669			
% On-Cycle Meter Reads	98.72%	98.21%	98.64%	98.58%	98.59%	98.57%	98.71%	98.53%	98.60%	98.58%	98.45%	98.34%	98.76%	0.22%	98.54%	98.32%
<b>METER TESTING**</b>																
<= 500 Cfh (180 month test interval)	61	58	234	581	572	1,472	163	519	1,279	1,702	1,224	1,427	8,904			
> 500 Cfh (120 month test interval)	21	25	30	21	17	45	7	43	54	88	82	98	933			
Total Meters Tested	82	83	264	602	589	1,517	170	562	1,333	1,790	1,306	1,525	9,837			
Customer Requested Tests	0	0	0	0	0	0	0	1	2	1	0	0	1			
Tests Completed in 15 Days	0	0	0	0	0	0	0	1	2	1	0	0	1			
% Completed in 15 Days	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	14.29%	85.71%	71.42%
<b>SERVICE APPOINTMENTS</b>																
Scheduled Service Appointments	487	369	619	854	930	944	3,355	2,285	2,136	2,652	2,633	2,474	1,845			
Completed Service Appointments	474	356	609	827	908	915	3,176	2,214	2,076	2,550	2,543	2,418	1,767			
% Service Appointments Met	97.33%	96.48%	98.38%	96.84%	97.63%	96.93%	94.66%	96.89%	97.19%	96.15%	96.58%	97.74%	95.78%	1.74%	94.04%	92.30%
<b>SAFETY</b>																
<b>Leak-Call Response:</b>																
<b>Normal Business Hours:</b>																
M-F 8:00-16:30 (excluding holidays)																
- Total Calls	273	329	357	420	409	494	446	337	328	338	362	346	382			
- Response in 30 Minutes or Less	257	321	343	408	387	471	432	327	320	332	349	341	366			
% in 30 Minutes or Less	94.14%	97.57%	96.08%	97.14%	94.62%	95.34%	96.86%	97.03%	97.56%	98.22%	96.41%	98.55%	95.85%	1.83%	94.02%	92.19%
<b>After Business Hours***:</b>																
- Total Calls	271	300	274	334	355	402	383	314	256	257	284	250	330			
- Response in 45 Minutes or Less	268	291	265	329	339	390	375	307	252	255	280	247	319			
% in 45 Minutes or Less	98.89%	97.00%	96.72%	98.50%	95.49%	97.01%	97.91%	97.77%	98.44%	99.22%	98.59%	98.80%	96.70%	1.77%	94.93%	93.16%

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The Narragansett Electric Company  
d/b/a National Grid  
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PUC 2-2

Request:

On page 3 of Attachment 4A, in the rows of data for "Response in 30 Minutes or Less" under the column for "36 Month Average,"

- a. does information labeled "FY 20" (i.e., 96.46%) represent the average of the data for the months from July 2017 to June 2020, and
- b. does the 36-month average of 96.89% represent the FY 21 data, and is that the average for the months from July 2018 to June 2021?

Response:

- a. Yes.
- b. Yes.



PUC 2-3

Request:

Regarding the entry of "Average (Proposed Fixed Values)" on page 3 of Attachment 4A:

- a. Is this 96.68% the average of the FY21 and FY20 36-month averages described above in PUC 2-2?
- b. Please confirm the "Average (Proposed Fixed Values) is the average of the data from July 2017 to June 2020 and July 2018 to June 2021
- c. Does the "Average (Proposed Fixed Values) give half the weight to July 2017 to June 2018 and July 2020 to June 2021 as it does to the same periods in 2018 to 2019 and 2019 to 2020?
- d. If so, why is National Grid proposing this methodology for calculating the fixed benchmark and penalty threshold? If not, please explain.

Response:

- a. Yes.
- b. Confirmed, the Average (Proposed Fixed Value) of 96.68% is the average of the FY 2021 Mean (96.89%) and the FY 2020 Mean (96.46%). The mathematical equation for the calculation is  $(96.89 + 96.46) / 2 = 96.68\%$ .
- c. Yes, the periods of July 2017 to June 2018 and July 2020 to June 2021 would have half the weighting of the months July 2018 to June 2020 because the July 2018 to June 2020 months would be represented twice in the averages. For comparison, the average for July 2017 to June 2020 (4-year period) is 96.69%, which produces a Standard Deviation of 1.67%, resulting in a Penalty Threshold of 95.02%.
- d. The proposed method for calculating a fixed benchmark and resulting penalty threshold did not have the intent of overweighting the performance from July 2018 to June 2020. Rather, when the FY 2021 benchmark and resulting penalty threshold was initially calculated using historical criteria and reviewed internally at the Company, the consensus was that the FY 2020 benchmark and penalty threshold already provided Rhode Island customers with a high performance standard and that any penalty threshold at or above 95% (which would represent the highest penalty threshold in the history of this metric) would signal that the metric has reached its maturity level and therefore would require a fixed mean and penalty threshold. The Company felt that the average between the FY 2020 and FY 2021 benchmarks and penalty thresholds, as a fixed mean and penalty threshold, provided a high-performance standard and was derived from recent performance standards.

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PUC 2-4

Request:

Given the questions in (and responses to) PUC 2-3 above, did National Grid consider using any of the following to arrive at an appropriate fixed benchmark and threshold for Leak Call Response for Normal Business Hours—if not, explain why; if so, explain why the method was not proposed:

- a. an average of the previous 3 years (July 2018 to June 2021)
- b. an average of the previous 4 years (July 2017 to June 2021)
- c. some other period of averaging.

Response:

- a. Please refer to the response in PUC 2-3, part d. The average for the previous 3 years (July 2018 to June 2021) represents the benchmark and penalty threshold as calculated using historical criteria (assuming updated business hours of M-F 8:00-16:00, excluding holidays). This produced a penalty threshold of 95.18%, which the Company views as being fully matured performance which requires a fixed mean and penalty threshold.
- b. The average of the previous 4 years was reviewed but was not considered as a proposed fixed mean and penalty threshold because it produced a penalty threshold that exceeded 95%.
- c. No additional periods were considered for averaging.

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PUC 2-5

Request:

In PUC 1-5, the PUC asked how National Grid's behavior would change if the PUC approves National Grid's proposal to shorten the period of the normal business hours in the response metric. Here, please explain how National Grid's behavior would change if the PUC denied the proposal.

Response:

The Company's behavior would not change if the PUC denied the proposal. Regardless of the PUC's decision regarding the proposed changes to this measure, National Grid will continue to place the safety of the public first and continue to remain diligent in responding to emergency calls as quickly as possible.