

October 25, 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 Division Advocacy Section Data Requests – Set 9

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 ninth set of data requests issued by the Rhode Island Division of Public Utilities and Carriers (“Division”) Advocacy Section (the “Advocacy Section”) in the above-referenced proceeding: Division 9-4, Division 9-7 through Division 9-10, Division 9-16 through Division 9-19, Division 9-21, Division 9-26, Division 9-28, Division 9-32 through Division 9-34, Division 9-50, Division 9-52, Division 9-54, Division 9-56, Division 9-58, Division 9-60, Division 9-61, Division 9-63 through Division 9-65, Division 9-69, Division 9-71, Division 9-73, Division 9-74, Division 9-85, Division 9-87, Division 9-89, Division 9-91 and Division 9-95 through Division 9-98.¹ National Grid will file its remaining responses to the Advocacy Section’s ninth set of data requests by or before October 26, 2021, as agreed with the Advocacy Section and the other intervening parties. Please note that because the Advocacy Section issued Division 9-1 through Division 9-34 as redacted requests to protect confidential information, National Grid has similarly redacted the requests within its responses to Division 9-4, Division 9-7 through Division 9-10, Division 9-16 through Division 9-19, Division 9-21, Division 9-26, Division 9-28, and Division 9-32 through Division 9-34.

¹ Although this is a 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
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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

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)

Redacted

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 Ninth Set of Data Requests

Issued on October 1, 2021

National Grid USA and The Narragansett Electric Company
Division 9-4

Request:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-4.

Redacted

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 Ninth Set of Data Requests

Issued on October 1, 2021

National Grid USA and The Narragansett Electric Company
Division 9-7

Request:

[REDACTED]

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-7.

Redacted

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 October 1, 2021

National Grid USA and The Narragansett Electric Company
Division 9-8

Request:



Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-8.

Redacted

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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Issued on October 1, 2021

National Grid USA and The Narragansett Electric Company
Division 9-9

Request:

[REDACTED]

Response:

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

Redacted

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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National Grid USA and The Narragansett Electric Company
Division 9-10

Request:

[REDACTED]

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-10.

Redacted

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 Ninth Set of Data Requests

Issued on October 1, 2021

National Grid USA and The Narragansett Electric Company
Division 9-16

Request:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-16.

Redacted

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 October 1, 2021

National Grid USA and The Narragansett Electric Company
Division 9-17

Request:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-17.

Redacted

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 Ninth Set of Data Requests

Issued on October 1, 2021

National Grid USA and The Narragansett Electric Company
Division 9-18

Request:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-18.

Redacted

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 Ninth Set of Data Requests

Issued on October 1, 2021

National Grid USA and The Narragansett Electric Company
Division 9-19

Request:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-19.

Redacted

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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Issued on October 1, 2021

National Grid USA and The Narragansett Electric Company
Division 9-21

Request:

[REDACTED]

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-21.

Redacted

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 9-26

Request:

[REDACTED]

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-26.

Redacted

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
Responses to Division's Ninth Set of Data Requests

Issued on October 1, 2021

National Grid USA and The Narragansett Electric Company
Division 9-28

Request:

[REDACTED]

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-28.

Redacted

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 Ninth Set of Data Requests

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National Grid USA and The Narragansett Electric Company
Division 9-32

Request:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-32.

Redacted

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 9-33

Request:



Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-33.

Redacted

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 9-34

Request:

[REDACTED]

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-34.

National Grid USA and The Narragansett Electric Company
Division 9-50

Request:

Referencing the response to DIV 1-28, which discusses the Transition Services Agreement and identifies the services that may be provided on Day 1 by the Service Company and will subsequently be transitioned to PPL, please:

- a. Confirm that PPL currently expects that on Day 1 following a closing of the Transaction, the Service Company will provide Supplier Services and perform related functions for the Retail Choice Programs for natural gas and electricity for Narragansett;
- b. Provide PPL's current expectation for the transition to PPL of Supplier Services and related functions for the Retail Choice Programs for natural gas and electricity during the two-year transition period; and
- c. If the Service Company will not perform these responsibilities on Day 1, please explain how these functions will be performed on Day 1.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-50.

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 9-52

Request:

Please describe the steps that PPL has taken to develop a business continuity plan to ensure that the Transaction will not alter the current operation of the competitive energy market, and provide all relevant documents setting forth this plan.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-52.

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 9-54

Request:

As compared to staffing levels of Narragansett, please describe in detail the staffing levels that PPL plans to use to support the Supplier Services functions and Retail Choice Programs for the electricity and natural gas competitive markets.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-54.

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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National Grid USA and The Narragansett Electric Company
Division 9-56

Request:

Please describe any changes that PPL intends to make to the Supplier Services functions or Retail Choice Programs and indicate whether such changes may disrupt the availability of or access to competitive supply services purchased by customers in the competitive energy market.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-56.

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's
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National Grid USA and The Narragansett Electric Company
Division 9-58

Request:

Please indicate whether PPL intends to maintain the same protocols that Narragansett follows to exchange data with competitive energy suppliers that is necessary to bill customers receiving competitive supply services. If not, please describe the protocols PPL plans to adopt.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-58.

National Grid USA and The Narragansett Electric Company
Division 9-60

Request:

State whether competitive energy suppliers will be required to execute new supplier and billing service agreements with PPL in order to continue servicing customers.

- a. If this is planned, please provide a timeline for providing proposed service agreements to competitive energy suppliers; and
- b. If this is not planned, please explain how PPL intends to ensure that each trading partner understands its rights and obligations.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-60.

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 9-61

Request:

Does PPL intend to maintain the same level of communication protocols between energy suppliers and the utility that Narragansett currently has in place, such as for the posting of gas nominations and operational flow orders, and the use of the Electronic Bulletin Board? If not, please describe the communication protocols that PPL plans to implement and explain when such protocols will be conveyed to competitive energy suppliers.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-61.

National Grid USA and The Narragansett Electric Company
Division 9-63

Request:

PPL's response to DIV 7-9 states (at 1) that the total cost of the LG&E main replacement program was \$287 million; the total of the programs for which costs are provided appears to be approximately \$208 million. Please:

- a. Verify that the difference between the total cost cited and the sum of the costs for the listed programs represents costs for pipe replacement prior to 2010, and if that is not correct document and explain the source of the difference between the cited total cost and the costs of the programs for which yearly detail is provided.
- b. Indicate the portion of the \$287 million that was incurred by LG&E prior to its acquisition by PPL.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-63.

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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National Grid USA and The Narragansett Electric Company
Division 9-64

Request:

PPL's response to DIV 7-9 states (at 1) that a total of more than 70,000 services have been replaced by LG&E. The data included in PPL's response appears to identify less than 30,000 services replaced in the years 2010-2020. Please document the number of services that were replaced by LG&E by program prior to LG&E's acquisition by PPL.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-64.

National Grid USA and The Narragansett Electric Company
Division 9-65

Request:

PPL's response to Division Data Request 7-4 states that with, respect to National Grid's non-public forecasting and planning information, "[s]ome of this information is confidential and is not expected to be shared with PPL until PPL owns Narragansett." With respect to that statement, please:

- a. Identify in as much detail as possible the nature the confidential information that will not be shared with PPL until PPL owns Narragansett; and
- b. Explain why the non-public information being withheld could not be provided to PPL under a non-disclosure agreement or other protective agreement.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-65.

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 9-71

Request:

Is PPL aware that the RIPUC has stayed its Docket No. 5113 filing for Advanced Metering Functionality?

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-71.

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 9-73

Request:

Please provide the proposed new location for the PPL Control Center.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-73.

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
Responses to Division's Ninth Set of Data Requests
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National Grid USA and The Narragansett Electric Company
Division 9-74

Request:

Please identify the communication paths and technologies that will create all the interconnection with the existing National Grid equipment to provide full intelligence to the control center.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-74.

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 9-85

Request:

With reference to Attachment PPL-DIV 1-54-1, please provide:

- a. the date on which the document was prepared; and
- b. the authors of the document.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-85.

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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National Grid USA and The Narragansett Electric Company
Division 9-87

Request:

Please explain why the document in Attachment PPL-DIV 1-54-1 was prepared. What is the purpose of the report?

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-87.

National Grid USA and The Narragansett Electric Company
Division 9-89

Request:

The document in Attachment PPL-DIV 1-54-1 states (at 4):

PPL integration teams developed a Rhode Island organizational structure by functional area that reflects the staffing levels expected to operate the business once fully transitioned from National Grid. PPL also developed the corporate and administrative services and associated costs necessary to operate Narragansett.

Please provide the referenced “organizational structure by functional area” that was developed by the “PPL integration teams.”

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-89.

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 9-91

Request:

The document in Attachment PPL-DIV 1-54-1 states (at 8) that PPL's "Rhode Island-focused operating model will also drive additional investment in the State." Please provide the "Rhode Island-focused operating model," and specify each component of the "additional investment" that PPL anticipates will be needed to implement its "Rhode-Island focused operating model."

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-91.

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 9-95

Request:

In response to DIV 2-28, PPL states "PPL and PPL RI will evaluate on a case-by-case basis whether they will seek to recover costs necessary to separate Narragansett from National Grid USA and integrate Narragansett into PPL, consistent with the guidance of the Policy Statement." Please supplement this response to reflect any hold harmless commitments to Rhode Island ratepayers with respect to PPL's recovery of capital costs necessary "allow PPL to establish the infrastructure required to operate Narragansett independently."

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-95.

National Grid USA and The Narragansett Electric Company
Division 9-96

Request:

In response to DIV 1-42(c), PPL states: "PPL and PPL RI do not plan to seek recovery from ratepayers for the costs associated with the [Gas Control Center (GCC)] that do not relate to new or improved technology capabilities to Narragansett, or for costs related to capital investments that would not have been made in the normal course of business for reasons including but not limited to obsolescence. These costs would be recoverable in the ordinary course of business in the absence of PPL RI's purchase of Narragansett, subject to ordinary regulatory and prudence review. PPL and PPL RI will seek recovery for any such costs pursuant to the appropriate cost recovery mechanisms Narragansett already has in place with the Rhode Island Public Utilities Commission and the Rhode Island Division of Public Utilities and Carriers, under existing statutes, rules, and tariffs." Please identify:

- a. Any "new or improved technology capabilities" PPL expects the GCC to provide to Narragansett; and
- b. The specific types of capital investments associated with the GCC that PPL expects to recover as having "been made in the normal course of business for reasons including but not limited to obsolescence."

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-96.

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 9-97

Request:

In response to DIV 1-42(b), PPL states: "PPL and PPL RI do not currently have cost estimates for the GCC. Once PPL and PPL RI have prepared such cost estimates, they will provide a supplemental response to this data request." Please supplement PPL's response to provide an updated cost estimate if available.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-97.

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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National Grid USA and The Narragansett Electric Company
Division 9-98

Request:

Various of the Applicants' responses to earlier data requests propounded by the Division offered to supplement responses as necessary—for example, when additional information became available, once studies or analyses were performed, or when plans were formulated. Please update or supplement all earlier responses as necessary.

Response:

National Grid USA and The Narragansett Electric Company ("Narragansett") have supplemented the following responses as part of this proceeding:

Original Response	Supplemental Response
Division 1-27	Division 7-30
Division 1-28	Division 7-36
Division 1-29	Division 7-39
Division 2-17	Division 7-36
Division 2-18	Division 7-35 and 7-36
Division 2-22	Division 7-36
Division 2-25	Division 7-37
Division 7-33	Division 7-33 Supplemental

At this time, National Grid USA and Narragansett do not have any additional information to add to their responses to Data Requests Division 2-27 and Division 2-42.

In addition, National Grid USA and Narragansett's response to Data Request Division 7-36 states that "National Grid USA and Narragansett expect to continue to update the TSA schedules until the closing of PPL Rhode Island Holdings, LLC's acquisition of Narragansett from National Grid USA and will supplement this response accordingly." National Grid USA and Narragansett anticipate the next meaningful update to the Transition Services Agreement schedules will be in early-December 2021 and will supplement their response to Data Request Division 7-36 at that time.