

October 26, 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 9-1, Division 9-5, Division 9-6, Division 9-11, Division 9-13 through Division 9-15, Division 9-20, Division 9-27, Division 9-29 through Division 9-31, Division 9-35, Division 9-49, Division 9-53, Division 9-55, Division 9-57, Division 9-59, Division 9-67, Division 9-69, Division 9-70, Division 9-72, Division 9-75, Division 9-76, Division 9-84, Division 9-86, Division 9-88, Division 9-90, and Division 9-92 through Division 9-94.<sup>1</sup> Also enclosed is National Grid’s supplemental response to data request Division 9-81. 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 9-1, Division 9-5, Division 9-6, Division 9-11, Division 9-13 through Division 9-15, Division 9-20, Division 9-27, and Division 9-29 through Division 9-31.

This submission completes National Grid’s responses to the Division’s ninth set of data requests.

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

---

<sup>1</sup> 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  
Docket D-21-09 – Responses to Advocacy Section Data Requests Set 9  
October 26, 2021  
Page 2 of 2

Very truly yours,

A handwritten signature in blue ink, appearing to read "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)

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 9-1

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 9-1.

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 9-5

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 9-5.

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 9-6

Request:

[REDACTED]

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-6.

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 9-11

Request:

[REDACTED]

[REDACTED]

[REDACTED]

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-11.



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 9-13**

**Request:**

[REDACTED]

[REDACTED]

[REDACTED]

**Response:**

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-13.

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 9-14

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 9-14.



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 9-15

Request:

[REDACTED]

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-15.

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 9-20

Request:

[REDACTED]

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-20.

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 9-27**

**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 9-27.

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 9-29

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 9-29.

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 9-30

Request:

[REDACTED]

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-30.



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 9-31

Request:

[REDACTED]

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-31.

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 9-35

Request:

Do PPL Corporation and PPL Rhode Island Holdings, LLC agree that any adjustments to restate the balance sheet assets and/or liabilities for pensions and other postretirement benefits, as referenced in the response to Division 4-9, will not increase Narragansett's revenue requirement above what it would be absent the Transaction?

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-35.

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 9-49

Request:

For each contractor currently providing environmental cleanup/remediation services for Narragansett's gas system, please indicate whether the contract will be carried forward after the acquisition of Narragansett by PPL without change or whether the contract will either be terminated or will require renegotiation. If renegotiation is required, please indicate when PPL expects that such renegotiation will be required and provide PPL's assessment of the manner in which the scope of services provided by the contractor and/or the costs of the contractor's services will be impacted.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-49.

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 9-53

Request:

Please confirm that PPL intends to maintain the protocols that Narragansett has in place to ensure that customers' ability to participate in the competitive energy market is unaffected and uninterrupted, and explain how PPL intends to do so. The response should address billing; staffing levels and other resources that can affect customer service; communications between energy suppliers and the utility; the assignment of customers; electronic data interchange protocols; access to customer usage information; enrollment procedures; availability of electronic bulletin boards and the posting of nominations.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-53.

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  
Responses to Division's Ninth Set of Data Requests  
Issued on October 1, 2021

---

**National Grid USA and The Narragansett Electric Company**  
Division 9-55

Request:

Referencing the organizational chart provided in response to DIV 2-24, please identify the PPL positions that will perform Supplier Services and Retail Choice Program functions for electricity and natural gas and the individual(s) on the leadership team listed in the response to whom these positions will report.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-55.



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 9-57

Request:

Does PPL intend to adopt and maintain the same electronic data interchange (EDI) protocols for the exchange of information with competitive energy suppliers that Narragansett has in place? If not, please describe the protocols PPL plans to adopt and maintain.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-57.

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 9-59

Request:

State whether competitive energy suppliers be required to “retest” EDI transactions with PPL. If retesting is planned, please indicate when retesting will begin. If retesting is not planned, please explain how PPL intends to ensure compatibility.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-59.

**National Grid USA and The Narragansett Electric Company**  
Division 9-67

Request:

PPL's response to DIV 7-29 states that "[i]t is anticipated that PPL Rhode Island will offer positions to as many as 350-400 National Grid Service Company employees." Please:

- a. Provide PPL's best estimates of:
  - i. The numbers of current union employees of the National Grid Service Company that are expected to be offered positions with PPL Rhode Island;
  - ii. The numbers of current non-union employees of the National Grid Service Company that are expected to be offered positions with PPL Rhode Island; and;
  - iii. The numbers of current non-union employees of the National Grid Service Company that are expected to be offered positions with PPL entities other than PPL Rhode Island; and
- b. Indicate whether PPL intends to offer any financial incentives to encourage current National Grid Service Company employees to transfer to PPL or PPL Rhode Island. If yes, please provide PPL's current best estimates for the costs of such financial incentives for:
  - i. Employees to be engaged in electric system operations;
  - ii. Employees to be engaged in gas system operations; and
  - iii. Employees to be engaged in general administrative functions.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-67.

**National Grid USA and The Narragansett Electric Company**  
Division 9-69

Request:

Narragansett presently benefits from National Grid's sharing of spare equipment across three operating companies, particularly with respect to spare power transformers from National Grid's Massachusetts operating company that are made available to, and are used, in Rhode Island. Please:

- a. Explain how will PPL achieve this synergy post-Transaction;
- b. Provide a detailed description and the additional capital and costs of duplicating materials and spare equipment for Narragansett Electric which are now provided through centralized inventory that is shared with Massachusetts and New York;
- c. Explain how PPL will minimize excess outage hours if equipment must come from Pennsylvania or Kentucky as compared to the current situation under National Grid ownership;
- d. Provide the anticipated increased cost to Narragansett for mobile transformers post-Transaction; and
- e. Explain how PPL will mitigate the outage duration impact of mobile transformers coming from Pennsylvania and Kentucky versus from Massachusetts.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-69.

**National Grid USA and The Narragansett Electric Company**  
Division 9-70

Request:

In National Grid's response to DIV 7-34, National Grid estimates that approximately 300-370 Service Company employees will provide support associated with the TSA, either part-time or full time, and "teams from the relevant Service Company functions will support PPL during the transition, and specific individuals will assist in the support as-needed. For example, Employee X will not be specifically assigned to support PPL on a full-time or part-time basis; however, Employee X's team will support PPL during the transition. National Grid USA will retain the resource capacity of the Service Company's functional teams to support the TSA." Please:

- a. Explain how PPL intends to create the level of support provided by teams comprised of 300-370 part-time or full time Service Company employees post-Transaction;
- b. Provide an estimate of the number of employees PPL expects will be required to replicate the services, both part-time and full time, once the TSA period has ended; and
- c. State whether PPL expects the functions provided by National Grid's Service Company can be replicated with the same or less resource man-hours and cost than National Grid Service Company currently provides.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-70.



**National Grid USA and The Narragansett Electric Company**  
Division 9-72

Request:

The TSA establishes a 24-month period that National Grid USA Service Company will provide transition services to PPL. Please:

- a. State whether PPL intends to recover the costs paid to the Service Company pursuant to the TSA in Rhode Island rates and, if so, explain how the costs will be recovered;
- b. Explain in detail how pricing is set under the TSA;
- c. Explain how PPL employees or resources will manage, assist, shadow or otherwise coordinate with Service Company training teams or employees during the TSA's term in order to successfully transition services to PPL, including:
  - i. How PPL will track the activities and costs associated with PPL employees or resources that train under the Service Company during the transition period; and
  - ii. Whether PPL intends to recover the costs of those activities described in subpart (i) in Rhode Island rates and provide an estimate of those costs and the proposed recovery mechanism; and
- d. Explain whether PPL expects duplication of services or resources to enable continuity in operations throughout the separation process. If yes, explain why; if no, explain why not.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-72.

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 9-75**

**Request:**

Please identify what GIS and OMS systems will be integrated with the control center.

**Response:**

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-75.

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 9-76

Request:

Please explain how the new Control Center will manage outage restoration and specifically major storm response after the end of the TSA 24 month transition period.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-76.

**National Grid USA and The Narragansett Electric Company**  
**Division 9-81 Supplemental**

**Request:**

Concerning the transmission to distribution substations in Rhode Island:

- a. How many substations are in Narragansett's system?
- b. How many of the substations have SCADA systems fully installed and implemented?
- c. How many of these substations have the SCADA system communications interconnected to the SCADA master control facilities and/or a control center?
- d. What is the location (city and state) of the SCADA master control system?
- e. How many electromechanical relays remain in the substations?
- f. How many electronic or solid state relays are in the substations?
- g. How many of the relays in the substations are integrated to the SCADA system?
- h. What are the various communication networks being used to communicate between the substation remote terminal units (RTU) and the SCADA master and control center?

**Original Response:**

- a. There are 105 Narragansett substations serving distribution customers.
- b. For this count the Company counted all stations with an RTU that communicates to the Control Center Energy Management System (EMS) providing either analog telemetry or control, or both. There are 83 substations that communicate to the EMS.
- c. Same answer as part b above.
- d. The location of the primary SCADA system is in Northborough, Massachusetts.
- e. There are 3,473 electromechanical relays in the substations.
- f. There are 1,215 electronic or solid-state relays in the substations.
- g. Most of the relays that are identified in answer to question f are integrated into the SCADA system where relays provide information to Communication processors and RTU. Providing a more specific count would require a significant effort to review the wiring diagrams in each case.

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

---

- h. At substations with SCADA National Grid uses DNP3 protocol to communicate between control centers and RTU's. The actual medium in how that is achieved varies among the following:
  - a. Private fiber infrastructure or Verizon MPLS circuits.
  - b. cellular routers (Verizon).
  - c. 9.6k modems (over Verizon phone circuits).
  - d. Microwave communication.

Supplemental Response:

- h. At substations with SCADA National Grid uses DNP3 protocol to communicate between control centers and RTU's. The actual medium in how that is achieved varies among the following:
  - a. Private fiber infrastructure or Verizon MPLS circuits.
  - b. cellular routers (Verizon).
  - c. 9.6k modems and 1200 baud modems (over Verizon phone circuits).
  - d. Microwave communication.



**National Grid USA and The Narragansett Electric Company**  
Division 9-84

Request:

Provide a list of each interconnection of devices and functions such as T&D substation SCADA that will need to be transitioned from the National Grid control center to the PPL control center in the 24 month transition period. Include a list of each communication network and the number of communication paths that will need to be transferred.

Response:

As stated in National Grid USA and The Narragansett Electric Company's ("Narragansett") response to Data Request Division 9-81, 83 Narragansett substations communicate to the National Grid USA Supervisory Control and Data Acquisition ("SCADA") system. These substations use the DNP3 protocol over a combination of private fiber infrastructure, Verizon MPLS circuits, cellular routers (Verizon), 9.6k modems and 1200 baud modems (over Verizon phone circuits), or microwave communication.

After PPL Rhode Island Holdings, LLC's acquisition of Narragansett from National Grid USA Transaction closes, the PPL Corporation ("PPL") control center will continue to use the legacy National Grid USA SCADA system under a Transition Services Agreement ("TSA"), transitioning over a period of time to the PPL SCADA system. Details of the cutovers to the PPL system will be determined by PPL after the close.

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 9-86

Request:

With reference to Attachment PPL-DIV 1-54-1, please provide all documents, including analyses, studies, and internal communications that concern or relate to the conclusions reached in Attachment PPL-DIV 1-54-1, including but not limited to the assertion (at page 18) that: "Using the methodologies described in this document, PPL's anticipated Narragansett operating costs of \$273.6M are approximately \$12M lower than National Grid's current Narragansett operating costs of \$285.5 M[.]"

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-86.

**National Grid USA and The Narragansett Electric Company**  
Division 9-88

Request:

Attachment PPL-DIV 1-54-1, states (at 2) that “[t]his analysis demonstrates that the Transaction will not result in increased costs to operate Narragansett and therefore will not increase rates for the current electric and gas distribution services.” Please:

- a. confirm that this conclusion does not reflect or account for the capital expenditures necessary to “allow PPL to establish the infrastructure required to operate Narragansett independently” (Attachment DIV 1-54-1 at 3 n.1); and
- b. provide any studies or analyses related to estimated capital expenditures necessary “to allow PPL to establish the infrastructure required to operate Narragansett independently,” (*id.*) including, if available, projections regarding the impact of such costs on Rhode Island ratepayers.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-88.

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 9-90

Request:

The document in Attachment PPL-DIV 1-54-1 states (at 8) that in “developing PPL’s anticipated costs to operate Narragansett, PPL first refined its intended operating model for the Rhode Island utility.” Please explain what “refine[ments]” were made to the “intended operating model” and why PPL concluded that each was necessary.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-90.

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 9-92

Request:

The document in Attachment PPL-DIV 1-54-1 includes (at 14-16) a listing of activities that PPL “will perform on a centralized basis to support Narragansett.” The document states (at 16): “PPL developed an estimate of the costs in each of these functions that includes any incremental costs to support Narragansett.” Please provide each of these cost estimates.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-92.

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 9-93

Request:

The document in Attachment PPL-DIV 1-54-1 states (at 16) that "PPL then applied its cost allocation methodology to assign and allocate costs to Narragansett." Please provide that "cost allocation methodology."

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-93.

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 9-94

Request:

The document in Attachment PPL-DIV 1-54-1 provides (at pages 19-25), a set of "Functional Cost Summary Comparisons" and "Corporate Cost Summary Comparisons." To the extent not provided in response to previous data requests, please provide all documents, including analyses, studies, and internal communications that concern or relate to the conclusions reached with respect to each of the areas for which cost comparisons were conducted.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 9-94.