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September 21, 2012

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PUBLIC UTILITIES COMMISSION

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

Re: Docket No. 4237  
Commission Investigation Relating to Stray and  
Contact Voltage Occurring in Narragansett Electric, n/k/a  
National Grid Territories

Dear Ms. Massaro,

Enclosed herewith you will find Power Survey's Additional Public Comment in the  
above matter.

Very truly yours,

Joseph J. McGair, Esq.

JJM:dd  
Enc.  
HAND-DELIVERED

**Docket No. 4237 – Commission’s Proceeding Relating to Stray and  
Contact Voltage Pursuant to Enacted Legislation  
Service List updated 9/20/12**

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September 20, 2012

Chairman Elia Germani Esq.  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

**Re: Docket 4237-Additional Public Comment  
Commission Investigation Relating to Stray and Contact Voltage Occurring in Narragansett  
Electric Company Territories**

Dear Chairman Germani,

Power Survey Company would like to clarify our concerns regarding the proposed “pilot survey” and to make clear our willingness to participate in an evaluation provided proper design standards are followed and proper controls have been established.

Power Survey does not object to the concept of a technology benchmarking or a “pilot survey.” As proposed, the current “pilot survey” does not meet basic standards for technology benchmarking or evaluation. Contact voltage bears inherent safety and liability ramifications and evaluation of equipment to identify it must be carefully constructed and implemented.

The following are glaring errors pointing to operational and experimental flaws in the proposed exercise:

- **Overall Evaluation Criteria (OEC) are not defined.**  
The proposed experiment does not define the evaluation criteria and does not included controls for dependant and independent variables, such as,
- **Inadequate treatment of energized structures upon discovery**  
There is no plan to address energized structures identified during the course of the pilot survey. Upon discovery of an energized structure, the current plan suggests either:
  - The vendor leaves the energized structure accessible to the public and continues testing. This scenario ignores risk to the public and creates immeasurable liability for all parties involved in the process.Or,
  - The Company secures or repairs hazards identified at the time of discovery. This scenario creates an imbalance in the exercise, as the hazard is no longer available for discovery by the other party, or is visibly identifiable by the presence of cones/tape, etc.

# POWER SURVEY

COMPANY

- **Target test area does not provide adequate randomization of targets to test effectiveness of a system.**

The proposed pilot survey does not consider the multivariate nature of contact voltage. Contact voltage energizes structures including but not limited to manhole covers, streetlights, sidewalks, fences, and street furniture. Systems must be tested in a manner that ensures their ability to detect all possible targets at varying voltages and distances.

- **Sample size is inadequate**

The small sample size of the proposed pilot survey provides low confidence levels and large standard errors; this means that error bands associated with data points overlap, making findings meaningless.

- **No qualified, independent evaluator**

Without a qualified, independent evaluator administering all phases of the test, the evaluation will generate more questions than answers.

The contact voltage detection technologies of Power Survey are widely accepted as the industry benchmark. The proposed evaluation is really an opportunity to benchmark another device against that technology. In theory, Power Survey supports this notion and understands the desire for competition in this space. However, as company with a rich pedigree in technology development stemming from our roots at the Sarnoff Laboratories and the Stanford Research Institute, we also understand the importance of thoughtful experimental planning and design.

The Power Survey track record of over 80,000 utility verified detections and years of quality service to some of the nation's largest investor owned utilities makes certain that a peace of mind is maintained which comes from hiring a professional, qualified organization with well established and proven technologies.

If National Grid and The Commission determine that an evaluation should proceed, we will gladly participate and assist all interested and qualified parties to design and implement a comprehensive evaluation. If the evaluation is designed in a statistically meaningful manner with appropriate controls, it will produce meaningful results. If the currently proposed evaluation is to be maintained, Power Survey Company cannot participate due to public safety and liability reasons.

Sincerely,



Angelo Verdoni PhD.

Senior Member Technical Staff