

July 8, 2021

**VIA ELECTRONIC MAIL**

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

**RE: Docket 3628 – Service Quality (Electric Operations)**  
**March 1-2, 2021 Storm Event**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a National Grid (National Grid or the Company), enclosed, please find an electronic version<sup>1</sup> of the Company's Petition through which the Company respectfully seeks approval by the Public Utilities Commission ("PUC") to classify March 1, 2021 and March 2, 2021 as Major Event Days for purposes of calculating reliability performance standards under the 2016 Amended Electric Service Quality Plan ("SQP"). Please note that this request is solely for the purpose of performing calculations under the SQP and approval of this Petition by the PUC would not impact any other classifications relevant to the March 1-2, 2021 storm event.

Thank you for your attention to this filing. If you have any questions, please contact me at 401-784-4263.

Sincerely,



Andrew S. Marcaccio

Enclosures

cc: Docket 3628 Service List  
Christy Hetherington, Esq.  
John Bell, Division

---

<sup>1</sup> Per practice during the COVID-19 emergency period, the Company is providing a PDF version of the 2020 Service Quality Report. The Company will provide the Commission Clerk with five (5) hard copies and, if needed, additional hard copies of the Report at a later date.

**STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

---

**The Narragansett Electric Company  
d/b/a National Grid General Petition to Classify  
March 1-2, 2021 as Major Event Days under the  
Electric Service Quality Plan**

---

)  
)  
) **Docket No. 3628**  
)  
)  
)

**PETITION FOR APPROVAL TO CLASSIFY MARCH 1-2, 2021 AS MAJOR EVENT  
DAYS FOR PURPOSES OF CALCULATING RELIABILITY PERFORMANCE  
STANDARDS UNDER THE ELECTRIC SERVICE QUALITY PLAN**

The Narragansett Electric Company d/b/a National Grid (“National Grid” or the “Company”) hereby respectfully submits this general petition (this “Petition”) in accordance with 810-RICR-00-00-1.11(A). The Company seeks approval by the Public Utilities Commission (“PUC”) to classify March 1, 2021 and March 2, 2021 as Major Event Days<sup>1</sup> for purposes of calculating reliability performance standards under the 2016 Amended Electric Service Quality Plan (“SQP”).

In prior filings, the Company noted that a Major Event Day is typically interpreted to mean a calendar day.<sup>2</sup> When applying a 24-hour calendar day duration of midnight to 11:59 PM, March 1, 2021 would not qualify as a Major Event Day under the SQP. However, as explained herein, it is consistent with the spirit and intent of the SQP to classify March 1, 2021 and March 2, 2021 as Major Event Days. This ambiguity prompted the Company to reach out to regulators to gain clarity on the matter. In accordance with past practice,<sup>3</sup> the Company reached

---

<sup>1</sup> A “Major Event Day” is defined in Statement No.5 herein.

<sup>2</sup> See 2008 Annual Service Quality Report, [http://www.ripuc.ri.gov/eventsactions/docket/3628-NGrid-08SQ-AnnualRept\(4-30-09\).pdf](http://www.ripuc.ri.gov/eventsactions/docket/3628-NGrid-08SQ-AnnualRept(4-30-09).pdf), at PDF Page 29; and 2016 Annual Service Quality Report, [http://www.ripuc.ri.gov/eventsactions/docket/3628-NGrid-2016-SQ-Rept\(5-1-17\).pdf](http://www.ripuc.ri.gov/eventsactions/docket/3628-NGrid-2016-SQ-Rept(5-1-17).pdf), at PDF Page 35.

<sup>3</sup> See Exhibit A for explanation of storm events that occurred on September 6-7, 2008 and September 5-6, 2016.

out to the Division of Public Utilities and Carriers (“Division”) to request that March 1, 2021 and March 2, 2021 be classified as Major Event Days for purposes of calculating reliability under the SQP. The Division reviewed the Company’s request and concluded that the treatment of March 1, 2021 and March 2, 2021 as Major Event Days under the SQP is appropriate. The Company respectfully requests that the PUC affirm this classification. The Company notes that this request is solely for the purpose of performing calculations under the SQP and approval of this Petition by the PUC would not impact any other classifications relevant to the March 1-2, 2021 storm event.

In support of this Petition, the Company states the following:

**ELECTRIC SERVICE QUALITY PLAN**

1. The SQP is the electric service quality plan that was in effect on March 1-2, 2021 and continues to be in effect as of the date of this filing.<sup>4</sup> The SQP was initially approved in 2005<sup>5</sup> and was later modified in 2007<sup>6</sup> and 2016.<sup>7</sup>
2. The purpose of the SQP is to ensure that electric distribution customers receive a reasonable level of service. To this end, the SQP establishes penalties and offsets relating to performance standards in four categories comprising of service reliability and customer service. Pertinent to the matter at hand is the category of interruption

---

<sup>4</sup> On June 28, 2016, the PUC issued written Order No. 22456 through which it approved proposed modifications to the 2005 electric service quality plan as amended in 2007. In part, the approved changes provided that the 2005 electric service quality plan as amended in 2007 and further amended in 2016 be referred to as the “2016 Amended Electric Service Quality Plan” and that the performance standards contained within the 2016 Amended Electric Service Quality Plan continue until they are further modified by the PUC.

<sup>5</sup> See PUC Order No. 18294, [http://www.ripuc.ri.gov/eventsactions/docket/3628-NEC-Ord18294\(7-12-05\).pdf](http://www.ripuc.ri.gov/eventsactions/docket/3628-NEC-Ord18294(7-12-05).pdf)

<sup>6</sup> See PUC Order No. 19020, [http://www.ripuc.ri.gov/eventsactions/docket/3628-NGrid-Ord19020\(7-13-07\).pdf](http://www.ripuc.ri.gov/eventsactions/docket/3628-NGrid-Ord19020(7-13-07).pdf)

<sup>7</sup> See PUC Order No. 22456, [http://www.ripuc.ri.gov/eventsactions/docket/3628-NGrid-SQ-Ord22456\\_6-28-16.pdf](http://www.ripuc.ri.gov/eventsactions/docket/3628-NGrid-SQ-Ord22456_6-28-16.pdf)

duration which is measured through the System Average Interruption Duration Index (“SAIDI”).

3. The calendar year results of Company’s performance in comparison to the SQP’s standards are annually reported to the PUC on or around May 1<sup>st</sup> through the filing of an annual electric service quality report (“Annual SQP Report”). For example, on May 1, 2021, the Company filed its 2020 Annual SQP Report. For calendar year 2020, the Company performed within minimum reliability thresholds on behalf of customers.<sup>8</sup>

#### **MAJOR EVENT DAYS**

4. The SQP provides that “[a]ctivities that occur on major event days should be separately analyzed and reported.”<sup>9</sup> For example, in 2020, there were six Major Event Days: February 7, April 13, August 4, September 30, October 7, and November 30 that were separately analyzed and reported.<sup>10</sup>
5. A Major Event Day is “[a] day in which the daily system SAIDI exceeds a threshold value,  $T_{MED}$ .”<sup>11</sup> For 2021, the threshold is 6.65 minutes by 4.68 minutes.
6. In prior filings, the Company noted that a Major Event Day is typically interpreted to mean a calendar day.<sup>12</sup> The SQP recognizes that a storm event could occur across multiple calendar days and provides that “any interruption that spans multiple calendar

---

<sup>8</sup> See 2020 Annual Service Quality Report.

<sup>9</sup> See [http://www.ripuc.ri.gov/eventsactions/docket/3628-NEC-Ord18294\(7-12-05\).pdf](http://www.ripuc.ri.gov/eventsactions/docket/3628-NEC-Ord18294(7-12-05).pdf) at PDF Page 32; and [http://www.ripuc.ri.gov/eventsactions/docket/3628-NGrid-Ord19020\(7-13-07\).pdf](http://www.ripuc.ri.gov/eventsactions/docket/3628-NGrid-Ord19020(7-13-07).pdf) at PDF Page 14.

<sup>10</sup> See 2020 Annual Service Quality Report.

<sup>11</sup> See [http://www.ripuc.ri.gov/eventsactions/docket/3628-NEC-Ord18294\(7-12-05\).pdf](http://www.ripuc.ri.gov/eventsactions/docket/3628-NEC-Ord18294(7-12-05).pdf) at PDF Page 32; and [http://www.ripuc.ri.gov/eventsactions/docket/3628-NGrid-Ord19020\(7-13-07\).pdf](http://www.ripuc.ri.gov/eventsactions/docket/3628-NGrid-Ord19020(7-13-07).pdf) at PDF Page 14.

<sup>12</sup> See 2008 Annual Service Quality Report, [http://www.ripuc.ri.gov/eventsactions/docket/3628-NGrid-08SQ-AnnualRept\(4-30-09\).pdf](http://www.ripuc.ri.gov/eventsactions/docket/3628-NGrid-08SQ-AnnualRept(4-30-09).pdf), at PDF Page 29; and 2016 Annual Service Quality Report, [http://www.ripuc.ri.gov/eventsactions/docket/3628-NGrid-2016-SQ-Rept\(5-1-17\).pdf](http://www.ripuc.ri.gov/eventsactions/docket/3628-NGrid-2016-SQ-Rept(5-1-17).pdf), at PDF Page 35.

days is accrued to the day on which the interruption began.”<sup>13</sup> However, the SQP does not expressly state how to treat interruptions like the ones that occurred during the March 1-2, 2021 storm event.

**MARCH 1-2, 2021 STORM EVENT**

7. A summary of the March 1-2, 2021 storm event is attached hereto as Exhibit A and is incorporated herein.
8. The March 1-2, 2021 storm event spanned over two calendar days but the day on which the weather event began does not, in isolation, qualify as a Major Event Day. Specifically, when looking at March 1, 2021 from midnight to 11:59 PM (i.e. a calendar day), the SAIDI is 3.0253 which does not qualify as a Major Event Day under the SQP. The main reason for March 1, 2021 not qualifying is the late start of the storm which began around 1:00 P.M.
9. When looking at the continuous 24-hour period from when the storm began (March 1, 2021 at 1:00 PM to March 2, 2021 at 12:59 PM), the SAIDI is 11.33 which would qualify as a Major Event Day.
10. The spirit and intent of the SQP is to separately analyze and report major storm events that exceed the applicable daily SAIDI threshold like the March 1-2 storm event. Using a methodology that excludes major storm events allows for a clearer understanding of the Company’s day to day reliability performance.<sup>14</sup>

---

<sup>13</sup> See [http://www.ripuc.ri.gov/eventsactions/docket/3628-NEC-Ord18294\(7-12-05\).pdf](http://www.ripuc.ri.gov/eventsactions/docket/3628-NEC-Ord18294(7-12-05).pdf) at PDF Page 32; and [http://www.ripuc.ri.gov/eventsactions/docket/3628-NGrid-Ord19020\(7-13-07\).pdf](http://www.ripuc.ri.gov/eventsactions/docket/3628-NGrid-Ord19020(7-13-07).pdf) at PDF Page 14.

<sup>14</sup> See [http://www.ripuc.ri.gov/eventsactions/docket/3628-NEC-Ord18294\(7-12-05\).pdf](http://www.ripuc.ri.gov/eventsactions/docket/3628-NEC-Ord18294(7-12-05).pdf) at PDF Page 4.

11. It is consistent with the SQP's intent to exclude the March 1-2, 2021 storm event from the calculation of reliability performance standards under the SQP. As such, the Company is requesting that March 1, 2021 and March 2, 2021 be classified as Major Event Days as the Company applies a continuous 24-hour time period that incorporates both days beginning at the onset of the weather event.

**DIVISION'S POSITION**

12. The Division, along with its engineering consultant, reviewed the Company's request and concluded that the treatment of the March 1-2, 2021 storm as Major Event Days under the SQP is appropriate and consistent with the Division's prior handling of similar events. (The similar events are described in Exhibit A.)

**CONCLUSION**

The Company respectfully requests that the PUC grant the Company's request to classify March 1, 2021 and March 2, 2021 as Major Event Days for purposes of calculating reliability performance standards under the SQP.

Respectfully submitted by,

**THE NARRAGANSETT ELECTRIC  
COMPANY d/b/a NATIONAL GRID**

By its attorney,



---

Andrew S. Marcaccio (RI #8168)  
280 Melrose Street  
Providence, RI 02907  
Telephone: (781) 784-4263  
Email: [andrew.marcaccio@nationalgrid.com](mailto:andrew.marcaccio@nationalgrid.com);

Dated: July 8, 2021

The company experienced a storm starting on March 1<sup>st</sup>, 2021 and concluding March 2<sup>nd</sup>, 2021. The storm started around 1:00pm on the 1<sup>st</sup>. The full restoration plot (Figure A) and the first 24-hour restoration plot (Figure B) are shown below:

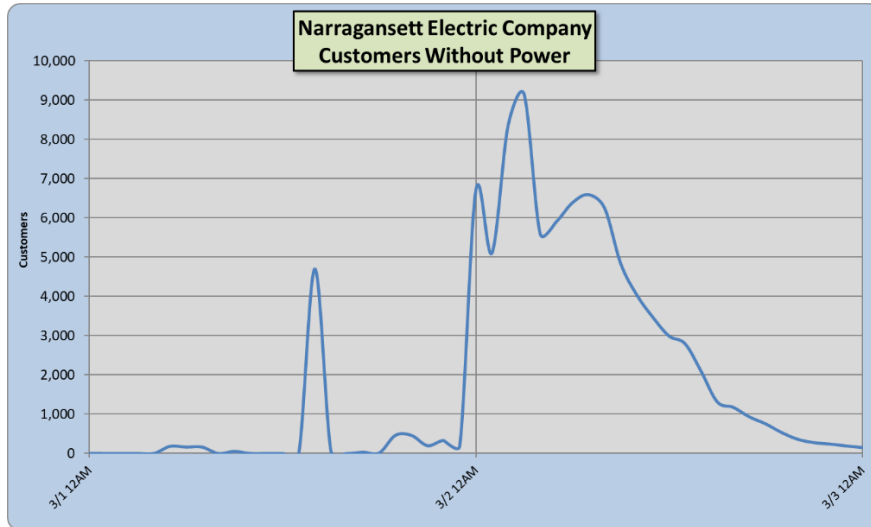


Figure A. full restoration plot

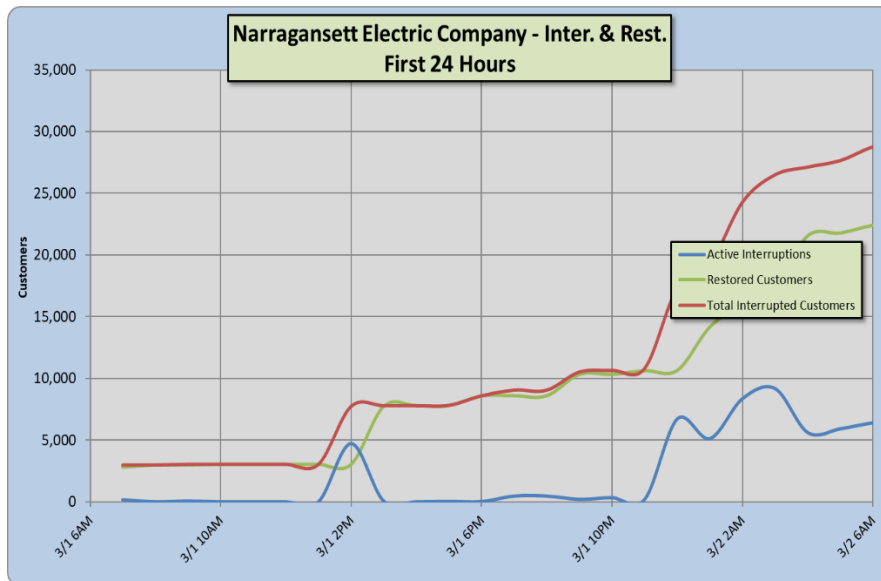


Figure B. 24 first hour restoration

The daily reliability summary from midnight to midnight is in table 1.

Day	Events	Customers Interrupted	Customer Minutes Interrupted	Customers Served	SAIFI	SAIDI*	CAIDI
3/1/2021 midnight to midnight	42	18,136	1,510,836	499,393	0.0363	3.0253	83.31
3/2/2021 midnight to midnight	185	16,459	4,217,391	499,393	0.0330	8.4450	256.24

**Table 1. midnight to midnight reliability summary**

The 24hr continuous daily summary starting at 1:00pm on 03/01/2021 is in table2:

Day	Events	Customers Interrupted	Customer Minutes Interrupted	Customers Served	SAIFI	SAIDI*	CAIDI
03/01/2021 13:00:00 to 03/02/2021 12:59:59	205	30,925	5,660,029	499,393	0.062	11.33	183.02

**Table 2. 24hr continuous reliability summary**

The March 1<sup>st</sup>, 2021 storm resulted in a 24-hour SAIDI value of 11.33 mins. This exceeds 2021 SAIDI threshold (Tmed) of 6.65 minutes by 4.68 minutes. Under the Company’s Service Quality Plan, certain events (Major Events) are excluded from the calculation of reliability performance standards for the purpose of penalty and offset assessment.

The Company experienced a similar storm in 2008 (Tropical Storm Hanna) that occurred over a two-day period (Sept. 6<sup>th</sup> and 7<sup>th</sup>, 2008) and resulted in a 24-hour SAIDI value exceeding the SAIDI threshold (Tmed) value for that year. Additionally, in 2016, the company experienced another similar storm that occurred over a two-day period (Sept. 5<sup>th</sup> and 6<sup>h</sup>, 2016). After consultation with the Division, in its 2008 Annual Service Quality Report filed with the PUC, the Company excluded Tropical Storm Hanna from the calculation of the reliability performance standard for the purpose of penalty and offset assessment as the storm constituted a Major Event. Specifically, the Company stated in this report as follows (see page 24):

**“A Major Event Day is typically interpreted to mean a calendar day, but since Tropical Storm Hanna started so late in the day on September 6th, the events on the following day were also considered when determining the storm’s impact. Since the SAIDI value of 6.00 minutes for September 6-7, 2008 exceeded the threshold value of 5.34 minutes, Tropical Storm Hanna qualified as a Major Event Day under the IEEE methodology.”**

Similarly, in its 2016 Annual Service Quality Report, the Company excluded the 2016 Labor Day Weekend Storm from the calculation of the reliability performance standard for the purpose of penalty and offset assessment as the storm constituted a Major Event. The 2016 Service Quality Report stated:

**“A Major Event Day is typically interpreted to mean a calendar day, but since the Labor Day Weekend storm started mid-day on September 5th, the events on the following day were also considered when determining the storm’s impact. Since the SAIDI value of 5.49 minutes for September 5-6, 2016 exceeded the threshold value of 5.26 minutes, the September 5-6, 2016 Labor Day Weekend storm qualified as a Major Event Day.”**



Specific information regarding the service interruptions for these two storms is provided below in table 3 and table 4.

<b>Tropical Storm Hanna – September 6-7, 2008</b>								
<b>Area Name</b>	<b>Day</b>	<b>Events</b>	<b>Customers Interrupted</b>	<b>Customer Minutes Interrupted</b>	<b>Customers Served</b>	<b>SAIFI</b>	<b>SAIDI</b>	<b>2008 Tmed SAIDI Threshold</b>
Narragansett Electric	9/6/2008 8:30pm - 09/7/2008 noon	134	28,696	2,846,136	474,099	0.06	6.00	5.36

**Table 3. 2008 Tropical Storm Hanna reliability summary**

<b>Labor Day Weekend Storm - September 5-6, 2016</b>								
<b>Area Name</b>	<b>Day</b>	<b>Events</b>	<b>Customers Interrupted</b>	<b>Customer Minutes Interrupted</b>	<b>Customers Served</b>	<b>SAIFI</b>	<b>SAIDI</b>	<b>2016 Tmed SAIDI Threshold</b>
Narragansett Electric	9/5/2016 Noon - 9/6/2016 11:59am	121	19,551	2,678,680	487,894	0.04	5.49	5.26

**Table 4. 2016 Labor Day weekend storm reliability summary**

The company seeks to exclude the 03/01/2021 to 03/02/2021 storm from the calculation of the reliability performance standard for the purpose of penalty and offset assessment as the storm constituted a Major Event.

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



\_\_\_\_\_  
Joanne M. Scanlon

July 8, 2021  
Date

**National Grid – Electric Service Quality Plan – Compliance - Docket 3628  
Service List Updated 8/26/2019**

<b>Name</b>	<b>E-mail Distribution List</b>	<b>Phone</b>
Jennifer Brooks Hutchinson National Grid 280 Melrose Street Providence, RI 02907-1438	<a href="mailto:jennifer.hutchinson@nationalgrid.com">jennifer.hutchinson@nationalgrid.com</a> ;	401-784-7288
	<a href="mailto:Celia.obrien@nationalgrid.com">Celia.obrien@nationalgrid.com</a> ;	
	<a href="mailto:Joanne.scanlon@nationalgrid.com">Joanne.scanlon@nationalgrid.com</a> ;	
Leticia C. Pimentel Robinson & Cole LLP One Financial Plaza, 14 <sup>th</sup> Floor Providence, RI 02903	<a href="mailto:lpimentel@rc.com">lpimentel@rc.com</a> ;	401-709-3337
Leo Wold, Esq. Division of Public Utilities & Carriers 89 Jefferson Boulevard Warwick, RI 02888	<a href="mailto:leo.wold@dpuc.ri.gov">leo.wold@dpuc.ri.gov</a> ;	
	<a href="mailto:Joseph.Shilling@dpuc.ri.gov">Joseph.Shilling@dpuc.ri.gov</a> ;	
	<a href="mailto:MFolcarelli@riag.ri.gov">MFolcarelli@riag.ri.gov</a> ;	
	<a href="mailto:dmacrae@riag.ri.gov">dmacrae@riag.ri.gov</a> ;	
	<a href="mailto:Al.contente@dpuc.ri.gov">Al.contente@dpuc.ri.gov</a> ;	
<b>Original &amp; 9 copies file w/:</b> Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Boulevard Warwick, RI 02888	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a> ;	401-780-2107
	<a href="mailto:Todd.bianco@puc.ri.gov">Todd.bianco@puc.ri.gov</a> ;	
	<a href="mailto:Cynthia.WilsonFrias@puc.ri.gov">Cynthia.WilsonFrias@puc.ri.gov</a> ;	
	<a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov</a> ;	