

National Grid USA and The Narragansett Electric Company
Division 2-27

Request:

Referring to Mr. Dudkin's testimony (at 23:16-18), what are the estimated costs of the steps necessary to separate Narragansett from National Grid USA and integrate Narragansett into PPL, including integration of existing systems to incorporate Narragansett's operation? The response should identify and quantify such costs to the extent possible.

Response:

National Grid USA and PPL Corporation are progressing through separation planning, inclusive of the information technology systems cutover plan. At this time, National Grid USA cannot fully estimate the costs of separation. National Grid USA and The Narragansett Electric Company will provide a supplemental response to this request after the separation planning is finalized and the associated costs are quantifiable.

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 Division's Second Set of Data Requests
Issued on June 11, 2021

National Grid USA and The Narragansett Electric Company
Division 2-28

Request:

Does PPL intend to seek recovery of costs necessary to separate Narragansett from National Grid USA and integrate Narragansett into PPL?

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 2-28.

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
Division 2-29

Request:

Provide the organizational chart for the National Grid USA Service Company (Service Company) and separately delineate the portion of the organization dedicated to Rhode Island.

Response:

National Grid USA utilizes the Service Company model to drive efficient delivery for customers, and therefore many employees dedicate a proportion of their working time to support the Rhode Island business while also supporting other operating companies. As a result, National Grid USA does not maintain an organizational chart for the Service Company that separately delineates the portion of the organization dedicated to Rhode Island.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
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National Grid USA and The Narragansett Electric Company
Division 2-30

Request:

Provide the total cost to all of the operating companies for the 2020 services provided by the Service Company and separately provide the amount of the total cost allocated to Rhode Island.

Response:

Please refer to Attachment NG-DIV 2-30 for the total cost to all of the operating companies for the 2020 services provided by National Grid USA Service Company, Inc. and National Grid Engineering Services, LLC (collectively, the "Service Companies").

The table below reflects the amount of the total costs allocated to The Narragansett Electric Company from the Service Companies in 2020.

Receiving Company - Text	Originating Company - Text	Total
Narragansett Electric Co	NG Engineering Srvcs, LLC	\$13,534.60
	NGUSA Service Company	\$255,325,443.93
Narragansett Electric Co		\$255,338,978.53

Calendar Year 2020 - Service Company Allocated Costs

Receiving Company - Text	Originating Company - Text	Total
Boston Gas-Colonial Div	NG Engineering Svcs, LLC	\$2,831.66
	NGUSA Service Company	\$53,895,833.58
Boston Gas-Colonial Div		\$53,898,665.24

Receiving Company - Text	Originating Company - Text	Total
Boston Gas Company	NG Engineering Svcs, LLC	\$10,103.22
	NGUSA Service Company	\$224,835,409.71
Boston Gas Company		\$224,845,512.93

Receiving Company - Text	Originating Company - Text	Total
Brooklyn Union Gas-KEDNY	NG Engineering Svcs, LLC	\$694,628.28
	NGUSA Service Company	\$480,097,849.70
Brooklyn Union Gas-KEDNY		\$480,792,477.99

Receiving Company - Text	Originating Company - Text	Total
EUA Energy Investment	NGUSA Service Company	\$21,644.34
EUA Energy Investment		\$21,644.34

Receiving Company - Text	Originating Company - Text	Total
Granite State Power Link	NGUSA Service Company	(\$197,757.20)
Granite State Power Link		(\$197,757.20)

Receiving Company - Text	Originating Company - Text	Total
Granite St Elec-Post Sale	NGUSA Service Company	\$69.83
Granite St Elec-Post Sale		\$69.83

Receiving Company - Text	Originating Company - Text	Total
KeySpan Corporation	NGUSA Service Company	\$4,707.59
KeySpan Corporation		\$4,707.59

Calendar Year 2020 - Service Company Allocated Costs

Receiving Company - Text	Originating Company - Text	Total
KS Gas East Corp-KEDLI	NG Engineering Svcs, LLC	\$1,731,451.99
	NGUSA Service Company	\$363,722,228.04
KS Gas East Corp-KEDLI		\$365,453,680.02

Receiving Company - Text	Originating Company - Text	Total
Massachusetts Electric Co	NG Engineering Svcs, LLC	\$16,539.95
	NGUSA Service Company	\$376,687,606.46
Massachusetts Electric Co		\$376,704,146.41

Receiving Company - Text	Originating Company - Text	Total
Nantucket Electric Co	NG Engineering Svcs, LLC	\$263.37
	NGUSA Service Company	\$5,430,782.14
Nantucket Electric Co		\$5,431,045.51

Receiving Company - Text	Originating Company - Text	Total
Narragansett Electric Co	NG Engineering Svcs, LLC	\$13,534.60
	NGUSA Service Company	\$255,325,443.93
Narragansett Electric Co		\$255,338,978.53

Receiving Company - Text	Originating Company - Text	Total
National Grid Connect Inc	NGUSA Service Company	(\$36,486.44)
National Grid Connect Inc		(\$36,486.44)

Receiving Company - Text	Originating Company - Text	Total
National Grid PartnersLLC	NGUSA Service Company	\$1,302,013.10
National Grid PartnersLLC		\$1,302,013.10

Receiving Company - Text	Originating Company - Text	Total
National Grid USA Parent	NG Engineering Svcs, LLC	(\$13,907.91)
	NGUSA Service Company	(\$10,110,106.25)
National Grid USA Parent		(\$10,124,014.16)

Calendar Year 2020 - Service Company Allocated Costs

Receiving Company - Text	Originating Company - Text	Total
NE Electric Trans Corp	NG Engineering Srvcs, LLC	\$0.03
	NGUSA Service Company	\$122,012.60
NE Electric Trans Corp		\$122,012.63

Receiving Company - Text	Originating Company - Text	Total
NE Hydro-Trans Corp	NG Engineering Srvcs, LLC	\$78.22
	NGUSA Service Company	\$3,263,974.06
NE Hydro-Trans Corp		\$3,264,052.29

Receiving Company - Text	Originating Company - Text	Total
NE Hydro-Trans Elec Co	NG Engineering Srvcs, LLC	\$131.90
	NGUSA Service Company	\$7,570,103.81
NE Hydro-Trans Elec Co		\$7,570,235.71

Receiving Company - Text	Originating Company - Text	Total
New England Power Company	NG Engineering Srvcs, LLC	\$3,771.62
	NGUSA Service Company	\$130,785,917.70
New England Power Company		\$130,789,689.32

Receiving Company - Text	Originating Company - Text	Total
NG Algonquin LLC	NGUSA Service Company	\$119,219.34
NG Algonquin LLC		\$119,219.34

Receiving Company - Text	Originating Company - Text	Total
NG Development Holdings	NG Engineering Srvcs, LLC	\$5,095.36
	NGUSA Service Company	\$2,857,122.06
NG Development Holdings		\$2,862,217.42

Receiving Company - Text	Originating Company - Text	Total
NG Electric Services	NGUSA Service Company	\$208.51
NG Electric Services		\$208.51

Calendar Year 2020 - Service Company Allocated Costs

Receiving Company - Text	Originating Company - Text	Total
NG Energy Management LLC	NGUSA Service Company	\$54,251.48
NG Energy Management LLC		\$54,251.48

Receiving Company - Text	Originating Company - Text	Total
NG Energy Services Inc.	NGUSA Service Company	\$100.00
NG Energy Services Inc.		\$100.00

Receiving Company - Text	Originating Company - Text	Total
NG Energy Trading Srvcs	NGUSA Service Company	\$551.80
NG Energy Trading Srvcs		\$551.80

Receiving Company - Text	Originating Company - Text	Total
NG Engineering Srvcs, LLC	NG Engineering Srvcs, LLC	\$4,550,556.71
	NGUSA Service Company	(\$1,852.00)
NG Engineering Srvcs, LLC		\$4,548,704.71

Receiving Company - Text	Originating Company - Text	Total
NG Generation LLC	NG Engineering Srvcs, LLC	\$59,802,935.40
	NGUSA Service Company	\$235,680,328.76
NG Generation LLC		\$295,483,264.16

Receiving Company - Text	Originating Company - Text	Total
NG Glenwood Energy Center	NG Engineering Srvcs, LLC	\$1,740,969.62
	NGUSA Service Company	\$725,366.34
NG Glenwood Energy Center		\$2,466,335.96

Receiving Company - Text	Originating Company - Text	Total
NG LNG LP RegulatedEntity	NG Engineering Srvcs, LLC	\$195.40
	NGUSA Service Company	\$4,693,482.15
NG LNG LP RegulatedEntity		\$4,693,677.56

Calendar Year 2020 - Service Company Allocated Costs

Receiving Company - Text	Originating Company - Text	Total
NG NEHoldings 2 LLC	NGUSA Service Company	\$1,151,506.13
NG NEHoldings 2 LLC		\$1,151,506.13

Receiving Company - Text	Originating Company - Text	Total
NG Partners Inc.	NGUSA Service Company	\$5,287,972.84
NG Partners Inc.		\$5,287,972.84

Receiving Company - Text	Originating Company - Text	Total
NG PortJeff Energy Center	NG Engineering Srvcs, LLC	\$1,852,261.47
	NGUSA Service Company	\$856,260.04
NG PortJeff Energy Center		\$2,708,521.51

Receiving Company - Text	Originating Company - Text	Total
NG Renewables, LLC	NGUSA Service Company	\$27,108,852.02
NG Renewables, LLC		\$27,108,852.02

Receiving Company - Text	Originating Company - Text	Total
NG Services, Inc.	NG Engineering Srvcs, LLC	\$242.73
	NGUSA Service Company	\$841,428.39
NG Services, Inc.		\$841,671.11

Receiving Company - Text	Originating Company - Text	Total
NG Trans Services Corp	NGUSA Service Company	\$381.06
NG Trans Services Corp		\$381.06

Receiving Company - Text	Originating Company - Text	Total
NGUSA Service Company	NG Engineering Srvcs, LLC	(\$480.41)
	NGUSA Service Company	\$259,125,854.19
NGUSA Service Company		\$259,125,373.78

Receiving Company - Text	Originating Company - Text	Total
NGV US Dist Energy Inc.	NGUSA Service Company	\$2,345,663.93
NGV US Dist Energy Inc.		\$2,345,663.93

Calendar Year 2020 - Service Company Allocated Costs

Receiving Company - Text	Originating Company - Text	Total
NGV US Transmission Inc.	NGUSA Service Company	\$5,770,675.61
NGV US Transmission Inc.		\$5,770,675.61

Receiving Company - Text	Originating Company - Text	Total
Niagara Mohawk Holdings	NGUSA Service Company	\$1,901.55
Niagara Mohawk Holdings		\$1,901.55

Receiving Company - Text	Originating Company - Text	Total
Niagara Mohawk Power Corp	NG Engineering Svcs, LLC	\$50,027.47
	NGUSA Service Company	\$495,877,943.52
Niagara Mohawk Power Corp		\$495,927,970.99

Receiving Company - Text	Originating Company - Text	Total
PSEG Electric Serv TSA Co	NG Engineering Svcs, LLC	\$1,757.64
	NGUSA Service Company	\$573,610.60
PSEG Electric Serv TSA Co		\$575,368.24

Receiving Company - Text	Originating Company - Text	Total
Transgas Inc	NG Engineering Svcs, LLC	\$77.11
	NGUSA Service Company	\$468,437.05
Transgas Inc		\$468,514.16

Receiving Company - Text	Originating Company - Text	Total
Valley Appliance & Merch	NGUSA Service Company	(\$9,031.70)
Valley Appliance & Merch		(\$9,031.70)

Receiving Company - Text	Originating Company - Text	Total
Vermont Green Line Devco	NGUSA Service Company	\$53,226.24
Vermont Green Line Devco		\$53,226.24

Receiving Company - Text	Originating Company - Text	Total
Wayfinder Group, Inc.	NG Engineering Svcs, LLC	(\$186.81)
	NGUSA Service Company	(\$447,736.55)
Wayfinder Group, Inc.		(\$447,923.36)

Total		\$ 3,006,319,848.69
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National Grid USA and The Narragansett Electric Company
Division 2-31

Request:

What are the projected costs of the Integration Management Office and Transition Management Office initiatives through the end of the transition period?

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 2-31 for the requested information.

National Grid USA and The Narragansett Electric Company
Division 2-32

Request:

Mr. Sorgi states (at 16:12-14) that "PPL or its affiliates expect to extend employment offers to certain employees of National Grid USA and/or its affiliates, including National Grid USA Service Company, Inc., who currently provide services to Narragansett." Please:

- a. Explain in detail how PPL will fill the positions for each Narragansett, National Grid, or Service Company employee who does not accept a position with PPL.
- b. Provide the estimated cost to fill all of these positions, and explain whether the related costs (for example, sign-on bonuses, relocation packages, or expanded benefits) will be allocated to RI ratepayers.

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 2-32 for the requested information.

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National Grid USA and The Narragansett Electric Company
Division 2-33

Request:

PPL has indicated it will have a President of Narragansett based in Rhode Island. Provide a proposed organizational chart for the management structure of Narragansett under PPL management, as well as a headcount of the expected management team members, including clerical and administrative support.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 2-33.

National Grid USA and The Narragansett Electric Company
Division 2-34

Request:

Referencing the Petition at paragraphs 10 and 11:

- a. Explain in detail how PPL will assure that transmission costs to Rhode Island rate payers will not increase over what they would have been if these assets remain with National Grid; and
- b. Given that the legal, engineering, regulatory, and other functions associated with all transmission activities in New England are currently coordinated among all of the National Grid distribution utilities, explain in detail how PPL will duplicate those economies of scale so that there is no duplication of efforts and no unnecessary charges imposed on ratepayers. Your response should address, among other things, daily, monthly and annual activities and filings and dockets at Federal Energy Regulatory Commission, the Rhode Island Public Utilities Commission, Siting Board and others.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 2-34.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
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National Grid USA and The Narragansett Electric Company
Division 2-35

Request:

Referring to paragraph 21 of the Petition, please provide any estimates prepared by or for the Applicants addressing the effect that the Transaction will have on the cost of the services presently provided by the Service Company to Narragansett after completion of the approximate two-year transition period.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 2-35.

National Grid USA and The Narragansett Electric Company
Division 2-36

Request:

Referring to paragraph 38 of the Petition, please:

- a. provide any available estimate of the acquisition premium that will be booked, but not recovered through rates, as a result of the Transaction;
- b. State whether the Applicants will seek to include the effect of the acquisition premium or transaction costs in the capital structure used for ratemaking purposes; and
- c. provide any available estimate of the transaction costs related to the Transaction. The response should itemize and quantify all such Transaction costs, regardless of whether PPL will seek to recover such costs in Rhode Island retail rates.

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 2-36 for the requested information.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
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National Grid USA and The Narragansett Electric Company
Division 2-37

Request:

Referring to Mr. Sobolewski's testimony (at 13:13-17), although the transfer of ownership of Narragansett to PPL Rhode Island will have no impact on base distribution rates charged to Narragansett electric and gas customers upon the closing of the Transaction, is it expected that the base distribution will eventually be impacted by PPL ownership? If so, please describe and quantify the expected impact of PPL ownership.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 2-37.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
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National Grid USA and The Narragansett Electric Company
Division 2-38

Request:

Referring to Mr. Dudkin's testimony (at 22:17-20), will PPL also commit that it will not seek an increase in base distribution rates to pay for other transaction costs related to the Transaction such as advisory costs and investment banking fees?

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 2-38 for the requested information.

National Grid USA and The Narragansett Electric Company
Division 2-39

Request:

Mr. Sorgi states (at 9:12-13) that PPL will not seek to recover any acquisition premium or transition cost in customer rates. Please:

- a. Define "transaction costs" and explain the extent to which the above pledge applies to costs associated with transitioning Narragansett's ownership, operations, administration and management from National Grid to PPL;
- b. Provide a detailed explanation of how these costs will be tracked and reported to assure they are not recovered in rates; and
- c. Confirm that PPL does not intend to recover from ratepayers the transition costs associated with transitioning the ownership, operations and all procedures and active docket processes from National Grid to PPL.

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 2-39 for the requested information.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
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National Grid USA and The Narragansett Electric Company
Division 2-40

Request:

How does PPL plan to track the costs associated with the Transition? What controls has PPL put in place to ensure that these costs will not be included in rates?

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 2-40.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
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National Grid USA and The Narragansett Electric Company
Division 2-41

Request:

Please state whether PPL proposes a rate freeze and/or a capital spending freeze during the transition period or any future period.

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 2-41 for the requested information.

National Grid USA and The Narragansett Electric Company
Division 2-42

Request:

Referring to paragraph 13 of the Petition, please describe the expected effect of Transaction on the Integrated Facilities Agreement between Narragansett and NEP. Provide any updates of your review of the plan for post-closing, physical operation of the Narragansett transmission assets and related regulatory approvals.

Response:

During a transition period after the Transaction has closed, Narragansett-owned electric transmission assets will continue to be integrated with the electric transmission system of National Grid transmission-owning subsidiaries in New England. During this transition period, Narragansett-owned electric transmission assets will continue to be operated by NEP and will be subject to an Integrated Facilities Agreement in Schedule III-B of NEP's FERC Electric Tariff No. 1 for operational purposes and for the provision of open access transmission service. During the transition period, NEP will also continue to serve as a Participating Transmission Owner for Narragansett-owned electric transmission assets under the Transmission Operating Agreement with ISO New England Inc. The transition period is currently anticipated to run through the end of June 2022. At the end of the transition period, it is anticipated that: (1) Narragansett will become a separate Participating Transmission Owner that is a party to the Transmission Operating Agreement with ISO New England Inc.; and (2) Narragansett will recover its electric transmission revenue requirements under the ISO New England Open Access Transmission Tariff and will no longer recover those revenue requirements under the Integrated Facilities Agreement in Schedule III-B of NEP's FERC Electric Tariff No. 1.

PPL and Narragansett are reviewing the Transmission Operating Agreement, the Rates Design and Funds Disbursement Agreement, the ISO New England Open Access Transmission Tariff, and NEP's FERC Electric Tariff No. 1 to determine if amendments to those documents will be necessary or appropriate to reflect the circumstances when Narragansett is a separate Participating Transmission Owner. Any such amendments would require approvals from the Federal Energy Regulatory Commission. Some amendments to these documents may also require agreement of ISO New England Inc. and/or some other Participating Transmission Owners.

With respect to physical operation of Narragansett's transmission assets, during the transition period, NEP will maintain current normal and emergency transmission operations and local control center services consistent with ISO New England Inc. Operating Procedures, North American Electric Reliability Corporation and Northeast Power Coordinating Council

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requirements, and Good Utility Practice. National Grid notes that the plan for post-closing, physical operation of the Narragansett transmission assets is undergoing ongoing review and refinement. National Grid will supplement this response with any significant updates to the plan for post-closing, physical operation of the Narragansett transmission assets.

Also, National Grid is working with PPL to consider whether additional documentation is appropriate to address operation of Narragansett electric transmission assets during the period after the Transaction has closed until Narragansett becomes a separate Participating Transmission Owner. National Grid will supplement this response to the extent it determines with PPL that any such additional documentation is appropriate and will address in its supplemental response whether it anticipates such additional documentation would require regulatory approvals.

National Grid USA and The Narragansett Electric Company
Division 2-43

Request:

On page 9, line 10 of Mr. Dudkin's testimony, he indicates that PPL continuously analyzes its infrastructure. Please:

- a. Describe the types of analyses PPL conducts to achieve this objective and provide examples of the studies and documents prepared, including all modeling procedures.
- b. Provide any studies, reports, or other Documents prepared by PPL comparing the analyses referenced in Mr. Dudkin's testimony (at 9:7-15) to the National Grid Electric Infrastructure, Safety, and Reliability Plan and Gas Infrastructure, Safety, and Reliability Plan.

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 2-43 for the requested information.

National Grid USA and The Narragansett Electric Company
Division 2-44

Request:

In his testimony, Mr. Sorgi states (at 9:10-12) a belief that “infrastructure investments and a more localized operation model under PPL’s ownership will create jobs and support economic development in Rhode Island.” Please:

- a. Explain how PPL’s operation would be more localized than National Grid, and
- b. Provide quantifiable support on how PPL’s more localized operation model creates jobs and supports economic development.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 2-44.

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National Grid USA and The Narragansett Electric Company
Division 2-45

Request:

Please provide a detailed list of the combination of best practices that will benefit the customers and the State as described in Mr. Dudkin's testimony (at 5:18-19).

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 2-45 for the requested information.

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National Grid USA and The Narragansett Electric Company
Division 2-46

Request:

Referencing to Mr. Dudkin's testimony (at 33:4-6), please provide a copy of all Documents delineating those aspects of the National Grid advanced metering and grid modernization plans that: (a) will integrate with the existing PPL systems; and (b) require adjustment.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 2-46.

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National Grid USA and The Narragansett Electric Company
Division 2-47

Request:

In his testimony, Mr. Sorgi mentions (at 8:15-16, 8:20) PPL's knowledge and experience implementing smart grid technology and in automating electricity networks. Please provide a detailed description of PPL's experience with smart grid technology and automation, including: the type of smart grid technology or automation, the year implemented, and the specific utility system on which it was implemented.

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 2-47 for the requested information.

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National Grid USA and The Narragansett Electric Company
Division 2-48

Request:

Please explain in detail how PPL has used its smart grid technology to streamline the process of gathering data as discussed on page 14, lines 6-10 of Mr. Dudkin's testimony.

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 2-48 for the requested information.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
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National Grid USA and The Narragansett Electric Company
Division 2-49

Request:

Provide copies of all Documents demonstrating the customer benefits associated with the 7,000 smart devices which have been installed on the transmission and distribution networks as described in Mr. Dudkin's testimony (at 10:1-3).

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 2-49.

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National Grid USA and The Narragansett Electric Company
Division 2-50

Request:

On page 10, lines 5-7 of Mr. Dudkin's testimony, he indicates that PPL avoided its one millionth customer outage because of smart grid technology. Please explain how PPL determined that smart grid technology was responsible for avoiding the outages.

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 2-50 for the requested information.

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
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Issued on June 11, 2021

National Grid USA and The Narragansett Electric Company
Division 2-51

Request:

Please provide all Documents, including analyses and plans, that address the possible installation on the Narragansett system of smart grid and automation devices.

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 2-51 for the requested information.

National Grid USA and The Narragansett Electric Company
Division 2-52

Request:

For the \$112 million of the LG&E and KU multi-year initiative discussed on page 10, lines 7-16 of Mr. Dudkin's testimony:

- a. Provide a breakdown of the referenced \$112 million expenditures by spending category;
- b. Explain how these smart grid investments allow PPL utilities to immediately pinpoint the location of power outages;
- c. State whether the technology implemented at each PPL utility system is identical, and if not, explain the differences;
- d. State whether all the smart grid technologies and Advanced Distribution Management Systems are managed through a single service within PPL. If they are not, explain how they are managed.

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 2-52 for the requested information.

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's
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National Grid USA and The Narragansett Electric Company
Division 2-53

Request:

Provide a list of each of the specific industry-leading advances in integrating DER made by PPL and referenced on page 13, lines 17-18 of Mr. Dudkin's testimony.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 2-53.

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
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Issued on June 11, 2021

National Grid USA and The Narragansett Electric Company
Division 2-54

Request:

Please provide a copy of each of the PPL distributed energy resource interconnection tariffs approved by each commission in the PPL jurisdictions.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 2-54.

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
Division 2-55

Request:

For each PPL regulated utility, please provide the following data, as of May 30, 2021:

- a. Number and capacity of distribution-interconnected DER by fuel type; and
- b. The outstanding interconnection queue.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 2-55.

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
Division 2-56

Request:

Provide a copy of any cybersecurity governance plans utilized by PPL or its affiliates in its interconnection processes for DERs.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 2-56.

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
Division 2-57

Request:

Please provide the basis for Mr. Dudkin's statement (at 35:1-2) that PPL Electric Utilities has greater capacity and ability to interconnect solar generation than most electric utilities.

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 2-57 for the requested information.

National Grid USA and The Narragansett Electric Company
Division 2-58

Request:

Mr. Dudkin states (at 13:18-20) that the transition to renewable energy resources will require different grid capabilities and data management systems. Please:

- a. Provide a detailed list of these grid capabilities and data management systems that PPL believes will be needed on the Narragansett system;
- b. Explain in detail how PPL will transition its capabilities and data management systems to integrate those already implemented by National Grid; and
- c. Provide a list of National Grid's grid capabilities and data management systems which will need to be abandoned or replaced in order to achieve integration with the PPL systems.

Response:

This data request will be best answered by PPL Corporation and PPL Rhode Island, LLC (collectively "PPL") once National Grid USA has completed a detailed review of grid capabilities and data management systems with PPL. Depending on how PPL supports grid capabilities, National Grid USA will align its overall system proposal to achieve integration with the PPL systems. In most cases, National Grid USA systems support multiple jurisdictions, so efforts involved will be to archive and transfer Rhode Island-related data as outlined in the Transition Services Agreement. The list of systems below is a set of systems to be assessed:

- Smallworld GIS
- IMAP (ArcGIS Online) - particularly DER System Data Portal
- Cascade
- Computapole
- Aspen
- MITS
- Streetlighting - CSS (Auth Source) & GIS
- STORMS
- Primavera
- IDS
- CSS
- SAP
- MyHub
- Powerplant

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's
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- Salesforce
- Interconnection Online Application Portal (IOAP) with CSS
- DRIVE tool (calculates hosting capacity)

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
Division 2-59

Request:

Please provide a list of each innovation implemented by PPL as discussed on page 9, lines 19 and 20 of Mr. Dudkin's testimony.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 2-59.

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
Division 2-60

Request:

Please provide five years of detailed system reliability statistics for each PPL jurisdiction including comparisons to the Institute of Electrical and Electronics Engineers (IEEE) statistics following the IEEE standards for reliability. This should include SAIDI, SAIFI and CAIDI.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 2-60.

National Grid USA and The Narragansett Electric Company
Division 2-61

Request:

Referencing the Petition at paragraph 32, PPL states it has a culture of safety. Please provide:

- a. For the past five years, the number of personal injury events that occurred on PPL system in each of the following categories: public; employee; contractor employee and any other applicable category not specified here; and
- b. For the past five years, the number of property damage events in each of the following categories: vehicular; private property, company property, and any other applicable category not specified here.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 2-61.

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
Division 2-62

Request:

Please provide:

- a. Any accident reports submitted to a state utility commission for public injuries or deaths on the system, and employee injuries or deaths submitted, by PPL or any of its affiliates over the last five years;
- b. The PPL safety management systems referenced in Mr. Dudkin's testimony at page 19, lines 11-12; and
- c. Each PPL utility's Occupational Safety and Health Administration (OSHA) safety rating data and number of reportable incidents per year for the last five years.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 2-62.

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
Division 2-63

Request:

Mr. Sorgi states (at 16:3-4) that PPL does not expect the Transaction to negatively impact current employees of Narragansett in Rhode Island. Provide all evaluations and analyses PPL has completed to support its statement that current employees will not be negatively impacted. What mitigation options does PPL plan to incorporate if these employees are negatively impacted?

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 2-63 for the requested information.

National Grid USA and The Narragansett Electric Company
Division 2-64

Request:

Please describe the effect that the Transaction is expected to have on Narragansett pension plans, other post-retirement benefits plans, and other employee benefit plans.

Response:

Certain of National Grid USA's Final Average Pension Plan ("FAPP") liabilities and assets will be spun off to a defined benefit pension plan sponsored by PPL Corporation ("PPL") for those current and former The Narragansett Electric Company ("Narragansett") employees who are participants in the FAPP and are being transitioned to employment with PPL as part of PPL Rhode Island Holdings, LLC's acquisition of Narragansett from National Grid USA (the "Transaction").

Similarly, other post-retirement benefit plan liabilities and assets of National Grid USA will be spun off to post-retirement benefit plans sponsored by PPL for those current and former Narragansett employees who are being transitioned to employment with PPL as part of the Transaction.

For those transferring employees who participate in one of National Grid USA's defined contribution plans, existing participant balances will stay in such plans unless the participant chooses to roll-over their balance to a plan sponsored by PPL.

The Transaction will not have any immediate impacts on other employee benefit plans.

In addition, it is important to note that the Transaction will not cause any of National Grid USA's retirement plans to terminate.

Please also see PPL and PPL Rhode Island Holdings, LLC's response to Data Request Division 2-64.