

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
NATIONAL GRID USA, and THE NARRAGANSETT ELECTRIC COMPANY

Docket No. D-21-09

PPL Corporation and PPL Rhode Island Holdings, LLC's
Responses to OER's First Set of Data Requests
Issued on September 15, 2021

OER 1-1

Request:

Please describe PPL's experience designing, developing, implementing, and/or providing oversight for comprehensive energy efficiency and demand response programs serving income-eligible and/or residential electric and natural gas customers.

Response:

PPL Electric Utilities Corporation ("PPL Electric") has been designing, developing, implementing and providing oversight for comprehensive energy efficiency and demand response programs for over twelve years pursuant to Pennsylvania Act 129 of 2008 ("Act 129"), 66 Pa. C.S.A. §§ 2806.1 and 2806.2. A copy of PPL Electric's approved Phase IV Act 129 Energy Efficiency and Conservation Plan ("Act 129 Plan") can be viewed at <https://www.puc.pa.gov/pcdocs/1705055.pdf>.

PPL Electric's Act 129 Plan includes programs for non-residential, residential, and low-income electric customers.

Louisville Gas and Electric Company ("LG&E") and Kentucky Utilities Company ("KU") have been designing, developing, implementing and providing oversight for comprehensive energy efficiency and demand response programs for many years pursuant to KRS 278.285. LG&E's and KU's most recent Demand Side Management/Energy Efficiency (DSM/EE) plan was approved by the Kentucky Public Service Commission on October 5, 2018, in Case No. 2017-00441. Details on their DSM/EE programs can be viewed in their tariffs, which can be found at the following link, beginning at Original Sheet No. 86: Rates and tariffs | LG&E and KU (lge-ku.com). The LG&E/KU Plan includes programs for non-residential, residential, and low-income customers.

PPL and PPL Rhode Island are working collaboratively with National Grid on Day 1 planning, which is still underway, and, based on the outcome of that planning process, knowledge transfer for Rhode Island energy efficiency programs will happen by way of transfer of employees to PPL on Day 1 or under the Transition Services Agreement. PPL Rhode Island anticipates hiring existing National Grid USA Service Company, Inc. employees with knowledge of and experience with The Narragansett Electric Company's Rhode Island energy efficiency programs.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
NATIONAL GRID USA, and THE NARRAGANSETT ELECTRIC COMPANY

Docket No. D-21-09

PPL Corporation and PPL Rhode Island Holdings, LLC's
Responses to OER's First Set of Data Requests
Issued on September 15, 2021

OER 1-2

Request:

Please describe PPL's experience designing, developing, implementing, and/or providing oversight for comprehensive energy efficiency and demand response programs serving commercial and/or industrial electric and natural gas customers.

Response:

PPL and PPL RI refer to their response to OER 1-1.

OER 1-3

Request:

Please describe PPL Rhode Island's planned approach to managing:

- (a) Residential energy efficiency programs
- (b) Income-Eligible energy efficiency programs
- (c) Commercial and Industrial energy efficiency programs
- (d) Demand response programs across all customer groups
- (e) Provision of energy efficiency services and incentives to customers utilizing delivered fuels (propane, heating oil) for water and/or space heating

Response:

PPL Rhode Island plans to continue The Narragansett Electric Company's ("Narragansett") existing energy efficiency programs on Day 1 in the same manner that the programs are operated and managed today. PPL Rhode Island will evaluate Narragansett's energy efficiency programs after the transaction closes to determine whether any changes or enhancements are appropriate. This evaluation will rely on PPL's experience in designing and managing energy efficiency programs in Pennsylvania and Kentucky as described in PPL's response to OER 1-1. PPL Rhode Island will seek all applicable regulatory approvals in accordance with the Least Cost Procurement statute, R.I. Gen. Laws § 39-1-27.7, to the extent that it determines that it wants to make changes to existing Narragansett energy efficiency programs.

PPL and PPL Rhode Island are working collaboratively with National Grid on Day 1 planning, which is still underway, and, based on the outcome of that planning process, knowledge transfer for Rhode Island energy efficiency programs will happen by way of transfer of employees to PPL on Day 1 or under the Transition Services Agreement. PPL Rhode Island anticipates hiring existing National Grid employees with knowledge of and experience with Narragansett's Rhode Island energy efficiency programs.

OER 1-4

Request:

What are the expected impacts of the transaction on energy efficiency program evaluation, measurement, and verification?

Response:

PPL Rhode Island does not expect the transaction to impact existing energy efficiency programs. PPL Rhode Island plans to continue The Narragansett Electric Company's ("Narragansett") existing energy efficiency programs on Day 1 in the same manner that the programs are operated and managed today, including program evaluation, measurement, and verification ("EM&V"). PPL Rhode Island will evaluate Narragansett's energy efficiency program EM&V after the transaction closes. PPL Rhode Island will seek all applicable regulatory approvals in accordance with the Least Cost Procurement statute, R.I. Gen. Laws § 39-1-27.7, to the extent that it determines that it wants to request changes to existing Narragansett's energy efficiency program EM&V.

PPL and PPL Rhode Island are working collaboratively with National Grid on Day 1 planning, which is still underway, and, based on the outcome of that planning process, knowledge transfer for Rhode Island energy efficiency programs EM&V will happen by way of transfer of employees to PPL on Day 1 or under the Transition Services Agreement. PPL Rhode Island anticipates hiring existing National Grid USA Service Company, Inc. employees with knowledge of Narragansett's Rhode Island energy efficiency programs EM&V.

OER 1-5

Request:

What is PPL Rhode Island's strategy for mitigating negative impacts identified in OER 1-4?

Response:

PPL Rhode Island has not identified any negative impacts in its response to OER 1-4, nor does it anticipate any negative impacts.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
NATIONAL GRID USA, and THE NARRAGANSETT ELECTRIC COMPANY

Docket No. D-21-09

PPL Corporation and PPL Rhode Island Holdings, LLC's
Responses to OER's First Set of Data Requests
Issued on September 15, 2021

OER 1-6

Request:

What is PPL Rhode Island's strategy to ensure no degradation of service or quality of energy efficiency programs?

Response:

PPL and PPL RI refer to their response to OER 1-3. PPL and PPL Rhode Island are working collaboratively with National Grid on Day 1 planning, which is still underway, and, based on the outcome of that planning process, knowledge transfer for Rhode Island energy efficiency programs will happen by way of transfer of employees to PPL on Day 1 or under the Transition Services Agreement. PPL Rhode Island anticipates hiring existing National Grid USA Service Company, Inc. employees with knowledge of and experience with Narragansett's energy efficiency programs and initiatives in Rhode Island.

OER 1-7

Request:

Please describe PPL Rhode Island's planned approach to managing:

- (a) System Reliability Procurement, generally
- (b) Procurement of non-wires solutions
- (c) Development and implementation of a non-pipes alternatives program

Response:

PPL and PPL RI's planned approach on Day 1 following the completion of the Transaction will be to follow the National Grid System Reliability Procurement ("SRP") plan, guidelines and criteria as outlined in the Rhode Island Public Utilities Commission filing in Docket No. 5080 for the 2021-2023 SRP Three-Year Plan, including the procurement of non-wires solutions and development and implementation of non-pipeline alternatives. PPL will continue to engage with stakeholders in Rhode Island regarding system reliability and procurement in accordance with the plan set forth in the 2021-2023 SRP Three-Year Plan. Thereafter, PPL will follow the existing statutory and regulatory requirements and processes to propose any potential changes to the SRP, procurement of non-wires solutions, and/or the development and implementation of non-pipeline alternatives.

OER 1-8

Request:

What is PPL's experience with deploying non-wires solutions and non-pipes solutions?

Response:

PPL Electric Utilities Corporation's ("PPL Electric") planning process evaluates non-wires alternatives ("NWA") when considering system improvements to address reliability or planning criteria improvements. PPL Electric has implemented several NWAs to date, including battery technology, deployment of over 7,000 smart grid devices, along with system automation and control platforms that offer industry leading distribution grid operating systems with the implementation of Advanced Distribution Management System ("ADMS") and Distributed Energy Resources Management System ("DERMS"). Through these NWA solutions, PPL Electric has both addressed planning concerns and also provided further improvements to system performance and customer reliability, which has led to avoiding over 1 million customer outages using PPL Electric's Fault Location, Isolation, and Service Restoration ("FLISR") technology.

For Louisville Gas and Electric Company and Kentucky Utilities Company ("LGE-KU"), electric distribution utilizes NWAs to reduce distribution system constraints and defer or avoid capital investments. LGE-KU has implemented smart grid infrastructure, system automation and control, and energy efficiency programs to mitigate capacity constraints and improve system reliability. LGE-KU does not have any defined non-pipes alternative programs.

OER 1-9

Request:

What is PPL Rhode Island's planned approach to managing and updating the Rhode Island System Data Portal?

Response:

PPL Rhode Island will manage and update the Rhode Island System Data Portal ("Portal") in a manner consistent with present practices followed by The Narragansett Electric Company. PPL and PPL Rhode Island are working collaboratively with National Grid on Day 1 planning, which is still underway, and, based on the outcome of that planning process, knowledge transfer regarding the Portal will happen by way of transfer of employees to PPL on Day 1 or under the Transition Services Agreement. In addition, the National Grid system planners that presently manage the Portal have been offered positions with PPL RI to continue to work in Rhode Island post-transaction closing. PPL RI continues to evaluate integration of these National Grid systems; however, PPL and PPL RI do not currently anticipate making changes that would decrease services.

OER 1-10

Request:

What is PPL Rhode Island's strategy to ensure no degradation of service or quality of system reliability procurement programs?

Response:

PPL and PPL RI's strategy on Day 1 following the completion of the Transaction will be to follow the National Grid System Reliability Procurement ("SRP") plan guidelines and criteria as outlined in the Rhode Island Public Utilities Commission ("RI PUC") filing in Docket No. 5080 for the 2021-2023 SRP Three-Year Plan. PPL and PPL RI also plan to comply with the Least Cost Procurement standards approved by the RI PUC on July 23, 2020 in Docket No. 5015. PPL and PPL RI also plan to continue collaboration with participating stakeholders through the SRP Technical Working Group, including the Rhode Island Office of Energy Resources, Rhode Island Energy Efficiency and Resource Management Council and its consultant team, Acadia Center, Conservation Law Foundation, Green Energy Consumers Alliance, the Northeast Clean Energy Council, and the Rhode Island Division of Public Utilities and Carriers. PPL and PPL RI anticipate no degradation of services with respect to the reliability procurement programs and will follow the existing statutory and regulatory requirements and processes to propose any potential future changes to the SRP programs.

OER 1-11

Request:

Please describe PPL Rhode Island's planned approach to managing:

- (a) The Renewable Energy Growth (REG) program and
- (b) Quarterly interconnection data sharing with the Office of Energy Resources.

Response:

PPL and PPL RI anticipate continuing to follow the National Grid approach as outlined in RI PUC Docket No. 5088 – Renewable Energy Growth (“RE Growth”) Program Year 2021. PPL and PPL RI also plan to follow the existing statutory and regulatory requirements and processes related to the RE Growth program, including Chapter 26.6 of Title 39 of the Rhode Island General Laws, as well as The Narragansett Electric Company's (“Narragansett”) RE Growth Program Tariff for Residential Customers and Narragansett's RE Growth Program Tariff for Non-Residential Customers. PPL and PPL RI also will continue to provide quarterly interconnection data sharing with the Office of Energy Resources as is currently provided by Narragansett.

OER 1-12

Request:

What is PPL Rhode Island's planned approach to disintegrating and managing the interconnection queue and interconnection application portal?

Response:

PPL Rhode Island plans to continue to utilize the National Grid USA processes and systems related to the interconnection queue as well as the interconnection application portal under the Transition Services Agreement. PPL and PPL Rhode Island's review of these systems will continue after the transaction closes so that PPL and PPL Rhode Island can determine how to best migrate Narragansett's existing interconnection systems onto the PPL systems. PPL and PPL Rhode Island do not anticipate any degradation of service with the interconnection systems from the migration onto the PPL systems or otherwise. See PPL's response to OER 1-15 regarding PPL's experience with interconnecting renewable energy resources.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
NATIONAL GRID USA, and THE NARRAGANSETT ELECTRIC COMPANY
Docket No. D-21-09
PPL Corporation and PPL Rhode Island Holdings, LLC's
Responses to OER's First Set of Data Requests
Issued on September 15, 2021

OER 1-13

Request:

How does PPL Rhode Island intend to set up and manage the Interconnection Technical Standards Committee (ITSC) outlined in the Interconnection Tariff?

Response:

PPL and PPL RI intend to continue the work done by The Narragansett Electric Company to manage the Interconnection Technical Standards Committee as outlined in section 9.4 of R.I.P.U.C. No. 2244, The Narragansett Electric Company Standards for Connecting Distributed Generation, which is effective as of September 1, 2021. PPL and PPL RI will continue to engage in collaborative processes with stakeholders, including the Rhode Island Office of Energy Resources, on all aspects of the Interconnection Technical Standards Committee.

OER 1-14

Request:

Please describe PPL's experience developing, designing, issuing, and evaluating responses to market-competitive request for proposals (RFPs) for scalable renewable energy power purchase agreements (PPA) and associated capacity and/or renewable energy certificates (RECs).

Response:

PPL's Kentucky utilities, Louisville Gas & Electric Company ("LG&E") and Kentucky Utilities ("KU"), have experience developing and issuing market RFPs for capacity and energy, including renewable energy. These RFPs include requirements for a comprehensive list of the attributes and performance characteristics required to assess each response for cost, value to customers, and system impact.

LG&E and KU's overall experience with RFPs for capacity and energy dates back to the inception of open access transmission tariffs, and the following RFPs included requests for renewable energy and/or resulted in the evaluation of renewable responses:

- 2003: RFP for capacity and energy resulted in renewable responses for hydropower assets.
- 2007: RFP for renewable energy supply resulted in 14 responses. Tentative agreements for 110 MW of wind did not receive regulatory approval by the required deadline for the transactions to proceed.
- 2010: RFP for capacity and energy resulted in responses for renewable energy.
- 2012: RFP for capacity and energy resulted in responses for renewable energy. As a result, renewable proposals were compared to self-build costs and LG&E/KU received regulatory approval to construct a 10 MW solar facility on existing KU property at the E.W. Brown station.
- 2019: Renewable-only RFP resulted in PPA for the 100 MW Rhudes Creek solar project; PPA energy allocated 75% to Green Tariff customers with Renewable Power Agreements and 25% to all LG&E/KU customers.
- 2021: RFP for capacity and energy, including renewables. As of September 2021, LG&E/KU has reached agreement on PPA pending sufficient participation by Green Tariff customers.

LG&E and KU evaluated RFP responses for timing, price, and system impact to form a short list of respondents for further evaluation. Typically, LG&E and KU invite these short-listed respondents to present their projects individually. Following those discussions, LG&E and KU will target one or more respondents for requested pricing improvements and, if warranted, further negotiations in pursuit of an agreement. Although LG&E and KU generally structure PPAs for renewable energy as must-take agreements for as-available energy, they also include requirements for performance assurances to ensure the facility operates at acceptable availability levels throughout the PPA term.

LG&E and KU also continue to purchase and sell RECs. LG&E and KU began purchasing RECs for customers participating in the Green Tariff REC program in 2007. In addition, LG&E and KU began selling RECs associated with the energy produced by the E.W. Brown solar facility in 2017. Given the limited market depth for specific REC products, LG&E and KU have completed both their purchase and sales transactions for RECs primarily through brokers.

Although PPL Electric Utilities Corporation ("PPL Electric"), in Pennsylvania, does not have experience developing and implementing competitive RFPs specifically for renewable energy, PPL Electric does have significant experience developing and implementing competitive RFPs for Pennsylvania Default Service Programs (akin to Rhode Island Last Resort Service), including such products as fixed price load following full requirements contracts, spot market load following full requirements contracts, 24x7 energy-only block products, energy-only unit contingent products, time-of-use products, and contracts exclusively for RECs. To date, PPL Electric has implemented six (6) Default Service Plans:

- Competitive Bridge Plan (Docket No. P-00062227), also referred to as the "CBP" - sought competitive wholesale supply for January 1 through December 31, 2010. PPL Electric procured 12-month fixed price, full requirements, load following contracts for 90% of customer load for Residential, Small C&I customers, and Large C&I customers. Further, PPL Electric procured 12-month spot market, load following contracts for 10% of the Residential and Small C&I customer classes, and created a separate 100% spot market product for the Large C&I customer class.
- Default Service Plan 1 or "DSP 1" (Docket No. P-2008-2060309) - sought competitive wholesale supply for January 2011 through May 2013. PPL Electric procured 90% of Residential and Small C&I customer supply through fixed price load following, full requirements contracts (various terms from 5-months to 24-months), 10% spot market load following contracts. Additionally, PPL Electric procured 300MWs of block energy contracts, procured 50MWs of unit contingent contracts, and procured REC contracts associated with the Residential customer class with various terms (5-months to 9-years).

The Company also procured 100% spot market full requirements supply for the Large C&I customer group.

- DSP 2 (Docket No. P-2012-2302074) – sought competitive wholesale supply for June 2013 through May 2015. PPL Electric procured 100% of its supply obligation for Residential and Small C&I customers through fixed price, load following, full requirements contracts (3 through 12-month terms). Additionally, the Company procured 100% of its supply obligation for Large C&I customers through 12-month spot market load following contracts.
- DSP 3 (Docket No. P-2014-2417907) – sought competitive wholesale supply for June 2015 through May 2017. PPL Electric procured 100% of its supply obligation for Residential and Small C&I customers through fixed price, load following, fully requirements contracts (6 and 12-month terms). PPL Electric also procured a subset of its REC obligation for the Residential customer class through a long-term REC contract, and through bilateral contracts with REC brokers. The Company continued its procurement of 12-month spot market, load following contracts for the Large C&I customer class.
- DSP 4 (Docket No. P-2016-2526627) – sought competitive wholesale supply for June 2017 through May 2021. PPL Electric maintained the same procurement approach for its Residential, Small C&I, and Large C&I customer classes for their respective load obligations as implemented in DSP 3. The Company also continued to enter into bilateral contracts with brokers for a subset of its REC obligations.
- DSP 5 (Docket No. P-2020-3019356) – (*currently in effect*) seeks competitive wholesale supply for June 2021 through May 2025. PPL Electric has maintained the procurement approach for its Residential, Small C&I, and Large C&I customer classes for their respective load obligations as implemented in DSP 3 and DSP 4; however, the Company is also seeking to procure 100MWs of block energy. Finally, PPL Electric is procuring its entire REC obligation through a series of REC-only RFPs.

Through each Default Service Plan implemented, PPL Electric completed careful internal analysis of the products it was considering implementing with each plan, by customer group (Residential, Small Commercial & Industrial, and Large Commercial & Industrial). PPL Electric also evaluated the historic results and lessons learned from prior default service plans. Such analysis resulted in different products (both type and term) for each customer group, which ensures the plans deliver products best suited to each individual group and the market as a whole.

In addition to this internal analysis, PPL Electric fully litigated its default service plans through the Pennsylvania Public Utility Commission (“PA PUC”). Such litigation traditionally included a bevy of intervening parties, including customer advocates (e.g., Office of Consumer Advocate and Office of Small Business Advocate), special interest advocates (e.g., Sustainable Energy Fund),

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
NATIONAL GRID USA, and THE NARRAGANSETT ELECTRIC COMPANY

Docket No. D-21-09

PPL Corporation and PPL Rhode Island Holdings, LLC's
Responses to OER's First Set of Data Requests
Issued on September 15, 2021

wholesale suppliers, and the PA PUC's Office of Investigation and Enforcement. Through the inclusion of these stakeholders, additional procurement approaches were proposed, which were evaluated by PPL Electric and in some instances, incorporated by agreement as part of its plan.

Additionally, although PPL Electric has not developed and implemented RFPs for the procurement of renewable energy and RECs under PPAs, PPL Electric has experience procuring RECs through bilateral contracts. PPL Electric has developed and implemented procurements for RECs throughout many of its default service plans. For example, during DSP 1, PPL Electric implemented a complex mix of short (5 to 9 months), medium (12 to 24 months), and long-term (7 to 9 years) REC auctions. Through discussions with stakeholders and ultimate approval by the PA PUC, PPL Electric sought to marry a portion of its REC procurements with fixed price full requirements contracts for the residential customer group. Further, PPL Electric layered in long-term REC procurements to both hedge against price volatility and to provide suppliers the opportunity to link RECs to a specific facility for long-term contracting and finance. It is important to note that historically, PPL Electric has met the majority of its REC obligations through its supplier full requirements contract obligations, especially for Small and Large Commercial & Industrial customers.

Currently through its DSP 5 program, PPL Electric is procuring its entire REC obligation through competitive auctions, no longer tying RECs to full requirements energy contracts. These procurements will acquire all default service obligations through a forecast and reconciliation approach – forecasting the RECs needed for a future period and then reconciling that versus what is actually needed, and finally adjusting future procurements to acquire the necessary RECs relative to the reconciliation and next period forecast successively.

Finally, although PPL Electric has not recently entered into PPAs with renewable energy facilities for energy, capacity and accompanying RECs, PPL Electric has entered into unit contingent bilateral agreements for energy and long-term block energy and REC deals, indirectly tied to generation facilities. As such, PPL Electric has experience managing contracts comparable to how renewable energy facility-specific deals currently are managed in Rhode Island.

OER 1-15

Request:

What is PPL Rhode Island's strategy to ensure no degradation of service or quality of renewable energy programs administered by the electric distribution utility?

Response:

PPL has extensive experience with interconnecting renewable resources. PPL Electric Utilities Corporation ("PPL Electric") has well-established distributed generation interconnection processes. PPL Electric has processed over 12,000 interconnections with approximately 246 MW of capacity to its distribution grid. PPL and PPL Rhode Island refer to Attachment OER 1-15-1. PPL Electric utilizes an online application portal to perform timely reviews of interconnection applications. As explained in PPL's response to DIV 2-57, PPL Electric has developed an industry-leading Distributed Energy Resource Management System.

Within the PPL Electric zone there are 13 transmission level renewable interconnections through the PJM Interconnection, LLC process with a total of 830 MW of capacity.

Louisville Gas and Electric Company ("LG&E") and Kentucky Utilities Company ("KU") continue to learn from the industry leaders and adopt best practices to plan their systems to accommodate future distributed generation. Through September 2021, LG&E and KU have successfully integrated over 1800 interconnection applications totaling nearly 22.3 MW of distributed generation with an additional 370 applications, or 3.9 MW of capacity, in queue or awaiting customer installation. Every interconnection is reviewed and modeled for any impacts to the electric distribution system. As interconnection counts continue to increase, LG&E and KU are investigating an online interconnection portal to automate the process and associated interconnection technical reviews.

PPL Rhode Island plans to continue Narragansett's existing renewable energy programs on Day 1 in the same manner that the programs currently are operated and managed. PPL Rhode Island will evaluate Narragansett's renewable energy programs after the transaction closes to determine whether any program enhancements are appropriate. This evaluation will rely on PPL's experience in designing and managing renewable energy programs in Pennsylvania and Kentucky as described above. PPL Rhode Island will seek all applicable regulatory approvals to the extent that it determines that it wants to make changes to existing Narragansett renewable programs.

PPL and PPL Rhode Island are working collaboratively with National Grid on Day 1 planning, which is still underway, and, based on the outcome of that planning process, knowledge transfer for Rhode Island renewable energy programs will happen by way of transfer of employees to PPL

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
NATIONAL GRID USA, and THE NARRAGANSETT ELECTRIC COMPANY

Docket No. D-21-09

PPL Corporation and PPL Rhode Island Holdings, LLC's
Responses to OER's First Set of Data Requests
Issued on September 15, 2021

on Day 1 or under the Transition Services Agreement. PPL Rhode Island anticipates hiring existing National Grid employees with knowledge of Narragansett's renewable programs.

OER 1-16

Request:

Please describe PPL Rhode Island's planned approach to managing:

- (a) The Electric Vehicle Off-peak Charging Rebate Pilot
- (b) The Electric Vehicle Charging Infrastructure Make-Ready Program
- (c) The Electric Fleet Advisory Services Program
- (d) The DC Fast Charger Discount Program

Response:

PPL RI plans to continue The Narragansett Electric Company's ("Narragansett")s existing electric vehicle programs on Day 1 following the completion of the transaction in the same manner that the programs are currently operated and managed. PPL RI will evaluate Narragansett's electric vehicle programs after the transaction closes to consider opportunities to determine whether any program enhancements are appropriate. PPL and PPL RI will follow the existing statutory and regulatory requirements and processes to the extent that they determine that they want to make any potential changes to existing electric vehicle programs. PPL Rhode Island anticipates hiring existing National Grid USA Service Company, Inc. employees with knowledge of and experience with Narragansett's electric transportation programs. PPL and PPL Rhode Island are working collaboratively with National Grid on Day 1 planning, which is still underway, and, based on the outcome of that planning process, knowledge transfer for Rhode Island electronic transportation programs will happen by way of transfer of employees to PPL on Day 1 or under the Transition Services Agreement.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
NATIONAL GRID USA, and THE NARRAGANSETT ELECTRIC COMPANY

Docket No. D-21-09

PPL Corporation and PPL Rhode Island Holdings, LLC's
Responses to OER's First Set of Data Requests
Issued on September 15, 2021

OER 1-17

Request:

What is PPL Rhode Island's strategy to ensure no degradation of service or quality of electric transportation programs administered by the electric distribution utility?

Response:

PPL and PPL RI refer to their response to OER 1-16. PPL RI anticipates hiring existing National Grid USA Service Company, Inc. employees with knowledge of The Narragansett Electric Company's electric transportation programs. PPL and PPL Rhode Island are working collaboratively with National Grid on Day 1 planning, which is still underway, and, based on the outcome of that planning process, knowledge transfer for Rhode Island electric transportation programs will happen by way of transfer of employees to PPL on Day 1 or under the Transition Services Agreement.

OER 1-18

Request:

Please describe PPL Rhode Island's planned approach to:

- (a) Stakeholder engagement, generally
- (b) Engaging with stakeholders from environmental justice, underrepresented, and overburdened communities
- (c) The Energy Efficiency Technical Working Group
- (d) The Energy Efficiency Equity Working Group
- (e) The System Reliability Procurement Technical Working Group
- (f) The Power Sector Transformation Advisory Group
- (g) Engaging with the Energy Efficiency and Resource Management Council
- (h) Engaging with the DG Board
- (i) Engaging with the Green Buildings Advisory Council
- (j) Coordinating with ISO-NE on load, energy efficiency, distributed generation, and electrification forecasting

Response:

PPL supports and values stakeholder involvement in all jurisdictions in which it operates. PPL Rhode Island anticipates that it will actively engage stakeholders on a broad variety of topics. To this end, PPL Rhode Island plans to continue Narragansett's existing stakeholder engagement on Day 1 in the same manner that engagement occurs today. PPL Rhode Island anticipates hiring existing National Grid USA Service Company, Inc. employees with knowledge of Narragansett's stakeholder engagement efforts. PPL and PPL Rhode Island are working collaboratively with National Grid on Day 1 planning, which is still underway, and, based on the outcome of that planning process, knowledge transfer for stakeholder engagement in Rhode Island will happen by way of transfer of employees to PPL on Day 1 or under the Transition Services Agreement.

OER 1-19

Request:

What is PPL Rhode Island's planned approach to ongoing improvements in energy equity, including ensuring both access to and benefits from utility programs?

Response:

PPL is committed to energy equity, and PPL Rhode Island will strive to provide equitable access to and benefits from utility programs. PPL and PPL Rhode Island are working collaboratively with National Grid on Day 1 planning, which is still underway, and, based on the outcome of that planning process, knowledge transfer for Rhode Island energy equity programs will happen by way of transfer of employees to PPL on Day 1 or under the Transition Services Agreement. PPL Rhode Island anticipates hiring existing National Grid USA Service Company, Inc. employees with knowledge of Narragansett's energy equity initiatives to continue the existing efforts.

PPL has extensive experience providing customer assistance programs. PPL Electric Utilities Corporation ("PPL Electric") provides the following customer assistance programs:

OnTrack

OnTrack provides payment assistance to income eligible customers. The customer's maximum OnTrack credit is determined by income levels and heat source. This credit is then applied to the customer's bill over the 18-month OnTrack program period. Arrearage forgiveness is also available through the program. OnTrack is funded by all residential customers through the Universal Service Rider. PPL Electric has approximately 66,000 customers participating in OnTrack at any given time. In 2020 PPL Electric provided OnTrack customer assistance in the amount of \$76 million.

Low Income Home Energy Assistance Program ("LIHEAP")

LIHEAP is a federally funded program that provides payment assistance to low-income households to pay their energy bills. PPL Electric actively works with the Pennsylvania Department of Human Services, low-income stakeholders and its customers to obtain LIHEAP funds. In the 2020/2021 season PPL Electric received 46,977 grants totaling \$13,812,909.

Operation HELP

Operation HELP provides grants to income eligible customers struggling to pay their electric bill. Operation HELP is funded by PPL and donations from its employees and customers. In 2021 (through July) PPL Electric has awarded 1,953 Operation HELP grants totaling \$1,360,636.

In response to the COVID-19 pandemic PPL Electric successfully petitioned the Pennsylvania Public Utility Commission to expand the income eligibility for Operation HELP to 250% of the Federal Poverty Income Guidelines ("FPIG") from 200% of the FPIG. Additionally, the PPL Foundation contributed an extra \$500,000 to the Operation HELP fund in 2020 to provide additional assistance to customers struggling with the COVID-19 pandemic.

WRAP

PPL Electric's WRAP program provides no-cost energy efficiency measures to income eligible customers. These energy efficiency measures help customers reduce electric consumption and provide long term bill relief. PPL Electric's WRAP program has a yearly budget of \$10 million. In 2021, PPL Electric has been able to serve 2,395 households through the WRAP program and has spent \$7.2 million. WRAP is funded by PPL Electric's residential customers through the Universal Service Rider.

PPL Electric also offers energy efficiency measures to low-income customers through its Pennsylvania Act 129 Energy Efficiency Plan. In PPL Electric's Phase IV Act 129 Plan (2021-2026) it has budgeted \$44 million for the low-income energy efficiency program. PPL Electric's Act 129 Plan is funded by all customers through the Act 129 Rider.

Customer Assistance and Referral Services ("CARES")

CARES provides crisis grants to customers who are suffering through a temporary hardship that is making it difficult for them to pay their electric bill. This program is not income limited but intended to assist with temporary income loss from job loss or medical issue. PPL Electric has provided 53 CARES grants for \$23,460 in 2021. CARES is funded by PPL and donations from its employees and customers.

Louisville Gas & Electric ("LG&E") and Kentucky Utilities ("KU") provide the following customer service programs:

Weatherization, Conservation Advice and Recycling Energy ("WeCare") (LG&E and KU)

WeCare is a voluntary program for income-eligible customers. It is designed to create savings through weatherization and energy education at no cost. The customer's income must meet the guidelines of the federal government's Low Income Heating Assistance Program (LIHEAP) at the 200% poverty level. The WeCare Program is funded through the Demand Side Management mechanism and is approved by the KPSC as part of the Energy Efficiency Portfolio. The approved program provides services to 4000 customer per year across the service territory.

LIHEAP (LG&E and KU) or Virginia Energy Assistance Program ("VEAP") (ODP)

LIHEAP and VEAP are federally funded programs that provide payment assistance to low-income households to pay their energy bills. LG&E and KU work with Community Action Kentucky and local community action agencies, and Old Dominion Power Company ("ODP") works with Virginia Department of Social Services and local social service agencies to assist its customers to obtain VEAP, Summer Cooling and Crisis funds.

Home Energy Assistance ("HEA") (LG&E and KU)

HEA is funded by a \$0.30 meter charge for residential customers. In addition, LG&E and KU Foundation, Inc. ("LKE Foundation") has committed \$650,000 annually to the program. Customer must be at or below the 200% Federal poverty level to be eligible. Bill assistance payments are for seven peak energy usage months (Jan-April & July-Sept) for electric and combination electric and gas customers and Jan-April for gas only customers. Approximately 5,800 customers are assisted annually.

Association of Community Ministries Grant ("ACM") (LG&E)

The billing assistance program is funded by a \$700,000 LKE Foundation contribution to ACM. Customers must be at or below 250% Federal poverty level to be eligible and is distributed by community ministry organizations. In 2020, 2,150 customers were assisted through this program.

Community Winterhelp (LG&E)/Wintercare (KU)/Wintershare (ODP)

The billing assistance programs are funded through customer donations and matching funds from LKE Foundation. Program is administered through community-based organizations. For 2020, total contributions for each program were as follows: Community Winterhelp (\$284,984), WinterCare (\$184,406), and Wintershare (\$34,062).

Low Income – Late Payment Charge ("LPC") Waiver (LG&E, KU, ODP)

When a low-income customer receives utility bill payment assistance from an approved agency or organization the LPC is waived for the current month and the following eleven months.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
NATIONAL GRID USA, and THE NARRAGANSETT ELECTRIC COMPANY
Docket No. D-21-09
PPL Corporation and PPL Rhode Island Holdings, LLC's
Responses to OER's First Set of Data Requests
Issued on September 15, 2021

OER 1-20

Request:

What is PPL's planned approach to data sharing with the Office of Energy Resources?

Response:

National Grid and Narragansett have a history of cooperation with the Office of Energy Resources ("OER"). Beginning on Day 1, PPL and PPL RI plan to continue to share data in the same manner that National Grid and Narragansett have historically shared data with OER. PPL and PPL RI plan to work collaboratively with OER on data sharing to help improve energy efficiency in Rhode Island. PPL and PPL RI will continue to evaluate their approach to data sharing with OER and will make adjustments if and when needed. PPL and PPL RI plan to engage in productive conversation with OER as needed moving forward.

OER 1-21

Request:

Please describe PPL Rhode Island's planned approach to:

- (a) Grid modernization
- (b) Deployment and utilization of advanced metering functionality
- (c) Time-varying rate design

Response:

Beginning on Day 1 following the close of the Transaction, PPL and PPL Rhode Island plan to evaluate Narragansett's existing plans for grid modernization, deployment and utilization of advanced metering functionality, and time-varying rate design and follow the existing statutory and regulatory requirements and processes to propose any potential changes to grid modernization or deployment and utilization of advanced metering functionality, or the introduction of time-varying rate design. This will include evaluation of and appropriate action in Docket Nos. 5113 and 5114, Narragansett's Updated Advanced Metering Functionality Business Case and Grid Modernization Plan, respectively, which the Public Utilities Commission has stayed pending resolution of this Docket.

- (a) PPL and PPL Rhode Island refer to their responses to Division 2-8, 2-13, 2-46, 2-47, 7-45, and 7-52 for information related to PPL's experience with grid modernization.
- (b) PPL and PPL Rhode Island refer to their responses to Division 2-46, 2-47, 7-45, and 7-52 for information related to PPL's experience with deployment and utilization of advanced metering functionality.
- (c) PPL and PPL Rhode Island plan to consider and apply what PPL has learned with the development and implementation of time-varying rates in Pennsylvania as part of the evaluation of when it would be appropriate to seek to implement time-varying rates for Narragansett, including in connection with any pending or future proceeding, as applicable.

OER 1-22

Request:

What is PPL Rhode Island's planned approach to partnering with the Office of Energy Resources and other agencies to cross-promote, leverage, and braid funding as appropriate from agency-administered energy efficiency, renewable energy, and electric transportation programs?

Response:

National Grid and Narragansett have a history of partnering with the Office of Energy Resources ("OER"). Beginning on Day 1, PPL and PPL RI plan to continue to partner with OER and other agencies to cross-promote, leverage, and braid funding as appropriate from agency-administered energy efficiency, renewable energy, and electric transportation programs in a similar manner as National Grid and Narragansett historically have done. PPL and PPL RI plan to work collaboratively with OER, as needed, with respect to such funding efforts related to agency-administered energy efficiency, renewable energy, and electric transportation programs.