

September 3, 2021

BY ELECTRONIC MAIL

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

**RE: Docket 4996 – Gas ISR FY2021 Reconciliation Filing
Docket 5165 – Distribution Adjustment Clause Filing
Responses to Division Data Requests – Set 1**

Dear Ms. Massaro:

I have enclosed National Grid's¹ responses to the Division of Public Utilities and Carriers' First Set of Data Requests issued in the above-referenced dockets.²

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

Very truly yours,



Raquel J. Webster

Enclosures

cc: Docket 4996 Service List
Docket 5165 Service List
Leo Wold, Esq.
Al Mancini, Division
John Bell, Division

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

² Per practice during the COVID-19 emergency period, the Company is providing a PDF version this report. The Company will provide the Commission Clerk with five (5) hard copies and, if needed, additional hard copies of this report upon request.

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket Nos. 4996 & 5165
Gas Infrastructure, Safety, and Reliability Plan FY2021
Reconciliation Filing and
2021 Distribution Adjustment Charge Filing
Responses to the Division's First Set of Data Requests
Issued on August 17, 2021

Division 1-1

Request:

Referring to Table C, please provide supporting documentation for the amounts in Column D and Column E.

Response:

Please see Attachment DIV 1-1-a for a revised version of Attachment C. The Company has revised Attachment C because the original Attachment C overstated the pre-FY21 spending amounts by \$18.62 million and understated FY21 spending by the same amount.

The revised pre- FY21 spending totals \$10.39 million. The overstatement was attributed to the inclusion of certain projects, placed in-service in FY21, with Pre FY21 spending totaling \$18.62 million. This amount was offset by an equal credit in the FY21 spending column that was generated when the project costs were transferred from CWIP to in-service. Removal of these items resulted in the revised version of Attachment C, which is provided as Attachment DIV 1-1-a to this response.

The updates were limited to the amounts reported in column D "CWIP Pre FY21" and column E "CWIP FY21 Spend". There was no change to the total CWIP amounts reported in column C.

Project level supporting documentation for the amounts in the revised version of Attachment C columns D and E is provided in Attachment DIV 1-1-b. Additional analysis of the column D CWIP Pre FY21 is included in Attachment DIV 1-1-c.

Attachment C - Adjusted Capital Additions and CWIP Balances						DIV 1-1-a
The Narragansett Electric Company d/b/a National Grid - RI Gas FY21 Assumed Capital Additions and March 31, 2021 Construction Work in Progress Balances by Investment Category (\$000)						
	A = B - C	B	C = D + E	D	E	
Categories	Adjusted Capital Additions Placed In-Service for FY21	Capital Additions From FY21 Spend	CWIP Balance as of 3/31/21	CWIP Pre FY21 Spend	CWIP FY21 Spend	
NON-DISCRETIONARY						
Public Works						
<i>CSC/Public Works - Non-Reimbursable</i>	\$8,150	\$12,441	\$4,292	\$476	\$3,816	
<i>CSC/Public Works - Reimbursable</i>	\$190	\$587	\$397	\$36	\$361	
<i>CSC/Public Works - Reimbursements</i>	(\$1,587)	(\$1,695)	(\$108)	(\$123)	\$15	
Public Works Total	\$6,753	\$11,334	\$4,580	\$388	\$4,192	
Mandated Programs						
<i>Corrosion</i>	\$1,604	\$2,141	\$537	\$21	\$516	
<i>Purchase Meters (Replacements)</i>	\$5,091	\$5,091	\$0	\$0	\$0	
<i>Reactive Leaks (CI Joint Encapsulation/Service Replacement)</i>	\$6,857	\$7,683	\$826	\$786	\$40	
<i>Service Replacements (Reactive) - Non-Leaks/Other</i>	(\$179)	\$487	\$666	\$211	\$455	
<i>Main Replacement (Reactive) - Maintenance (incl Water Intrusion)</i>	\$607	\$873	\$266	\$10	\$256	
<i>Transmission Station Integrity</i>	(\$0)	\$43	\$43	\$0	\$43	
<i>Other Mandated</i>	(\$87)	\$9	\$96	\$24	\$72	
Mandated Total	\$13,892	\$16,326	\$2,434	\$1,054	\$1,380	
Damage / Failure (Reactive)						
Damage / Failure (Reactive)	\$0	\$0	\$0	\$0	\$0	
NON-DISCRETIONARY TOTAL	\$20,645	\$27,660	\$7,014	\$1,442	\$5,573	
DISCRETIONARY						
Proactive Main Replacement						
<i>Main Replacement (Proactive) - Leak Prone Pipe</i>	\$44,692	\$54,635	\$9,942	\$2,195	\$7,747	
<i>Main Replacement (Proactive) - Large Diameter LPCI Program</i>	\$220	\$1,412	\$1,193	\$813	\$379	
<i>Atwells Avenue</i>	\$5,155	\$5,155	\$0	\$0	\$0	
Proactive Main Replacement Total	\$50,067	\$61,203	\$11,135	\$3,009	\$8,127	
Proactive Service Replacement						
Proactive Service Replacement Total	\$35	\$250	\$215	\$8	\$207	
Reliability						
<i>Gas System Control</i>	\$19	\$19	\$0	\$0	\$0	
<i>System Automation</i>	(\$30)	\$955	\$985	\$456	\$529	
<i>Heater Installation Program</i>	\$2,585	\$2,616	\$31	\$22	\$9	
<i>Pressure Regulating Facilities</i>	\$183	\$4,264	\$4,081	\$1,422	\$2,659	
<i>Allens Ave Multi Station Rebuild</i>	\$8,038	\$9,664	\$1,626	\$247	\$1,379	
<i>Take Station Refurbishment</i>	\$200	\$277	\$77	\$21	\$56	
<i>valve installation/replacement and stormwater management</i>	\$81	\$155	\$75	\$1	\$74	
<i>Gas System Reliability</i>	\$428	\$456	\$28	\$20	\$8	
<i>I&R - Reactive</i>	\$212	\$1,514	\$1,301	\$409	\$893	
<i>Distribution Station Over Pressure Protection</i>	\$331	\$1,378	\$1,047	\$104	\$943	
<i>LNG</i>	(\$307)	\$2,638	\$2,945	\$404	\$2,541	
<i>Replace Pipe on Bridges</i>	(\$46)	(\$44)	\$2	\$1	\$1	
<i>Access Protection Remediation</i>	\$71	\$71	\$0	\$0	\$0	
<i>Tools & Equipment</i>	\$147	\$482	\$335	\$277	\$58	
Reliability Total	\$11,911	\$24,444	\$12,533	\$3,384	\$9,148	
SUBTOTAL DISCRETIONARY (Without Gas Expansion)	\$62,014	\$85,897	\$23,883	\$6,401	\$17,482	
Southern RI Gas Expansion Project						
<i>Pipeline</i>	\$30,031	\$40,566	\$10,535	\$0	\$10,535	
<i>Other Upgrades/Investments</i>	(\$2,602)	\$714	\$3,316	\$2,500	\$816	
<i>Regulator Station Investment</i>	\$89	\$462	\$373	\$47	\$325	
Southern RI Gas Expansion Project Total	\$27,518	\$41,742	\$14,224	\$2,547	\$11,676	
DISCRETIONARY TOTAL (With Gas Expansion)	\$89,532	\$127,639	\$38,107	\$8,948	\$29,159	
CAPITAL ISR TOTAL (Base Capital - Without Gas Expansion)	\$82,659	\$113,557	\$30,897	\$7,842	\$23,055	
CAPITAL ISR TOTAL (With Gas Expansion)						
Budgets do not include incremental paving associated with new RI Paving Law or PE Stamps	\$110,178	\$155,299	\$45,121	\$10,390	\$34,732	
Incremental Costs¹						
<i>PE Stamps</i>	\$0	\$0	\$0	\$0	\$0	
<i>Incremental Paving - Main Installation</i>	\$0	\$0	\$0	\$0	\$0	
<i>Incremental Paving - Patches</i>	\$0	\$0	\$0	\$0	\$0	
<i>Incremental Paving - Southern RI Gas Expansion</i>	\$0	\$0	\$0	\$0	\$0	
Incremental Costs Total	\$0	\$0	\$0	\$0	\$0	
CAPITAL ISR TOTAL (with Gas Expansion, PE Stamps, and Incremental Paving)	\$110,178	\$155,299	\$45,121	\$10,390	\$34,732	

DIV 1-1-b

The Narragansett Electric Company
Attachment C Supporting Detail

#	ISR Sub-Category	PROJECT	PROJECT_DESCRIPTION	FY21 CWIP	Pre FY21 Spend	FY21 Spend
1	CSC/Public Works - Non-Reimbursable	CRCC306	Main Repl Pub work non-reimb-RI	4,075,266	217,888	3,857,379
		CRCC308	Gas Main Encroach Parallel-RI	180,518	257,841	(77,323)
		CRCC312	Gas Main Encroach Undermined-RI	35,951	-	35,951
	CSC/Public Works - Non-Reimbursable Total			4,291,736	475,729	3,816,007
2	CSC/Public Works - Reimbursable	C044752	RIDOT 195 Cont 15 - Reimbursables	(4,310)	(4,310)	(0)
		CRCC307	Main Repl Pub work reimb-RI	401,174	40,608	360,566
	CSC/Public Works - Reimbursable Total			396,864	36,298	360,566
3	CSC/Public Works - Reimbursements	CRCC307	Main Repl Pub work reimb-RI	(108,148)	(123,052)	14,904
	CSC/Public Works - Reimbursements Total			(108,148)	(123,052)	14,904
4	Corrosion	CRRC301	RI Corrosion WOs	537,353	21,155	516,198
	Corrosion Total			537,353	21,155	516,198
6	Reactive Leaks (CI Joint Encapsulation/Service Replacement)	CRFN211	CI Joint Encapsulate (RI hub rule)	18,381	18,381	-
		CRFN219	Leak Invest/Repair Serv & Main-RI	74,007	28,733	45,274
		CRFS219	Leak Invest/Repair Serv & Main-RI	733,629	739,170	(5,540)
	Reactive Leaks (CI Joint Encapsulation/Service Replacement) Total			826,017	786,283	39,734
7	Service Replacements (Reactive) - Non-Leaks/Other	CON0030	Leak Repair scheduled/unscheduled	1,689	-	1,689
		CRFN210	React Main & Serv Work Nonleak-RI.	109,956	31,806	78,150
		CRFN309	Service Demolitions-RI	3,154	-	3,154
		CRFS210	React Main & Serv Work Nonleak-RI.	522,908	165,404	357,504
		CRFS309	Service Demolitions-RI	1,292	1,292	-
		CRFS310	Cappd Alve-IRA/IRMA- RI	2,380	1,135	1,246
	Service Replacements (Reactive) - Non-Leaks/Other Total			641,379	199,636	441,743
8	Main Replacement (Reactive) - Maintenance (incl Water Intrus	CRCC210	React Main & Serv Work Nonleak-RI	204,098	7,934	196,164
		CRFN224	Latent Damage-RI	4,503	998	3,505
		CRFS210	React Main & Serv Work Nonleak-RI.	57,386	1,479	55,906
	Main Replacement (Reactive) - Maintenance (incl Water Intrusion) Total			265,987	10,412	255,576
	Service Replacements (Reactive) - Non-Leaks/Other	CRCC210	React Main & Serv Work Nonleak-RI	24,687	11,687	13,000
	Service Replacements (Reactive) - Non-Leaks/Other Total			24,687	11,687	13,000
9	Transmission Station Integrity	CRIC451	Transmission Station Integrity-RI	42,805	-	42,805
	Transmission Station Integrity Total			42,805	-	42,805
10	Other Mandated	CRCC223	Cross Bore Remediation-RI	120	-	120
		CREC318	Access Protection Remediation-RI	95,435	24,400	71,035
	Other Mandated Total			95,555	24,400	71,155
12	Main Replacement (Proactive) - Leak Prone Pipe	CON0034	RI-Gas-Main Repl-Age-RI Blnt	229,611	159,308	70,303
		CON0040	RI-Gas-Repl Serv Install-RI Blanket	49	-	49
		CON0091	Land and Land Rights RI Gas	9,100	-	9,100
		CRCC203	Bare Steel Main Replace-RI	2,704,037	835,372	1,868,666
		CRCC206	"CI Main Replace 10"" 12"" 14""-RI"	70,904	-	70,904
		CRCC207	"CI Main Replace < 10""-RI"	6,914,944	1,199,199	5,715,745
		CRCC208	Plastic Main Replacement-RI	13,811	1,254	12,558
	Main Replacement (Proactive) - Leak Prone Pipe Total			9,942,457	2,195,133	7,747,324
13	Main Replacement (Proactive) - Large Diameter LPCI Program	C078187	Lining Project - Moore St, PVD	582,600	569,184	13,415
		C078188	Lining Project - Blackstone St, PVD	109	-	109
		CRCC204	Cast Iron Main Lining-RI	184,301	1,365	182,936
		CRCC205	"CI Main Replace >=16"" Prog.-RI"	425,676	242,837	182,840
	Main Replacement (Proactive) - Large Diameter LPCI Program Total			1,192,685	813,385	379,300
15	Proactive Service Replacement	C031892	Service Replacement Program	804	-	804
		CRCC218	Proact Serv Replace Prog-RI	214,513	7,892	206,621
	Proactive Service Replacement Total			215,317	7,892	207,425
16	System Automation	CRGC403	System Automation-RI	984,777	456,102	528,674
	System Automation Total			984,777	456,102	528,674

#	ISR Sub-Category	PROJECT	PROJECT_DESCRIPTION	FY21 CWIP	Pre FY21 Spend	FY21 Spend
17	Heater Installation Program	C077172	CRA-LATEN KNIGHT GS-REPL HTR-RIS334	(12,980)		(12,980)
		C077680	EPV-WampanoagTr TS-REGREPL-RIS-064	20,782	20,782	-
		C079173	CRA-LatenKnightRd-RCV-RIS-334	1,494	1,494	(0)
		C085231	EPV-DeyStGS-RIS-311-HTRREPLACE	21,810	-	21,810
	Heater Installation Program Total			31,106	22,276	8,830
18	Pressure Regulating Facilities	C077246	EPV-Willet@Forbes-REPLREG-RIS071	893,748	552,421	341,327
		CRIC402	Pres Reg Facil - proactive-RI	3,187,278	869,868	2,317,409
	Pressure Regulating Facilities Total			4,081,026	1,422,289	2,658,736
19	Allens Ave Multi Station Rebuild	C056104	Allens Ave Multi Station Rebuild	1,625,901	246,842	1,379,059
	Allens Ave Multi Station Rebuild Total			1,625,901	246,842	1,379,059
20	Take Station Refurbishment	C080795	PVD -Holder 19 Station Replacements	45,885	20,932	24,953
		C084648	CLD_DiamondHillGS_ControlLineRepl	6		6
		C084983	PSM-PORTSMOUTH TS-RISN203	31,151	-	31,151
	Take Station Refurbishment Total			77,042	20,932	56,111
21	Valve Installation/Replacement (incl Storm Hardening & Midd	C085142	Newport LP Sectionalizing Valves	74,565	597	73,969
	Valve Installation/Replacement (incl Storm Hardening & Middletown/Newport) Total			74,565	597	73,969
22	Gas System Reliability	CRCC401	Gas Planning - Reliability-RI.	28,434	20,387	8,047
	Gas System Reliability Total			28,434	20,387	8,047
23	I&R - Reactive	CRIC213	Pres Reg Facil - Reactive-RI	1,301,436	408,779	892,657
	I&R - Reactive Total			1,301,436	408,779	892,657
24	Distribution Station Over Pressure Protection	C084288	Dist. Overpressure Protection RI	1,046,780	104,112	942,668
	Distribution Station Over Pressure Protection Total			1,046,780	104,112	942,668
25	LNG	C041203	Exeter RI Boil-Off Compressors	4,304	4,304	0
		C079870	Exeter LNG Boiloff Compressor 2	423,995	86,531	337,464
		C080782	EXLNG20_ESD System Install	275,046	23,785	251,261
		C080783	EXLNG20_Hi Ex Foam System	505,701	35,625	470,076
		C082835	OMLLNG20_Permanent Portable Site	686,866	176,304	510,562
		C085201	EXLNG21_Critical Spares	106,079	-	106,079
		C086158	EXLNG_21 Tank Upgrade	32,772	-	32,772
		CRLC406	LNG - Cumberland LNG	402,255	77,514	324,741
		CRLC407	LNG - Exeter LNG	507,919	-	507,919
	LNG Total			2,944,938	404,064	2,540,874
26	Replace Pipe on Bridges	C083015	Main Replacement - Glenbridge Ave	397	397	-
		C083016	Main Replacement - Broad St, PVD	793	793	(0)
		C083017	Main Replacement - Goat Island	568		568
	Replace Pipe on Bridges Total			1,758	1,190	568
28	Tools & Equipment	C071846	RI Meter Lab Testing Equipment	1,221		1,221
		CRFC501	Discretionary - Maintain RI	333,688	276,650	57,038
	Tools & Equipment Total			334,909	276,650	58,259
29	Pipeline	C079252	GrowthPoint - Pipeline	10,535,281	-	10,535,281
	Pipeline Total			10,535,281	-	10,535,281
30	Other Upgrades/Investments	C081907	GrowthPoint - Existing Facilities	3,093,883	2,407,667	686,216
		C082302	GrowthPoint-Existing PRE Facilities	222,138	92,199	129,938
	Other Upgrades/Investments Total			3,316,021	2,499,866	816,155
31	Regulator Station Investments	C081906	GrowthPoint - Regulator Station	28,119	22,297	5,822
		C085181	GrowthPoint-Coweset Reg Upgrades	344,350	25,171	319,179
	Regulator Station Investments Total			372,469	47,468	325,001
	Grand Total			45,121,136	10,390,513	34,730,623

DIV 1-1-c

**The Narragansett Electric Company
Analysis of Pre FY21 Spending**

	Pre FY21	FY21	CWIP	Commentary
Spending	10,390,513	34,730,623	45,121,136	
By Type:				
Fcst In-Svc	4,997,151			Large \$ orders with forecasted in-service dates.
Accrual	2,319,227			Recurring orders created to capture accruals for 5 blanket program categories. \$2.3m represents the net of accruals and reversal recorded as of 03/31/2020.
Other	3,074,135			Approximately 7% of total CWIP balance that includes smaller \$ orders initiated and charged prior to FY21. Expected to go in-service in the future.
Total	10,390,513			

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket Nos. 4996 & 5165
Gas Infrastructure, Safety, and Reliability Plan FY2021
Reconciliation Filing and
2021 Distribution Adjustment Charge Filing
Responses to the Division's First Set of Data Requests
Issued on August 17, 2021

Division 1-2

Request:

Referring to Table C, please reconcile the amounts in Column D and Column E to the balance of CWIP in the Company's financial statements as of March 31, 2021.

Response:

Please see Attachment DIV 1-2 for the requested information.

DIV 1-2

**The Narragansett Electric Company
Gas CWIP Reconciliation - March 31, 2021**

Category	Description	Amount	Commentary
CWIP	Per 03/31/2021 General Ledger	60,761,591	
	Exclude ledger only adjustments	(1,268,700)	GL only adjustments not recorded to projects.
CWIP	Project Balances (Day 2 Report) - 03-31-2021	62,030,291	
	Exclusions:		
	Gas Growth	(3,364,981)	Not eligible for ISR (Not included in prior additions)
	Facilities	(830,547)	Not eligible for ISR (Not included in prior additions)
	CAP OH	(1,270,674)	Not included in prior ISR additions
	Pre Eng	(283,430)	Not included in prior ISR additions
	In-Service	(11,159,524)	Review identified in-service eligible costs that remained in CWIP.
	Net 03/31/2021 CWIP	45,121,135	

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket Nos. 4996 & 5165
Gas Infrastructure, Safety, and Reliability Plan FY2021
Reconciliation Filing and
2021 Distribution Adjustment Charge Filing
Responses to the Division's First Set of Data Requests
Issued on August 17, 2021

Division 1-3

Request:

Referring to Table C, please provide the balance of ISR eligible CWIP as of March 31, 2020, and reconcile that balance to the balance of CWIP in the Company's financial statements as of March 31, 2020.

Response:

Please see Attachment DIV 1-3 for the requested information.

DIV 1-3

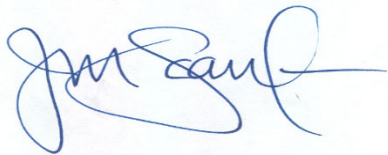
**The Narragansett Electric Company
Gas CWIP Reconciliation - March 31, 2020**

Category	Description	Amount	Commentary
CWIP	Per 03/31/2020 General Ledger	95,786,546	
	Exclude ledger only adjustments	(1,339,016)	GL only adjustments not recorded to projects.
CWIP	Project Balances (Day 2 Report) - 03-31-2020	97,125,562	
	Exclusions:		
	Gas Growth	(3,568,232)	Not eligible for ISR (Not included in prior additions)
	Facilities	(1,288,608)	Not eligible for ISR (Not included in prior additions)
	CAP OH	(423,388)	Not included in prior ISR additions
	In-Service	(40,621,965)	Review identified in-service eligible costs that remained in CWIP, including \$37m for GrowthPoint project.
	Net 03/31/2020 CWIP	51,223,368	

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

September 3, 2021

Date

Docket No. 4996 - National Grid's FY 2021 Gas Infrastructure, Safety and Reliability (ISR) Plan - Service List 8/19/2020

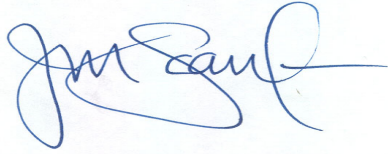
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<p>Conservation Law Foundation Jerry Elmer, Esq. Conservation Law Foundation 235 Promenade St. Suite 560, Mailbox 28 Providence, RI 02908</p>	<p>JElmer@clf.org;</p>	<p>401-228-1904</p>
<p>Office of Energy Resources (OER) Daniel Majcher, Esq. Dept. of Administration Division of Legal Services One Capitol Hill, 4th Floor Providence, RI 02908</p>	<p>daniel.majcher@doa.ri.gov;</p>	
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<p>File an original & nine (9) copies w/: Luly E. Massaro, Commission Clerk Margaret Hogan, Commission Counsel Public Utilities Commission 89 Jefferson Blvd. Warwick RI 02888</p>	<p>Luly.massaro@puc.ri.gov;</p>	<p>401-780-2107</p>
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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

September 3, 2021
Date

**Docket No. 5165 – National Grid –2021 Annual Distribution Adjustment
Charge Filing (DAC) - Service List as of 9/1/2021**

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