

November 23, 2021

VIA ELECTRONIC MAIL

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

RE: Docket D-21-09 – Petition of PPL Corporation, PPL Rhode Island Holdings, LLC, National Grid USA, and The Narragansett Electric Company for Authority to Transfer Ownership of The Narragansett Electric Company to PPL Rhode Island Holdings, LLC and Related Approvals
Rebuttal Testimony of National Grid USA and The Narragansett Electric Company

Dear Ms. Massaro:

On behalf of National Grid USA and The Narragansett Electric Company (together, “National Grid”), enclosed is National Grid’s Joint Rebuttal Testimony of Christopher Kelly and Duncan Willey in the above-referenced docket.¹

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

Very truly yours,



Jennifer Brooks Hutchinson

¹ Although this is a Division of Public Utilities and Carriers (“Division”) filing, consistent with Public Utilities Commission’s filing requirements during the COVID-19 emergency period, National Grid is submitting an electronic version of this filing. National Grid will provide the Division Clerk with five hard copies within 24 hours and, if needed, additional hard copies of the enclosures upon request.

Luly E. Massaro, Division Clerk

Docket D-21-09 – Rebuttal Testimony of National Grid USA and The Narragansett Electric Company

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Enclosures

cc: Docket D-21-09 Service List (electronic only)
John Bell, Division
Leo Wold, Esq.
Christy Hetherington, Esq.
Scott H. Strauss, Esq. (electronic only)
Latif M. Nurani, Esq. (electronic only)
Amber L. Martin Stone, Esq. (electronic only)
Anree G. Little, Esq. (electronic only)

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

Docket No. D-21-09

In Re: Petition for Authority to Transfer Ownership of
The Narragansett Electric Company to
PPL Rhode Island Holdings, LLC and Related Approvals
Witnesses: Kelly and Willey

JOINT REBUTTAL TESTIMONY

OF

CHRISTOPHER KELLY

AND

DUNCAN WILLEY

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1 **I. Introduction**

2 **Q. Mr. Kelly, please state your full name and business address.**

3 A. My name is Christopher Kelly. My business address is 280 Melrose Street, Providence,
4 Rhode Island 02907.

5
6 **Q. By whom are you employed and in what capacity?**

7 A. I am employed by National Grid USA Service Company, Inc. (“Service Company”) as
8 the Interim President for the Rhode Island Jurisdiction and Chief Operating Officer for
9 the US Electric Business, New England. I assumed the role of Interim President on
10 October 1, 2021.

11
12 **Q. What are your principal responsibilities in your position?**

13 A. In my role as Interim President, I am responsible for overseeing the regulated electric and
14 gas distribution operations of National Grid USA in Rhode Island. As Chief Operating
15 Officer for the US Electric Business, New England, which I assumed in April 2021, I
16 oversee 2,000 employees and am responsible for the safe and reliable delivery of
17 electricity across Rhode Island and Massachusetts.

1 **Q. Please describe your educational background and professional experience.**

2 A. I received a Bachelor of Science degree in Electrical Engineering from Rutgers
3 University and a Master of Business Administration degree from Worcester Polytechnic
4 Institute. I joined a predecessor of National Grid USA in 1988 as an Associate Engineer.
5 Since then, I have held roles of increasing responsibility, including Power Systems
6 Engineer, Operations Planner, Manager of Distribution Engineering and Operations,
7 Director of Protection and Telecommunications Operations, Director of Substation
8 Engineering and Design, Director of Project Management, Director of Protection and
9 Meter Engineering, Director of Utility of the Future, Vice President of Electric Systems
10 Engineering, Senior Vice President of Electric Process and Engineering, and US Chief
11 Electric Engineering Officer. I became the Chief Operating Officer for the US Electric
12 Business, US in April 2019. In addition to my professional roles with National Grid
13 USA, I serve as a Board Member for several boards, including The Narragansett Electric
14 Company (“Narragansett”). I am also a Registered Professional Engineer.

15
16 **Q. Have you previously testified before the Rhode Island Division of Public Utilities**
17 **and Carriers (the “Division”), Rhode Island Public Utilities Commission (the**
18 **“PUC”), or any other regulatory commissions?**

19 A. No, I have not previously testified before the Division, the PUC, or any other regulatory

1 commissions. On November 23, 2021, I submitted an affidavit in this docket to replace
2 Terence Sobolewski as the witness on behalf of National Grid USA and Narragansett.
3 Through my affidavit, I adopted the pre-filed direct testimony of Terence Sobolewski,
4 filed in this proceeding on May 4, 2021, as my testimony.

5
6 **Q. Mr. Willey, please state your full name and business address.**

7 A. My name is Duncan Willey. My business address is 40 Sylvan Road, Waltham,
8 Massachusetts 02451.

9
10 **Q. By whom are you employed and in what capacity?**

11 A. I am employed by the Service Company as the Vice President for Rhode Island
12 Transition Management Office (“TMO”). For purposes of the transaction that is the
13 subject of this proceeding, I serve as the National Grid USA lead for the TMO.

14
15 **Q. What are your principal responsibilities in your position?**

16 A. I am responsible for the overall management of the TMO, which has been established by
17 National Grid USA to ensure the safe and smooth transition of Narragansett from
18 National Grid USA to PPL. My key responsibilities include developing and delivering
19 the plans to separate Narragansett from National Grid USA, monitoring and managing

1 the risks, and ensuring the appropriate development of transition services, which will be
2 documented in schedules that will be attached to the Transition Services Agreement
3 (“TSA”) to be executed at the closing of the transaction. Once the transaction closes, I
4 will have responsibility for oversight and delivery of the transition services to be
5 provided by the Service Company to Narragansett under the TSA.
6

7 **Q. Please describe your educational background and professional experience.**

8 A. I have a Bachelor of Economics degree from Cardiff Business School in the UK. I have
9 worked at National Grid entities for more than 15 years in both the UK and US
10 businesses, with experience working in both the gas and electric businesses in
11 distribution and transmission roles. I have undertaken a wide range of roles, including
12 regulatory, finance, contract management, and capital delivery.
13

14 **Q. Have you previously testified before the Division, PUC, or any other regulatory**
15 **commissions?**

16 A. No, I have not previously testified before the Division, the PUC, or any other regulatory
17 commissions.

1 **II. Purpose of Testimony**

2 **Q. What is the purpose of your joint rebuttal testimony?**

3 A. The purpose of this joint rebuttal testimony is to provide National Grid USA and
4 Narragansett’s response to the pre-filed direct testimony submitted by certain witnesses
5 for the Division Advocacy Section (“Advocacy Section”), the Rhode Island Attorney
6 General (“Attorney General”), and Green Energy Consumers Alliance, Inc. (“Green
7 Energy”) (collectively, the “Intervenors”). In particular, this joint rebuttal testimony
8 addresses certain comments and recommendations of the Intervenors on National Grid
9 USA’s role in the transition of Narragansett to PPL Rhode Island Holdings, LLC (“PPL
10 Rhode Island”) ownership. The rebuttal testimony of David J. Bonenberger, Todd J.
11 Jirovec, Lonnie E. Bellar, Tadd Henninger, Bethany L. Johnson, and John J. Reed and
12 Daniel S. Dane on behalf of PPL Corporation (“PPL”) and PPL Rhode Island addresses
13 the other pertinent comments and recommendations raised in the Intervenors’ testimony.
14 This joint rebuttal testimony refers to PPL, PPL Rhode Island, National Grid USA, and
15 Narragansett collectively as the “Petitioners.” Moreover, this joint rebuttal testimony
16 confirms that the Petitioners have met the standard for approval under Rhode Island
17 General Laws Section 39-3-25 for PPL Rhode Island’s acquisition of Narragansett from
18 National Grid USA (the “Transaction”).

1 **Q. How is your testimony organized?**

2 A. Section I and Section II are the introduction and purpose of testimony, respectively.
3 Section III summarizes the transition of Narragansett from National Grid USA to PPL
4 Rhode Island ownership and responds to the concerns raised by certain witnesses for the
5 Intervenors. Section IV is the conclusion.

6
7 **Q. Are you sponsoring any exhibits as part of your joint rebuttal testimony?**

8 A. Yes. We are sponsoring two exhibits in this joint rebuttal testimony:

9 Exhibit NG-1 Transition Timeline (Attachment NG-DIV 7-33
10 Supplemental)

11 Exhibit NG-2 List of TSA Schedules (Attachment NG-DIV 7-36-1
12 Supplemental)

13

14 **III. Transition of Narragansett from National Grid USA to PPL**

15 **Q. Before addressing the Intervenors' testimony, please summarize the plan to**
16 **transition Narragansett to PPL after the Transaction closes.**

17 A. National Grid USA is committed to transitioning Rhode Island customers and other
18 stakeholders to a comparable position with PPL as exists today with National Grid USA.
19 Through its work during the post-closing transition period, National Grid USA is
20 confident that customers of Narragansett will continue to receive safe, reliable, and cost-

effective electric and gas distribution service from Narragansett under PPL Rhode Island ownership. As explained throughout discovery, National Grid USA and PPL have been conducting an in-depth planning process to identify functional activities that can be safely and efficiently transferred to Narragansett on Day 1¹ and activities that will require a more gradual transition supported by the TSA to be entered into by the Service Company, National Grid USA (solely with respect to Section 4.6), and Narragansett.² Table 1, below, provides the detailed list of functional activities that currently are expected to transfer to PPL (i.e., activities transferring to PPL on Day 1) and transition to PPL in the long term (i.e., activities that need support under the TSA):³

Table 1

<i>As of November 17, 2021</i>	Activities transferring to PPL on Day One	Long-term: Activities with TSA Needs
Customer	<ul style="list-style-type: none">• Customer Connections• Customer Programs (Energy Efficiency, Low Income)• Marketing & Growth	<ul style="list-style-type: none">• Contact Center• Billing & Collections• Customer Delivery• Meter Data Services
Gas	<ul style="list-style-type: none">• Customer Meter Services• Meter Shop• Field Operations• Leak Survey & Damage Prevention• Construction & Inspection• Project & Construction Management• Work & Resource Planning• Engineering & Asset Management• LNG Operations• Instrumentation & Regulation• Pipeline Safety & Compliance	<ul style="list-style-type: none">• Control Center• Gas Procurement• Emergency support

¹ “Day 1” refers to the first day after the Transaction closes.

² Please see National Grid USA and Narragansett’s responses to Data Requests Division 1-28, Division 2-18, Division 2-22, Division 7-35, and Division 7-36 Supplemental.

³ Please see National Grid USA and Narragansett’s response to Data Request Division 7-36 Supplemental for more information regarding the functional areas included on Day 1 and under the TSA.

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Electric	<ul style="list-style-type: none"> • Field Engineering • Protection, Control, Telecom, Meter Engineering & Operations • Distribution Design • Asset Management • Distribution Control Center • Regional Field Operations • Customer Meter Services • Project & Construction Management • Work & Resource Planning 	<ul style="list-style-type: none"> • Electricity Procurement • Transmission Control Center • T-line and substation design & engineering Transmission interconnections • Emergency support
Regulatory & Government Affairs	<ul style="list-style-type: none"> • Regulatory Affairs • Regulatory Strategy • Accountability for all Regulatory Filing Requirements 	<ul style="list-style-type: none"> • TSA will provide consultant services on specific list of quarterly, annual, monthly filings as agreed with PPL
Operations Support (including Business Services)	<ul style="list-style-type: none"> • Fleet • Environmental • Safety 	<ul style="list-style-type: none"> • Payroll & Timekeeping • P2P • Facilities & property services • Inventory management & warehouse management • Security • Technical Training • TSA will provide consultant services for fleet, environmental and safety
HR	<ul style="list-style-type: none"> • Recruitment • Talent management • Labor relations • Performance mgmt. 	<ul style="list-style-type: none"> • Employee services • HRIS • Benefits & retirement administration
Legal & Compliance	<ul style="list-style-type: none"> • All activities transitioning to PPL 	<ul style="list-style-type: none"> • None
Finance & Accounting (including Tax)	<ul style="list-style-type: none"> • Financial planning, debt, cash management, tax filings, enterprise risk management, insurance, audit and internal controls 	<ul style="list-style-type: none"> • Balance sheet account reconciliations, mid/back-office for energy procurement • Transactional activities in support of property tax, accounting & financial reporting, tax consulting
IT	<ul style="list-style-type: none"> • PPL to provision access to RI employees to legacy PPL systems. RI employees to retain access to NG systems necessary for Day 1 operations 	<ul style="list-style-type: none"> • All IT activities to be fully supported. App support for systems expected to drop-off with corresponding reductions in business TSA

1 Exhibit NG-1 to this joint rebuttal testimony shows the current plan for the Day 1
2 transition through the target decision date of February 25, 2022. Exhibit NG-2 shows the
3 list of transition services by function and duration, as of November 17, 2021.
4 Simultaneously with the filing of this joint rebuttal testimony, National Grid USA and
5 Narragansett are filing a supplemental response to Data Request Division 7-36 to include
6 updated TSA schedules for the following functions: Billing & Collections; Business
7 Services: Balance Sheet Account Reconciliations; Business Services: Employee
8 Services; Business Services: Fleet Management; Business Services: Procure to Pay;
9 Customer Services; Electric Operations & Engineering; Energy Procurement; Facilities;
10 Finance & Accounting; Gas Operations & Engineering; Health & Safety, Monitoring &
11 Compliance; Human Resources; Information Technology; Regulatory; and Supply Chain
12 Management.⁴ National Grid USA and PPL will continue the work associated with
13 Day 1 planning and will further review and refine the TSA schedules until the
14 Transaction closes.

15
16 **Q. Please summarize your understanding of the Interveners' testimony regarding the**
17 **Narragansett transition plan.**

18 **A. The Interveners' testimony alleges concerns regarding the extent of the Service**

⁴ Please see Attachment NG-DIV 7-36-2-1 Supplemental through Attachment NG-DIV 7-36-2-16 Supplemental to National Grid USA and Narragansett's response to Data Request Division 7-36 Supplemental for the detailed draft TSA schedules as of November 17, 2021.

1 Company's support to Narragansett under the TSA and manner by which the Service
2 Company provides such support; the duration of the TSA between the Service Company
3 and Narragansett; and the costs for the Service Company's services to Narragansett under
4 the TSA. In particular, Michael R. Ballaban, Gregory L. Booth, Bruce R. Oliver, and
5 Matthew I. Kahal on behalf of the Advocacy Section, along with Mark D. Ewen and
6 Robert D. Knecht on behalf of the Attorney General and Kai Salem on behalf of Green
7 Energy, argue that it will be difficult to separate Narragansett from National Grid USA,
8 so they request assurances as to how the transition will be handled.⁵ Mr. Ballaban, Mr.
9 Booth, and Mr. Oliver on behalf of the Advocacy Section have also argued that they do
10 not think the full transition of all services to be provided by the Service Company to
11 Narragansett can be completed within two years.⁶ Finally, Mr. Booth and Mr. Oliver on
12 behalf of the Advocacy Section, along with Mr. Ewen and Mr. Knecht on behalf of the
13 Attorney General, have also argued that the determination of costs that will be charged by
14 the Service Company for services provided to Narragansett during the transition period
15 have not been clearly defined.⁷ We address each of these issues below.

⁵ Ballaban Test. at 8-12, 23-24, 30-32; Booth Test. at 8-10, 12, 15-19, 21-24, 26, 45-48, 52-53, 56; Kahal Test. at 27; Oliver Test. at 4, 6, 8-10, 11-12, 21, 28-29, 31-34, 72; Ewens and Knecht Test. at 7-9, 28-30; Salem Test. at 14.

⁶ Please see Ballaban Test. at 15; Booth Test. at 10, 21-22, 23-24, 25, 27, 40-42, 54-55, 56; Oliver Test. at 13-14, 30-31, 56-57, 61.

⁷ Please see Booth Test. at 8, 9, 20-21, 50, 53-54, 56-57; Oliver at 26, 27-28, 29-31, 53-59, 60-61, 66; Ewen and Knecht Test. at 28, 29-30.

1 **A. National Grid USA Support Under the TSA**

2 **Q. Several witnesses have raised concerns about the potential difficulty of separating**
3 **Narragansett from National Grid USA and its shared services model. What is**
4 **National Grid USA's response to those concerns?**

5 A. Separating Narragansett from the National Grid USA organization and integrating it into
6 PPL's organization is not an insurmountable task as the Interveners seem to suggest.
7 Similar to National Grid USA, PPL utilizes a shared services model to provide synergies
8 across its operations in Pennsylvania and Kentucky. Once integrated into PPL's
9 organization, National Grid USA is confident that Narragansett will develop similar
10 efficiencies and economies of scale through the PPL organization.

11
12 To facilitate the separation and assist PPL with the integration of Narragansett into the
13 PPL organization, National Grid USA has in place a TMO that is fully and singularly
14 dedicated to delivering the safe and efficient separation of employees, assets, and
15 operations from National Grid USA and the transition of employees, assets, and
16 operations to PPL in accordance with the terms of the Share Purchase Agreement. The
17 TMO includes leaders who are responsible for execution of separation activities for their
18 respective functions for National Grid USA. The TMO consists of a separation leader on
19 behalf of National Grid USA, who is accountable for overall separation, overseeing

1 program level risks, decisions on separation activities, escalations to the executive
2 steering committee, and coordinating with PPL on separation activities. The TMO team
3 is also supported by National Grid USA functional teams responsible for working on the
4 Day 1 and TSA transition efforts described earlier in this testimony. After the
5 Transaction closes, the TMO shifts its focus to oversight of the transition services that
6 will be provided by the Service Company to Narragansett under the TSA until
7 Narragansett terminates such services when they are no longer needed from National
8 Grid USA. As discussed above, Mr. Willey will be responsible for the oversight and
9 delivery of the transition services to be provided by the Service Company to Narragansett
10 under the TSA to facilitate a seamless and efficient transition to PPL. The
11 comprehensive work of the TMO, in addition to the transfer of Narragansett and Service
12 Company employees and knowledge to PPL, will enable Narragansett to separate
13 successfully from the National Grid USA organization.

14
15 As a key part of this work, National Grid USA's TMO is working closely with PPL's
16 Integration Management Office ("IMO") team on the separation and transition effort.
17 Since April 2021, the TMO and IMO teams have been meeting no less than weekly to
18 discuss progress against the schedule and workplans and coordinate across integration
19 and transition topics. The TMO and IMO governance structures will remain in place

1 through the end of the transition period. In addition, National Grid USA and PPL subject
2 matter experts have engaged in many working meetings to ensure the orderly transition
3 and integration of Narragansett from National Grid USA to PPL.

4
5 The Petitioners' comprehensive work on the separation and transition demonstrates their
6 confidence in successfully separating Narragansett from National Grid USA and
7 integrating National Grid USA's Rhode Island-related employees, assets, and operations
8 into PPL Rhode Island, so that the functional activities can be safely and effectively
9 transferred to PPL. National Grid USA believes that the established transition processes
10 will ensure the continuation of consistent, safe, and reliable service to Rhode Island
11 customers.

12
13 **Q. Earlier you mentioned the various functions covered on Day 1 and through the**
14 **TSA. How does National Grid USA plan to transfer to PPL Rhode Island its**
15 **experience and expertise of the Rhode Island gas and electric distribution systems?**

16 **A.** National Grid USA will transfer its experience and expertise to PPL in a number of ways.
17 First, the Petitioners are finalizing the Service Company employees and Narragansett
18 employees who will transfer to PPL on Day 1. National Grid USA expects many of the
19 employees currently working on Narragansett business will continue the same work

1 following the Transaction close because they will be transferring to PPL on Day 1. These
2 include employees directly employed by Narragansett and those employed through the
3 Service Company. These employees currently perform the work on behalf of
4 Narragansett and have detailed knowledge of the systems and processes in the functional
5 activities that will be transferred to PPL on Day 1. Approximately 731 direct
6 Narragansett employees will continue working in their current roles for Narragansett
7 when ownership is transferred to PPL Rhode Island. Approximately 368 Service
8 Company employees will transfer to the PPL organization as part of the Transaction.

9
10 Second, functional activities that are not transferred to PPL on Day 1 will be gradually
11 transitioned to PPL as specified in the TSA. Although still being reviewed, refined, and
12 finalized, the Service Company anticipates that it will conduct training to PPL during the
13 transition period under the following TSA schedules: Energy Transactions (Financial);
14 Training Facilities; Training (Learning and Development); Talent and Performance
15 Management; Health Services; Safety Policy & Programs; Consultancy Services for
16 Dispatch Supervision; and Energy Planning and Operations.⁸ In addition, the teams

⁸ For the above-referenced TSA schedules regarding training that the Service Company anticipates providing to PPL during the transition period, please see Attachment NG-DIV 7-36-2-3 Supplemental (at pages 12-13), Attachment NG-DIV 7-36-2-5 Supplemental (at pages 3-4), Attachment NG-DIV 7-36-2-4 Supplemental (at page 37), Attachment NG-DIV 7-36-2-9 Supplemental (at page 8), Attachment NG-DIV 7-36-2-11 Supplemental (at pages 3 and 4), and Attachment NG-DIV 7-36-2-13 Supplemental (at pages 3, 5-6, 10, 12-13, 15, 16), respectively.

1 performing the relevant Service Company functional activities will continue to support
2 Narragansett during the transition period, just as they would if Narragansett remained
3 part of the National Grid USA organization, and specific individuals will provide that
4 support as needed. National Grid USA will retain the resource capacity of the Service
5 Company's functional teams to support the transition services under the TSA, with
6 approximately 300-370 Service Company employees providing continued support
7 associated with the TSA, either part-time or full-time. The resources delivering the TSA
8 will be the same teams and resources that currently provide such services to Rhode
9 Island. This is in addition to the 368 Service Company employees who are transferring to
10 PPL on Day 1, as discussed above.

11
12 Third, National Grid USA and PPL are developing knowledge transfer services, which
13 will be incorporated into the TSA schedules. The knowledge transfer services will enable
14 PPL to access National Grid USA subject matter experts who will help to build PPL's
15 knowledge during the transition period following the close of the Transaction.

16
17 Fourth, the Service Company will transfer appropriate knowledge and historical data,
18 including physical documents and electronic files, to PPL to ensure operational continuity
19 for Narragansett.

1 **Q. Please provide more information about the experience and expertise of the**
2 **Narragansett and Service Company employees transferring to the PPL organization**
3 **on Day 1.**

4 A. As explained above, approximately 731 direct Narragansett employees are transferring to
5 the PPL organization on Day 1. These employees will remain employees of Narragansett
6 and will be performing the same functional activities in Rhode Island under PPL
7 ownership as they currently do under National Grid USA ownership. Thus, the level of
8 experience and expertise of the direct Narragansett employees transferring to the PPL
9 organization is the same as with National Grid USA.

10
11 As discussed above, approximately 368 Service Company employees are expected to
12 transfer to the PPL organization on Day 1. PPL's Rhode Island leadership team will be
13 led by the following current Service Company employees who are transferring to the PPL
14 organization: Michele Leone, Vice President, Gas Operations; Alan LaBarre, Senior
15 Director, Electric Operations; Kristin DeSousa, Senior Director, Customer; Brian
16 Schuster, Director, Regulatory and Government Affairs; Kate Hearn, Director, Finance;
17 Avia Levin, Director, Business Services; Patrick Carmody, Director of Compliance;
18 Celia O'Brien, Chief Counsel; Kathy Moar, Manager, Human Resources; and Mary
19 Smith, Senior Executive Assistant. These Service Company employees are established

leaders at National Grid USA and will bring their experience and expertise to PPL. The Service Company employees who are expected to transfer to PPL are in the functions set forth in Table 2 below:

Table 2

Function	Approximate Service Company Employees Transferring to PPL
Customer	65
Electric Operations	103 ⁹
Finance & Accounting	12
Gas Operations	145 ¹⁰
Human Resources	6
Legal & Compliance	5
Operations Support	15
Regulatory & Government Affairs	13
Transformation Office	4

⁹ Table 2 represents Service Company employees only. In total, more than 450 combined direct Narragansett employees and Service Company employees who are in the Electric Operations function are expected to transfer to the PPL organization.

¹⁰ Table 2 represents Service Company employees only. In total, more than 450 combined direct Narragansett employees and Service Company employees who are in the Gas Operations function are expected to transfer to the PPL organization.

1 In addition, many of the Service Company employees in Electric Operations and Gas
2 Operations will comprise the teams that will be responsible for PPL's electric and gas
3 distribution operations in Rhode Island under Mr. LaBarre and Ms. Leone's leadership,
4 respectively, on Day 1. These teams consist of employees at the vice president, director,
5 manager, supervisor, and analyst level at National Grid USA, many of whom will be
6 working on the same subject matter for PPL as they have for National Grid USA. These
7 teams are discussed in more detail below.

8
9 **Q. Does National Grid USA agree with Mr. Oliver's comment that, after closing,**
10 **National Grid USA will not support PPL Rhode Island sufficiently because it will**
11 **prioritize its work in Massachusetts and New York?**¹¹

12 A. No, and there is no basis whatsoever for this comment. National Grid USA has a long
13 history of providing excellent service to Rhode Island and is committed to achieving a
14 successful, seamless transition so that the customers of Narragansett continue to receive
15 safe, reliable, and cost-effective electric and gas distribution service from PPL as they
16 have from National Grid USA. In addition, National Grid USA is contractually obligated
17 to provide services and support to Narragansett under the Share Purchase Agreement and
18 TSA. Overall, National Grid USA will prioritize Narragansett the same as it has

¹¹ Please see Oliver Test. at 64.

historically through the end of the transition period.

Q. Certain Interveners have raised concerns about transitioning specific areas of operations and subject matter expertise to PPL, which will be addressed individually. First, Mr. Oliver alleges concerns regarding the experience of the employees who will be handling liquefied natural gas (“LNG”) operations for PPL Rhode Island.¹² What is National Grid USA’s response to Mr. Oliver’s concerns?

A. Mr. Oliver devotes several pages of testimony alleging that PPL Rhode Island will not have sufficient experience in the design, construction, operation, and maintenance of LNG facilities in Rhode Island.¹³ Mr. Oliver cites National Grid USA and Narragansett’s response to Data Request Division 5-1 for the list of 25 direct employees of Narragansett with responsibilities for performing LNG operations who are transferring to PPL on Day 1 as support for his allegation that PPL will not have the requisite experience to operate Narragansett’s LNG facilities on Day 1. He downgrades the experience of these 25 direct employees of Narragansett with his statements that “[o]f the persons listed most are technicians or crew leaders” and “[o]nly two are identified as Senior Supervisors.”¹⁴ These allegations overlook the fact that these individuals are the same Narragansett

¹² Please see Oliver Test. at 68-70.

¹³ Id.

¹⁴ Id. at 69.

1 employees whether under PPL or National Grid USA ownership. In other words, the
2 experience and subject matter expertise of those employees are the same whether they are
3 performing LNG operations for National Grid USA or PPL.

4
5 In addition to the employees referenced in response to Data Request Division 5-1, an
6 additional Service Company employee was recently named the future Manager of LNG
7 Operations at PPL and will be transferring to PPL on Day 1. This individual has twelve
8 years of LNG experience, including five years at the Narragansett LNG facilities and
9 seven years of additional LNG experience before joining National Grid USA. Other
10 Service Company employees with LNG experience at National Grid USA are transferring
11 to PPL in other gas distribution system roles, but will be available to assist with LNG
12 operations where needed. National Grid USA also understands that PPL Rhode Island
13 will use third-party contractors to perform certain functional activities of its LNG
14 operations as National Grid USA currently does. Therefore, a significant number of
15 employees with LNG- and gas-related experience who will transfer to PPL Rhode Island
16 on Day 1 to ensure that Rhode Island gas customers continue to receive comparable LNG
17 services under PPL ownership.

1 **Q. Mr. Oliver also states that “[m]ost of the management employees supporting**
2 **Narragansett’s gas operations are based in other jurisdictions (i.e., New York and**
3 **Massachusetts). As a result, there is a dearth of experience in gas utility**
4 **management, forecasting, and planning personnel resident in Rhode Island. There**
5 **are also indications that PPL will incur increased costs to attract and retain**
6 **experienced management and engineering personnel for Rhode Island’s**
7 **comparatively small operations.”¹⁵ What is National Grid USA’s response to Mr.**
8 **Oliver’s comment?**

9 **A.** National Grid USA disagrees; there is a plethora of experience in gas utility management,
10 forecasting, and planning personnel resident in Rhode Island. PPL Rhode Island’s gas
11 operations will be led by a Vice President of Gas Operations, Michele Leone, who has
12 held various management roles for National Grid USA in Rhode Island, including her
13 current role as Director of Gas Field Operations and Customer Meter Services in Rhode
14 Island. The Service Company employees transferring to PPL as part of the Gas
15 Operations leadership team have decades of operations management and related gas
16 experience, including engineering, dispatch, control center, pipeline safety & compliance,
17 resource and work planning and field operations (including Customer Metering Service
18 and Construction & Maintenance), and currently are serving in roles at National Grid

¹⁵ Oliver Test. at 4.

1 USA including Director of Pipeline Safety Management Programs, Director of Pipeline
2 Safety and Compliance, Director of Process and Performance for Gas Business
3 Enablement, Manager of Resource Coordination – New England South (including Rhode
4 Island), Principal Operator for the New England Gas Control Center, and Manager of Gas
5 Field Operations – New England South for National Grid USA. In addition, more than
6 25 operations managers and supervisors currently working in Rhode Island are
7 transferring to the PPL Rhode Island organization. Many of these employees have more
8 than ten years of gas operations experience, and numerous employees have spent their
9 entire careers at National Grid USA working on gas operations in Rhode Island.

10
11 As explained later in this testimony, the two-year transition period provides ample time
12 for National Grid USA to train PPL staff adequately, including in its management,
13 forecasting, and planning methodology. For example, from a forecasting perspective,
14 National Grid USA plans to staff the forecasting work with the same employees who
15 perform that work today for Rhode Island. National Grid USA and PPL's transition plan
16 for gas utility management, forecasting, and planning will provide PPL sufficient time
17 and provide the right level of knowledge transfer to establish its own forecasting group.

1 **Q. Mr. Oliver has also raised concerns regarding the transition of gas supply-related**
2 **work for Narragansett. What is National Grid USA’s response to Mr. Oliver’s**
3 **concerns?**

4 **A. Mr. Oliver alleges several concerns regarding the transition of the gas supply function for**
5 Narragansett. First, Mr. Oliver alleges a concern over increased pricing for LNG and
6 other gas supply “that PPL would need to address in a timely manner.”¹⁶ In particular,
7 Mr. Oliver indicates that, if the Fields Point liquefaction facility does not liquefy natural
8 gas until mid-October 2022, then the volumes of LNG it can be expected to produce for
9 winter 2022-23, and the costs of LNG for its production that winter, must be
10 questioned.¹⁷ Mr. Oliver’s testimony indicates this is an issue if PPL owns
11 Narragansett’s gas distribution system. Mr. Oliver’s timing concern, however, is the
12 same regardless of whether PPL or National Grid USA owns Narragansett for winter
13 2022-23 and therefore is not pertinent to approval of the Transaction.

14
15 Second, Mr. Oliver alleges that Narragansett’s gas procurement costs will increase under
16 PPL’s ownership because Narragansett will be a stand-alone purchaser in the gas supply

¹⁶ Oliver Test. at 43.

¹⁷ Mr. Oliver also testified that supply from the Northeast Energy Center project likely will not be available until April 2023 because of ongoing delays in the issuance of a permit for the Northeast Energy Center project by the Massachusetts Energy Facilities Siting Board (“EFSB”). See Oliver Test. at 44. On October 22, 2021, the Massachusetts EFSB issued the permit for the Northeast Energy Center project. Nonetheless, the issue over timing of the Northeast Energy Center project is the same regardless of whether PPL or National Grid USA own Narragansett.

1 market without the purchasing power that existed under National Grid USA's
2 ownership.¹⁸ Mr. Oliver's opinion here is not accurate. National Grid USA operates
3 each of its jurisdictional gas supply portfolios separately. This means that each of
4 National Grid USA's local distribution companies enters into its own gas supply
5 purchase, transportation, and storage agreements with pipeline companies and natural gas
6 producers. Gas procurement decisions are made based on each local distribution
7 company's respective forecasted requirements. Narragansett's gas procurement contracts
8 are in its own name, and they will remain Narragansett contracts after closing of the
9 Transaction. Narragansett will be able to engage with other similarly situated customers
10 in the New England area when evaluating new projects, industry trends, and other
11 strategic decisions regarding gas procurement; however, PPL's procurement decisions
12 will continue to be based on Narragansett's independent needs. Thus, Narragansett will
13 not lose any bargaining power for its gas purchases.

14
15 Similarly, Mr. Oliver also indicates that Narragansett will lose its bargaining power in the
16 Canadian market with PPL rather than with National Grid USA. This assertion is
17 unfounded. Narragansett's Canadian assets currently are managed under asset
18 management arrangements by third parties that are active in the Canadian markets and

¹⁸ Oliver Test. at 72-73.

1 with whom Narragansett has contracts in place to purchase natural gas. Mr. Oliver has
2 provided no basis why PPL could not continue to manage Narragansett's Canadian assets
3 in this manner.

4
5 Further, Mr. Oliver alleges concerns over PPL's operation of the Natural Gas
6 Procurement Management Program ("NGPMP") and Gas Procurement Incentive
7 Program ("GPIP"). National Grid USA intends to work with PPL Rhode Island to
8 manage the NGPMP and the GPIP during the transition period, which will be consistent
9 with the plans currently in place as approved by the PUC in the 2021 Gas Cost Recovery
10 filing in PUC Docket No. 5180, subject to any modifications that occur from discussions
11 with the Division or rulings from the PUC in the Gas Cost Recovery proceedings during
12 the transition period. Through the process currently in place today, Narragansett receives
13 feedback from the Division on its NGPMP and GPIP filings before it files these plans
14 with the PUC for its review and approval. Any concerns with the NGPMP and GPIP,
15 including National Grid USA's support during the two-year transition period, should be
16 addressed in a future year's Gas Cost Recovery proceeding. There is no basis for Mr.
17 Oliver's allegation that PPL cannot operate the NGPMP and GPIP effectively after the
18 two-year transition period.

1 **Q. In addition, Mr. Booth has alleged concerns regarding the transition of the Electric**
2 **Infrastructure, Safety, and Reliability (“ISR”) Plan process and its Area Studies to**
3 **PPL. Does National Grid USA believe these concerns are well-founded?**

4 A. No. PPL Rhode Island’s incoming Senior Director of Electric Operations, Alan LaBarre,
5 is currently National Grid USA’s Vice President of New England Control Centers, after
6 serving for many years as the Director of Distribution Planning and Asset Management
7 for New England, and he has been involved with the development and preparation of the
8 Electric ISR Plan. Mr. LaBarre has guided the adoption and overseen the execution of
9 the long-range planning processes that support the Electric ISR Plan. The members of
10 the team transferring to PPL Rhode Island with Mr. LaBarre are very experienced with
11 the Electric ISR Plan, including integral members of the National Grid USA Distribution
12 Planning and Asset Management team who have worked on the Electric ISR Plan for
13 years and are familiar to the Division and PUC. Also transferring to PPL Rhode Island is
14 National Grid USA’s Director of New England Electric Performance and Planning who is
15 responsible for regulatory compliance for Narragansett with respect to electric
16 distribution operations and capital expenditures in Rhode Island and has participated in
17 and managed the Electric ISR Plan consultation with the Division for the last several
18 years. Thus, Mr. Booth’s opinion that National Grid USA will retain the employees most
19 experienced with the Electric ISR Plan is unfounded because those employees are

1 transferring to PPL on Day 1.

2
3 As indicated earlier in this testimony, to the extent Service Company employees who
4 work on the Electric ISR Plan and its Area Studies do not transfer to PPL, Service
5 Company employees who work on the Electric ISR Plan and Area Studies will continue
6 to support PPL's work on them.¹⁹ These employees and departments will perform
7 substantive work, consulting, knowledge transfer, training, and other support for the
8 Electric ISR Plan and its Area Studies.

9
10 Thus, as of Day 1, the appropriate personnel from National Grid USA will be executing,
11 managing, and/or supporting the Electric ISR Plan process in a comparable capacity as
12 exists today under National Grid USA ownership. National Grid USA and the employees
13 transferring to PPL Rhode Island are well equipped to transition the work on the Electric
14 ISR Plan and Area Studies after the Transaction closes to ensure alignment of National
15 Grid USA's comprehensive and robust Electric ISR Plan process within the PPL
16 organization.

¹⁹ Please see Attachment NG-DIV 11-29-1 and Attachment NG-DIV 11-29-2 to National Grid USA and Narragansett's response to Data Request Division 11-29 for the list of Service Company employees and departments that support the Electric ISR Plan and Area Studies. The employees and departments listed in these documents essentially are those who will be transferring to PPL on Day 1 or will be supporting PPL's work on the Electric ISR Plan under the TSA.

1 **Q. Does National Grid USA agree with Mr. Booth’s allegations that 24 months is not**
2 **sufficient to transition the Area Study and Electric ISR Plan process?**

3 **A.** No. Mr. Booth makes several conclusory statements and assumptions regarding the
4 amount of time it will take for PPL to recruit and onboard the staffing to be in a position
5 to replicate the Area Studies and Electric ISR planning process that exists under National
6 Grid USA ownership. The only support Mr. Booth offers for these assumptions is his
7 experience with the state of Delaware’s process of developing and implementing a new
8 Electric ISR Plan process that is designed to reflect the Rhode Island process. Mr. Booth
9 states that the state of Delaware’s process is “another three to five years away from
10 approaching the level which has been reached in Rhode Island between the Division and
11 National Grid.”²⁰ These allegations overlook the fact that PPL will have the benefit of an
12 already established Area Study and Electric ISR planning process for Narragansett on
13 Day 1 with personnel who are experienced in the management, development, and/or
14 execution of the Electric ISR Plan. Mr. Booth offers no concrete support for his
15 allegations that it will be necessary to continue Service Company services beyond 24
16 months.

²⁰

Booth Test. at 40-42.

1 **Q. The witnesses for the Attorney General and Green Energy have alleged that future**
2 **compliance with climate policies and programs in Rhode Island, including the 2021**
3 **Act on Climate should be a condition of approval of the Transaction. Does National**
4 **Grid USA agree with this allegation?**

5 A. No. The Attorney General and Green Energy both expressed concern about whether PPL
6 will continue or improve National Grid USA’s existing climate policies and be consistent
7 with the 2021 Act on Climate (the “2021 Act”). As National Grid USA and Narragansett
8 explained in their response to Data Request Division AG 1-30, the 2021 Act does not
9 place any requirements on public utilities with which they must comply at this time, so it
10 is unknown at this point how future rules and regulations implementing the new targets
11 under the 2021 Act will implicate the utility sector. Thus, compliance with future rules
12 or regulations implementing the 2021 Act should be addressed in a separate forum and
13 not as a condition of approval of the Transaction.

14
15 **B. Duration of the TSA**

16 **Q. Do you agree with the Interveners that the transition of all the services the Service**
17 **Company provides to Narragansett cannot be completed in a 24-month period**
18 **under the TSA?**

19 A. No. The 24-month transition period under the TSA is the outside date by which

1 functional activities will be transitioned fully to Narragansett post-closing. In fact, the
2 majority of the functional activities will require much less than 24 months to transition
3 fully to Narragansett under PPL Rhode Island ownership. As shown on Exhibit NG-2,
4 each individual TSA schedule has ranges in duration from a minimum of six months to a
5 maximum of 24 months.²¹ As functional activities are transitioned fully to Narragansett
6 and those transition services terminated, the Service Company will continue to support
7 the more complex and lengthier transition services throughout the full 24-month period.
8 More importantly, hundreds of Narragansett and Service Company employees with
9 extensive knowledge of the services currently provided to Narragansett, including those
10 functional activities described under the TSA schedules, will transfer to the PPL
11 organization on Day 1. Throughout the transition period, the Service Company also will
12 provide knowledge transfer services to support the successful transfer of ownership of
13 Narragansett to PPL Rhode Island and will have sufficient time to train the transferring
14 employees on the various services provided by the Service Company under the TSA.
15 Through all these measures, National Grid USA is confident that a complete transition of
16 all services to be provided by the Service Company to Narragansett under the TSA will
17 be achieved by the end of the two-year transition period.

18

²¹ Please see Exhibit NG-2 for a list of TSA schedules and the duration for each of them.

1 Thus, National Grid USA and PPL agreed that 24 months was the appropriate maximum
2 length of time for the Service Company to provide services to Narragansett post-closing
3 to enable continuity of operations throughout the separation process.
4

5 **Q. If needed, are National Grid USA and PPL able to extend the transition period**
6 **longer than two years under the Share Purchase Agreement and TSA?**

7 A. Yes. If additional time is necessary, Section 6.9(a)(vii) of the Share Purchase Agreement
8 dated March 17, 2021, by and among PPL Energy Holdings, LLC, PPL Corporation
9 (solely with respect to Section 4.10 and 6.14), and National Grid USA (the “Share
10 Purchase Agreement”) and Section 2.1 of the TSA provide a mechanism for the parties to
11 mutually agree to extend the term of the TSA. Specifically, Section 2.1 of the TSA
12 provides for an extension of the two-year period if: Narragansett requests that any
13 transition services continue beyond the end of the 24-month period; the Service Company
14 agrees to provide such transition services beyond the end of the 24-month period; and
15 Narragansett and the Service Company mutually agree to extend the 24-month period.
16

17 The Petitioners are confident they can complete the transition under the TSA within two
18 years after closing. Both Petitioners are highly motivated to effectuate the transition as
19 smoothly and efficiently as possible. National Grid USA is confident in PPL’s

1 capabilities to operate Narragansett. National Grid USA's goal is to work with PPL
2 through a smooth and timely transition so Narragansett customers receive the same safe
3 and reliable service they are receiving today under National Grid USA ownership.
4

5 **Q. How do you respond to Mr. Booth's recommendation for an "indefinite" extension**
6 **of the TSA?**

7 A. It is not reasonable or effective to have an "indefinite" extension of the TSA, as Mr.
8 Booth recommends in his testimony. PPL is an established public utility and the parties
9 will work diligently during the transition period, including through the transfer on Day 1
10 of the same Narragansett employees who are providing services today and of experienced
11 Service Company employees to PPL, the support of hundreds of Service Company
12 employees providing services through the TSA, and the knowledge transfer efforts. As
13 discussed above, 24 months is an appropriate maximum amount of time in which to
14 achieve that outcome.
15

16 **C. Costs of Transition Services**

17 **Q. Are the anticipated costs for the Service Company to provide services to**
18 **Narragansett during the transition reasonable?**

19 A. Yes. Under the TSA, the anticipated costs for services provided by the Service Company

1 to Narragansett will use the same methodology to charge “fully loaded”²² costs that the
2 Service Company currently uses to charge Narragansett. Accordingly, the methodology
3 for pricing for services under the TSA is reasonable and consistent with market value.

4
5 Moreover, the five percent mark-up on Fully Loaded Costs referenced in the TSA
6 constitutes reasonable, but minimal, compensation to cover National Grid USA’s
7 additional costs to supervise and administer the transition services with a non-affiliated
8 party. The five percent mark-up is not charged on goods or services provided by third
9 parties. It applies only to internal costs, not total expenses.

10
11 **D. Petitioners Have Met the Standard for Approval of the Transaction**

12 **Q. In your opinion, have the Petitioners demonstrated that, if the Transaction is**
13 **approved, the “facilities for furnishing service to the public will not be thereby**
14 **diminished” and that the Transaction is “consistent with the public interest”?**

15 **A. Yes. As referenced in the Petition, our understanding of the standard for approval under**
16 **Rhode Island General Laws Section 39-3-25 is as follows. First, the Division must find**

²² The Share Purchase Agreement defines “Fully Loaded Costs” as “fully loaded direct and indirect costs and expenses of providing the Transition Services (including employee salaries, wages, pensions, benefits and health insurance, office supplies and expenses, property insurance, injuries and damages, miscellaneous general expenses, administrative, supervisory and support costs, rents, maintenance of structures and equipment, capital expenditures, depreciation and amortization, payroll and other taxes, and compensation for the use of capital).” Please see the TSA at Exhibit A to the Share Purchase Agreement, at Article II, Section 2.1 (Exhibit A to the pre-filed direct testimony of Vincent Sorgi, at Article II).

1 that “the facilities for furnishing service to the public will not thereby be diminished,”
2 meaning “there will be no degradation of utility services after the transaction is
3 consummated.”²³ Second, the Division must find that the Transaction is “consistent with
4 the public interest,” meaning the Transaction will result in “no harm to the general public
5 as a whole (including ratepayers).”²⁴

6
7 This joint rebuttal testimony in addition to the testimony in support of the initial Petition,
8 the Petitioners’ responses to the voluminous data requests, and PPL and PPL Rhode
9 Island’s rebuttal testimony, demonstrates that the Petitioners’ comprehensive and robust
10 work on separating Narragansett from National Grid USA, and integrating National Grid
11 USA’s Rhode Island-related employees, assets, and operations into PPL, will result in the
12 continuation of safe and reliable electric and gas distribution service in Rhode Island and
13 leave Rhode Island customers in a comparable position as they are today with National
14 Grid USA. In other words, the Transaction will not result in the degradation of utility
15 services and will not harm the general public as a whole, including Rhode Island
16 customers.

²³ In re: Joint Petition for Purchase and Sale of Assets by The Narragansett Electric Company and the Southern Union Company, Division Docket No. D-06-13 (“Southern Union”), Report and Order No. 18676, at 52 (July 25, 2006) (“Southern Union”).

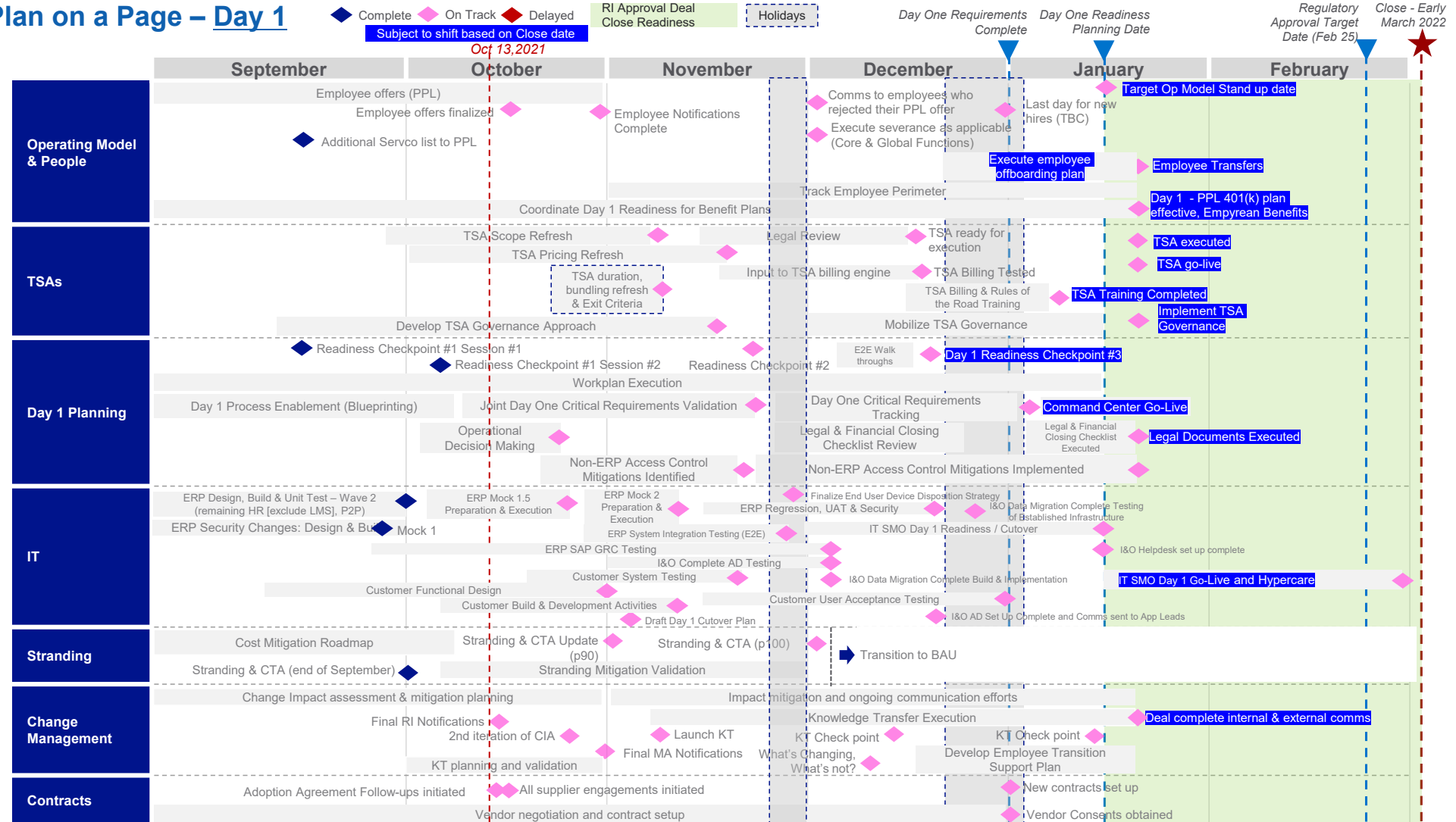
²⁴ Id.

1 **IV. Conclusion**

2 **Q. Does this conclude your testimony?**

3 **A. Yes.**

Plan on a Page – Day 1



TSA ID	TSA Schedule	TSA Grouping	Workstream responsible	Sub-workstream responsible	Duration	Status
001-BS	Customer Billing Operations	Business Services	Customer Service	Billings & Collections	24 months	Active
002-BS	SAP (Non-Utility) Billing Operations	Business Services	Customer Service	Billings & Collections	24 months	Active
003-BS	Payment Processing	Business Services	Customer Service	Billings & Collections	24 months	Active
004-BS	Credit & Collections	Business Services	Customer Service	Billings & Collections	24 months	Active
005-BS	Revenue assurance	Business Services	Customer Service	Billings & Collections	24 months	Active
006-BS	Financial transactions	Business Services	Customer Service	Billings & Collections	24 months	Active
008-BS	High volume residential building	Business Services	Customer Service	Billings & Collections	24 months	Active
009-BS	Complex Billing Account Management	Business Services	Customer Service	Billings & Collections	24 months	Active
010-BS	Protections	Business Services	Customer Service	Billings & Collections	24 months	Active
011-BS	Service Applications Manger (SAM)	Business Services	Customer Service	Billings & Collections	24 months	Active
012-BS	Account Data Maintenance (ADM)	Business Services	Customer Service	Billings & Collections	24 months	Active
013-BS	Advanced Consumption, Long Term Estimates, Leave For Landlord	Business Services	Customer Service	Billings & Collections	24 months	Active
014-BS	Supply Chain Master Data Management (MDM)	Business Services	Procure to Pay	Procure to Pay	24 months	Active
015-BS	Accounts payable	Business Services	Procure to Pay	Procure to Pay	24 months	Active
016-BS	Transactional Procurement	Business Services	Procure to Pay	Procure to Pay	24 months	Active
017-BS	Manage Procure to Pay (P2P)	Business Services	Procure to Pay	Procure to Pay	24 months	Active
018-BS	Procure to Pay (P2P) system	Business Services	Procure to Pay	Procure to Pay	24 months	Active
019-BS	Storm Filing process	Business Services	Procure to Pay	Procure to Pay	24 months	Active
021-BS	Employee Services Support Center & HR Administration	Business Services	HR & Employee Relations	HR Operations	12 months	Active
023-BS	HRIS - Organisation and Postion management	Business Services	HR & Employee Relations	HR Operations	12 months	Active
024-BS	HRIS - Reporting	Business Services	HR & Employee Relations	HR Operations	12 months	Active
025-BS	HRIS - Technology Support Services	Business Services	HR & Employee Relations	HR Operations	12 months	Active
026-BS	Employee Records & Information requests	Business Services	HR & Employee Relations	HR Operations	12 months	Active
027-BS	Benefits administration	Business Services	HR & Employee Relations	HR Operations	5/1/2022	Active
028-BS	401k administration	Business Services	HR & Employee Relations	HR Operations	12 months	Active
029-BS	Pension administration	Business Services	HR & Employee Relations	HR Operations	12 months	Active
030-BS	Retirement administration	Business Services	HR & Employee Relations	HR Operations	12 months	Active
031-BS	Time Governance	Business Services	HR & Employee Relations	HR Operations	12 months	Active
032-BS	Payroll Processing	Business Services	HR & Employee Relations	HR Operations	12 months	Active
033-BS	Period End Payroll Tax Forms Processing	Business Services	HR & Employee Relations	HR Operations	1/31/2023	Active
034-BS	Audit Support for Employee and Retirement Benefit Plans	Business Services	HR & Employee Relations	HR Operations	24 months	Active
035-BS	Balance Sheet Account Reconciliations	Finance	Finance & Accounting	Finance & Accounting	24 months	Active
036-BS	Fleet Management	Business Services	Inventory Mgmt./Warehouse Mgmt./Fleet	Mgmt./Warehouse Mgmt.	12 months	Active
039-CS	Call Center Operations	Customer Service	Customer Service	Customer Delivery	24 months	Active
046-FAC	Mailroom Services	Facilities & Property Services	Facilities & Property Services	Facilities & Property Services	24 months	Active
047-FIN	Accounting and financial reporting	Finance	Finance & Accounting	Finance & Accounting	24 months	Active
051a-FIN	Middle Office support for gas procurement activities	Finance	Treasury	Treasury	24 months	Active
051b-FIN	Middle Office support for electric procurement activities	Finance	Treasury	Treasury	24 months	Active
051c-FIN	Back-Office support for energy procurement activities	Finance	Finance & Accounting	Finance & Accounting	24 months	Active
052-FIN	Claims handling/ investigation	Finance	Finance & Accounting	Finance & Accounting	12 months	Active
053-FIN	Tax consulting services	Finance	Tax	Tax	24 months	Active
054-FIN	Property tax services	Finance	Tax	Tax	24 months	Active
XXX-FIN	Insurance (Insurable Value Reports)	Finance	Treasury	Treasury	24 months	Active
055-HSE	Environment (HS&E) and Security, Regulatory Monitoring, Reporting, and Compliance	HSE (incl. Environment, Compliance, Training & Security)	HSE	HSE	24 months	Active
056-HSE	Field Safety support	HSE (incl. Environment, Compliance, Training & Security)	HSE	HSE	24 months	Active
059-HSE	Site Investigation and Remediation (SIR)	HSE (incl. Environment, Compliance, Training & Security)	HSE	HSE	24 months	Active
060-HSE	Environmental Consulting Services	HSE (incl. Environment, Compliance, Training & Security)	HSE	HSE	12 months	Active
064-HSE	Site security services	HSE (incl. Environment, Compliance, Training & Security)	HSE	HSE	24 months	Active
065-REG	Regulatory support - General	Regulatory support	Regulatory support	Regulatory support	12 months	Active
066-REG	Regulatory support - Reporting and filings - Electric & Gas distribution	Regulatory support	Regulatory support	Regulatory support	12 months	Active
067-REG	Regulatory support - Reporting & filing - Transmission	Regulatory support	Regulatory support	Regulatory support	12 months	Active
068-SC	Strategic Procurement	Supply Chain management	Procurement	Procurement	24 Months	Active
069-SC	Inventory management	Supply Chain management	Inventory Mgmt./Warehouse Mgmt./Fleet	Mgmt./Warehouse Mgmt.	24 Months	Active
070-EO	Transmission Asset Management and Planning	Electricity operations	Electricity Operations (Distribution & Transmission)	Asset & Engineering	12 months	Active
071-EO	Transmission Line and Substation Support Services	Electricity operations	Electricity Operations (Distribution & Transmission)	Asset & Engineering	12 months	Active
072-EO	Transmission and Substation Engineering and Design	Electricity operations	Electricity Operations (Distribution & Transmission)	Construction	6 months	Active
073A-EO	Transmission Line, Distribution Line, Substation, and Protection Standards & Work	Electricity operations	Electricity Operations (Distribution & Transmission)	Asset & Engineering	6 months	Active
073B-EO	Electric Lab & Field testing	Electricity operations	Electricity Operations (Distribution & Transmission)	Others	24 months	Active
074B-EO	Electric Meter Shop	Electricity operations	Electricity Operations (Distribution & Transmission)	Others	24 months	Active
076-EO	Transmission Planned Major Maintenance & Capital Construction	Electricity operations	Electricity Operations (Distribution & Transmission)	Construction	6 months	Active
078-EO	Electric Transmission Network Control	Electricity operations	Electricity Operations (Distribution & Transmission)	Others	24 months	Active
079-EO	Mapping and records	Electricity operations	Electricity Operations (Distribution & Transmission)	Others	24 months	Active
080-EO	Meter Data Services	Electricity operations	Electricity Operations (Distribution & Transmission)	Others	24 months	Active
081-EO	NERC/ NPCC - Reliability Compliance	Electricity operations	Electricity Operations (Distribution & Transmission)	Others	24 months	Active
082A-EO	Emergency Restoration Support	Electricity operations	Electricity Operations (Distribution & Transmission)	Storm Response	6 months	Active
083-EO	Transmission Aerial Inspection & Patrol	Electricity operations	Electricity Operations (Distribution & Transmission)	Asset & Engineering	6 Months	Active
084-EO	Shared Telecom Network (STN)	Electricity operations	Electricity Operations (Distribution & Transmission)	Others	24 months	Active
085A-EO	Distribution Pole Attachments	Electricity operations	Electricity Operations (Distribution & Transmission)	Distribution	12 Months	Active
085B-EO	Outdoor Lighting	Electricity operations	Electricity Operations (Distribution & Transmission)	Distribution	12 Months	Active
086-EO	Land Mobile Radio (LMR) and Microwave Systems	Electricity operations	Electricity Operations (Distribution & Transmission)	Radio and Microwave	24 Months	Active
087-EO	Electric Distribution Control Center	Electricity operations	Electricity Operations (Distribution & Transmission)	Distribution		
089-EO	Right of Way and Survey Engineering	Electricity operations	Electricity Operations (Distribution & Transmission)	Others	12 months	Active
090-EO	Vegetation Management	Electricity operations	Electricity Operations (Distribution & Transmission)	Others	12 months	Active
091-EO	Transformer Spares	Electricity operations	Electricity Operations (Distribution & Transmission)	Others	24 months	Active
087a-GO	Dispatch Training Support	Gas operations	Gas operations	Dispatch	3 months	Active
087b-GO	Consultancy Services for Dispatch Supervision	Gas operations	Gas operations	Dispatch	12 months	Active
087c-GO	Emergency Call Dispatch Support	Gas operations	Gas operations	Dispatch	12 months	Active
091-GO	Gas Control Center Operations	Gas operations	Gas operations	Gas Control	24 months	Active
XXX-CS	Marketing and Growth	Customer Service	Customer Service	Others	6 - 24 Months	Active
101A-EP	Gas load forecasting	Energy Procurement	Energy Procurement	Energy Procurement	24 months	Active
101B-EP	Electric load forecasting	Energy Procurement	Energy Procurement	Energy Procurement	24 months	Active
102-EP	Gas procurement services - General	Energy Procurement	Energy Procurement	Energy Procurement	24 months	Active
103A-EP	Energy transactions (Physical transactions)	Energy Procurement	Energy Procurement	Energy Procurement	24 months	Active
103B-EP	Energy transactions (Financial)	Energy Procurement	Energy Procurement	Energy Procurement	24 months	Active
104-EP	Retail Choice Programs	Energy Procurement	Energy Procurement	Energy Procurement	24 months	Active
105-EP	Clean Energy Supply	Energy Procurement	Energy Procurement	Energy Procurement	24 months	Active
106-EP	Electric procurement	Energy Procurement	Energy Procurement	Energy Procurement	24 months	Active
106-IT	Business application services	IT	IT	IT	24 months	Active
107-IT	Service desk and service management integration services	IT	IT	IT	24 months	Active
108-IT	Collaboration services (email)	IT	IT	IT	24 months	Active
109-IT	Data center services	IT	IT	IT	24 months	Active
110-IT	Client services	IT	IT	IT	24 months	Active
111-IT	Commercial services	IT	IT	IT	24 months	Active
112-IT	IT Infrastructure services	IT	IT	IT	24 months	Active
113-IT	Networking support	IT	IT	IT	24 months	Active
114-IT	IT Energy Management System (EMS) - Supervisory control and data acquisition (SCADA) systems - Outage Management Systems (OMS)	IT	IT	IT	24 months	Active
115-IT	Cyber security services	IT	IT	IT	24 months	Active
116-IT	Emergency response services	IT	IT	IT	24 months	Active
117-IT	TSA Exit support services	IT	IT	IT	24 months	Active
118-HR	Labour and Employee Relations	HR	HR & Employee Relations	Labor Relations	6 months	Active
119-HR	Training (Regulatory, Compliance and Technical)	HR	HR & Employee Relations	Talent Mgmt & Learning	24 months	Active
120-HR	Talent acquisition	HR	HR & Employee Relations	Talent Acquisition	12 months	Active
122-HR	Workforce planning and people analytics	HR	HR & Employee Relations	People Team	12 months	Active
123-HR	Talent and Performance Management	HR	HR & Employee Relations	Talent Mgmt & Learning	3 months	Active
124-FAC	Massachusetts and New York offices	Facilities & Property Services	Facilities & Property Services	Facilities & Property Services	12 months	Active
125-FAC	Massachusetts operations facilities	Facilities & Property Services	Facilities & Property Services	Facilities & Property Services	24 months	Active
126-FAC	Massachusetts warehouse facilities	Facilities & Property Services	Facilities & Property Services	Facilities & Property Services	12 months	Active
127-SC	Warehouse management	Supply Chain Management	Inventory Mgmt./Warehouse Mgmt./Fleet	Mgmt./Warehouse Mgmt.	24 Months	Active
129-FIN	Financial planning and analysis	Finance	Finance & Accounting	Finance & Accounting	12 months	Active
130-HSE	Health services	HSE (incl. Environment, Compliance, Training & Security)	HSE	HSE	24 months	Active
131-HSE	Safety policy & programs	HSE (incl. Environment, Compliance, Training & Security)	HSE	HSE	24 months	Active
132-FAC	Northboro contact center	Facilities & Property Services	Facilities & Property Services	Facilities & Property Services	24 months	Active
133-FAC	Training facilities	Facilities & Property Services	Facilities & Property Services	Facilities & Property Services	24 months	Active
135-FAC	Capital Project support	Facilities & Property Services	Facilities & Property Services	Facilities & Property Services	18 months	Active
136-REG	Regulatory Support – New England Power Company Services on Behalf of NECO – Transmission	Regulatory Support	Regulatory support	Regulatory support	12 months	Active
137-REG	Regulatory Support – Stakeholder Group Participation – Transmission	Regulatory Support	Regulatory support	Regulatory support	6 months	Active
138-BS	Card and Expenses Administration	Business Services	Procure to Pay	Procure to Pay	24 months	Active
143-SOX	Sarbanes Oxley Testing	Finance	Finance & Accounting	Controls	24 Months	Active