

March 2, 2022

BY ELECTRONIC MAIL

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

**RE: Docket 5210 - Proposed FY 2023 Gas Infrastructure, Safety and Reliability Plan
National Grid's Rebuttal Comments**

Dear Ms. Massaro:

I have enclosed the electronic version of National Grid's¹ rebuttal comments in response to the Division of Public Utilities and Carriers' recommendations in the above-referenced matter.²

Thank you for your attention to this matter. If you have any questions, please contact me at 781-472-0531.

Very truly yours,



Raquel J. Webster

Enclosures

cc: Docket 5210 Service List
Leo Wold, Esq.
Al Mancini, Division
John Bell, Division
Rod Walker, Division

¹ The Narragansett Electric Company d/b/a National Grid.

² Per a communication from Commission counsel on October 4, 2021, the Company is submitting an electronic version of this filing followed by six (6) hard copies filed with the Clerk within 24 hours of the electronic filing.

The Narragansett Electric Company d/b/a National Grid
Rebuttal Comments in Response to the
Rhode Island Division of Public Utilities and Carriers' Recommendations

On February 18, 2022, Alberico Mancini – Chief Regulatory Analyst for the Rhode Island Division of Public Utilities and Carriers (the “Division”) and Rod Walker, Chief Executive Officer and President of RW&A Consultancy, submitted a memorandum in Docket 5210 (the “Division Memorandum”) regarding The Narragansett Electric Company’s (the “Company”) Fiscal Year (“FY”) 2023 Gas Infrastructure, Safety & Reliability (“ISR”) Plan. The Division’s Memorandum includes five specific recommendations regarding the Company’s gas ISR plan. The Company submits these rebuttal comments in response to those recommendations.

Division Recommendation 1: The Company must re-evaluate semi-annually the performance of its replacement program and adjust the program (*e.g.*, by reprioritizing Company resources) to ensure that the actual replacement rate for any particular year does not fall below the targeted rate for that year. This process should assist the Company in maintaining the replacement program "on track" to ensure that the projected remaining term for completion of the program does not stagnate but rather, in fact, continues to decline.

Company Response: The Company currently evaluates its entire capital plan, including its investment in the main replacement program, on a monthly basis and adjusts its work plan and year-end forecast based on actual performance, spending year-to-date, and forecasted spend for the remainder of the fiscal year. The Company’s quarterly ISR plan reports submitted to the Division reflect adjustments made throughout the year. The Company does not object to reviewing its evaluation process and forecast for programs, such as the main replacement program, in a more in-depth manner with the Division and at an agreed upon frequency. Currently, the Company meets with the Division on a quarterly basis to review the quarterly ISR plan reports.

Division Recommendation 2: The Company needs to continue to re-evaluate the effectiveness of its proactive replacement programs to ensure the riskiest leak prone aging mains and services are being replaced so the metrics around leak rates, *i.e.*, inventory of leaks to be repaired, continue to trend downward, especially around the most hazardous leaks (Grade 1). Specifically, the Company should evaluate making modifications to its Gas Work Method ENG04030 to address: 1) Risk Ranking Criteria, 2) Lack of Risk Ranking Procedure for Services and 3) Infrastructure Program Methodology. The Division recommends that the Commission direct the Company to undertake such an evaluation and address each of the Division’s concerns in a report to be filed in this docket on or before October 1, 2022.

Company Response: The Company's Gas Work Method ENG04030 contains proper risk ranking criteria and a robust risk ranking procedure that includes factors for incorporating associated gas service risk. The Company follows the criteria set forth in the work method, which results in selecting segments for replacement that reduce risk and leak rates. The Company does not object to reviewing its work method in more detail with the Division and proposes the following: (1) a technical session with subject matter experts to review the work method and how it is used to select main segments for replacement; and (2) the Company will file a report with the Rhode Island Public Utilities Commission (the "Commission") by October 1, 2022, that includes any changes to the work method agreed to with the Division

Division Recommendation 3: The Division recommends that the Commission require the Company to complete its data scrub and provide an accurate count of all remaining leak prone mains and services as of March 31, 2022 (End of FY 2022) on or before October 1, 2022.

Company Response: The Company agrees to providing the Division with a firm date for completing the data scrub. The Company is evaluating how much time is required to complete this effort. The Company proposes to meet with the Division within 60 days following the Commission's Order in this docket to discuss the work effort necessary to complete the scrub and to agree on a date by which the work will be completed.

Division Recommendation 4: The Company has agreed to work with the Division to better understand leak receipts, how leaks are classified, when and how leaks are repaired, and develop a plan to track the most hazardous Grade 1 and Grade 2 leaks.

Company Response: As indicated in the Division Memorandum, the Company has informed the Division that it agrees with this recommendation and proposes a technical session to occur within 30 days following the Commission's Order in this docket.

Division Recommendation 5: The Commission should require PPL to provide the Commission and Division with a written update as to the Company's plans for maintaining, replacing or modifying its Synergi software program no later than six months after any acquisition of the Company is completed.

Company Response: The Company cannot comment on this recommendation on behalf of PPL.

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.

March 2, 2022 Date

Joanne M. Scanlon

Docket No. 5210 - National Grid's FY 2023 Gas Infrastructure, Safety and Reliability (ISR) Plan - Service List 12/22/2021

Name/Address	E-mail Distribution	Phone
Raquel J. Webster, Esq. National Grid 40 Sylvan Road Waltham, MA 02451	raquel.webster@nationalgrid.com ;	781-907-2121
	celia.obrien@nationalgrid.com ;	
	Joanne.scanlon@nationalgrid.com ;	
	Jennifer.Hutchinson@nationalgrid.com ;	
National Grid Amy Smith Melissa Little Lee Gresham Ryan Scheib	Amy.smith@nationalgrid.com ;	
	Melissa.Little@nationalgrid.com ;	
	mei.sun@nationalgrid.com ;	
	Theresa.Burns@nationalgrid.com ;	
	Michael.Pini@nationalgrid.com ;	
	Nathan.Kocon@nationalgrid.com ;	
Division of Public Utilities & Carriers Leo Wold, Esq.	Leo.Wold@dpuc.ri.gov ;	401-780-2130
	Margaret.l.hogan@dpuc.ri.gov ;	
	Al.mancini@dpuc.ri.gov ;	
	John.bell@dpuc.ri.gov ;	
	Linda.george@dpuc.ri.gov ;	
	Robert.Bailey@dpuc.ri.gov ;	
	eullucci@riag.ri.gov ;	
MFolcarelli@riag.ri.gov ;		
Rod Walter, CEO/President Rod Walker & Associates	Rwalker@RWalkerConsultancy.com ;	706-244-0894
File an original and five copies Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick RI 02888	Luly.massaro@puc.ri.gov ;	401-780-2107
	Patricia.lucarelli@puc.ri.gov ;	
	Todd.bianco@puc.ri.gov ;	
	Alan.nault@puc.ri.gov ;	
PPL Electric Utilities	rjreybitz@pplweb.com ;	

Ronald Reybitz
Stephen Breininger

skbreininger@pplweb.com