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March 21, 2012

Luly Massaro  
Clerk  
Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

In Re: Investigation Relating to Stray Voltage and Contact Voltage – Docket No. 4237

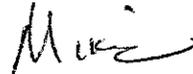
Dear Luly:

As you know, this office represents Block Island Power Company (BIPCo).

Attached are an original and ten (10) copies of BIPCo's Responses to the Commission's March 15, 2012, Data Requests directed to NGrid, BIPCo, and Pascoag Utility District. Copies have been served on the service list.

If you have any questions, please feel free to call.

Very truly yours,



Michael R. McElroy

MRMc:tmg  
cc: Service List

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION

IN RE: Investigation relating to Stray voltage  
and Contact voltage

DOCKET NO. 4237

BIPCo's RESPONSES TO THE COMMISSION'S MARCH 15, 2012  
DATA REQUESTS  
DIRECTED TO NATIONAL GRID, BIPCo AND PASCOAG UTILITY  
DISTRICT

March 21, 2012

1. What would be the cost and rate impact of requiring all electric utilities operating within the state of Rhode Island to submit quarterly reports (similar to COMM 1-2(c) and COMM 1-2 (d) to the PUC and DPUC on the incidence of stray and contact voltage, such reports to include without limitation the nature of the incident (including level of voltage), the location and cause of the incident, resulting injuries, the manner in which the incident was reported to the utility, and the date, time and nature of any repairs made as a result of the incident?

BIPCo Answer: BIPCo has received no reports of stray or contact voltage and does not anticipate such incidents in the future. Therefore, costs to submit quarterly reports should be small. BIPCo had offered an explanation of the difference between stray voltage and contact voltage in a previous submission to this docket. To reiterate:

Stray voltage has two generally accepted meanings and can be confused with the meaning of contact voltage. Technically speaking, stray voltage describes the occurrence of voltage between two objects that should not have any voltage difference between them. These are small voltages that are often measured between two grounded objects in distant locations and are due to normal current flow in the power system. However, Stray Voltage or EMI is a major problem for Hospitals, Manufacturing Plants and Farms. Hospitals are concerned with the *Microshock Electrocutation* hazard in addition to the problem that EMI can cause with sensitive electronics. Farms are a special case because the stray voltage level can become so high that people and animals can actually feel the electrical shock. The meaning of stray voltage for the general public is that of contact voltage.

Contact voltage is not related to normal system operation and can exist at levels that may be hazardous. Contact voltage is caused by an abnormal or unintended flow of current as it flows through the impedance of available abnormal current pathways. Improper or faulty insulation of wires can be such a cause of contact

voltage. Contact voltage can be dangerous to people and animals and was brought to light by the accidental electrocution of a woman in NYC who was walking her dog and stepped upon an electrified manhole cover. The attendant publicity about this incident led to using the term “stray voltage” instead of “contact voltage”

a. Would these reporting requirements increase your awareness of the incidence of stray and contact voltage?

BIPCo Answer: No, since BIPCo has not had any reported incidents of stray or contact voltage to date and would report “no incidents” at each filing.

b. Would reporting requirements serve to reduce the number of injuries to human or animal life?” Why/Why not?

BIPCo Answer: No, BIPCo has not had any incidents of stray or contact voltage to date.

2. National Grid stated in COMM 2-18 that the cost of implementing regular monitoring and/or elevated voltage testing of these facilities, using either mobile or manual testing, would range from \$250,000 to \$1.090M (COMM 2-18, Comm 3-1). Would regular monitoring of stray and contact voltage, through mobile or manual testing, even at the lower end of the price range, on an annual or more frequent basis, increase your utility's awareness of the incidence of stray and contact voltage?

BIPCo answer: BIPCo is concerned that such an added cost would be unnecessary as there have been no incidents of stray or contact voltage and these costs would be passed on to our ratepayers. BIPCo routinely examines areas where stray or contact voltages may occur such as the downtown circuits, the marina circuits and residential underground wiring. This is part of the usual maintenance budget of BIPCo.

3. Would regular monitoring for stray and contact voltage, through manual or mobile testing, on an annual or more frequent basis, serve to reduce the injuries to human or animal life? Why/why not?

BIPCo Answer: No, since we have had no issues related to stray or contact voltage and do not anticipate any issues in the future.

4. (BIPCo and PUD only) Is it true that BIPCo and PUD do not regularly inspect underground or overhead equipment or facilities for stray and contact voltage?

BIPCo Answer: BIPCo routinely examines areas where stray or contact voltages may occur such as the downtown circuits, the marina circuits and residential underground wiring.

5. (BIPCo and PUD only) What are BIPCo and PUDs' cost estimates for implementing regular monitoring of stray and contact voltage through manual or mobile testing?

BIPCo Answer: With the limited resources that BIPCo has, BIPCo would have to hire an outside contractor to perform more monitoring than that which BIPCo currently does as mentioned in the answer to question 2. BIPCo has not investigated the cost of such service.

6. National Grid stated in COMM 2-20 that the cost of implementing Massachusetts reporting requirements (COMM 1-6 Attachment 3, Sec. VIII.) in Rhode Island would be negligible.

- a. (BIPCo and PUD only) What would be the estimated costs to BIPCo and PUD of implementing the Massachusetts reporting requirements referenced in COMM 1-6 Attachment 3, Sec. VIII.?

BIPCo Answer: Since BIPCo has had no incidents of stray or contact voltage; BIPCo believes that the cost of reporting would be very little.

- b. Would these reporting requirements increase your awareness of the incidence of stray and contact voltage?

BIPCo Answer: No, BIPCo has had no reports of such incidents and does not anticipate any such incidents in the future.

- c. Would these reporting requirements serve to reduce the number of injuries to human or animal life?

BIPCo Answer: No, BIPCo has not had any incidents of injury to human or animal life and does not anticipate any such incidents.

7. Please provide an estimate for the annual cost to implement the contact voltage detection and repair program in Senate Bill No. 2387 introduced on February 15, 2012.

BIPCo Answer: BIPCo, with its limited resources and manpower, would need to hire an outside contractor to perform this service. We have not queried the market for the cost of performing this service for BIPCo.

8. Please provide an estimate of the monthly rate impact of Senate Bill No. 2387 on a typical residential, commercial and industrial ratepayer.

BIPCo Answer: Since this Bill is directed primarily towards urban development, BIPCo thinks it would be difficult to formulate a number as BIPCo has not had any instances of stray or contact voltage.

9. Would the contact voltage detection and repair program proposed in Senate Bill No. 2387 serve to reduce the number of injuries to human or animal life? Why/why not?

BIPCo Answer: This Bill would not offer any benefit to the inhabitants of Block Island as BIPCo has had no incidents of stray or contact voltage.

Docket No. 4237 - Commission's Investigation Relating to Stray and Contact Voltage  
 Updated 4/11/11

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