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October 6, 2017

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

Subject: Docket 4237 July 28, 2017 National Grid Contact Voltage Annual Report

Dear Steve:

I have reviewed National Grid's *2017 Contact Voltage Annual Report* dated July 28, 2017. 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. I have also provided letters containing comments and recommendations concerning each of the Annual reports on: September 25, 2014, August 3, 2015 and May 4, 2016. My testimony and recommendations associated with the National Grid FY 2018 ISR Plan filing included an adjustment to the Contact Voltage Program due to the trend in changing ownership of street lights to the municipalities. The Division recommended moving from completing a 100% area survey to a 20% survey of the DCVRA.

I found that National Grid's July 28, 2017 *Contact Voltage Annual Report* meets the requirements set forth in §39-2-25(b)(6)¹, while also incorporating all previous recommendations of the Division and multiple PUC Orders incorporating program additions and enhancements.

The Company has explained in detail the contact voltage survey process and the findings and actions taken. It compared the FY2017 results to the FY2016 mobile surveys. Table 3 indicates a significant decrease in mobile events (now 32 versus 59 in 2016) and all 2017 events were associated with Street Lights. The events over 1 volt have declined from 26 to only 8. This shows the program is finally maturing and the remediation benefits are becoming evident. 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 Company has also incorporated a Shock Line on which it received two calls, found elevated voltage, and mitigated the elevated voltage.

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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The Company changed mobile survey vendors during its cycle testing process for FY 2016 to TRC (formerly Willbros Engineering, LLC). The Company proposes to continue the use of this vendor for the next fiscal year testing.

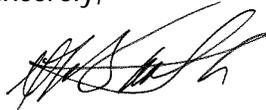
The repair of identified events on street lights is now transitioning to municipal contractors for the street lights owned by the municipals. The transitioning process will include the municipal contractor shadowing the Company's testing vendor.

National Grid proposes to complete a survey of 20% of the DCVRA areas since it has now completed a 100% survey for five consecutive years. It also proposes continued use of THD testing. These proposals coincide with the Division's recommendations.

I support the Company's recommendations contained on pages 31 and 32 of its report. These are consistent with the Division's recommendations for the FY 2018 ISR Plan analysis process.

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

Sincerely,



Gregory L. Booth, PE
President

glb/sk