

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 Division's Eleventh Set of Data Requests  
Issued on October 13, 2021

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Division 11-1

Request:

Referring to Attachment PPL-DIV 1-54-1 (Analysis of PPL's Cost to Operate The Narragansett Electric Company), did PPL evaluate the differences in system construction standards, means and methods of construction and if so, provide a detailed copy of this analysis?

Response:

In developing Attachment PPL-DIV 1-54-1, PPL and PPL RI did not evaluate the differences in system standards, means and methods of construction. PPL and PPL RI refer to their response to data request Division 9-87.

Division 11-2

Request:

Referring to Attachment PPL-DIV 1-54-1 (Analysis of PPL's Cost to Operate The Narragansett Electric Company), provide all analyses of the differences in materials utilized between Narragansett Electric and PPL including but not limited to how PPL can create the same economies of scale for Narragansett Electric as National Grid currently has for purchasing, storage, material handling, supply chain and available stock for storms and other work flow taking place between the three National Grid jurisdictions at this time.

Response:

PPL and PPL RI object to this data request because it is not "in response to" the supplemental responses to data requests that PPL and PPL RI served on September 30, 2021. PPL and PPL RI agreed to an extension of the deadline for the Rhode Island Division of Public Utilities and Carriers Advocacy Section to serve additional discovery after the October 1, 2021 deadline (until October 15, 2021) solely for that limited purpose. Accordingly, PPL and PPL RI assert that this request is outside the scope.

Without waiving this objection, PPL and PPL RI did not evaluate the impact of any potential cost differences related to differences in materials utilized between Narragansett Electric and PPL and PPL RI. Based on PPL's experience operating utilities, PPL and PPL RI do not expect that there will be any meaningful differences in the costs of materials.

Under PPL and PPL RI ownership, opportunities for consolidated purchasing, storage, material handling, supply chain and available stock for storms will be explored across PPL operating companies in Pennsylvania, Kentucky, and Rhode Island. PPL and PPL RI also refer to their responses to data requests Division 11-14 and 11-17.

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Division 11-3

Request:

Referring to Attachment PPL-DIV 1-54-1 (Analysis of PPL's Cost to Operate The Narragansett Electric Company), provide all analyses of construction differences between PPL and Narragansett Electric and how PPL will transition work force training to PPL standards and the associated costs and timeline.

Response:

PPL and PPL RI did not analyze potential construction differences between PPL and PPL RI and Narragansett Electric or how PPL and PPL RI will transition work force training to PPL standards as part of the analysis for developing Attachment PPL-DIV 1-54-1. PPL and PPL RI also refer to their responses to data requests Division 11-1, 11-4, and 11-12.

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Division 11-4

Request:

Is PPL going to transition the Narragansett construction standards to the PPL construction standards?

Response:

PPL and PPL RI object to this data request because it is not "in response to" the supplemental responses to data requests that PPL and PPL RI served on September 30, 2021. PPL and PPL RI agreed to an extension of the deadline for the Rhode Island Division of Public Utilities and Carriers Advocacy Section to serve additional discovery after the October 1, 2021 deadline (until October 15, 2021) solely for that limited purpose. Accordingly, PPL and PPL RI assert that this request is outside the scope.

Notwithstanding this objection, PPL and PPL RI respond that they currently are in the process of reviewing and comparing the Narragansett construction standards with PPL's construction standards. PPL and PPL RI anticipate that they will develop one set of construction standards that may include aspects of both Narragansett's construction standards and PPL's current construction standards.

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Division 11-5

Request:

Is PPL going to transition the Narragansett construction materials to the PPL construction materials?

Response:

PPL and PPL RI object to this data request because it is not "in response to" the supplemental responses to data requests that PPL and PPL RI served on September 30, 2021. PPL and PPL RI agreed to an extension of the deadline for the Rhode Island Division of Public Utilities and Carriers Advocacy Section to serve additional discovery after the October 1, 2021 deadline (until October 15, 2021) solely for that limited purpose. Accordingly, PPL and PPL RI assert that this request is outside the scope.

Notwithstanding this objection, PPL and PPL RI respond that, to the extent that Narragansett owns construction materials, those construction materials will continue to be owned by Narragansett after the closing of the Transaction. PPL and PPL RI do not anticipate transferring ownership of Narragansett construction materials to any other PPL entity.

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Division 11-6

Request:

Is PPL going to transition power line material and equipment purchases to a centralized PPL process and system or leave those purchases exclusively with PPL Rhode Island if the transaction is approved?

Response:

PPL and PPL RI object to this data request because it is not "in response to" the supplemental responses to data requests that PPL and PPL RI served on September 30, 2021. PPL and PPL RI agreed to an extension of the deadline for the Rhode Island Division of Public Utilities and Carriers Advocacy Section to serve additional discovery after the October 1, 2021 deadline (until October 15, 2021) solely for that limited purpose. Accordingly, PPL and PPL RI assert that this request is outside the scope.

Without waiving this objection, PPL and PPL RI currently plan that power line material and equipment purchases will be made via a centralized PPL supply chain process and system.

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Division 11-7

Request:

Referring to Attachment PPL-DIV 1-54-1 (Analysis of PPL's Cost to Operate The Narragansett Electric Company), provide the details of the PPL analysis of the loss of efficiency in material purchases currently existing with the larger National Grid Company purchasing for multiple jurisdictions.

Response:

PPL and PPL RI refer to their response to data requests Division 9-70(c), Division 9-87, Division 10-5(f), Division 10-6, Division 10-10(b), and Division 10-14(c) and (d) for information regarding the purpose of Attachment PPL-DIV 1-54-1.

PPL and PPL RI did not analyze a potential loss of efficiency in material purchases. Under PPL and PPL RI ownership, Narragansett will be part of a broader portfolio of electric utilities in Pennsylvania, Kentucky and Rhode Island where efficiencies in material purchases will be explored. PPL and PPL RI also refer to their responses to data requests Division 2-1, Division 7-56, and Division 7-56 (Supplement) – referencing Attachment PPL-DIV 1-54-1.

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Division 11-8

Request:

Referring to Attachment PPL-DIV 1-54-1 (Analysis of PPL's Cost to Operate The Narragansett Electric Company), provide the details of the PPL analysis of the cost associated with training and work force efficiency losses while transitioning to PPL work practices and standards and material acquisitions. If PPL does not believe this is a cost then provide the analysis showing this is not a cost.

Response:

PPL and PPL RI did not prepare an analysis of the cost associated with training and work force efficiency impacts as part of the preparation of Attachment PPL-DIV 1-54-1. The transition to PPL and PPL RI work practices will largely occur during the transition period, and Attachment PPL-DIV 1-54-1 is not an analysis of estimated costs during that transition period. PPL and PPL RI refer to their response to data requests Division 9-70(c), Division 9-87, Division 10-5(f), Division 10-6, Division 10-10(b), and Division 10-14(c) and (d) for information regarding the purpose of Attachment PPL-DIV 1-54-1.



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Division 11-9

Request:

Referring to Attachment PPL-DIV 1-54-1 (Analysis of PPL's Cost to Operate The Narragansett Electric Company), provide the cost to storm outage restoration process and durations due to a lack of surplus materials in stock to meet the needs of materials that would otherwise be available from the larger National Grid Company. If PPL does not believe this is a cost, then provide the analysis showing it is not a cost.

Response:

PPL and PPL RI refer to their responses to data requests Division 9-70(c), Division 9-87, Division 10-5(f), Division 10-6, Division 10-10(b), and Division 10-14(c) and (d) for information regarding the purpose of Attachment PPL-DIV 1-54-1.

PPL and PPL RI did not assess the impact of materials availability during a storm outage process. Under PPL and PPL RI ownership, Narragansett will be part of a broader portfolio of utilities in Pennsylvania, Kentucky and Rhode Island where PPL practices for materials planning for storm outage restoration will be applied across this portfolio. PPL and PPL RI also refer to their responses to data requests Division 11-14 and 11-17.

Division 11-10

Request:

Referring to Attachment PPL-DIV 1-54-1 (Analysis of PPL's Cost to Operate The Narragansett Electric Company), PPL states on page 8: PPL collaborated with National Grid to ensure it understood the specific work, activities and staffing levels required to operate Narragansett across electric, gas, customer and corporate functions. Provide the following information and analyses associated with the PPL effort:

- a. The PPL distribution voltages and National Grid distribution voltages and impact on a synergy of construction standards, material standards and material surplus stock and ability to address outages and storm damage repairs.
- b. The PPL information collected on all differences in standards and work activities and the time and cost associated to migrating to a PPL methodology and standard.
- c. Provide a list of all activities and specific work evaluated and the details of that evaluation including but not limited to each difference between the companies and how they would be transitioned.
- d. Provide a copy of the PPL bottom-up staffing model.

Response:

As described in Attachment PPL-DIV 1-54-1, "PPL does not currently own and operate Narragansett and does not have the ability to fully assess each and every aspect of its future operations. [...] The purpose of [the] analysis is to provide a current view of PPL's reasonable expectation of the comparison between National Grid's current costs to operate Narragansett and PPL's anticipated costs to operate Narragansett at the conclusion of the transition period. If the [Rhode Island] Division [of Public Utilities and Carriers] approves the Transaction, [and] when PPL takes over control and operation of Narragansett and obtains firsthand knowledge of its operations[,] the anticipated costs will change to some extent. This analysis, therefore, is not a budget for PPL [and PPL RI's] costs [to operate Narragansett] in future years; it is a cost comparison based on the best information currently available and estimates generated from that information."

- a. An evaluation of PPL distribution voltages and National Grid distribution voltages and impact on potential synergies in construction standards, material standards and material surplus stock and the ability to address outages and storm damage repairs was not conducted as a part of developing Attachment PPL-DIV 1-54-1.

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- b. Any differences in standards and work activities and the time and cost associated to migrating to a PPL methodology and standard were not considered in developing Attachment PPL-DIV 1-54-1.
- c. Specific work activities and the potential differences between PPL and National Grid were not evaluated or considered in developing Attachment PPL-DIV 1-54-1.
- d. The PPL bottom-up staffing model is reflected throughout Attachment PPL-DIV 1-54-1, which provides estimated staffing levels in the functions and subfunctions that PPL evaluated in preparing that document, as well as the PPL Rhode Island Direct Organization Structure provided as Appendix 3 to the document, and the PPL Rhode Island Aligned Corporate Functional Support chart provided as Appendix 4 to the document.

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Division 11-11

Request:

If PPL proposes to transition Narragansett operations to the PPL construction standards including material standards, how many years does PPL expect this transition to take?

Response:

PPL and PPL RI object to this data request because it is not "in response to" the supplemental responses to data requests that PPL and PPL RI served on September 30, 2021. PPL and PPL RI agreed to an extension of the deadline for the Rhode Island Division of Public Utilities and Carriers Advocacy Section to serve additional discovery after the October 1, 2021 deadline (until October 15, 2021) solely for that limited purpose. Accordingly, PPL and PPL RI assert that this request is outside the scope.

Without waiving this objection, PPL and PPL RI have not yet determined whether they will transition Narragansett operations to the PPL construction standards, nor have they estimated how long it may take to transition Narragansett operations to centralized construction standards. PPL and PPL RI also refer to their response to data request Division 11-4.

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Division 11-12

Request:

If PPL plans on Narragansett and Rhode Island to stand alone on construction standards and materials, how has PPL evaluated the cost associated with a much smaller system standing alone versus the existing larger National Grid system?

Response:

PPL and PPL RI object to this data request because it is not "in response to" the supplemental responses to data requests that PPL and PPL RI served on September 30, 2021. PPL and PPL RI agreed to an extension of the deadline for the Rhode Island Division of Public Utilities and Carriers Advocacy Section to serve additional discovery after the October 1, 2021 deadline (until October 15, 2021) solely for that limited purpose. Accordingly, PPL and PPL RI assert that this request is outside the scope.

Without waiving this objection, PPL and PPL RI refer to their responses to data requests Division 11-4 and 11-11. Because PPL does not plan on Narragansett and Rhode Island standing alone on construction standards and materials, PPL has not evaluated costs associated with such a scenario.

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Division 11-13

Request:

Will Narragansett be responsible for all of its material and supply stocking requirements or will that be shared with PPL?

Response:

PPL and PPL RI object to this data request because it is not "in response to" the supplemental responses to data requests that PPL and PPL RI served on September 30, 2021. PPL and PPL RI agreed to an extension of the deadline for the Rhode Island Division of Public Utilities and Carriers Advocacy Section to serve additional discovery after the October 1, 2021 deadline (until October 15, 2021) solely for that limited purpose. Accordingly, PPL and PPL RI assert that this request is outside the scope.

Without waiving this objection, PPL and PPL RI will likely have materials available locally, but PPL and PPL RI may also have a centralized location from which it will ship materials to Rhode Island. PPL and PPL RI also refer to their responses to data requests Division 11-2 and 11-14.

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Division 11-14

Request:

How has PPL evaluated the cost and impact on reliability associated with storm outage restoration with materials and supplies having to be transported from Pennsylvania or Kentucky to Rhode Island rather than from the much closer supply chain and stock of National Grid currently?

Response:

PPL and PPL RI object to this data request because it is not "in response to" the supplemental responses to data requests that PPL and PPL RI served on September 30, 2021. PPL and PPL RI agreed to an extension of the deadline for the Rhode Island Division of Public Utilities and Carriers Advocacy Section to serve additional discovery after the October 1, 2021 deadline (until October 15, 2021) solely for that limited purpose. Accordingly, PPL and PPL RI assert that this request is outside the scope.

Notwithstanding this objection, PPL and PPL RI respond that they plan to maintain materials and supplies stocked in Rhode Island for storm restoration. Accordingly, PPL and PPL RI do not expect that there will be any impact to cost or reliability as a result of materials and supplies no longer being provided from National Grid's supply chain and stock.

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Division 11-15

Request:

Does PPL believe that National Grid does not have an organization dedicated to serve the customers of Rhode Island?

Response:

PPL and PPL RI object to this data request because it is not “in response to” the supplemental responses to data requests that PPL and PPL RI served on September 30, 2021. PPL and PPL RI agreed to an extension of the deadline for the Rhode Island Division of Public Utilities and Carriers Advocacy Section to serve additional discovery after the October 1, 2021 deadline (until October 15, 2021) solely for that limited purpose. Accordingly, PPL and PPL RI assert that this request is outside the scope.

Notwithstanding this objection, PPL and PPL RI respond that they believe that National Grid has an organization dedicated to serve the customers of Rhode Island. Specifically, current employees of Narragansett are dedicated to serve the customers of Rhode Island. Additionally, as is typical in utility holding companies that have service organizations that support multiple utilities, some employees of the National Grid USA Service Company, Inc. (the “Service Company”) are dedicated to serving only Narragansett, while other employees of the Service Company have responsibility for other organizations in addition to Narragansett.



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Division 11-16

Request:

Narragansett has one of the best reliability statistics among all IEEE reporting utilities. Does PPL contend it will improve on the Narragansett already near the highest reliability level? If PPL does believe it can make such improvements, provide the details as to how that will be accomplished, at what cost, and the associated quantifiable benefits.

Response:

PPL and PPL RI object to this data request because it is not "in response to" the supplemental responses to data requests that PPL and PPL RI served on September 30, 2021. PPL and PPL RI agreed to an extension of the deadline for the Rhode Island Division of Public Utilities and Carriers Advocacy Section to serve additional discovery after the October 1, 2021 deadline (until October 15, 2021) solely for that limited purpose. Accordingly, PPL and PPL RI assert that this request is outside the scope.

Without waiving this objection, PPL and PPL RI refer to their responses to data requests Division 2-1, Division 7-56, and Division 7-56 (Supplemental) – referencing Attachment PPL-DIV 1-54-1.

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Division 11-17

Request:

Explain in detail how PPL's creation of a locally controlled and managed PPL Rhode Island will overcome the loss of economic and operational synergies which currently exist under National Grid's ownership of Narragansett.

Response:

PPL and PPL RI object to this data request because it is not "in response to" the supplemental responses to data requests that PPL and PPL RI served on September 30, 2021. PPL and PPL RI agreed to an extension of the deadline for the Rhode Island Division of Public Utilities and Carriers Advocacy Section to serve additional discovery after the October 1, 2021 deadline (until October 15, 2021) solely for that limited purpose. Accordingly, PPL and PPL RI assert that this request is outside the scope.

Without waiving this objection, PPL and PPL RI refer to their responses to data requests Division 2-1, Division 7-56, and Division 7-56 (Supplement) – referencing Attachment PPL-DIV 1-54-1.

Division 11-18

Request:

PPL has stated multiple times in its response to DIV 1-54 that it will make additional investment in the state and increase the amount of infrastructure investment in Rhode Island. What studies has PPL completed or reviewed that supports the PPL statements about increasing infrastructure investment? Additionally, what benefit cost analysis and reliability enhancement analysis has PPL completed to support its statement? Furthermore, has PPL completed any Narragansett area studies or ISR Plan and analysis to support its statement that it will increase the amount of infrastructure investments in Rhode Island?

Response:

PPL and PPL RI object to this data request because it is not "in response to" the supplemental responses to data requests that PPL and PPL RI served on September 30, 2021. PPL and PPL RI agreed to an extension of the deadline for the Rhode Island Division of Public Utilities and Carriers Advocacy Section to serve additional discovery after the October 1, 2021 deadline (until October 15, 2021) solely for that limited purpose. Accordingly, PPL and PPL RI assert that this request is outside the scope.

Without waiving this objection, PPL and PPL RI refer to their responses to data requests Division 1-35, Division 1-43, and Division 7-43. To date, PPL and PPL RI have not yet completed any Narragansett area studies or ISR Plan and analysis; however, PPL and PPL RI refer to their response to data requests Division 2-14, Division 2-43, and Division 7-47 regarding PPL's experience with plans and studies similar to Narragansett's Infrastructure, Safety, and Reliability plans.

Division 11-19

Request:

Regarding Attachment PPL-DIV-54-1, Table 7:

- a. For each year from 2015 to 2020, provide PPL's actual total costs for each category, the allocation factor calculations used to allocate costs to each operating company, and the amount assigned to each operating company. Provide the same information assuming that Narragansett is an additional operating company.
- b. For each category, provide the analysis or assumptions to derive the estimated costs to be assigned to Narragansett, indicating the number of employees, amount of invested capital, and O&M expenses required in each category.
- c. Provide the number of positions in each category that PPL expects will be filled by current National Grid employees.

Response:

- a. PPL and PPL RI (collectively, "PPL") object to this data request because it seeks irrelevant information and documents and exceeds the scope of this proceeding. This joint petition seeks Division approval for PPL Rhode Island Holdings, LLC's purchase of all shares of common stock of The Narragansett Electric Company ("Narragansett") under R.I. Gen. Laws s. 39-3-24 and 39-3-25. Those statutes and the Division's August 19, 2021 Order in this proceeding establish the standard of review applicable to this proceeding: they require a finding that the proposed transaction will neither cause a detriment to the public nor diminish the provision of Narragansett's electric and gas distribution service. As the Division has held in this proceeding, this review is narrow. First, before approving a R.I.G.L. § 39-3-24 petition, "the Division must find that there will be no degradation of utility services after the transaction is consummated." *In re 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 Docket No. D-21-09 Electric Company to PPL Rhode Island Holdings, LLC and Related Approvals*, Dkt. No. D-21-09, 74 (R.I.D.P.U.C. August 19, 2021) (internal citations and quotations omitted). "The Division makes this determination by considering the buyer's experience and financial strength[.]" *Id.* at 75. Second, the Division must find "that the proposed transaction will not unfavorably impact the general public (including ratepayers)." *Id.* (internal citations and quotation marks omitted). The information requested in this data request will not inform the Division's application of the standard.

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This data request seeks information that does not bear on the two-pronged standard the Division applies to evaluate this transaction. Specifically, this request for PPL's actual costs from 2015 to 2020 in the categories listed in Attachment PPL-DIV 1-54-1, Table 7, and related information is not relevant because such information has no bearing on PPL and PPL RI's experience and financial strength or on whether the proposed transaction will unfavorably impact the general public, including customers. PPL's actual costs for those years have no bearing on whether PPL's estimates of costs to be allocated to Narragansett are reasonable or appropriate, and therefore do not bear on whether PPL RI ownership of Narragansett will result in increased or decreased costs to operate the utility. Accordingly, such information will not inform the evaluation of whether PPL can continue to operate Narragansett in a manner that provides an equivalent level of service, or whether the Transaction will have an adverse impact on the public (including customers). Similarly, the request to produce such information assuming Narragansett is an additional PPL operating company during those years raises an irrelevant hypothetical scenario that provides no meaningful information about PPL and PPL RI's future ownership of Narragansett and the associated costs to operate Narragansett. From 2015-2020, Narragansett was not an operating company of PPL; therefore, there is no reasonable way to create the speculative, hypothetical cost allocations called for by the request. Nor does this request seek any information that bears on the impact the transaction will have on the public. Rather, this request seeks irrelevant and proprietary information regarding PPL's decision to enter this transaction, and, furthermore, this request is overbroad and unduly burdensome. This request seeks information beyond the scope of this proceeding.

- b. PPL and PPL RI refer to Attachment PPL-DIV 1-54-1, which sets forth the analyses and assumptions PPL and PPL RI employed to derive the estimated costs to be assigned to Narragansett, including the number of employees and projected O&M expenses required in each functional category for which PPL and PPL RI prepared cost comparison estimates. Additionally, as PPL and PPL RI noted in Attachment PPL-DIV 1-54-1, the cost comparison did not include costs associated with capital investments PPL and PPL RI plan to make to transition ownership and operation of Narragansett. PPL and PPL RI also refer to their response to data request Division 9-93 and Attachment PPL-DIV 9-93-1, which provides PPL's Cost Allocation Manual, which provides the basis for the allocations PPL used in preparing its cost estimates for Narragansett. PPL and PPL RI also refer to their response to data request Division 9-86 and Attachment PPL DIV 9-86-1 for the work papers that formed the basis for the cost analysis.
- c. PPL and PPL RI expect that all current Narragansett employees will remain employees of Narragansett after the Transaction closes and PPL RI assumes ownership and control of Narragansett. PPL and PPL RI's current estimate for the approximate number of

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positions PPL and PPL RI expect to be filled by National Grid employees for relevant categories provided in PPL-DIV-54-1, Table 7 are as follows:

- Office of General Counsel - 8
- Transmission & Substation - 3
- Human Resources - 1
- Finance - 4
- Regulatory Affairs - 3

PPL and PPL RI do not have estimates for other categories at this time.

Division 11-20

Request:

Attachment PPL-DIV 1-54-1, states (at 3) that the estimated costs to operate Narragansett represent a "steady state" after the 24 month transition period.

- a. What are the estimated duplicative operating costs expected to be incurred during the transition period?
- b. Does PPL intend to recover these duplicative operating costs from ratepayers?

Response:

PPL and PPL RI object to this data request because it is not "in response to" the supplemental responses to data requests that PPL and PPL RI served on September 30, 2021. PPL and PPL RI agreed to an extension of the deadline for the Rhode Island Division of Public Utilities and Carriers Advocacy Section to serve additional discovery after the October 1, 2021 deadline (until October 15, 2021) solely for that limited purpose. Accordingly, PPL and PPL RI assert that this request is outside the scope.

Without waiving this objection, PPL and PPL RI refer to their response to data request Division 10-4.

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 Division's Eleventh Set of Data Requests  
Issued on October 13, 2021

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Division 11-21

Request:

Explain in detail what information National Grid shared with PPL as part of PPL's statement (in its response to DIV 1-54 Supplement) that it collaborated with National Grid in the Analysis of PPL operating cost of Narragansett? Over what period of time did these discussions take place? Provide the names and titles of National Grid employees that participated in the discussions.

Response:

PPL had various meetings with National Grid employees during August and September 2021 concerning the operating costs analysis where operating cost data information was shared. These meetings were with National Grid employees whose job functions are related to finance and budgeting. PPL and PPL RI also refer to their response to data request Division 10-10.



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 Division's Eleventh Set of Data Requests  
Issued on October 13, 2021

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Division 11-22

Request:

Provide the last five years of the Narragansett IEEE reliability statistics including a comparison to all National Grid USA reporting utilities by year.

Response:

PPL and PPL RI refer to the response of National Grid USA and The Narragansett Electric Company to data request Division 11-22.

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 Division's Eleventh Set of Data Requests  
Issued on October 13, 2021

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Division 11-23

Request:

Does National Grid believe it has an organization dedicated to serving the customers in Rhode Island?

Response:

PPL and PPL RI refer to the response of National Grid USA and The Narragansett Electric Company to data request Division 11-23.

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 Division's Eleventh Set of Data Requests  
Issued on October 13, 2021

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Division 11-24

Request:

Does National Grid utilize the same or substantially similar construction and material standards in Rhode Island and Massachusetts?

Response:

PPL and PPL RI refer to the response of National Grid USA and The Narragansett Electric Company to data request Division 11-24.

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 Division's Eleventh Set of Data Requests  
Issued on October 13, 2021

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Division 11-25

Request:

Does National Grid share materials and supplies particularly during storm restoration between Rhode Island and Massachusetts?

Response:

PPL and PPL RI refer to the response of National Grid USA and The Narragansett Electric Company to data request Division 11-25.

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 Division's Eleventh Set of Data Requests  
Issued on October 13, 2021

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Division 11-26

Request:

Is it correct that National Grid has the capability to utilize spare power transformers and other equipment from Massachusetts with Rhode Island and is that equipment compatible across both jurisdictions?

Response:

PPL and PPL RI refer to the response of National Grid USA and The Narragansett Electric Company to data request Division 11-26.

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 Division's Eleventh Set of Data Requests  
Issued on October 13, 2021

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Division 11-27

Request:

Is it correct that recently National Grid utilized a power transformer from Massachusetts to replace a failing transformer or failed transformer in Rhode Island and that the capacity and voltages were compatible and match the Rhode Island design?

Response:

PPL and PPL RI refer to the response of National Grid USA and The Narragansett Electric Company to data request Division 11-27.

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 Division's Eleventh Set of Data Requests  
Issued on October 13, 2021

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Division 11-28

Request:

Are the National Grid construction personnel trained and accustomed to performing storm repairs and other work on both the Rhode Island distribution system and Massachusetts distribution system?

Response:

PPL and PPL RI refer to the response of National Grid USA and The Narragansett Electric Company to data request Division 11-28.

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 Division's Eleventh Set of Data Requests  
Issued on October 13, 2021

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Division 11-29

Request:

Provide a list of the total employees and staff members of National Grid that are typically involved in the development and preparation of Area Studies and the annual ISR Plan. This should include every aspect of the preparation from start to finish and every employee of every group or department, including management approvals. Provide the employee name, title, department, and general role in either or both processes. Specifically identify employees in Corporate Services. In cases where a section or group is consulted to develop Area Studies or the ISR Plan as opposed to an individual, indicate the group and approximate number of employees that contribute to the process (e.g. Environmental-3 [sic] employees and 1 manager, or Providence Area operations group -5 employees and 1 manager).

Response:

PPL and PPL RI refer to the response of National Grid USA and The Narragansett Electric Company to data request Division 11-29.