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August 3, 2015

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

Subject: National Grid June 30, 2015 Stray and Contact Voltage Compliance
Report Recommendations and Review Comments

Dear Steve:

I have reviewed National Grid's *2015 Contact Voltage Compliance Report* dated June 30, 2015 and its update of July 14, 2015. 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 *Contact Voltage Compliance Report* dated August 29, 2013, and 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.

I found that National Grid's June 30, 2015 *Contact Voltage Compliance 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, and incorporated tables with the data accumulated in the August 2013 report into the June 30, 2015 report results from its last survey. It is important to note that there has been an increase in actionable events from FY2014 to FY2015. The FY2014 mobile survey had sixteen (16) mobile events having 1 volt or greater. The FY2015 mobile survey had nineteen (19) mobile events having 1 volt or greater, given in Table 3, page 14. It is notable that the Table 3 indicated an increase in the number of identified readings between 1 and 4.5 volts between the 2014 and 2015 survey, and there are 7 instances of readings over 4.5 volts in the 2015 survey. The level of readings over 4.5 volts has remained unchanged over the past three years of mobile surveys. 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 should review its statement on Page 11, "Twenty one (21) mobile events were recorded during the mobile scanning survey having 1 volt or greater.", as Table 3 would reflect only 19 events over 1 volt. I recommend that the Company continue pilot testing of THD analysis for readings between 1 and 4.5 volts.

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.

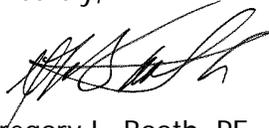
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The Company also included in its 2015 Contact Voltage Compliance Report details outlining its compliance with the Division's two additional process recommendations, detailed by the Company in Items 26 and 27 on page 8. I found that the Company, through the process and findings provided in Section 2 subpart 2(2) *Manual Surveying and Testing Results*, met the requirements of the additional testing recommended by the Division. Although no actionable events were found, I recommend the Company continue to implement the post remediation work surveys and sample random object testing for FY2016 mobile surveys. This is important considering the new technology being implemented.

National Grid again proposes as Option 1 to complete a 100% survey of the DCVRA areas, which would be the fourth consecutive year. Additionally, the Company is proposing a modification to the months in which testing will be performed, citing, among other issues, the impact of winter weather which can impact efficiency. I recommend the Division support the proposals in Section 7 of the Company's report and continue with a 100% survey for FY2016. This is supported by two factors: 1) the need to further documentation of the effectiveness of the new technology being used and 2) the continued identification of significant contact voltage locations exceeding the threshold level.

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

Sincerely,



Gregory L. Booth, PE
President

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