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Sent: Thursday, May 05, 2016 5:03 PM
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Subject: NGrid contact voltage annual report Docket 4237
Attachments: Booth Docket 4237 Compliance Report Letter 5-5-2016.pdf

Luly,

Gregory Booth, P.E. of Powerservices, Inc has reviewed the National Grid 2016 contact voltage annual report submitted to the PUC on April 6 in Docket 4237. He submitted a letter to the Division based on his review of the report, which I am submitting to the Commission as the Division's response to the National Grid filing.

Stephen Scialabba
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May 4, 2016

Mr. Steve Scialabba
Rhode Island Division of Public Utilities and Carriers
89 Jefferson Boulevard
Warwick, Rhode Island 02888

Subject: April 6, 2016 National Grid Contact Voltage Annual Report

Dear Steve:

I have reviewed National Grid's *2016 Contact Voltage Annual Report* dated April 6, 2016. This letter outlines my review and comments and recommendation. In September 2012 I prepared and filed testimony concerning Docket 4237, on December 19, 2013 I filed a memorandum with the Division in which I commented and provided recommendations concerning the National Grid *Stray and Contact Voltage Compliance Report* dated August 29, 2013, on September 25, 2014 I provided a letter containing my recommendations and review comments in response to National Grid's Annual *Contact Voltage Compliance Report* dated June 26, 2014, and on August 3, 2015 I provided a similar letter with recommendations related to the National Grid *2016 Contact Voltage Annual Report* dated June 30, 2015 and updated July 14, 2015.

I found that National Grid's April 6, 2016 *2016 Contact Voltage Annual Report* meets the requirements set forth in §39-2-25(b)(6)¹, while also incorporating recommendations of the Division. The Company has explained in detail the contact voltage survey process and the findings and actions taken. It compared the FY2016 results to the FY2015 mobile surveys. It is important to note that there has been a significant increase in actionable events (assets that registered greater than 1 volt which are permanently repaired) from FY2015 to FY2016, and FY2015 had increased from FY2014. Table 3 indicates an increase in all three mobile event categories from FY2015 to FY2016. An increase year over year was reported in FY2015 as well. In addition, the Company utilized THD readings, for contact voltages between 1 and 4.5 volts to evaluate the usability of these readings in determining actionable contact voltage events. The increasing trend of recordable events has not been explained by the Company in its report.

The Company has changed mobile survey vendors during its cycle testing process. Premier was the vendor for FY2013 through FY2015, and Willbros is the vendor for FY2016 through the contract period of FY2019. Willbros was a subsidiary of Premier Utility Services, LLC. There have been patent infringement issues and technology changes that have also transpired over the past four years.

¹ 4. §39-2-25(b)(6)- Annually report on contact voltage findings, including, but not limited to, the number and type of energized objects on both company-owned and customer-owned assets, voltage level, corrective action taken, shocks that occur to members of the public or to pets owned by members of the public, and any other information that the commission deems appropriate.

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National Grid has once again proposed to complete a 100% survey of the DCVRA areas, which would be the fifth consecutive year. It also recommends continued use of THD testing during the FY2017 mobile survey.

I am providing the following recommendations based on my review of the FY2016 Annual Contact Voltage Report and the previous three reports.

1. Require the Company provide a detailed explanation of the reasons for the trend of identifying more events each testing cycle.
2. Require the Company include in its annual report the comparison of each test category for all the test years, not just the one previous year.
3. Upon review of the Company's response to 1. above, the Division will be in a position to make a decision as to whether it supports the Company's recommendations contained on page 35 of its report.

If you have any questions or would like additional clarification, please contact me.

Sincerely,



Gregory L. Booth, PE
President

glb/sk