

CLF 1-1

Request:

Please identify any state or other jurisdictions in which PPL operates or operated and in which PPL is or was subject to a comprehensive climate law similar or analogous to the Rhode Island Act on Climate, which mandates greenhouse gas (GHG) emission reductions, includes target dates for achieving those reductions, and requires creation of climate action plans and regulations to guide climate policy that will achieve GHG reductions. Please provide citations and links to any such laws.

Response:

Pennsylvania and Kentucky do not have a comprehensive climate law similar or analogous to the Rhode Island Act on Climate.

During PPL's ownership of Western Power Distribution (WPD), the electricity distribution network operator in the U.K. for the East and West Midlands, South West England and South Wales, WPD was subject to binding carbon reduction requirements. Under the U.K. law, WPD was required to purchase carbon allowances to offset emissions associated with WPD's operations.

The Climate Change Act 2008 committed the U.K. to an 80% reduction in carbon emissions relative to the levels in 1990, to be achieved by 2050. In June 2019, legislation was passed that extended that target to at least 100% by 2050.

WPD also reported to the U.K. utility regulator, Ofgem, regarding climate adaptation, innovation and progress toward reducing its business carbon footprint. Performance relative to low-carbon initiatives are embedded in the regulatory incentives for network operators.

PPL and PPL RI note that the Rhode Island Act on Climate does not place any immediate requirements on the utility sector.

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 Conservation Law Foundation's First Set of Data Requests
Issued on October 1, 2021

CLF 1-2

Request:

Please identify any and all PPL, PPL RI, or other corporate affiliate, policies or plans for achieving compliance with any state or other jurisdiction's law or policy identified in response to the previous question, CLF-1-1. Please provide copies of any and all such policies.

Response:

There are no GHG reduction mandates in the jurisdictions that PPL currently operates, and PPL does not have any policies or plans responsive to this data request. PPL and PPL RI also refer to their responses to data requests AG 1-29, AG 1-31, GECA 1-13 and GECA 1-14.

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CLF 1-3

Request:

Please describe any and all internal plans developed by PPL, PPL RI, or any corporate affiliate, that outline the corporate commitments, goals, and actions intended by PPL or its affiliate(s) to achieve GHG emission reductions. Please provide copies of any and all such internal climate plans.

Response:

PPL and PPL RI refer to their responses to data requests AG 1-29, AG 1-31, GECA 1-13 and GECA 1-14.

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

Docket No. D-21-09

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CLF 1-4

Request:

All documentation and correspondence within PPL, PPL RI, National Grid/Narragansett, and between applicants, related to how PPL or PPL RI will maintain and continue existing climate resilience and vulnerability assessment programs and commitments to ensure no frustration, hinderance, diminishment, or delay in any such program or commitment.

Response:

Counsel for PPL Corp. ("PPL"), PPL Rhode Island Holdings, LLC ("PPL Rhode Island"), National Grid USA ("National Grid"), The Narragansett Electric Company ("Narragansett"), and The Rhode Island Division of Public Utilities and Carriers Advocacy Section (the "Division Advocacy Section") met and conferred regarding the breadth and scope of certain data requests. After that meet and confer, the Division Advocacy Section sent a letter, dated June 22, 2021, advising that PPL, PPL Rhode Island, National Grid, and Narragansett can "use sound judgment and the rule of reason in crafting responses and providing responsive documents." The Division Advocacy Section also advised in the June 22, 2021 letter PPL, PPL Rhode Island, National Grid, and Narragansett to "consider the Advocacy Section's goal of protecting ratepayers when determining scope and relevancy." Based on the scope and breadth of this request, PPL and PPL Rhode Island have applied the rule of reason and used sound judgment in limiting the breadth and scope of documents produced in response to this request, and have considered the Division Advocacy Section's goal of protecting ratepayers in determining which documents it will produce.

PPL and PPL RI received a substantial number of documents during due diligence that mention Narragansett's climate resilience and vulnerability assessment programs. Although such documents do not address how PPL or PPL RI will maintain and continue the existing climate resilience and vulnerability assessment programs and commitments to ensure no frustration, hinderance, diminishment, or delay in any such program or commitment, PPL and PPL RI plan to continue Narragansett's existing climate resilience and vulnerability assessment 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 continue to evaluate such programs after the Transaction closes to consider opportunities to determine whether to make any changes to these programs. PPL and PPL RI will follow any applicable statutory and regulatory requirements and processes to the extent that they determine that they want to make any changes.