

December 9, 2013

BY HAND DELIVERY & ELECTRONIC MAIL

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

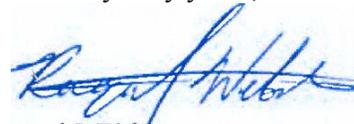
**RE: Docket 4442 - The Narragansett Electric Company d/b/a National Grid
Tariff Advice Filing for Customer-Owned Street & Area Lighting Proposal
Responses to Record Requests**

Dear Ms. Massaro:

I have enclosed National Grid's responses to the Commission's Record Requests 2 through 10 in the above-referenced docket. National Grid will file its response to Record Request 1 on December 10, 2013 pursuant to the extension it received from the Commission. Please note that the attachments referenced in National Grid's response to Record Request 2 will be included in the Company's response to Record Request 1.

Thank you for your attention to this matter. If you have any questions regarding this filing, please contact me at (781) 907-2121.

Very truly yours,



Raquel J. Webster

Enclosures

cc: Docket 4442 Service List
Thomas Ahern, Administrator
Leo Wold, Esq.
Steve Scialabba, Division

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 will be hand delivered to the RI Public Utilities Commission and the RI Division of Public Utilities and Carriers



Joanne M. Scanlon

December 9, 2013
Date

**Docket No. 4442 - National Grid – LED Tariff Advice Filing
Service List updated 10/2/13**

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Record Request 2

Request:

Referencing National Grid's Response to Commission Data Request 1-1, Attachment 11, the top middle picture, showing an emergency light attached to the pole, please identify the location of the pole, whether there is a Licensing Agreement, and with whom the agreement was entered. If the emergency light is not in Rhode Island, please indicate whether there are any pole attachments in Rhode Island where the attaching entity is a public entity. If so, please provide one example, with a copy of any Licensing Agreement. If there is such a situation and no Licensing Agreement, please indicate the reason.

Response:

The location of the snow ban emergency light in the above-referenced attachment is pole number 6131-0 on Park Street in Beverly, Massachusetts. The photograph was taken prior to September 2006. The Company is unable to locate an attachment agreement for this attachment. Upon further review, the Company does not presently allow this type of attachment installation due to non-compliance with Company standards. The Company is unaware of any similar attachments in Rhode Island.

Examples of pole attachments involving public entities are provided in the Company's response to Record Request 1. (Reference Attachments RR-1: 1-8, 1-12, 1-14, 1-15, 1-16).

Record Request 3

Request:

Referencing National Grid's Response to Commission Data Request 1-1, Attachment 11, the bottom middle picture, showing holiday decorations attached to streetlights, please indicate whether there are any such attachments in Rhode Island and whether there are related Licensing Agreements. If so, please indicate the identity of the attaching party and provide a copy of the Licensing Agreement. If there is such a situation and no Licensing Agreement, please indicate the reason.

Response:

The photograph attached as Attachment 11 to Commission Data Request 1-1 is not specific to the Company's service area. Rather, the Company obtained this photograph from the Internet to illustrate this type of attachment. The Company was unable to identify locations or obtain any agreements associated with holiday decorations attached to the Company's infrastructure. However, the Company acknowledges the potential that this type of temporary attachment likely exists. Since these attachments are of a short duration, they are managed at the local office level. Additionally, these attachments utilize a convenience outlet as the electrical source, which also provides the means of a physical disconnect.

Record Request 4

Request:

Would the Field Survey Charge be the same for a municipality as for any other customer who requests work relative to the customer's attachment?

Response:

The Company's charges associated with the cost of performing field investigations are specific to the type of attachment and the provisions regarding field surveys contained within the corresponding agreements in place. In addition, certain agreements include application fees in conjunction with field survey charges. The Company is providing the following comparison of fees and charges, which are assessed historically and which are associated with the various types of attachments provided in the Company's response to Record Request 1.

Telecom/CATV

Application Fee = \$260.00

Field Survey Charge = \$49.58/Pole

Attachment Fee = \$5.21/yr. (jointly owned) or \$11.85/yr. (solely owned)

Wireless/DAS

Application Fee = \$260.00

Field Survey Charge = \$49.58/Pole

Attachment Fee = \$23.56/yr. (jointly owned) or \$47.12/yr. (solely owned)

Street Light

Application Fee = \$0

Field Survey Charge = \$130.00

Attachment Fee = \$0

Record Request 5

Request:

Please provide an example of where a change to a luminaire has resulted in the change out of a pole.

Response:

The Company owns and maintains all street lights currently installed on distribution poles in Rhode Island. Therefore, the Company is responsible for all work, including the associated costs of pole replacement work as a result of a new street light. The field survey related to this type of work is performed as a normal course of business by the Company's Electric Distribution Design Engineering group. If make-ready work is required, including the replacement of a pole due to physical conditions or height requirements, the project work incorporates the necessary changes in addition to the installation of the street light assembly. Consequently, identifying past projects in which a change to a luminaire has resulted in the change out of a pole is difficult because not all street light work requires pole replacement work, and the projects for this type of condition are not specifically identified in the Company's work order management systems.

Therefore, the Company was unable to identify an example of a pole replacement work order that was the result of a new street light request.

Record Request 6

Request:

Please provide a copy of the National Electric Safety Code requirement for disconnect devices on third party attachments that are not a part of the utility system.

Response:

The Company is providing the 2012 National Electric Safety Code (NESC) document (Attachments RR-6-1a and RR-6-1b). The Company, as the controlling entity of the electric distribution system, designates the service delivery point and considers the minimum requirement of a disconnect device as illustrated in Figure 011-1 compliant with the purpose of the NESC. The following index provides references relevant to sections that support the Company's position that disconnect devices are required. Please note that due to the voluminous nature of Attachment RR-6-1a, the Company is providing the document on CD-ROM.

<u>Page</u>	<u>Section Description</u>
1	010 – Purpose
2	011 – Scope A.4 (covered)
2	011 – Scope B.1,3 (non covered)
3	011 - Figure 011-1 Service Point
4	011 – Types of Requirements C.2.b
4	012 – General Rules A-C
7	Section 2 – Definitions of Special Terms; area lighting
17	Section 2 – Definitions of Special Terms; Utility – 1. Public Utility
18	Section 2 – Definitions of Special Terms; Utilization Equipment, <i>NOTE</i> (emphasis added)

Accredited Standards Committee
C2-2012

Errata to 2012 Edition National Electrical Safety Code®

Correction Sheet
Issued 6 February 2012

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Printed in the United States of America.

This correction sheet may be freely reproduced and distributed in order to maintain the utility and currency of the underlying Standard. This correction sheet may not be sold, licensed or otherwise distributed for any commercial purposes whatsoever. The content of this correction sheet may not be modified.

Page 2: There is a typographical error in Rule 011A4. The sentence should contain a closing parenthesis.

4. Street and area lights that provide a supply of lumens where these facilities are supplied by underground or overhead conductors installed and/or maintained under the exclusive control of utilities (including their authorized contractors or other qualified persons).

Page 96: There is an error in item (f) of Footnote 10 that appears at the end of Table 232-1 (m). Item (f) should contain “215C4 or.”

- (f) Grounded guys, guys meeting Rules 279A1 and 215C4 or 215C5 exposed to 0 to 300 V 2.9

Page 96: There is an error in Footnote 15 that appears at the end of Table 232-1 (m). The word “215C5” should be replaced with “215C4.”

¹⁵The portion of anchor guys below the lowest insulator meeting Rules 279A1 and 215C4 may have the same clearance as grounded guys.

Page 97: There are errors that appear at the end of Table 232-1 (m). Although Footnote 25 was deleted from the previous version, it should have been listed as follows. Therefore, the inserted footnote should have been shown as Footnote 26.

²⁵This footnote not used in this edition.

²⁶When designing a line to accommodate oversized vehicles, these clearance values shall be increased by the difference between the known height of the oversized vehicle and 4.3 m.

Pages 97, 98, and 99: There is an error in Table 232-1 (ft). The cells in columns 2 and 5 of the header row should state “(ft)” for feet and not “(m)” for meters.

Nature of surface underneath wires, conductors, or cables	Insulated communication conductors and cable; messengers; overhead shield/surge-protection wires; grounded guys; ungrounded portions of guys meeting Rules 215C4, 215C5, and 279A1 exposed to 0 to 300 V ^{6 11 15} ; neutral conductors meeting Rule 230E1; supply cables meeting Rule 230C1 (ft)	Noninsulated communication conductors; supply cables of 0 to 750 V meeting Rule 230C2 or 230C3 (ft)	Supply cables over 750 V meeting Rule 230C2 or 230C3; open supply conductors, 0 to 750 V ³ ; ungrounded portions of guys meeting Rules 215C4, 215C5, and 279A1 exposed to over 300 V to 750 V ^{6 14 15} (ft)	Open supply conductors, over 750 V to 22 kV; ungrounded portions of guys meeting Rules 215C4, 215C5, and 279A1 exposed to 750 V to 22 kV ^{6 14 15} (ft)	Trolley and electrified railroad contact conductors and associated span or messenger wires ¹	
					0 to 750 V to ground (ft)	Over 750 V to 22 kV to ground (ft)

Page 100: There is an error in item (f) of Footnote 10 that appears at the end of Table 232-1 (ft). Item (f) should contain “215C4 or.”

- (f) Grounded guys, guys meeting Rules 279A1 and 215C4 or 215C5 exposed to 0 to 300 V 9.5

Page 100: There is an error in Footnote 15 that appears at the end of Table 232-1 (ft). The word “215C5” should be replaced with “215C4.”

⑮The portion of anchor guys below the lowest insulator meeting Rules 279A1 and 215C4 may have the same clearance as grounded guys.

Although Footnote 25 was deleted from the previous version, it should have been listed as follows. Therefore, the inserted footnote should have been shown as Footnote 26.

⑲This footnote not used in this edition.

⑳When designing a line to accommodate oversized vehicles, these clearance values shall be increased by the difference between the known height of the oversized vehicle and 14 ft.

Page 129: There are three errors in Figure 234-4(b). At the top of the figure, the two instances of “H” should read “A.” The text associated with “A” in the legend should read “B + 5.5 m (18 ft)” and not “V + 5.5 m (18 ft).”

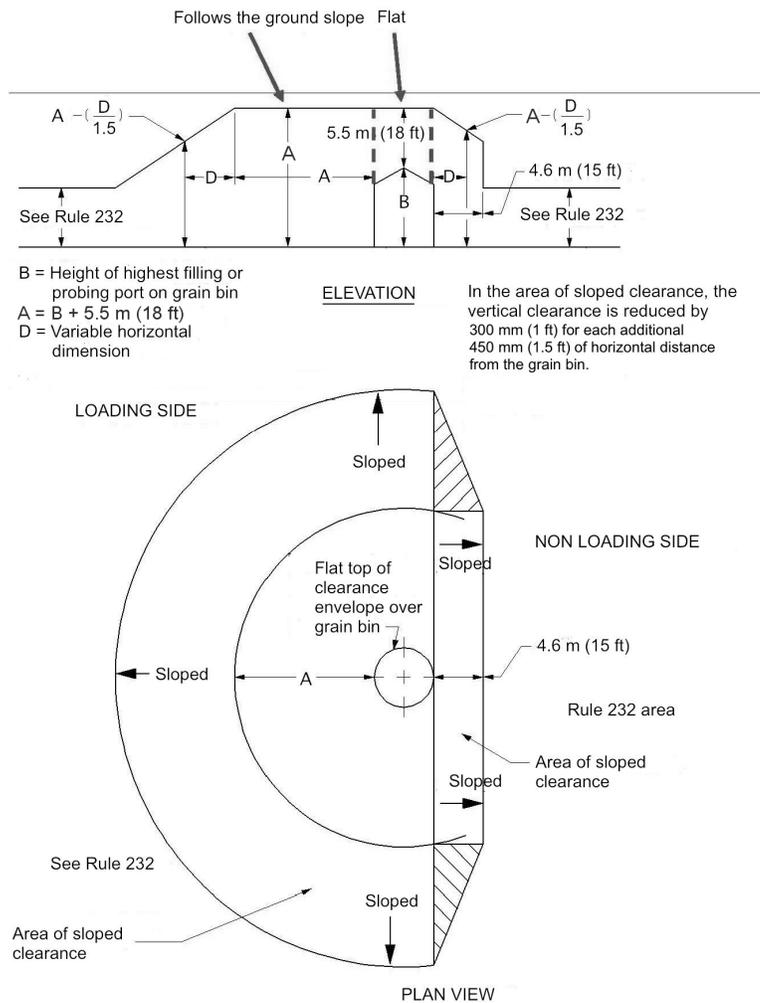


Figure 234-4(b)—Clearance envelope for grain bins filled by portable augers, conveyors, or elevators

Pages 130, 131, and 132: There is an error in Table 234-1 (m). The cell in column 6 of the header row should contain “ungrounded equipment cases, 750 V to 22 kV.”

Clearance of	Insulated communication conductors and cables; messengers; overhead shield/surge-protection wires; grounded guys; ungrounded portions of guys meeting Rules 215C4, 215C5, and 279A1 exposed to 0 to 300 V ⁽¹¹⁾ ⁽¹⁴⁾ neutral conductors meeting Rule 230E1; supply cables meeting Rule 230C1 (m)	Supply cables of 0 to 750 V meeting Rule 230C2 or 230C3 (m)	Unguarded rigid live parts, 0 to 750 V; noninsulated communication conductors; ungrounded equipment cases, 0 to 750 V; and ungrounded portions of guys meeting Rules 215C4, 215C5, and 279A1 exposed to open supply conductors of over 300 V to 750 V ⁽⁵⁾ ⁽¹⁴⁾ (m)	Supply cables over 750 V meeting Rule 230C2 or 230C3; open supply conductors, 0 to 750 V ⁽¹³⁾ (m)	Unguarded rigid live parts, over 750 V to 22 kV; ungrounded equipment cases, 750 V to 22 kV; ungrounded portions of guys meeting Rules 215C4, 215C5, and 279A1 exposed to over 750 V to 22 kV ⁽⁵⁾ ⁽¹⁴⁾ (m)	Open supply conductors, over 750 V to 22 kV (m)
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Page 133: There is an error in Footnote 11 that appears at the end of Table 234-1 (m). The word “215C5” should be replaced with “215C4.”

⁽¹¹⁾The portion of anchor guys below the lowest insulator meeting Rules 279A1 and 215C4 may have the same clearance as grounded guys.

Although Footnotes 12 and 13 were deleted from the previous version, the remaining footnotes should not have been renumbered. They should be listed as follows:

- ⁽¹²⁾This footnote not used in this edition.
- ⁽¹³⁾This footnote not used in this edition.
- ⁽¹⁴⁾For clearances above railings, walls, or parapets around balconies, decks, or roofs, use the clearances required for row 1b(1). For such clearances where an outside stairway exists to provide access to such balconies, decks, or roofs, use the clearances required for row 2b(2).
- ⁽¹⁵⁾Does not include neutral conductors meeting Rule 230E1.
- ⁽¹⁶⁾These clearance values also apply to guy insulators.
- ⁽¹⁷⁾It is presumed that a flag or banner is fully extended but that there is no deflection or displacement of the flagpole or other supporting structure due to wind and that the conductors, cables, or rigid live parts are not displaced by the wind. The specified clearance is measured to the point of maximum displacement of the banner or flag towards the overhead utility facility.
- ⁽¹⁸⁾When designing a line to accommodate oversized vehicles, these clearance values shall be increased by the difference between the known height of the oversized vehicle and 4.3 m.

Pages 134, 135, and 136: There is an error in Table 234-1 (ft). The cell in column 6 of the header row should contain “ungrounded equipment cases, 750 V to 22 kV.”

Clearance of	Insulated communication conductors and cables; messengers; overhead shield/surge-protection wires; grounded guys; ungrounded portions of guys meeting Rules 215C4, 215C5, and 279A1 exposed to 0 to 300 V⁽¹⁾⁽⁴⁾ neutral conductors meeting Rule 230E1; supply cables meeting Rule 230C1 (ft)	Supply cables of 0 to 750 V meeting Rule 230C2 or 230C3 (ft)	Unguarded rigid live parts, 0 to 750 V; noninsulated communication conductors; ungrounded equipment cases, 0 to 750 V; and ungrounded portions of guys meeting Rules 215C4, 215C5, and 279A1 exposed to open supply conductors of over 300 V to 750 V⁽⁵⁾⁽⁴⁾ (ft)	Supply cables over 750 V meeting Rule 230C2 or 230C3; open supply conductors, 0 to 750 V⁽³⁾ (ft)	Unguarded rigid live parts, over 750 V to 22 kV; ungrounded equipment cases, 750 V to 22 kV; ungrounded portions of guys meeting Rules 215C4, 215C5, and 279A1 exposed to over 750 V to 22 kV⁽⁵⁾⁽⁴⁾ (ft)	Open supply conductors, over 750 V to 22 kV (ft)
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Page 137: There is an error in Footnote 11 that appears at the end of Table 234-1 (ft). The word “215C5” should be replaced with “215C4.”

⁽¹⁾The portion of anchor guys below the lowest insulator meeting Rules 279A1 and 215C4 may have the same clearance as grounded guys.

Although Footnotes 12 and 13 were deleted from the previous version, the remaining footnotes should not have been renumbered. They should be listed as follows:

⁽²⁾This footnote not used in this edition.

⁽³⁾This footnote not used in this edition.

⁽⁴⁾For clearances above railings, walls, or parapets around balconies, decks, or roofs, use the clearances required for row 1b(1). For such clearances where an outside stairway exists to provide access to such balconies, decks, or roofs, use the clearances required for row 2b(2).

⁽⁵⁾Does not include neutral conductors meeting Rule 230E1.

⁽⁶⁾These clearance values also apply to guy insulators.

⁽⁷⁾It is presumed that a flag or banner is fully extended but that there is no deflection or displacement of the flagpole or other supporting structure due to wind and that the conductors, cables, or rigid live parts are not displaced by the wind. The specified clearance is measured to the point of maximum displacement of the banner or flag towards the overhead utility facility.

⁽⁸⁾When designing a line to accommodate oversized vehicles, these clearance values shall be increased by the difference between the known height of the oversized vehicle and 14 ft.

Page 138: There is a typographical error in Table 234-2 (m). The underscore should be removed from the comma in the last sentence of the parenthetical statement below the table caption.

**Table 234-2—
Clearance of wires, conductors, cables, and unguarded rigid live parts from bridges**
(Voltages are phase to ground for effectively grounded circuits and those other circuits where all ground faults are cleared by promptly de-energizing the faulted section, both initially and following subsequent breaker operations. See the definitions section for voltages of other systems. Clearances are with no wind displacement except where stated in the footnotes below.
See Rules 234A, 234D1a, and 234H4.)

Page 142: There is an error in Footnote 2 that appears at the end of Table 234-3 (m). The word “215C5” should be replaced with “215C4.”

②The portion of anchor guys below the lowest insulator meeting Rules 279A1 and 215C4 may have the same clearance as grounded guys.

Page 143: There is an error in Footnote 2 that appears at the end of Table 234-3 (ft). The word “215C5” should be replaced with “215C4.”

②The portion of anchor guys below the lowest insulator meeting Rules 279A1 and 215C4 may have the same clearance as grounded guys.

Page 166: There is an error in Table 235-6 (mm). The cell in column 2 of row 2c should read “75” and not “3.”

c. All other	75 ^⑦	150 ^{①⑦}	150 ^{①⑦}	150	150 plus 10 per kV in excess of 8.7 kV	580 plus 10 per kV in excess of 50 kV
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Page 222: There is a typographical error in Footnote 3 that appears at the end of Table 261-1. Delete the strikethrough (“R”) in the last sentence of the footnote.

③Wood and reinforced structures shall be replaced or rehabilitated when deterioration reduces the structure strength to 3/4 of that required when installed. When new or changed facilities modify loads on existing structures, the required strength shall be based on the revised loadings. If a structure or component is replaced, it shall meet the strength required by Table 261-1. If a structure or component is rehabilitated, the rehabilitated portions of the structures shall have strength greater than 3/4 of that required when installed.

Page 230: There is an error in Rule 279A2b(1). The sentence should contain “215C4 or.”

(1) The guy is otherwise insulated to meet the requirements of Rules 215C4 or 215C5 and 279A1.

Page 262: There is a typographical error in Rule 410A3b. The exception and notes are applicable to Rule 410A3 and not Rule 410A3b.

410. General requirements

A. General

3. The employer shall ensure that an assessment is performed to determine potential exposure to an electric arc for employees who work on or near energized lines, parts, or equipment.

If the assessment determines potential employee exposure, clothing made from acetate, nylon, polyester, or polypropylene shall not be worn, unless arc rated.

If the assessment determines a potential employee exposure greater than 2 cal/cm² exists (see Neal, Bingham, and Doughty [B63]), the employer shall:

- a. Perform a detailed arc hazard analysis, or use Table 410-1, 410-2, or 410-3 to determine the effective arc rating of clothing or a clothing system to be worn by employees working on or near energized lines, parts, or equipment at voltages 50 V to 800 000 V.

The arc hazard analysis shall include a calculation of the estimated arc energy based on the available fault current, the duration of the arc (cycles), and the distance from the arc to the employee.

- b. Require employees to wear clothing or a clothing system with an effective arc rating not less than the anticipated level of arc energy.

EXCEPTION: If the clothing or clothing system required by this rule has the potential to create additional or greater hazards than the possible exposure to the heat energy of the electric arc, then clothing or a clothing system with an effective arc rating less than that required by the this rule may be worn.

NOTE 1: Assessments performed to determine potential exposure to an electric arc consider the affected employee's assigned tasks and/or work activities.

NOTE 2: A clothing system (multiple layers) that includes an outer layer of flame resistant material and an inner layer of non-flame resistant natural fiber material has been shown to block more heat than a single layer. The effect of the combination of these multiple layers may be referred to as the *effective arc rating* (e.g., E_{BT}, ATPV).

NOTE 3: Engineering controls can be utilized to reduce arc energy levels and work practices can be utilized to reduce exposure levels.

The Narragansett Electric Company

d/b/a National Grid

R.I.P.U.C. Docket No. 4442

In Re: Customer-Owned Street and Area Lighting Proposal
Responses to Record Requests issued at the Commission's Evidentiary Hearing
On December 3, 2013

Record Request 7

Request:

Are there any streetlights on poles solely owned by Verizon? To the extent there are, please indicate whether there are written agreements between National Grid and Verizon outside of the Joint Pole Ownership Agreement. If so, please provide a copy of one. If not, please explain how the attachment has been effectuated and under what terms. Please explain any differences for the four communities in which there are jointly owned poles.

Response:

National Grid is a Joint Owner with Verizon New England on approximately 90% of the total wood poles in the State of Rhode Island. All existing Company street light facilities that occupy space on wood poles would require corresponding secondary power wiring to be attached to provide an electrical source, and as such, National Grid would be a joint owner of those wood poles. If it is found that National Grid has any street light attachment on a wood pole that is solely owned by Verizon, then National Grid would purchase partial ownership of the pole. National Grid does not have an "Attachment" agreement for use of poles that are solely owned by Verizon.

Record Request 8

Request:

Please explain whether there will be any testing for contact voltage required on municipally owned streetlights? Which part(s) of the pole/lighting is currently tested by National Grid in its three-year cycle testing? Where is the contact voltage detectible by humans and/or pets relative to contact voltage associated with street lights?

Response:

If municipally-owned street lights are in a defined Contact Voltage Risk Area¹, they will be included in National Grid's mobile elevated voltage testing. Manual testing for contact voltage will not be performed by National Grid on municipally-owned street lights and is not necessarily required for the municipality to perform; however, the municipality is responsible for the operation and maintenance of the street lights. It should be noted that street lights in this context and subject to testing refers only to those fed through underground distribution infrastructure and mounted on metallic poles.

The part of the pole/lighting equipment currently tested by National Grid in its three-year cycle testing is only along the metallic pole. As the pole is metallic and conductive, the contact voltage could be present along any part of it and would be detectible along its length. This testing is only applicable to street lights fed through underground distribution infrastructure and mounted on metallic poles.

Contact voltage could be detectible on any portion of the streetlight. In addition, contact voltage could be detectible on the ground in the vicinity of the streetlight if conditions allowed for the voltage potential to "travel", such as when there is a puddle or the ground is wet.

¹ Contact Voltage Risk Areas are in certain underground only sections of Newport, Pawtucket, Providence, and Woonsocket as defined in Docket 4237.

Record Request 9

Request:

How is the cost of removal factored into depreciation?

Response:

Current depreciation rates are intended to include an allowance for future cost of removal ("COR"). As is the case with any depreciation study, the rates reflect assumptions for a given point in time and require periodic calibration based on adequacy of reserve levels as time passes. Actual COR and salvage, both of which impact depreciation reserve, are experienced.

Therefore, the reserve for depreciation reflected on the Company's books includes the recovery of the cost of the assets as well as a portion of the future cost of removal of the asset. Thus, net plant associated with street lighting assets, i.e. original cost less depreciation, reflects a lower value than if cost of removal were not included in depreciation rates and in the calculation of depreciation expense.

Record Request 10

Request:

Please indicate whether the cost of removal of the pole is included in the depreciation of lighting.

Response:

As discussed in the response to Record Request No. 9, cost of removal is a part of all of the Company's various depreciation rates. Regarding depreciation rates applicable to street lighting equipment, the cost of removal of dedicated streetlight poles is reflected in the depreciation rate approved by the Commission over the years, which is applicable to street lighting equipment and recorded in FERC Account 373 – Street Lighting and Signal Systems. Depreciation associated with distribution poles to which lighting equipment is attached also includes cost of removal. However, this type of pole is not considered street lighting equipment and is, therefore, not recorded in FERC Account 373. Therefore, these poles will not be sold to municipalities.