

November 4, 2021

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**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a National Grid (“National Grid” or the “Company”), enclosed, please find a Petition to modify certain service quality measures within the Gas Service Quality Plan (“Gas SQP”). The enclosed Petition is being filed in accordance with 810-RICR-00-00-1.11(A).

On August 6, 2021, the Company filed its Gas SQP Annual Report for Fiscal Year 2021 (“FY 2021 Annual Report”). At that time, the Company indicated that it anticipated filing a formal Petition at a later date through which the Company would seek approval from the Public Utilities Commission (“PUC”) to modify certain service quality measures. The enclosed represents such formal Petition. Specifically, the Company is respectfully requesting PUC approval to make the following modifications to the Gas SQP effective for FY 2022:

- To measure leak call responsiveness – normal business hours using the hours of Monday through Friday 8:00 a.m. to 4:00 p.m. (excluding holidays) and measure leak call responsiveness – after normal business hours using the hours outside of Monday through Friday 8:00 a.m. to 4:00 p.m. (including Saturdays, Sundays, and holidays);
- To discontinue the service measure for customer requested meter tests subject to the Company continuing to complete customer requested meter tests within a 15-day period (meaning the practice continues but it is not measured for purpose of the Gas Service Quality Plan);
- To set a fixed mean and penalty threshold for the service measure for oncycle meter reads; and
- To set a fixed mean and penalty threshold for the service measure for leak call responsiveness – normal business hours.

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The purpose of the Petition is to more accurately reflect the Company's current business practices in connection with the leak call responsiveness service measures and address the service measures (customer requested meter tests; on-cycle meter reads and leak call responsiveness-normal business hours) that have reached a high level of maturity.

In support of making the above-referenced modifications to the Gas SQP, please see the enclosed Petition.

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 3476 Service List
Christy Hetherington, Esq.
Al Mancini, Division

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

THE NARRAGANSETT ELECTRIC COMPANY)	
D/B/A NATIONAL GRID PETITION TO)	
MODIFY SERVICE MEASURES AND BENCHMARKS)	DOCKET NO. 3476
UNDER THE GAS SERVICE QUALITY PLAN)	
)	

**PETITION TO MODIFY SERVICE MEASURES AND BENCHMARKS UNDER
THE GAS SERVICE QUALITY PLAN**

The Narragansett Electric Company d/b/a National Grid (“National Grid” or the Company”) hereby respectfully submits this general petition (this “Petition”) in accordance with 810-RICR-00-00-1.11(A). The Company seeks approval by the Public Utilities Commission (“PUC”) to make the following modifications to the Gas Service Quality Plan (“Gas SQP”):

- To measure leak call responsiveness – normal business hours using the hours of Monday through Friday 8:00 a.m. to 4:00 p.m. (excluding holidays) and measure leak call responsiveness – after normal business hours using the hours outside of Monday through Friday 8:00 a.m. to 4:00 p.m. (including Saturdays, Sundays, and holidays);
- To discontinue the service measure for customer requested meter tests subject to the Company continuing to complete customer requested meter tests within a 15-day period (meaning the practice continues but it is not measured for purpose of the Gas SQP);
- To set a fixed mean and penalty threshold for the service measure for on-cycle meter reads; and
- To set a fixed mean and penalty threshold for the service measure for leak call responsiveness – normal business hours.

The Company respectfully requests that the above modifications take effect for fiscal year (“FY”) 2022 which runs from July 1, 2021 through June 30, 2022 and continue for future fiscal years until terminated or modified by the PUC. The PUC possesses the authority to adopt proposed modifications to the Gas SQP as it did via Order No. 17605 (2003) and Order No. 20864 (2012).

In support of this Petition, the Company states the following:

GAS SERVICE QUALITY PLAN

1. The Gas SQP is representative of the directives issued by the PUC via Order No. 17605 (2003)¹ and Order No. 20864 (2012).²
2. The purpose of the Gas SQP is to ensure that the Company's gas customers receive a reasonable level of service. To that end, the Gas SQP is comprised of the following five key aspects: (i) service measures; (ii) benchmark standards; (iii) a penalty amount for not meeting the benchmark standards; (iv) the penalty weight for each measure; and (v) the time period for measuring performance to assess a penalty.³
3. The Gas SQP consists of eight service measures: (i) abandoned call rate; (ii) average speed of answer; (iii) on-cycle meter reads; (iv) testing of meters; (v) customer requested meter tests completed; (vi) service appointments met as scheduled; (vii) leak call responsiveness – normal business hours; and (viii) leak call responsiveness – after normal business hours.⁴

¹ See PUC Order No. 17605, [http://www.ripuc.ri.gov/eventsactions/docket/3476-NEGasOrd17605\(11-21-03\).pdf](http://www.ripuc.ri.gov/eventsactions/docket/3476-NEGasOrd17605(11-21-03).pdf)

² See PUC Order No. 20864, [http://www.ripuc.ri.gov/eventsactions/docket/3476-NGrid-Ord20864\(11-8-12\).pdf](http://www.ripuc.ri.gov/eventsactions/docket/3476-NGrid-Ord20864(11-8-12).pdf)

³ See Pre-Filed Direct Testimony of Amy Smith dated July 17, 2020, Page 5 of 13, Lines 16-21, [http://www.ripuc.ri.gov/eventsactions/docket/3476-Gas%20SQ-Request%20for%20Relief%20\(PUC%207-17-2020\).pdf](http://www.ripuc.ri.gov/eventsactions/docket/3476-Gas%20SQ-Request%20for%20Relief%20(PUC%207-17-2020).pdf)

⁴ See Id. at Page 6 of 13, Lines 1-5; and PUC Order No. 17605, ¶ 2, [http://www.ripuc.ri.gov/eventsactions/docket/3476-NEGasOrd17605\(11-21-03\).pdf](http://www.ripuc.ri.gov/eventsactions/docket/3476-NEGasOrd17605(11-21-03).pdf)

4. For each FY (July 1 through June 30), benchmarks and penalty thresholds are updated for seven⁵ of the eight service measures in accordance with the methodology set forth in the Gas SQP.⁶ The updated benchmarks and penalty thresholds are presented through the Company's Annual Report for Gas Service Quality.
5. If the Company falls below any of the penalty thresholds, it incurs a penalty; and the money paid in penalties is credited to ratepayers.⁷ Such a credit to ratepayers is made through the Service Quality Performance Factor which is presented through the Company's annual Gas Distribution Adjustment Charge ("DAC") Filing.⁸
6. Through this Petition, the Company is not seeking relief of any penalties. Furthermore, the Company did not incur any penalties during FY 2021 that led to this Petition. Rather, the purpose of this Petition is to more accurately reflect the Company's current business practices in connection with the leak call responsiveness service measures and address the service measures (customer requested meter tests; on-cycle meter reads and leak call responsiveness-normal business hours) that have reached a high level of maturity.

⁵ The metrics for testing of meters are set on a calendar year basis and are adjusted to reflect the 10 and 15-year requirements in the Division's Rules and Regulations for Gas Utilities, Master Meter Systems, and Jurisdictional Propane Systems, [815-RICR-20-00-1](#). See Agreement to Modify Performance Benchmarks, Pages 2-3, Subsection 2, which was approved by the PUC via Order No. 20864, [http://www.ripuc.ri.gov/eventsactions/docket/3476-NGrid-Ord20864\(11-8-12\).pdf](http://www.ripuc.ri.gov/eventsactions/docket/3476-NGrid-Ord20864(11-8-12).pdf).

⁶ See PUC Order No. 17605, ¶ 3, referencing the Company's Brief and Plan Synopsis dated June 23, 2003, Page 3, [http://www.ripuc.ri.gov/eventsactions/docket/3476-NEGas-Brief\(6-23-03\).PDF](http://www.ripuc.ri.gov/eventsactions/docket/3476-NEGas-Brief(6-23-03).PDF)

⁷ See Report and Order No. 23962, Page 1, [http://www.ripuc.ri.gov/eventsactions/docket/3476-NGrid-Ord23962%20\(1-5-2021\).pdf](http://www.ripuc.ri.gov/eventsactions/docket/3476-NGrid-Ord23962%20(1-5-2021).pdf)

⁸ See R.I.P.U.C. NG-GAS No. 101, Section 3, Schedule A, Sheet 7, Subsection 3.6, https://www.nationalgridus.com/media/pdfs/billing-payments/rigas_tariff.pdf

LEAK CALL RESPONSIVENESS - CHANGE OF BUSINESS HOURS

7. The Company respectfully seeks approval by the PUC to measure leak call responsiveness – normal business hours using the hours of Monday through Friday 8:00 a.m. to 4:00 p.m. (excluding holidays) and measure leak call responsiveness – after normal business hours using the hours outside of Monday through Friday 8:00 a.m. to 4:00 p.m. (including Saturdays, Sundays, and holidays).
8. The purpose of this request is to align the SQP with the Company’s actual business hours.
9. Historically this measure considered business hours to be 8:00 a.m. to 4:30 p.m. However, as part of the Gas Business Enablement (“GBE”) implementation, the Company identified a misalignment of the business hours used to measure the SQP (8:00 a.m. to 4:30 p.m.) versus the Company’s standardized normal business hours of 8:00 a.m. to 4:00 p.m., which is a normal working shift for Company personnel. As such, approval of this request would conform the metric to the Company’s normal business hours.

CUSTOMER REQUESTED METER READS – DISCONTINUANCE

10. The Company respectfully seeks approval by the PUC to discontinue the service measure for customer requested meter tests subject to the Company continuing to complete customer requested meter tests within a 15-day period (meaning the practice continues but it is not measured for purpose of the Gas SQP).

11. As shown in the Company's FY 2021 Annual Report on Gas Service Quality, the Company completed 100% of the customer-requested meter tests within 15 days during the 36 months of the benchmark period and only received an average of 6.0 requests per year over that time.
12. The Company has completed 100% of the customer-requested meter tests dating back to August 2008 during which the Company missed the 15-day compliance on one customer request.
13. Based on the low occurrence of the requests and high rate of compliance, the Company believes this metric has reached its maturity level and can be removed from the annual performance measures.
14. For purposes of clarity, the Company is simply proposing to remove the metric and will continue to complete customer-requested meter tests within 15 days.

ON-CYCLE METER READS – FIXED PENALTY THRESHOLD

15. The Company respectfully seeks approval by the PUC to set a fixed mean and penalty threshold for the service measure for on-cycle meter reads.
16. The on-cycle meter reads metric has achieved high performance with minimal monthly variations for the past three years. Under its current calculation method, the Company believes this metric has also reached its maturity level. The 36-month average (mean) performance for this metric was 98.76% with a standard deviation of 0.22%, which, under the existing calculation methods, results in a FY 2022 penalty threshold of 98.54%. Although the 36-month mean of 98.54% and low standard deviation of 0.22%

reflects a high level of performance for Rhode Island customers, which is due in part to improved technology investments and processes, it is also a result of favorable weather conditions. Thus, the standard deviation of 0.22% and resulting penalty threshold of 98.54% does not allow for a realistic multi-day (5-day) weather event in which two days of meter reads would be missed. When calculating a proposed fixed mean and penalty threshold, the Company factored such a weather event into the 36-month average by deducting 29,319 meter reads from January 2020 (2 days of missed meter reads). The result would be a mean of 98.47%, a standard deviation of 1.65%, and a penalty threshold of 96.82%, which the Company considers to be a high-performance standard for Rhode Island Customers, but also allows for a realistic temporary performance variation.

17. Therefore, the Company requests a fixed mean of 98.47%, a standard deviation of 1.65%, and a penalty threshold of 96.82%.

**LEAK CALL RESPONSIVENESS – NORMAL BUSINESS HOURS –
FIXED PENALTY THRESHOLD**

18. The Company respectfully seeks approval by the PUC to set a fixed mean and penalty threshold for the service measure for leak call responsiveness – normal business hours.
19. The leak call responsiveness – normal business hours metric has achieved high performance for the past three years. Under its current calculation method, the Company believes this metric has also reached its maturity level. The 36-month average (mean) performance for this metric was 96.89% with a standard deviation of 1.71%,

which would result in a FY 2022 penalty threshold of 95.18% under the existing calculation methods. This would increase the penalty threshold by 0.45% compared to the FY 2021 penalty threshold of 94.73%, which already represented a best in class performance standard. A penalty threshold of 95.18% would also present the highest penalty threshold in the history of the metric as compared to a penalty threshold of 87.97% which was agreed upon when this metric was originally put in place in 2003. To derive a proposed fixed penalty threshold, the Company calculated the average mean, standard deviation, and penalty threshold between those used for FY 2021 and those that, absent any modifications to the Gas SQP, would be used for FY 2022. The averages resulted in a mean of 96.68%, a standard deviation of 1.72%, and a penalty threshold of 94.96%.

20. Therefore, the Company requests a fixed mean of 96.68%, a standard deviation of 1.72%, and a penalty threshold of 94.96%.

DIVISION'S POSITION

21. In 2020, the Division provided support for two of the Company's requests: (i) to change the business hours for the leak call responsiveness service measures and (ii) the discontinuance of service measure for customer requested meter tests. The Division's support was reflected through a filing in this docket dated September 29, 2020.⁹

CONCLUSION

⁹ See the Division's Position/Recommendations dated September 29, 2020, Pages 4-5, Nos. 3 & 4, [http://www.ripuc.ri.gov/eventsactions/docket/3476-DPUC-Recommendation%20\(9-29-20\).pdf](http://www.ripuc.ri.gov/eventsactions/docket/3476-DPUC-Recommendation%20(9-29-20).pdf)

The Company respectfully requests that the PUC grant the Company's request to modify the service measures and benchmarks within the Gas SQP as described above.

Respectfully submitted by,

**THE NARRAGANSETT ELECTRIC
COMPANY d/b/a NATIONAL GRID**

By its attorney,



Andrew S. Marcaccio (RI #8168)
280 Melrose Street
Providence, RI 02907
Telephone: (781) 784-4263
Email: andrew.marcaccio@nationalgrid.com;
Dated: November 4, 2021

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.



November 4, 2021

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

Name/Address	E-mail Distribution List	Phone
Jennifer Brooks Hutchinson, Esq. Andrew Marcaccio, Esq. National Grid 280 Melrose St. Providence, RI 02907	Andrew.marcaccio@nationalgrid.com ;	401-784-7288
	Celia.Obrien@nationalgrid.com ;	401-784-4263
	Jennifer.Hutchinson@nationalgrid.com ;	
	Joanne.scanlon@nationalgrid.com ;	
	Amy.smith@nationalgrid.com ;	
	Nathan.kocon@nationalgrid.com ;	
Leticia C. Pimentel Robinson & Cole LLP One Financial Plaza 14th Floor Providence, RI 02903	lpimentel@rc.com ;	401-709-3337
Leo Wold, Esq. Division of Public Utilities and Carriers	Leo.wold@dpuc.ri.gov ;	401-780-2177
	Linda.george@dpuc.ri.gov ;	
	Margaret.L.Hogan@dpuc.ri.gov ;	
	Al.mancini@dpuc.ri.gov ;	
	John.bell@dpuc.ri.gov ;	
	Robert.bailey@dpuc.ri.gov ;	
	Don.ledversis@dpuc.ri.gov ;	
	dmacrae@riag.ri.gov ;	
Original & nine (9) copies file w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov ;	401-780-2107
	Patricia.lucarelli@puc.ri.gov ;	
	Alan.nault@puc.ri.gov ;	
	Todd.bianco@puc.ri.gov ;	