

October 20, 2021

**VIA ELECTRONIC MAIL**

Luly E. Massaro, Division Clerk  
Rhode Island Division of Public Utilities and Carriers  
89 Jefferson Boulevard  
Warwick, RI 02888

**RE: Docket D-21-09 – Petition of PPL Corporation, PPL Rhode Island Holdings, LLC, National Grid USA, and The Narragansett Electric Company for Authority to Transfer Ownership of The Narragansett Electric Company to PPL Rhode Island Holdings, LLC and Related Approvals Responses to Attorney General Data Requests – Set 1 (Part 2)**

Dear Ms. Massaro:

On behalf of National Grid USA and The Narragansett Electric Company (together, “National Grid”), enclosed are National Grid’s following responses to the first set of data requests issued by the Rhode Island Attorney General (“Attorney General”) in the above-referenced proceeding: AG 1-2, AG 1-3, AG 1-6, AG 1-9, AG 1-13 through AG 1-16, AG 1-19, AG 1-20, AG 1-22, AG 1-23, AG 1-27, AG 1-28, AG 1-31 through AG 1-33, and AG 1-36 through AG 1-38.<sup>1</sup>

This submission completes National Grid’s responses to the Attorney General’s first set of data requests.

Thank you for your attention to this matter. If you have any questions, please contact me at 401-784-7288.

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<sup>1</sup> Although this is a Division of Public Utilities and Carriers (“Division”) filing, consistent with Public Utilities Commission’s filing requirements during the COVID-19 emergency period, National Grid is submitting an electronic version of this filing. National Grid will provide the Division Clerk with five hard copies within 24 hours and, if needed, additional hard copies of the enclosures upon request.

Luly E. Massaro, Division Clerk  
Docket D-21-09 – Responses to Attorney General Data Requests Set 1  
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Very truly yours,

A handwritten signature in blue ink, reading "Jennifer Brooks Hutchinson", with a long horizontal flourish extending to the right.

Jennifer Brooks Hutchinson

Enclosures

cc: Docket D-21-09 Service List (electronic only)  
John Bell, Division  
Leo Wold, Esq.  
Christy Hetherington, Esq.  
Scott H. Strauss, Esq. (electronic only)  
Latif M. Nurani, Esq. (electronic only)  
Amber L. Martin Stone, Esq. (electronic only)  
Anree G. Little, Esq. (electronic only)

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,  
NATIONAL GRID USA, and THE NARRAGANSETT ELECTRIC COMPANY  
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**National Grid USA and The Narragansett Electric Company**  
**AG 1-2**

**Request:**

Please detail PPL's due diligence efforts regarding the reasonableness of the purchase price for Narragansett Electric, including but not limited to the following:

- (a) Please include the analysis and professional opinions of any investment banks retained by PPL for this transaction.
- (b) Please include internal or external evaluations of markets, growth potential, financial outlook, and the regulatory environment.

**Response:**

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request AG 1-2.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,  
NATIONAL GRID USA, and THE NARRAGANSETT ELECTRIC COMPANY  
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**National Grid USA and The Narragansett Electric Company**  
AG 1-3

Request:

Please provide a list of all assets being transferred as a result of the proposed Transaction. Please name the current owner and current operator of all identified assets, as well as the entity that would own and operate the assets if the proposed Transaction is approved.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request AG 1-3.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,  
NATIONAL GRID USA, and THE NARRAGANSETT ELECTRIC COMPANY  
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**National Grid USA and The Narragansett Electric Company**  
AG 1-6

Request:

Please detail any and all “ring-fencing” provisions that PPL will adopt to ensure that cash flows generated by Narragansett Electric will not be used to support third-party borrowings, PPL acquisitions, or meet other corporate cash requirements outside Rhode Island.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request AG 1-6.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,  
NATIONAL GRID USA, and THE NARRAGANSETT ELECTRIC COMPANY  
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**National Grid USA and The Narragansett Electric Company**  
AG 1-9

Request:

Referencing PPL's response to DIV 2-3(b), please describe the impact, if any, of the tax election addressed in the response on the Narragansett Electric revenue requirements for both the electric and gas operations.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request AG 1-9.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,  
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**National Grid USA and The Narragansett Electric Company**  
AG 1-13

Request:

Currently, National Grid operates in Rhode Island, Massachusetts, and New York, providing certain regional benefits and cost savings which it claims has helped avoid additional costs for Rhode Island ratepayers. If this Transaction were approved, how will PPL avoid additional costs as a result of its not having any local or regional presence?

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request AG 1-13.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,  
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**National Grid USA and The Narragansett Electric Company**  
AG 1-14

Request:

Please provide a summary of your billing practices including if possible a sample bill or a description of what you anticipate your bills to look like including what items will be specified in the breakdown of charges.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request AG 1-14.



PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,  
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**National Grid USA and The Narragansett Electric Company**  
AG 1-15

Request:

Will PPL have a customer service presence physically located in Rhode Island following the proposed Transaction? If not, please explain why you do not believe a physical presence is necessary. If so, where will the facilities be located and how many local customer service employees are expected to be employed at the local facility. Will customers be able to physically go to the location to meet with customer service representatives? If not, please explain why.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request AG 1-15.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,  
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**National Grid USA and The Narragansett Electric Company**  
**AG 1-16**

Request:

Will there be physical locations in Rhode Island where ratepayers can pay their electric and/or natural gas bills? If so, will those locations provide an option for paying by cash?

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request AG 1-16.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,  
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**National Grid USA and The Narragansett Electric Company**  
**AG 1-19**

Request:

Please discuss your understanding of the issues in *Laura Bennett, et al. v. Thomas Ahern, et al.*, PC-2015-4214. Discuss how you believe the outcome may affect your treatment of the classes of ratepayers that are the subject to the suit and how the result could affect rates.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request AG 1-19.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,  
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**National Grid USA and The Narragansett Electric Company**  
AG 1-20

Request:

Please provide any projections PPL may have for rates over the next five years for each electric and gas rate class.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request AG 1-20.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,  
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**National Grid USA and The Narragansett Electric Company**  
AG 1-22

Request:

How does PPL plan to service its gas customers on Aquidneck Island in light of the crisis experienced in 2019? Is PPL prepared to continue forward with National Grid's application expected before the Energy Facility Siting Board in 2022 and implementation of any approved plan resulting therefrom? If not, why?

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request AG 1-22.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,  
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**National Grid USA and The Narragansett Electric Company**  
**AG 1-23**

Request:

Please discuss the differences and similarities in the treatment of interconnection costs and process of interconnection in Rhode Island with the costs and process in the jurisdiction's PPL operates in. Discuss who is responsible for the costs of interconnection in each jurisdiction, how is this determined, and what changes PPL intends to make to the process in Rhode Island.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request AG 1-23.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,  
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**National Grid USA and The Narragansett Electric Company**  
AG 1-27

Request:

In your efforts regarding the transition to clean energy, please identify efforts you have made that you have funded without seeking partial or full recovery through rates, efforts you have pursued and sought partial or full recovery through rates, and efforts that have been funded via third party, whether grants or other source.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request AG 1-27.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,  
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**National Grid USA and The Narragansett Electric Company**  
AG 1-28

Request:

What benefits does PPL plan to provide ratepayers to incentivize the use of green/renewable energies?

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request AG 1-28.



PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,  
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**National Grid USA and The Narragansett Electric Company**  
**AG 1-31**

Request:

What efforts will PPL make to help Rhode Island meet its mandated reductions in fossil fuel and greenhouse gas emissions as laid out in the 2021 Act on Climate, including reaching net zero by 2050?

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request AG 1-31.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,  
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**National Grid USA and The Narragansett Electric Company**  
**AG 1-32**

Request:

How does PPL plan to “modernize” Rhode Island’s electric grid as claimed in the Petition? What upgrades to the electric system might this include? Please include in your answer specific programs and examples of how you may have implemented programs in your current service areas under any of your subsidiaries. Please also identify any expected costs related to this “modernization” and how those costs may be passed on to ratepayers.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request AG 1-32.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,  
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**National Grid USA and The Narragansett Electric Company**  
AG 1-33

Request:

Please provide PPL's long-term vision for the natural gas distribution business, in the context of global climate change and Rhode Island's 2021 Act on Climate. For instance, does PPL have any plans to degas Rhode Island or to convert natural gas lines to some form of renewable/alternative fuel?

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request AG 1-33.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,  
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**National Grid USA and The Narragansett Electric Company**  
**AG 1-36**

Request:

Reference Petition at para. 4, regarding PPL's sale of its Western Power Distribution ("WPD") operations:

- (a) Please specify the magnitude of PPL corporate and administrative costs that are currently assigned to WPD but will remain with PPL after the sale.
- (b) Please indicate how costs previously assigned to WPD will be recovered in the future.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request AG 1-36.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,  
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**National Grid USA and The Narragansett Electric Company**  
AG 1-37

Request:

Referencing PPL's response to DIV 3-11, PPL Gas Utilities Corporation, please detail the reasons for PPL's acquisition and subsequent divestiture of gas distribution operations in Pennsylvania.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request AG 1-37.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,  
NATIONAL GRID USA, and THE NARRAGANSETT ELECTRIC COMPANY  
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**National Grid USA and The Narragansett Electric Company**  
**AG 1-38**

Request:

Please provide a list of other jurisdictions you have operated in over the last 15 years in the electric or gas market. Please provide the name of the entity you operated as, your reason for withdrawal from the market, and whether your withdrawal was connected to litigation or resulted in litigation. If litigation did occur, please provide the status of the litigation.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request AG 1-38.