

April 20, 2017

**VIA HAND DELIVERY & ELECTRONIC MAIL**

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

**RE: Docket No. 4685 – The Narragansett Electric Company d/b/a National Grid  
Tariff Advice Filing to Amend Tariff RIPUC No. 2142  
Street and Area Lighting – Customer Owned Equipment S-05  
Reply Comments**

Dear Ms. Massaro:

On behalf of National Grid,<sup>1</sup> I submit this letter to reply to the Comments filed by Prism Streetlights, Inc. d/b/a PRISM, the RI League of Cities and Towns, and the Washington County Regional Planning Council (collectively, the Municipalities). National Grid is pleased that the Municipalities support the proposed changes to the Street and Area Lighting – Customer Owned Equipment S-05 tariff, RIPUC No. 2142 (the S-05 Tariff),<sup>2</sup> and that the proposal to add the additional customer groups to the Availability section of the Tariff is acceptable to the Municipalities. National Grid has previously explained why it is unnecessary and inadvisable to add the two additional groups of customers proposed by the Municipalities in their Comments – regional school districts and private citizens – but will, nonetheless, address those groups herein.

**A. Regional School Districts**

As explained in National Grid's response to Data Request PUC 1-1, after a review of its billing inventory, National Grid determined that the municipal purchases to date already include the street and area lighting assets (street lights) serving the regional school districts. When a municipality with a regional school district purchases its street lights from National Grid, the street lights of the regional school district that are physically located in such municipality are included in the sale to that municipality. For example, if the regional school district is comprised of Town X and Town Y, the regional school district's street lights physically located in Town X would be included in the sale of street lights to Town X; and the regional school district's street lights physically located in Town Y would be included in the sale of street lights to Town Y. Moreover, no regional school district has contacted National Grid expressing an interest in

---

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

<sup>2</sup> The proposed Tariff assigns RIPUC No. 2179 as the new tariff number, canceling the existing RIPUC No. 2142.

purchasing street lights. Accordingly, there is no need to add regional school districts to the Availability section of the S-05 Tariff.

**B. Private Citizens**

As explained in National Grid's response to Data Request PUC 1-1, National Grid strongly disagrees with adding private citizens to the S-05 Tariff. Currently, the S-05 Tariff applies only to municipalities that take unmetered lighting service under National Grid's General Street and Area Lighting Rate S-14 or Decorative Street and Area Lighting Service Rate S-06. Those rates are available only to government entities, including municipalities. This filing seeks to add to the S-05 Tariff the other government entities that currently take unmetered lighting service under Rates S-14 or S-06 – not private citizens. Indeed, Rates S-14 and S-06 are not available to private citizens. As explained in National Grid's responses to Data Requests PUC 1-2 and 1-4, National Grid is concerned with the additional risk created when additional workers are maintaining street light equipment attached to National Grid's utility poles or within underground structures. In particular, National Grid is concerned about the safety of all people working on the street lighting equipment because such equipment is within the electrified space of the distribution system and requires advanced protection equipment, training, and adherence to industry standards above those of a licensed electrician. National Grid does not believe private citizens who happen to have street lights on their property that light municipal roadways are equipped to handle such work. Thus, National Grid would caution against the potential risk of further opening the availability of the S-05 Tariff to private citizens.

The Municipalities' Comments also indicate that a municipality may wish to purchase street lights currently leased and billed by National Grid to a private citizen and include such street lights in the municipality's overall purchase of street lights from National Grid. If a private citizen agrees to have a municipality assume the billing responsibility for any such street lights, the private citizen may do so and National Grid will transfer the billing for the street lights from the private citizen to the municipality. Such street lights could then be included with the equipment purchased by the municipality from National Grid. There is no need to amend the S-05 Tariff for this to occur.

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

Very truly yours,



Robert J. Humm

cc: Docket 4685 Service List  
Leo Wold, Esq.  
Steve Scialabba, Division

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

April 20, 2017

Date

**Docket No. 4685 - National Grid's Tariff Advice to Amend Street and Area Lighting Customer Owned Equipment, RIPUC 2142 (S-05)**

**Service List updated 3/30/17**

<b>Name/Address</b>	<b>E-mail Distribution</b>	<b>Phone</b>
Robert Humm, Esq. National Grid 280 Melrose St. Providence, RI 02907	<a href="mailto:Robert.humm@nationalgrid.com">Robert.humm@nationalgrid.com</a> ;	401-784-7288
	<a href="mailto:Celia.obrien@nationalgrid.com">Celia.obrien@nationalgrid.com</a> ;	
	<a href="mailto:Joanne.scanlon@nationalgrid.com">Joanne.scanlon@nationalgrid.com</a> ;	
Leo Wold, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	<a href="mailto:LWold@riag.ri.gov">LWold@riag.ri.gov</a> ;	401-784-4775
	<a href="mailto:Steve.scialabba@dpuc.ri.gov">Steve.scialabba@dpuc.ri.gov</a> ;	
	<a href="mailto:Al.contente@dpuc.ri.gov">Al.contente@dpuc.ri.gov</a> ;	
	<a href="mailto:jmunoz@riag.ri.gov">jmunoz@riag.ri.gov</a> ;	
	<a href="mailto:dmacrae@riag.ri.gov">dmacrae@riag.ri.gov</a> ;	
<b>File an original &amp; 9 copies w/:</b> Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a> ;	401-780-2017
	<a href="mailto:Cynthia.WilsonFrias@puc.ri.gov">Cynthia.WilsonFrias@puc.ri.gov</a> ;	
	<a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov</a> ;	
	<a href="mailto:Margaret.hogan@puc.ri.gov">Margaret.hogan@puc.ri.gov</a> ;	
	<a href="mailto:Todd.bianco@puc.ri.gov">Todd.bianco@puc.ri.gov</a> ;	
Chris Kearns, Chief Program Development RI Office of Energy Resources (OER)	<a href="mailto:Christopher.Kearns@energy.ri.gov">Christopher.Kearns@energy.ri.gov</a> ;	401-574-9113
	<a href="mailto:Nicholas.ucci@energy.ri.gov">Nicholas.ucci@energy.ri.gov</a> ;	
Jeff Broadhead, Executive Director Washington County Regional Planning Council & PRISM	<a href="mailto:jb@wcrpc.org">jb@wcrpc.org</a> ;	
	<a href="mailto:dan@rileague.org">dan@rileague.org</a> ;	
Seth Handy, Esq.	<a href="mailto:seth@handylawllc.com">seth@handylawllc.com</a> ;	
Andrew Marcaccio, Esq.	<a href="mailto:Andrew.Marcaccio@doa.ri.gov">Andrew.Marcaccio@doa.ri.gov</a> ;	