

September 21, 2012

VIA HAND DELIVERY & ELECTRONIC MAIL

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

RE: Docket 4237 - Commission Investigation relating to Stray and Contact Voltage Occurring in Narragansett Electric Company Territories
National Grid Reply Comments to Division

Dear Ms. Massaro:

On behalf National Grid¹ enclosed are an original and ten (10) copies of the testimony of Jennifer L. Grimsley, Edward S. Paluch, and Bartholomew J. Cass in response to the pre-filed direct testimony of Gregory L. Booth and Michael W. White, filed on behalf of the Rhode Island Division of Public Utilities and Carriers on September 18, 2012, concerning the above-captioned proceeding.

Please be advised that the Company is seeking protective treatment for Request for Proposal (“RFP”) responses provided as an attachment to the Company’s testimony, as permitted by Commission Rule 1.2(g) and by R.I.G.L. § 38-2-2(5)(i)(B). The Company is submitting herewith a Motion for Protective Treatment along with one (1) copy of the RFP responses to the Commission pending a determination on the Company’s Motion.

Thank you for your attention to this transmittal. If you have any questions, please feel free to contact me at (401) 784-7667.

Very truly yours,



Thomas R. Teehan

Enclosure

cc: Docket 4237 Service List
Steve Scialabba
Leo Wold, Esq.

¹ The Narragansett Electric Company d/b/a National Grid (“National Grid” or the “Company”).

Certificate of Service

I hereby certify that a copy of the cover letter and/or any materials accompanying this certificate were electronically transmitted to the individuals listed below. Copies of this filing were hand delivered to the RI Public Utilities Commission.



September 21, 2012

**Docket No. 4237 – Commission’s Proceeding Relating to Stray and Contact Voltage Pursuant to Enacted Legislation
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STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

RHODE ISLAND PUBLIC UTILITIES COMMISSION

**COMMISSION INVESTIGATION RELATING TO STRAY AND CONTACT VOLTAGE
OCCURRING IN NARRAGANSETT ELECTRIC COMPANY TERRITORIES**

Docket No. 4237

**NATIONAL GRID'S REQUEST
FOR PROTECTIVE TREATMENT OF CONFIDENTIAL INFORMATION**

National Grid¹ hereby requests that the Rhode Island Public Utilities Commission (“Commission”) provide confidential treatment and grant protection from public disclosure of certain confidential, competitively sensitive, and proprietary information submitted in this proceeding, as permitted by Commission Rule 1.2(g) and R.I.G.L. § 38-2-2(4)(i)(B). National Grid also hereby requests that, pending entry of that finding, the Commission preliminarily grant National Grid’s request for confidential treatment pursuant to Rule 1.2 (g)(2).

I. BACKGROUND

On September 21, 2012, National Grid filed with the Commission its testimony responding to testimony submitted by the Division of Public Utilities and Carriers in this docket. This filing included information relative to Request for Proposals (“RFP”) responses that the Company had received regarding mobile testing services for which National Grid is requesting confidential treatment.

II. LEGAL STANDARD

The Commission's Rule 1.2(g) provides that access to public records shall be granted in accordance with the Access to Public Records Act ("APRA"), R.I.G.L. §38-2-1, *et seq.* Under APRA, all documents and materials submitted in connection with the transaction of official business by an agency is deemed to be a "public record," unless the information contained in such documents and materials falls within one of the exceptions specifically identified in R.I.G.L. §38-2-2(4). Therefore, to the extent that information provided to the Commission falls within one of the designated exceptions to the public records law, the Commission has the authority under the terms of APRA to deem such information to be confidential and to protect that information from public disclosure.

In that regard, R.I.G.L. §38-2-2(4)(i)(B) provides that the following types of records shall not be deemed public:

Trade secrets and commercial or financial information obtained from a person, firm, or corporation which is of a privileged or confidential nature.

The Rhode Island Supreme Court has held that this confidential information exemption applies where disclosure of information would be likely either (1) to impair the Government's ability to obtain necessary information in the future; or (2) to cause substantial harm to the competitive position of the person from whom the information was obtained. Providence Journal Company v. Convention Center Authority, 774 A.2d 40 (R.I.2001).

The first prong of the test is satisfied when information is voluntarily provided to

¹ The Narragansett Electric Company d/b/a National Grid ("National Grid or "the Company").

the governmental agency and that information is of a kind that would customarily not be released to the public by the person from whom it was obtained. Providence Journal, 774 A.2d at 47.

In addition, the Court has held that the agencies making determinations as to the disclosure of information under APRA may apply the balancing test established in Providence Journal v. Kane, 577 A.2d 661 (R.I.1990). Under that balancing test, the Commission may protect information from public disclosure if the benefit of such protection outweighs the public interest inherent in disclosure of information pending before regulatory agencies.

II. BASIS FOR CONFIDENTIALITY

The Company seeks protective treatment for the RFP responses that it is submitting as those responses contain pricing and other information that is proprietary and confidential to the parties that have submitted those responses as well as to the Company. This is not the type of information that the Company would ordinarily share with others and if it were made public would cause substantial harm to the competitive position of the person from whom the information was obtained. Moreover, it would interfere with the Company's ability to obtain competitive pricing for services in the future.

III. CONCLUSION

The Company respectfully requests that the Commission grant its Motion for Protective Treatment as stated herein.

Respectfully submitted,

NATIONAL GRID

By its attorney,



Thomas R. Teehan, Esq. (RI Bar #4698)
National Grid
280 Melrose Street
Providence, RI 02907
(401) 784-7667

Dated: September 21, 2012

**THE NARRAGANSETT ELECTRIC COMPANY
d/b/a NATIONAL GRID
R.I.P.U.C. DOCKET NO. 4237
IN RE: INVESTIGATION RELATING TO
STRAY AND CONTACT VOLTAGE
REPLY TESTIMONY TO THE DIVISION**

**TESTIMONY
OF
JENNIFER L. GRIMSLEY, EDWARD S. PALUCH PE, PMP
AND
BARTHOLOMEW J. CASS
IN RESPONSE TO
THE PREFILED DIRECT TESTIMONY OF
GREGORY L. BOOTH AND MICHEAL W. WHITE**

September 21, 2012

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1 **I. INTRODUCTION**

2 **Q. Please state your names and business address.**

3 **Jennifer L. Grimsley**

4 A. My name is Jennifer L. Grimsley. My business address is 40 Sylvan Road, Waltham,
5 MA 02451.

6 **Edward S. Paluch**

7 A. My name is Edward S. Paluch. My business address is 40 Sylvan Road, Waltham, MA
8 02451

9 **Bartholomew J. Cass**

10 A. My name is Bartholomew J. Cass. My business address is 7496 Round Pond Road, North
11 Syracuse, NY 13212

12 **Q. Have you previously submitted testimony in this proceeding?**

13 A. Yes. On September 20, 2012, we submitted joint testimony addressing the issues and
14 recommendations made in the September 7, 2012 testimony of Mr. W. Alan Homyk
15 made on behalf of Capital Advocacy, LLC d/b/a/ Contact Voltage Information Center.

16 **II. PURPOSE OF TESTIMONY**

17 **Q. What is the purpose of your testimony?**

18 A. The purpose of this testimony is to address the issues and recommendations made in the
19 September 18, 2012, direct testimony of Mr. Gregory L. Booth and Micheal W. White on

1 behalf of the Division of Public Utilities and Carriers (“Division”). In their testimony,
2 Messrs. Booth and White recommend the following:

3 1. A two-step mobile technology evaluation approach that (a) accepts National Grid’s
4 (“Company”) Request for Proposal (“RFP”) and pilot approach and (b) performs a
5 technological assessment that includes using the results of the Company’s RFP pilot
6 program and other evaluation information.¹

7 2. Establishing the Contact Voltage Program threshold level at 4.5 volts.²

8 3. Revise the existing Electric Operating Procedures (“EOP”) for elevated voltage
9 testing and the proposed Electric Contact Voltage Program to include the following
10 Rhode Island state regulatory requirements and recommendations:³

11 a. Include the cycle survey schedule for each facilities type or program;

12 b. Provide a detailed listing of all company or non-company items that will be
13 addressed by each survey program. These changes will reflect similar
14 procedures that are already listed for New York and Massachusetts and should
15 include the following:

16 i. For Overhead Distribution Facilities include metallic risers, uncovered
17 or insulated down grounds, down guys, and any other accessible

¹ Booth/White at pages 38-39.

² Booth/White at page 40.

³ Booth/White at pages 42-43.

1 conductive piece of equipment on a pole within reach from the ground
2 in testing and documentation.

3 ii. For Underground Distribution Facilities include metallic covers
4 (manhole, handhole, vault covers, junction box, splice box equipment
5 covers), Equipment (padmount transformers, switchgear, primary
6 junction cabinets, trans closures) Street Lights, and Publicly Accessible
7 Objects (sidewalks, roadways, storm drains, metallic gratings, metal
8 pedestals, traffic poles, fire hydrants, community fences in testing and
9 documentation;

10 c. Add a new section that describes Designated Contact Voltage Risk Areas and
11 any exceptions that the Company proposes.

12 d. Clarify where any Company-owned overhead, underground or street light
13 facilities will be excluded from regular cycle testing.

14 4. Implement a Quality Assessment/Quality Control program to monitor the accuracy of
15 testing results and field personnel measurements and practices.⁴

16 5. Revise the overhead testing schedule to a five-year cycle and test all street lights on a
17 three-year cycle.⁵

18 6. Contact Voltage Areas should be expanded to include underground residential
19 distribution systems (“URD”).⁶

⁴ Booth/White at page 43.

⁵ Id.

1 7. The Company should not define designated contact voltage areas based upon the
2 limitations of technology, but only by land use and underground facilities.⁷

3 Finally, this testimony will provide a brief update on the status of the Company's Request
4 for Proposal ("RFP"), including the pilot program, which has been a central issue of
5 public comment to date, and provide a recommendation as to how the Company plans to
6 proceed to address the full recovery of the Contact Voltage Program costs within the
7 existing Infrastructure, Safety and Reliability ("ISR") program.

8 **Q. Please comment on Messrs. Booth and White's recommendations.**

9 A. Overall, the Company agrees with the comments and recommendations of Messrs. Booth
10 and White. Specifically, the Company agrees with the recommendations to have the
11 Commission approve the RFP process with a pilot program, and that the initial voltage
12 threshold level remains at 4.5 volts. The Company plans to revise and update its existing
13 EOPs on approval of the final Contact Voltage Program by the Commission and intends
14 to add the specific details to the operations procedures as recommend by Messrs. Booth
15 and White. In addition, the Company is willing to revise its overhead testing schedule to
16 a five-year cycle and agrees that testing all street lights on a three-year cycle is
17 appropriate.

18 However, the Company also believes that additional clarification is necessary for a
19 limited number of comments. Below, the Company will provide additional information

⁶ Booth/White at page 34.

1 with respect to Messrs Booth and White's recommendation for a formal Quality
2 Assessment/Quality Control program; their interpretation of the requirement that the
3 Company conduct an initial survey of forty percent of Contact Voltage Risk Areas under
4 the statute; the addition of adding the testing of URD's to the Contact Voltage Program,
5 as recommended by Mr. Homyk in his testimony in this case; and Messrs. Booth and
6 White's recommendation to eliminate the buffer zones in designated contact voltage
7 areas and conduct manual testing of all facilities.

8 **Q. Please address Messrs Booth and White's recommendation to implement a Quality**
9 **Assessment/Quality Control program to monitor the accuracy of testing results and**
10 **field personnel measurements and practices.**

11 A. The Company agrees with Messrs. Booth and White that it is important to ensure the
12 accuracy of testing results and field personnel measures and practices. To that end, the
13 Company currently has a quality assurance (QA) program for its manual elevated voltage
14 testing that started in February 2012. The QA program is a critical part of maintaining
15 the integrity of the Company's elevated voltage testing program. The Company has set a
16 testing accuracy goal of 95% for distribution, underground, transmission, sub-
17 transmission and a threshold of 98% for streetlights. QA is performed by an internal
18 department independent from the inspections department. The QA audits encompass a
19 random sample of elevated voltage tested assets. Any QA failures must have a root cause

⁷ Booth/White at page 32.

1 analysis performed to illustrate trends and determine possibilities of failed equipment,
2 human error and/or training issues. The inspection department reviews all findings to
3 determine if any follow up action is required.

4 In addition, the Company plans to undertake periodic assessments of all aspects of its
5 final Contact Voltage Program, including quality assessment and quality control. The
6 Company recognizes that it is good business practice to review all its programs
7 periodically, and to incorporate any necessary changes and process improvements to
8 those programs. For example, as the Company repairs hazardous faults found in its
9 surveys, it will be necessary to assess whether certain areas surveyed need to continue to
10 be designated as Contact Voltage Risk Areas and whether other areas of the state may
11 need to be designated a Contact Voltage Risk Area. Messrs. Booth and White's
12 recommendation is more general in nature, and thus, the Company is not able to
13 determine if its current QA/QC program addresses their concerns or whether there is a
14 need for any additional components to a quality assessment and quality control program
15 at this time. The Company is willing to meet and discuss its current QA/QC program
16 with the Division and determine if additional components or changes to a quality
17 assessment/quality control program as compared to what Company is currently doing are
18 warranted.

1 **Q. Please address the recommendation to add underground residential distribution**
2 **facilities (“URDs”) to the Contact Voltage Program?**

3 A. Messrs. Booth and White agree with Mr. Homyk’s suggestion to expand the Designated
4 Contact Voltage Areas to include direct buried cable to residences.⁸ However, as pointed
5 out in the Company’s September 20, 2012 testimony in this proceeding, Mr. Homyk’s
6 recommendation significantly expands the scope of testing beyond the statute. The statute
7 requires the Company to designate, and the Commission to approve, contact voltage risk
8 areas, “based on the presence of underground electric distribution and situated in
9 pedestrian-dense areas such as urban neighborhoods, commercial areas, central business
10 districts, tourist heavy locations and other places where pedestrians could be exposed to
11 contact voltage.” The Company does not believe that URDs are pedestrian-dense areas
12 intended to be included in contact voltage risk areas for mobile testing under the statute.
13 However, it should be noted that the Company does perform manual elevated voltage
14 testing on Company-owned assets within URDs. This testing has been performed since
15 2006, when the Company started manual testing for elevated voltage. Expanding the
16 contact voltage risk areas to include URDs would significantly impact the scope of the
17 program, as URD mileage in Rhode Island is approximately 740 miles of roads, whereas
18 the Company’s proposed contact voltage risk areas cover approximately 135 miles of
19 roads. The Company believes that its current manual testing program for elevated
20 voltage on Company-owned assets is the appropriate testing program for URDs.

⁸ Booth/White at page 34.

1 **Q. Please comment on the recommendation that the Company should not define its**
2 **designated contact voltage areas based upon the technology, but only by land use**
3 **and underground facilities.**

4 A. Messrs. Booth and White maintain that the Company’s Designated Contact Voltage Risk
5 areas should be developed based on land use and the placement of underground facilities,
6 and that manual testing should be used in areas where mobile technology may not work
7 or cause interference, such as sidewalks, manholes and conductive surfaces.⁹ However,
8 at the same time, they acknowledge that to meet the statutory requirements under the
9 Contact Voltage law to test these types of facilities that “[t]hese facilities will also be
10 more time consuming for field personnel performing manual scans and in the case of
11 sidewalks and roadways, large scale manual scanning is impractical.”¹⁰

12 Messrs. Booth and White furthermore state that “[a]lthough not specifically stated by the
13 Company’s proposed plan, these manual tests for areas where mobile testing is currently
14 affected by overhead lines, will need to include any publicly accessible objects such as
15 sidewalks, manholes, and conductive surfaces in addition to Company-owned
16 facilities.”¹¹ In its development of its Designated Contact Voltage Risk Areas, the
17 Company recognized that only the use of mobile technology would allow the Company
18 to survey and test all conductive surfaces in areas required by the statute. However, at
19 the same time, the Company also acknowledged that mobile technology would not

⁹ Messrs. Booth and White at page 32.

¹⁰ Messrs. Booth and White at pages 27-28.

¹¹ Messrs. Booth and White at page 32.

1 provide accurate information in a Designated Contact Voltage Risk Area where overhead
2 facilities were found, due to the interference that would occur from these overhead
3 facilities. It is precisely for this reason that the Company included a “buffer” zone in its
4 Designated Contact Voltage Risk Areas.

5 Messrs. Booth and White do acknowledge, that “[m]ost state regulated contact voltage
6 programs are in their infancy (less than ten years old) and have not been through
7 sufficient cycles of testing, reporting and remediation to adequately develop a definitive
8 consensus and nationally accepted model program.”¹² The Company has modeled its
9 proposed contact voltage program on its combined practices in New York and
10 Massachusetts, and while mobile testing cannot be performed in overhead areas to survey
11 for contact voltage on all conductive surfaces in public rights-of-way, the Company
12 proposes to continue manual testing of Company-owned assets, in both overhead and
13 underground areas, in areas not designated contact voltage risk areas on a five-year cycle.
14 Furthermore, the Company agrees to changing the cycle for street light inspections to
15 three years, as street lights have the highest rate of elevated voltage findings on the
16 Company’s system. Messrs. Booth and White’s suggestion that Designated Contact
17 Voltage risk areas should not be limited by technology is simply not practical at this time.
18 If in the future mobile or other technology advances to eliminate this overhead
19 interference issue, the Company would be willing to reconsider eliminating the buffer
20 zones and reassessing its Designated Contact Voltage Risk Areas.

1 **Q. Please address the recommendation for the Company to establish the measurement**
2 **methodology that it will use to confirm compliance with the 2013 forty percent**
3 **initial survey requirement?**

4 A. In their testimony, Messrs. Booth and White state that “The Company will need to
5 establish a methodology for determining how the 40 percent is calculated, since such
6 areas include items that are not currently tracked by the Company such as storm drains or
7 sidewalks.”¹³ However, the specific requirement for determining the 40 percent
8 requirement is stated in the statute. Specifically, R.I. G.L. §39-2-25 (b)(2) states that by
9 June 30, 2013, the Company will have conducted “an initial survey of no less than forty
10 percent (40%) of *designated contact voltage areas*, for contact voltage hazards on all
11 conductive surfaces in public rights-of-way using equipment and technology determined
12 by the commission;”.(Emphasis added) Thus, the forty percent requirement relates to the
13 percentage of contact voltage areas determined by the Commission, and is not related to a
14 percentage of items such as storm drains or sidewalks that are to be tested. For example,
15 if the Commission were to approve the 13 contact voltage areas proposed by the
16 Company, the forty percent compliance would be met by completing the mobile surveys
17 in six of those areas.

18 As discussed previously, the Company does not see manual testing on all conductive
19 surfaces in a designated contact area, such as sidewalks, roadways, fences, storm drains
20 or other metallic gratings as a practical method to maintain compliance with the statute.

¹² Messrs. Booth and White at page 5.

1 The Company does not maintain an inventory of the multitude of such conductive
2 surfaces within its service territory, many of which are not owned by the Company.
3 Thus, it would be impossible to determine whether the Company had in fact tested 40%
4 of a number of conductive surfaces which is unknown, and which would be burdensome,
5 if not impossible to accurately determine. In addition, while mobile testing allows the
6 Company to determine that a designated testing route has been completed in total, the
7 results of mobile testing only identify those surfaces that fail testing, not all surfaces
8 which have been tested. Therefore, the results of such mobile testing would not provide
9 sufficient information to determine if the Company had met the statutory requirement to
10 test 40% of the Designated Contact Voltage Risk Areas. For these reasons, the Company
11 believes its method for determining the Designated Contact Voltage Risk Areas is
12 consistent with the statute, and is in fact, the most practical method to determine
13 compliance with the statutory requirement.

14 **III. UPDATE ON REQUEST FOR PROPOSAL**

15 **Q. Please provide a brief update on the Company's Request for Proposal, including the**
16 **pilot program.**

17 A. The Company is taking this opportunity to update the Commission on where it stands
18 with respect to the proposed RFP pilot program. As of September 14, 2012, the
19 Company has received two bid responses on pricing for surveying the Company's

1 designated contact voltage risk areas. Those responses and bid prices are being made
2 available to the Commission in a confidential attachment to this filing. While the
3 Company was not able to begin the pilot in September, as originally planned due to the
4 refusal of one of the two potential vendors to participate in the proposed pilot program,
5 the Company is now prepared to move forward with the RFP process and pilot testing,
6 assuming the Commission approves the RFP in its current form. The Company notes that
7 in their testimony Messrs. Booth and White concur with the Company's process of using
8 a pilot project to assess the most accurate and cost effective mobile scanning technology.
9 More specifically, they recommend that to the extent a vendor refuses to participate in
10 such a pilot project assessment, the Company should consider that vendor a non-
11 responsive bidder and proceed without consideration of that vendor's system and
12 process.¹⁴ The Company concurs with the Division's recommendation.

13 While the Company was not able to conduct the pilot program as planned, at this time,
14 the Company stands ready to conduct the pilot program if approved by the Commission.
15 The RFP pilot would be conducted by Company personnel who are familiar with both
16 vendor technologies from their services in New York and personnel who are familiar
17 with the Rhode Island electric underground and overhead distribution system. Testing
18 would be done on the same day and within hours of each vendor's equipment testing so
19 as to minimize the impact of the weather or other outside factors on each vendors test
20 results.

¹⁴ Booth/White at page 39.

1 **Q. Please describe how the Company would recommend how to reconcile and recover**
2 **contact voltage costs.**

3 A. In its proposed Contact Voltage Program, the Company proposed to reconcile and
4 recover the costs of the program as part of its annual Electric ISR reconciliation filing.
5 The Company also stated it would address the recovery of program costs and how it
6 proposes to reconcile these statutory timing requirements as part of its FY14 ISR plan
7 filing.¹⁵

8 At this time, costs for proposed Contact Voltage Program are still under review and
9 would be subject to any changes that may be made in this proceeding. In addition, any
10 recovery mechanism proposed in the Electric ISR must by statute first be negotiated with
11 the Division before being filed with the Commission. Moreover, to the extent any
12 contact voltage costs are included in the current rate case proceeding in Docket No. 4323,
13 the Company would provide a credit to customers in the Electric ISR reconciliation equal
14 to the amount of contact voltage costs reflected in the cost of service in that proceeding.

15 With all of these issues still under review, the Company would request that the
16 Commission approve the Electric ISR mechanism as the annual recovery mechanism for
17 contact voltage costs, and permit the Company and Division to attempt to negotiate the
18 specific terms of that mechanism as part of the FY2014 ISR process.

19

¹⁵ Rhode Island Contact Voltage Program at page 25.

1 **Q. Does this conclude this testimony?**

2 **A. Yes, it does.**