

March 23, 2021

**VIA ELECTRONIC MAIL**

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

**RE: Docket 5098 - Proposed FY 2022 Electric Infrastructure, Safety, and Reliability Plan  
National Grid's Reply to Division's Memorandum**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a National Grid ("National Grid" or the "Company"), enclosed<sup>1</sup>, please find the Company's comments in reply to the Division of Public Utilities and Carriers' memorandum on March 19, 2021, in the above-referenced docket.

Thank you for your attention to this transmittal. If you have any questions or concerns, please do not hesitate to contact me at 401-784-4263.

Sincerely,



Andrew S. Marcaccio

Enclosures

cc: Docket 5098 Service List  
John Bell, Division  
Greg Booth, Division  
Tiffany Parenteau, Esq.  
Al Contente, Division

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<sup>1</sup> Per Commission counsel's update on October 2, 2020, concerning the COVID-19 emergency period, the Company is submitting an electronic version of this filing followed by five hard copies filed with the Clerk within 24 hours of the electronic filing.

**STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

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The Narragansett Electric Company d/b/a National Grid )  
FY 2022 Electric Infrastructure, Safety and )  
Reliability Plan (ISR Plan) )  

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Docket. No. 5098

**THE NARRAGANSETT ELECTRIC COMPANY D/B/A NATIONAL GRID  
REPLY MEMORANDUM TO THE DIVISION OF PUBLIC UTILITIES AND  
CARRIERS' POST HEARING MEMORANDUM**

**INTRODUCTION**

The Narragansett Electric Company d/b/a National Grid (the “Company”) appreciates the opportunity to respond to the Post Hearing Memorandum (“Memorandum”) that was submitted by the Division of Public Utilities and Carriers (the “Division”) on March 19, 2021 in which the Division clarified two issues that it believes are confused on the record. The Company also believes the two issues are confused on the record and supports the clarifications and explanations contained within the Division’s Memorandum.

The two issues are the budgets, rationale, and specificity associated with the COVID-19 work (“COVID-Work”) and Strategic Distributed Energy Resources (“DER”) Investments. As noted in the Division’s Memorandum, the questions and comments on these topics during the hearing that took place on March 16, 2021 could be interpreted to suggest that the Company lacked justification to advance certain projects and was seeking approval for regulatory protection only. The Company supports the Division’s Memorandum on these matters that the Company’s intentions warranted clarification and the Company submits this reply to be helpful and to also provide a little more background.

**COVID-WORK**

The Company supports the Division’s informal recommendation that the Company provides information for significant new work that is expected to emerge into the infrastructure, safety, and reliability (“ISR”) plan. During fiscal year (“FY”) 2021 the COVID-19 pandemic created a concern related to system performance resulting from load shifts due to more people working from home. The Company began discussions with the Division in May 2020 about the analysis being performed and potential outcomes as it was possible it would create significant work emerging in FY 2021. While there was some small-scale work done in FY2021, the analysis being performed was a very detailed feeder-based analysis and something not done previously that took more time than initially anticipated. However, the Company continued to provide the Division updates on the analysis, which was still ongoing as we began to more formally develop the FY 2022 ISR plan. In addition, some issues identified in the analysis were created by the COVID pandemic load shifts while there were other pre-existing issues identified in the analysis that we exacerbated by the pandemic load shifts.

**DER**

The Strategic DER enabling investments as proposed in FY 2022 differed from what was approved in the FY 2021 ISR. The Company had proposed investments in the Discretionary portfolio, but the PUC approval of the FY 2021 plan required the investments be included in the Non-Discretionary portfolio.

In addition, as the Division's Brief has indicated there were specific projects proposed in areas where the Company had performance concerns. The portion negotiated and left in the FY 2022 ISR proposed plan is not a placeholder but rather a prudent staging of spending for specifically identified solutions that correlate with a separate, as of yet unapproved Grid Modernization Plan ("GMP").

**CONCLUSION**

In conclusion, the Company supports the Division's Memorandum and respectfully requests that the Public Utilities Commission approve the COVID-Work and DER budget proposals.

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.



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Joanne M. Scanlon

March 23, 2021

Date

**Docket No. 5098 - National Grid's Electric ISR Plan FY 2022  
Service List as of 1/28//2021**

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