

June 22, 2018

**VIA HAND DELIVERY & ELECTRONIC MAIL**

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

**RE: Docket 3476 – Quarterly Report on Service Quality Plan**  
**Request for Relief from Penalty Because of Exogenous and/or Force Majeure Event**

Dear Ms. Massaro:

On behalf of National Grid,<sup>1</sup> I am enclosing the Company's request for relief from a penalty under the Gas Service Quality Plan (the Service Quality Plan) as a result of an exogenous and/or force majeure event. Pursuant to Rhode Island Public Utilities Commission (PUC) Order No. 17605 (November 21, 2003) regarding the Service Quality Plan in Docket No. 3476, if the Company "contends that an exogenous event or a force majeure occurred, it must seek relief from the Commission and the burden of proof will be on [the Company]." The Company's November 2017 performance for On-Cycle Meter Reads fell below the penalty threshold established in Order No. 17605 as a result of an exogenous and/or force majeure event, namely the October 29-30, 2017 wind and rain storm (the October Storm). The October Storm required the reallocation of the Company's meter reading workforce to provide emergency wires down support during the week of October 30, during which the Company responded to more than 5,000 wires down calls. As a result of the five days of estimated meter reads incurred during the Company's response to the October Storm, the Company will not be able to achieve the annual On-Cycle Meter Reads target under the Service Quality Plan. Accordingly, the Company requests relief from the PUC from the On-Cycle Meter Reads penalty as a result of the exogenous and/or force majeure event.

This request is supported by the pre-filed direct testimony of Gary Bennett, Director of Customer Meter Services, New England South and West.

Thank you for your attention to this filing. If you have any questions, please contact me at 401-784-7415.

Very truly yours,



Robert J. Humm

Enclosure

cc: Docket 3476 Service List  
Leo Wold, Esq.

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<sup>1</sup> The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 3476  
In Re: Gas Service Quality Plan  
Witness: Bennett

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**PRE-FILED DIRECT TESTIMONY**

**OF**

**GARY BENNETT**

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1 **I. Introduction**

2 **Q. Please state your name and business address.**

3 A. My name is Gary Bennett. My business address is 280 Melrose Street, Providence,  
4 Rhode Island 02907.

5

6 **Q. By whom are you employed and in what capacity?**

7 A. I am employed by National Grid USA Service Company, Inc. (Service Company) as  
8 Director of Customer Meter Services, New England South and West. In this role, I  
9 manage the Customer Meter Services department in Rhode Island and Southern and  
10 Western Massachusetts. Among other responsibilities, I oversee the work performed for  
11 the gas and electric service quality measures set forth in The Narragansett Electric  
12 Company's (the Company) service quality plans, including the execution of meter  
13 reading.

14

15 **Q. Please describe your educational background and professional experience.**

16 A. I earned a Bachelor of Science degree in Marine Engineering from Massachusetts  
17 Maritime Academy in 1982. In 1987, I earned a Master's degree in Business  
18 Administration from Rensselaer Polytechnic Institute. Before working at National Grid, I  
19 worked at General Dynamics as a Nuclear Test Engineer from 1982 to 1988, and at  
20 LTXX as a Manufacturing Supervisor from 1988 to 1991. In 1991, I began working at  
21 National Grid – namely, its predecessor companies Boston Gas Company (Boston Gas)

1 and KeySpan Corporation (KeySpan). At Boston Gas, I held the following positions:  
2 Budget Analyst in the Field Customer Service department; Field Coordinator for the  
3 Distribution department; and Supervisor of Gas Dispatch. At KeySpan Home Energy  
4 Services, a division of KeySpan, I held the position of Manager of Field Operations and  
5 Director of Support Services. I also held the position of Director of Call Center and  
6 Billing at KeySpan. After National Grid merged with KeySpan, I held the following  
7 positions: Director of Customer Meter Services, New England North; Director of  
8 Dispatch; Director of Performance and Reporting; and my current position as Director of  
9 Customer Meter Services, New England South and West. I assumed my current position  
10 in 2016.

11  
12 **Q. Have you previously testified before the Rhode Island Public Utilities Commission**  
13 **(PUC) or any other regulatory commission?**

14 A. I have not previously testified before the PUC. However, in 2008, I testified before the  
15 New Hampshire Public Utilities Commission as part of EnergyNorth Natural Gas, Inc.  
16 d/b/a National Grid NH's rate case filing in Docket DG 08-009.

17  
18 **II. Purpose and Structure of Testimony**

19 **Q. What is the purpose of your testimony in this docket?**

20 A. The purpose of my testimony is to describe the Company's fiscal year (FY) 2018 On-  
21 Cycle Meter Reads performance as part of the overall Gas Service Quality Plan (the

1 Service Quality Plan). In particular, my testimony will demonstrate that the Company's  
2 On-Cycle Meter Reads performance fell below the penalty threshold established by the  
3 PUC in the Service Quality Plan in Docket No. 3476 as a result of an exogenous and/or  
4 force majeure event, namely the October 29-30, 2017 wind and rain storm (the October  
5 Storm). Accordingly, my testimony requests relief from the PUC, pursuant to Order No.  
6 17605 in Docket No. 3476, from the On-Cycle Meter Reads penalty as a result of the  
7 exogenous and/or force majeure event.  
8

9 **Q. How is the testimony structured?**

10 A. Section I of my testimony presents the Introduction. Section II describes the purpose and  
11 structure of my testimony. Section III presents the Company's request for relief from the  
12 PUC as a result of the occurrence of an exogenous and/or force majeure event, including  
13 the background and reasons for the request. Section IV is the conclusion of my  
14 testimony.  
15

16 **III. Request for Relief from Penalty Because of Exogenous and/or Force Majeure Event**

17 **Q. What is the purpose of the Service Quality Plan?**

18 A. The purpose of the Service Quality Plan is to ensure that the Company's gas customers  
19 receive a reasonable level of service. The Service Quality Plan is comprised of the  
20 following five key aspects: service measures, benchmark standards, a penalty amount for  
21 not meeting the benchmark standards, the penalty weight for each measure, and the time

1 period for measuring performance to assess a penalty. To meet these standards, the  
2 Company's Service Quality Plan includes the following eight service quality measures to  
3 monitor the quality of service to customers: Abandoned Call Rate; Average Speed of  
4 Answer; On-Cycle Meter Reads; Testing of Meters; Customer Requested Meter Tests  
5 Completed; Service Appointments Met as Scheduled; Leak Call Responsiveness –  
6 Normal Business Hours; and Leak Call Responsiveness – After Normal Business Hours.

7  
8 **Q. What is the On-Cycle Meter Reads service quality measure?**

9 A. The On-Cycle Meter Reads percentage measures the ratio of actual meter reads to the  
10 number of meters assigned to be read.

11  
12 **Q. What is the current service quality benchmark for On-Cycle Meter Reads, and how  
13 was that benchmark established?**

14 A. The current service quality benchmark for On-Cycle Meter Reads is 98.70 percent over  
15 the Service Quality Plan fiscal year,<sup>1</sup> with a penalty threshold of 98.53 percent. When the  
16 PUC established the Service Quality Plan in 2003, the PUC originally set a benchmark of  
17 94.52 percent for On-Cycle Meter Reads, with a penalty threshold of 93.30 percent,  
18 based on a three-year meter reading performance utilizing one standard deviation as a  
19 means to set the penalty threshold. The Company has consistently achieved and/or

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<sup>1</sup> The Service Quality Plan fiscal year is July 1 through June 30, as set forth in Docket No. 3476.

1 exceeded the On-Cycle Meter Reads benchmark each year since its inception. As a  
2 result, the On-Cycle Meter Reads benchmark has increased to its current level of 98.70  
3 percent with a much narrower penalty threshold.  
4

5 **Q. Please describe the process for how the Company completes the On-Cycle Meter**  
6 **Reads?**

7 A. The Company reads all of its approximately 795,000 gas and electric meters in Rhode  
8 Island each month, including approximately 278,000 gas meters each month.<sup>2</sup> The gas  
9 meter reading schedule is divided into 20 cycles per month. The Company uses two  
10 methods to read gas meters. First, more than 99 percent of the gas meters are read by an  
11 Automated Meter Reading process. Automated Meter Reading uses an Encoded  
12 Receiver Transmitter device installed on the meter that transmits a radio signal to a meter  
13 reading application located on a Company vehicle as the vehicle passes by the meter.  
14 Second, the remaining meters are read through an Electronic Meter Reading process.  
15 Under the Electronic Meter Reading process, a pedestrian meter reader manually reads a  
16 meter and enters the information into a handheld meter reading device. Gas meters must  
17 be read within three days of their scheduled reading date before the window is closed for  
18 customer billing. Any meter that is not read within the three day window will be

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<sup>2</sup> The same Company employees read both gas and electric meters.



1 provided an estimated read on a customer's bill. The Company uses between 15 and 17  
2 employees to read all gas and electric meters each month.

3  
4 **Q. During week of October 30, 2017, how many gas meters were assigned to be read  
5 and how many actual meter reads occurred?**

6 A. The table below sets forth the schedule of gas meters assigned to be read, and actual  
7 meter reads, during the week of October 30, 2017:

Date	Meters Assigned to be Read	Actual # of Meters Read
October 30 (Cycle 20)	9,974 meters assigned	0 meters read
October 31 (Cycle 1)	20,183 meters assigned	0 meters read
November 1 (Cycle 2)	10,448 meters assigned	0 meters read
November 2 (Cycle 3)	21,697 meters assigned	0 meters read
November 3 (Cycle 4)	12,379 meters assigned	0 meters read

8  
9 Thus, none of the gas meters scheduled to be read during the week of the October Storm  
10 were actually read.

11  
12 **Q. Why did the Company not read any of the scheduled meters during the week of the  
13 October Storm?**

14 A. The October Storm required the reallocation of the Company's Customer Meter Services  
15 department, including the meter reading workforce, to provide emergency wires down  
16 support during the week of October 30, 2017. "Emergency wires down support" consists  
17 of dispatching a qualified person to respond to electric wires on the ground that could  
18 potentially pose a public safety hazard and to take appropriate action to make the area

1 safe, including guarding the fallen wire until a qualified crew can be dispatched to  
2 remediate the wires down issue. During the week of October 30, the Company responded  
3 to more than 5,000 wires down calls. As a result of the five days of estimated meter  
4 reads incurred during the Company's response to the October Storm, the Company will  
5 not be able to achieve the annual On-Cycle Meter Reads target.

6  
7 **Q. How does the Company's performance during the week of October 30, 2017 affect**  
8 **the Service Quality Plan annual benchmark for On-Cycle Meter Reads?**

9 A. As a result of the five days the Company was unable to read meters because of the  
10 October Storm, the Company will not be able to achieve its required annual benchmark  
11 of 98.70 percent or annual penalty threshold of 98.53 percent, even if the Company were  
12 to achieve an On-Cycle Meter Reads rate of 100 percent for the remainder of the Service  
13 Quality Plan fiscal year.

14  
15 **Q. Why is the Company making this request for relief from the penalty?**

16 A. Pursuant to Order No. 17605 in Docket No. 3476, if the Company "contends that an  
17 exogenous event or a force majeure occurred, it must seek relief from the Commission  
18 and the burden of proof will be on [the Company]." The October Storm is an exogenous  
19 and force majeure event. As such, the Company seeks relief from the penalty associated  
20 with not meeting the annual benchmark for the On-Cycle Meter Reads, which is the  
21 direct result of the impact of the October Storm.

1 **Q. Why is the October Storm an exogenous and force majeure event?**

2 A. The October Storm was a major wind and rain event that severely impacted the  
3 Company's infrastructure throughout its service territory. Contrary to the forecasts, the  
4 October Storm brought strong, hazardous wind gusts that affected the majority of the  
5 Northeast during the night on Sunday, October 29 through Monday, October 30, 2017.  
6 The October Storm impacted a total of approximately 176,247 customers in the  
7 Company's Rhode Island service territory, with approximately 144,144 customers  
8 impacted at the October Storm's peak. The Company experienced interruptions in all 38  
9 communities it serves, with more than 200 distribution feeders affected and more than  
10 5,000 wires down calls throughout the state. In fact, the October Storm impacted more  
11 customers than Hurricane Sandy in 2012 and produced more physical damage to the  
12 Company's poles than Tropical Storm Irene in 2011. Overall, the October Storm posed  
13 significant challenges for the Company, as the weather rapidly escalated to a very severe  
14 event beyond the expected forecasts, and impacted all of the Company's communities  
15 within a very short timeframe.

16  
17 **Q. But for the five-day period during the October Storm, would the Company have  
18 incurred a penalty for its On-Cycle Meter Reads performance?**

19 A. No. To put the impact of the October Storm into context, the Company's inability to read  
20 meters on November 1, 2, and 3 during the week of October 30, 2017 resulted in a  
21 November 2017 meter read rate of 83.17 percent, comprised of 278,026 meters scheduled

1 to be read and 231,236 meters actually read. In comparison, for the past five years, the  
2 Company had averaged an annual meter reading rate of approximately 98.70 percent.  
3 Assuming the June 2018<sup>3</sup> results are in line with historical experience, a typical meter  
4 reading rate for the impacted week in November 2017 would have resulted in an annual  
5 performance rate above the penalty threshold for the year. The last time the Company  
6 fell below even a 98 percent annual On-Cycle Meter Reads rate for any one month was in  
7 July 2013 (97.8 percent), which was still well above the annual benchmark and penalty  
8 threshold at the time.

9  
10 **IV. Conclusion**

11 **Q. Does this conclude your testimony?**

12 **A. Yes.**

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<sup>3</sup> The Company expects the June 2018 data will be available in mid-July 2018.