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October 25, 2021

VIA ELECTRONIC MAIL AND HAND DELIVERY

Luly E. Massaro, Commission Clerk
Rhode Island Division of Public Utilities and Carriers
89 Jefferson Boulevard
Warwick, RI 02888

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 Electric Company to PPL Rhode Island Holdings, LLC and Related Approvals; Docket No. D-21-09

Dear Ms. Massaro:

Enclosed please find an original and four copies of PPL Corporation (“PPL”) and PPL Rhode Island Holdings, LLC’s (“PPL RI”) Responses and Objections to the Rhode Island Attorney General’s Second Set of Data Requests, issued on October 1, 2021 (the “AG’s Second Set of Data Requests”).

This filing includes PPL and PPL RI’s partial responses to the AG’s Second Set of Data Requests, specifically 2-2, 2-3, 2-5 and 2-7. On October 22, 2021, Attorney General granted an extension to October 26, 2021 as to the remaining requests, which will be provided on a rolling basis as they are complete.

Thank you for your attention to this matter. Please do not hesitate to contact me should you have any questions.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Adam M. Ramos".

Adam M. Ramos

Enclosures

cc: Service List D-21-09 (via e-mail only)

Docket No. D-21-09 PPL Corp., PPL RI Holdings, LLC, National Grid USA and The Narragansett Electric Co. (collectively, Applicants) – Petition to Transfer Ownership and Related Approvals

Service List Updated 8/18/2021

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October 26, 2021

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Luly E. Massaro, Commission Clerk
Rhode Island Division of Public Utilities and Carriers
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This filing includes PPL and PPL RI’s partial responses to the AG’s Second Set of Data Requests, specifically 2-6. On October 22, 2021, the Rhode Island Attorney General granted an extension to October 26, 2021 as to the remaining requests. This completes PPL and PPL RI’s responses to the AG’s Second Set of Data Requests.

Thank you for your attention to this matter. Please do not hesitate to contact me should you have any questions.

Very truly yours,

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PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
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Docket No. D-21-09
PPL Corporation and PPL Rhode Island Holdings, LLC's
Responses to RI Attorney General's Second Set of Data Requests
Issued on October 1, 2021

AG 2-1

Request:

Please identify and describe any agreements between Applicants for services to be provided following the Transaction. Include in the description any preferential rates or priority of service that may be included in the agreement. For example, if the agreement involves storm response, please note whether assisting Narragansett will be a priority ahead of assisting others or how priority will be determined. Please provide the agreements if available.

Response:

This request is overly broad and unduly burdensome in its request for "any agreements between Applicants for services to be provided following the Transaction." Nevertheless, PPL and PPL RI refer to their responses to data requests Division 1-28, Division 1-29, Division 1-34, Division 1-40, Division 1-45, Division 1-46, Division 2-17, Division 2-19, and Division 3-20. PPL and PPL RI also refer to National Grid and Narragansett's responses to data requests Division 1-28, Division 7-36, and Division 1-29 and the attachments to those responses. These responses discuss and reflect contracts for services to be provided between National Grid and its affiliates to Narragansett after the Transaction closes during the transition period, and also reflect agreements related to mutual assistance in storm response efforts.

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 RI Attorney General's Second Set of Data Requests
Issued on October 1, 2021

AG 2-2

Request:

Please provide a comparison of the current typical residential and low income bills for both electric and gas customers with what the bill will look like under PPL ownership. Please provide samples and describe the differences and similarities. Please also state how customers are and will be able to view and access their bills.

Response:

PPL and PPL RI refer to their response to data request AG 1-14.

Customers will have the same capabilities they currently have to view and access their bills through PPL branded systems (rather than National Grid's branded system). There will be no change to current functionality and capabilities.

AG 2-3

Request:

Do PPL or its affiliates have any programs currently focused on environmental justice communities? If so, please describe the programs. Please describe any plans to address environmental justice issues in Rhode Island.

Response:

PPL's operating companies have a strong history of community engagement to support development activities. PPL engages with regulators, customers, employees and the community early and often during a multi-year process, including through public open houses and feedback surveys. This same approach will be implemented in Rhode Island when developing projects or programs that would have a significant impact in the communities in which they are located.

With respect to environmental justice, PPL works with nonprofit and community partners to focus philanthropic investments on efforts helping to drive communities forward through programs focused on diversity, equity and inclusion; equitable education; economic and workforce development; health and safety and sustainable local community projects.

PPL recognizes that any infrastructure project has the potential to significantly impact the local community.

PPL considers environmental and economic factors in assessing and planning development activity across all communities. Environmentally, PPL assesses properties for endangered species, biodiversity, impact to water resources, and cultural- and heritage-related concerns. PPL also evaluates economic drivers as a major factor that takes into consideration impacts to residential, commercial and agriculture properties.

With more than a century of experience developing and maintaining the systems that keep electricity and natural gas flowing, PPL has established best practices to ensure it is focused on engagement, access, affordability and community support in every project it develops.

Honed over decades and backed up by extensive experience, these best practices include:

- Using environmental screening to identify all communities impacted by projects under development.
- Seeking early and frequent stakeholder engagement, including public open houses and public feedback surveys.

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 RI Attorney General's Second Set of Data Requests

Issued on October 1, 2021

- Communicating with plant advisory committees and plant neighbors.
- Providing timely and transparent information.
- Working with local community leaders.
- Expanding community support and development efforts.

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 RI Attorney General's Second Set of Data Requests
Issued on October 1, 2021

AG 2-4

Request:

Are there currently any pending or potential municipal light arrangements? If so, how will the Transaction affect them.

Response:

PPL and PPL RI refer to the response of National Grid USA and The Narragansett Electric Company to data request AG 2-4.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
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Docket No. D-21-09

PPL Corporation and PPL Rhode Island Holdings, LLC's
Responses to RI Attorney General's Second Set of Data Requests
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AG 2-5

Request:

Please list and provide any FERC jurisdictional tariffs that Narragansett is currently a party to. Please note any tariffs that may need revisions in the three years following the Transaction, describe the revisions that may be needed, and the timing of when these revised tariffs will be filed.

Response:

PPL and PPL RI refer to the response of National Grid USA and The Narragansett Electric Company to data request AG 2-5.

PPL CORPORATION, PPL RHODE ISLAND HOLDINGS, LLC,
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Docket No. D-21-09

PPL Corporation and PPL Rhode Island Holdings, LLC's
Responses to Division's Ninth Set of Data Requests

Issued on October 1, 2021

AG 2-6

Request:

Do Applicants expect there to be any change in the relationship and/or provision of services to Block Island Utility District or Pascoag Utility District upon the transfer of ownership of Narragansett? Particularly discuss any potential changes to response to outages or extreme conditions that may currently be addressed by National Grid Service Company.

Response:

PPL does not expect there to be any changes in the relationship with and/or provision of services to Block Island Utility District or Pascoag Utility District. PPL and PPL RI also refer to their responses to data requests AG 2-9 and AG 2-10.

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 RI Attorney General's Second Set of Data Requests
Issued on October 1, 2021

AG 2-7

Request:

With respect to ratepayers currently on payment plans, how will the Transaction affect those payment plans. Will they be allowed to continue their payment plans? Please discuss your plans regarding existing payment plans.

Response:

PPL and PPL RI refer to their responses to data requests AG 1-17 and OER 1-19. PPL and PPL RI also refer to the response of National Grid USA and The Narragansett Electric Company to data requests AG 1-17 and AG 1-18.

After the Transaction closes, Narragansett customers will remain on the current payment plans and will be allowed to continue to do so.

AG 2-8

Request:

Reference Narragansett Electric Emergency Response Plan (ERP):

- a. Confirm that this plan is formally referenced as the "National Grid Rhode Island Emergency Response Plan."
- b. Please provide a copy (unredacted) of the currently operative plan, or plans.
- c. Please describe how PPL intends to transition emergency response oversight and functions from National Grid, and the timing thereof.
- d. Please indicate whether PPL has any plans to modify Narragansett Electric's current ERP or otherwise adjust its approach to emergency response.

Response:

- a. PPL and PPL RI refer to National Grid USA and The Narragansett Electric Company's response to data request AG 2-8(a).
- b. PPL and PPL RI refer to National Grid USA and The Narragansett Electric Company's response to data request AG 2-8(b).
- c. PPL is working with National Grid to ensure all key roles within the Incident Command Structure are staffed with knowledgeable individuals in Rhode Island on Day 1. The intent is to have all functions of the Emergency Response Organization staffed and a gap analysis completed to identify any open areas, at which time PPL will work with National Grid under the Transition Service Agreement to ensure there is continuity of emergency response.
- d. PPL does not have plans to make substantive changes to Narragansett's current gas and electric Emergency Response Plans ("ERP"). PPL will maintain continuity of emergency response by utilizing the existing ERPs. Due to rebranding, there may be some slight modifications to titles and organizational structures, but the foundation of the ERPs, how PPL will prepare, respond and communicate, will not change.

AG 2-9

Request:

Please describe PPL's emergency response strategy and systems for communicating with state and local officials, the general public, and other relevant emergency management personnel in the event of a storm emergency.

Response:

In Rhode Island, PPL will maintain continuity with all established communication methods interacting with state and local officials as well as the public as outlined in section 17 and 18 of the National Grid, Rhode Island Electric Emergency Response Plan ("ERP"). This includes systems like WebEOC, IVR's Rhode Island Outage Maps, and municipal (muni) rooms.

Louisville Gas & Electric Company ("LG&E") and Kentucky Utilities' ("KU") strategy is to develop and foster relationships with local, regional, and state emergency management personnel, government leaders, and the public in advance of emergencies involving the electric and gas systems to assure public safety, efficient response, and effective communications during events.

More specifically, LG&E and KU have a dedicated Emergency Management Outreach Coordinator ("EMOC") who partners with the Kentucky Emergency Management ("KYEM") division and is part of their Emergency Operations Center ("EOC") in Frankfort, Kentucky during emergencies. Additionally, the EMOC works with county EOCs and ensures appropriate LG&E and KU representatives are part of their emergency operations. LG&E and KU have an External Affairs department that works closely with state and local officials to ensure their concerns are addressed during emergencies and communicated to the appropriate storm response leadership team. Finally, LG&E and KU have four internal call centers and 26 business offices strategically located across the service area that interact and take calls from customers during storm emergencies.

Systems used to interact and inform customers include a feature-rich mobile application to input outages and view outage maps of the service territory, text an outage as well as receive updates, interact with an Integrated Voice Response System ("IVRU") to provide outage information when call center representatives are not available, as well as radio, television, and social media.

Similar to LG&E and KU, PPL Electric Utilities ("PPL Electric") in Pennsylvania fosters a relationship with our state, county and local emergency management personnel to establish communications during an emergency event to ensure we are coordinating on public safety and restoration of critical infrastructure.

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Docket No. D-21-09

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PPL Electric provides routine updates to the Pennsylvania Public Utility Commission including restoration updates and estimated restoration times for the customers impacted by a storm or other situations requiring emergency response. PPL Electric partners with local and county emergency management agencies to arrange access to cooling or warming stations during periods of extreme high or low temperatures and proactively communicates how customers can obtain ice and water during multiple-day events.

Using multiple active and passive communication tactics such as email, texts, mobile-friendly applications and/or Interactive Voice Response Systems, PPL Electric provides outage status to our customers including estimated restoration times.

AG 2-10

Request:

With respect to emergency response, provide specific information concerning the systems and approach for effective communications regarding outage locations, potential outage durations, and staging and mobilization of cleanup and line de-energizing crews.

Response:

In Rhode Island, PPL will maintain continuity with the existing communication strategy regarding outage locations and estimated restoration times. This includes staffing the customer contact center, maintaining and updating the public facing outage website, and other modes of communication including social media platforms. In addition, PPL will maintain the ability to execute the staging site plans as outlined in section 7.3 of the National Grid Rhode Island Electric Emergency Response Plan ("ERP").

Coordination of Task Forces, outlined in section 14.5 of the ERP, will remain in effect enabling crews to coordinate the clean-up and de-energizing of lines to assist municipal workers with road clearing. The Area Community Liaisons will continue to work directly with the municipal emergency management agencies.

In Kentucky, Louisville Gas & Electric Company ("LG&E") and Kentucky Utilities ("KU") have adopted an Incident Command System ("ICS")-based structure for responses to significant emergencies and outage events on the company's electric distribution and transmission systems. The ICS provides assurance the company responds to events on the electric system in a timely, effective, and consistent manner while also providing for standard communications during emergencies to key stakeholders, both internal and external, to the company. The ICS consists of the Incident Commander who manages the overall storm response along with five sections consisting of Customer Experience, Logistics, Operations, Work Planning, and Information Technology. Assisting the Incident Commander is the Estimated Restoration Time ("ERT") Officer, who has responsibility for establishing and then monitoring adherence of system-wide, local area and circuit level ERTs that are provided to customers via systems mentioned in PPL and PPL RI's response to data request AG 2-9.

LG&E and KU are actively involved in Regional Mutual Assistance Groups ("RMAG") including Great Lakes Mutual Assistance, Southeastern Electric Exchange, and Midwest Mutual Assistance. Through these organizations, external field resources are procured and mobilized through the Work Planning Section and then staged and housed through the Logistics Section. Pre-defined staging locations have been identified and coordinated with owners across the commonwealth to expedite the staging of materials, fuel, and housing. Finally, the Operation Section has

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responsibility for all emergency response/public safety, damage assessment, switching and restoring, and ultimately repairing of the distribution and transmission grid.

Similar to LG&E and KU, PPL Electric Utilities ("PPL Electric") has an established Emergency Response Organization ("ERO") built on the principles of the Incident Command System ("ICS"). This ERO structure is the foundation PPL Electric uses to respond to all emergencies that impact its distribution and transmission systems. PPL Electric ensures all employees are trained, exercised and ready to respond to any weather, cyber or other emergency events that impact service to customers. The PPL Electric ERO system is comprised of an Incident Commander who works with the Customer Service, Planning, Logistics and Operational teams to set the restoration strategy for each event, and then execute and adjust that strategy until restoration is complete. A key element of PPL Electric's ERO is the Public Information Officer who works with the Customer Service team to ensure timely and accurate information is communicated to customers, the media, and appropriate state, county and local agencies.

PPL Electric also is actively involved in Regional Mutual Assistance Groups ("RMAG") including the North Atlantic Mutual Assistance Group and the Southeastern Electric Exchange. Coordinating with partners in Kentucky and the RMAGs allows PPL Electric to acquire external line and vegetation management resources, which receive safety orientation and work assignments. Based on the severity and impact of an event, PPL Electric able to stage external crews at various locations across its service territory, allowing the crews to be housed and fed close to the locations requiring their support.