

October 22, 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 Conservation Law Foundation Data Requests – Set 1

Dear Ms. Massaro:

On behalf of National Grid USA and The Narragansett Electric Company (together, “National Grid”), enclosed are National Grid’s responses to the first set of data requests issued to National Grid by the Conservation Law Foundation.¹

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

Very truly yours,



Jennifer Brooks Hutchinson

¹ 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 Conservation Law Foundation Data Requests Set 1
October 22, 2021
Page 2 of 2

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)

National Grid USA and The Narragansett Electric Company
CLF 1-1

Request:

Comprehensive listing and description of all existing programs and commitments of National Grid or Narragansett related to climate vulnerability assessment, climate resilience, and climate adaptation, including but not limited to current disaster preparedness and response plans, facility siting considerations, vegetation management strategies, and future demand predictions, among other programs and commitments.

Response:

The broadly framed request to produce a “[c]omprehensive listing and description of all existing programs and commitments of National Grid or Narragansett related to climate vulnerability assessment, climate resilience, and climate adaptation” effectively requests the production of information not relevant to this request or to the review by the Rhode Island Division of Public Utilities and Carriers (“Division”) pursuant to R.I. Gen. Laws §§ 39-3-24 and 39-3-25, thereby imposing an undue burden on National Grid USA and The Narragansett Electric Company (“Narragansett”). Pursuant to the Hearing Officer’s Order in response to the Motion to Intervene, Strike and Recusal, Order No. 24109, the review of PPL Rhode Island Holdings, LLC’s acquisition of Narragansett from National Grid USA (the “Transaction”) is limited to confirm[ing] that the ‘facilities for furnishing service to the public will not thereby be diminished’ and that the sale is ‘consistent with the public interest.’”

Notwithstanding this effect, please see National Grid USA and Narragansett’s response to Data Request AG 1-30 for a summary of Narragansett’s existing programs and commitments aimed at helping Rhode Island achieve its clean energy goals. In addition, please see National Grid USA and Narragansett’s response to Data Request AG 2-8 for Narragansett’s current Emergency Response Plans. Please also see Narragansett’s most recent electric and gas infrastructure, safety, and reliability (“ISR”) plans filed in Rhode Island Public Utilities Commission Docket Nos. 5098 and 5099, respectively, through which Narragansett provides safe, reliable, and efficient electric and gas service for customers. Among other programs and commitments, Narragansett’s electric ISR plan includes details regarding Narragansett’s vegetation management program.

National Grid USA and The Narragansett Electric Company
CLF 1-2

Request:

All documentation of any deliberations or analysis of, or proposals for, preparing and responding to the impacts of climate change—including sea level rise, flooding, increased storm intensity and frequency, temperature, fire, energy demand, and other impacts of climate change—on current and future infrastructure and operational plans, and incorporation of climate change predictions and modeling into siting and operational decisions, on National Grid or Narragansett's infrastructure and operations.

Response:

The broadly framed request to produce “[a]ll documentation of any deliberations or analysis of, or proposals for, preparing and responding to the impacts of climate change” effectively requests the production of information not relevant to this request or to the review by the Rhode Island Division of Public Utilities and Carriers (“Division”) pursuant to R.I. Gen. Laws §§ 39-3-24 and 39-3-25, thereby imposing an undue burden on National Grid USA and The Narragansett Electric Company (“Narragansett”). Pursuant to the Hearing Officer's Order in response to the Motion to Intervene, Strike and Recusal, Order No. 24109, the review of PPL Rhode Island Holdings, LLC's acquisition of Narragansett from National Grid USA (the “Transaction”) is limited to confirm[ing] that the ‘facilities for furnishing service to the public will not thereby be diminished’ and that the sale is ‘consistent with the public interest.’”

Notwithstanding this effect, please see National Grid and Narragansett's response to Data Request AG 1-30 for a summary of Narragansett's existing proposals aimed at helping Rhode Island achieve its climate and clean energy goals. In addition, please see National Grid and Narragansett's response to Data Request AG 2-8 for Narragansett's current Emergency Response Plans. Please also see Narragansett's most recent electric and gas infrastructure, safety, and reliability (“ISR”) plans filed in Rhode Island Public Utilities Commission Docket Nos. 5098 and 5099, respectively, which were developed in a way that advances many of the goals for the electric and gas systems, including to address the challenge of climate change and other forms of pollution, such as through emissions reduction.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
NATIONAL GRID USA, and THE NARRAGANSETT ELECTRIC COMPANY
Docket No. D-21-09
National Grid USA and The Narragansett Electric Company's
Responses to the Conservation Law Foundation's First Set of Data Requests
Issued on October 1, 2021

National Grid USA and The Narragansett Electric Company
CLF 1-3

Request:

Please identify any and all National Grid or other corporate affiliate policies or plans for achieving compliance with the Rhode Island Act on Climate law. Please provide copies of any and all such policies.

Response:

Please see National Grid USA and The Narragansett Electric Company's response to Data Request AG 1-30 for the requested information.

National Grid USA and The Narragansett Electric Company
CLF 1-4

Request:

All documentation and correspondence within PPL, PPL RI, National Grid/Narragansett, and between applicants, related to how PPL or PPL RI will maintain and continue existing climate resilience and vulnerability assessment programs and commitments to ensure no frustration, hinderance, diminishment, or delay in any such program or commitment.

Response:

The broadly framed request to produce “[a]ll documentation and correspondence within PPL, PPL RI, National Grid/Narragansett, and between applicants, related to” the requested information effectively requests the production of information not relevant to this request or to the review by the Rhode Island Division of Public Utilities and Carriers (“Division”) pursuant to R.I. Gen. Laws §§ 39-3-24 and 39-3-25, thereby imposing an undue burden on National Grid USA and The Narragansett Electric Company (“Narragansett”). Pursuant to the Hearing Officer’s Order in response to the Motion to Intervene, Strike and Recusal, Order No. 24109, the review of PPL Rhode Island Holdings, LLC’s acquisition of Narragansett from National Grid USA (the “Transaction”) is limited to confirm[ing] that the ‘facilities for furnishing service to the public will not thereby be diminished’ and that the sale is ‘consistent with the public interest.’”

Notwithstanding this effect, National Grid USA provided a substantial number of documents during due diligence that mention climate resilience and vulnerability assessment programs; however, such documents do not address how PPL Corporation or PPL Rhode Island Holdings, LLC will maintain and continue the existing climate resilience and vulnerability assessment programs and commitments to ensure no frustration, hinderance, diminishment, or delay in any such program or commitment.