

December 5, 2014

BY HAND DELIVERY & ELECTRONIC MAIL

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

**RE: Docket 4237 - Commission Investigation relating to Stray and Contact Voltage
Occurring in Narragansett Electric Company Territories**

Dear Ms. Massaro:

On behalf of National Grid,¹ I write to inform the Rhode Island Public Utilities Commission (PUC) of a recent development relating to the above-referenced docket.

The Company currently uses Premier Utility Services, LLC (Premier) to perform stray voltage testing in Rhode Island. To perform stray voltage testing, Premier has used a mobile testing sensor device created by L-3 Communications Holdings, Inc. d/b/a Narda Safety Test Solutions (Narda), which is the subject a patent infringement lawsuit brought by Power Survey, LLC (Power Survey) against Narda and Premier. On November 21, 2014, the United States District Court for the District of New Jersey granted Power Survey's motion for a preliminary injunction and entered a preliminary injunction prohibiting Premier from using the Narda device. (*See* Civil Action No. 13-5670(FSH), Document No. 131). Consequently, Premier currently cannot use the Narda device to perform stray voltage testing.

To fulfill its obligation to perform stray voltage testing for National Grid in Rhode Island, Premier will use the Electric Field Sensor Device (E-Field), a new mobile sensing device for the detection of stray voltage developed by the University of Michigan. In August 2014, National Testing Systems, an independent laboratory in Boxborough, MA, certified E-Field, which can detect stray voltage from 1-600 volts. National Testing Systems is the same independent laboratory that certified the Narda device. A copy of the laboratory certification letter for the new mobile device is included as Attachment A to this letter.

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

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The Company has informed the Rhode Island Division of Public Utilities and Carriers (the Division) of these developments, and Premier plans to begin testing with E-Field on Sunday, December 7, 2014. Manual testing of Company and public equipment will be performed by the Company approximately one week after the mobile testing.

Thank you for your attention to this transmittal. If you have any questions, please contact me at (781) 907-2121.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Raquel Webster", is written over a light blue rectangular background.

Raquel J. Webster

Enclosure

cc: Docket 4237 Service List
Steve Scialabba
Leo Wold, Esq.



www.nts.com

November 25, 2014

Mr. Marc Makely, President
Premier Utility Services LLC
100 Marcus Blvd, Suite 3
Hauppauge, NY 11788

Dear Mr. Makely:

National Technical Systems (NTS), a listed nationally recognized testing laboratory (NRTL) and independent third-party analysis firm, recently performed testing on the Electric Field Sensor System. Testing occurred at our Boxborough, Massachusetts facility on 20 August, 21 August and 25 August, 2014.

NTS testing included both chamber (bench) testing of the sensor, and in the field operational testing, to validate its real world capabilities.

Results based upon witnessed electric field detection, and a number of variables introduced consistent with stray field interference testing, NTS can certify that the Electric Field Sensor System is able to reliably detect the electric fields on objects with AC potential ranging from 1 to 600 volts on them.

Additionally, concurrent testing was performed using the Electric Power Research Institute (EPRI) hand held contact voltage detector. NTS asserts the EPRI contact voltage detector is able to reliably detect the electric fields on objects with AC potential ranging from 1 to 600 volts on them.

Test and protocol details are described in NTS Test Report TR-PR031642-14D, Rev. 0, dated September 16, 2014.

Respectfully,

CHARLES R. PILOTTE
Program Manager

National Technical Systems
1146 Massachusetts Avenue
Boxborough, MA 01719
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charlesp@ntscorp.com

Certificate of Service

I hereby certify that a copy of the cover letter and/or any materials accompanying this certificate was electronically transmitted to the individuals listed below.

Copies of this filing were hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities Carriers.



Joanne M. Scanlon

December 5, 2014
Date

**Docket No. 4237 – Commission’s Proceeding Relating to Stray
and Contact Voltage Pursuant to Enacted Legislation
Service List updated 3/20/14**

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