

June 9, 2014

BY HAND DELIVERY & ELECTRONIC MAIL

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

RE: Docket 4473 - FY 2015 Electric Infrastructure, Safety, and Reliability (“ISR”) Plan Update Concerning National Grid’s Vegetation Management Discussions with Verizon

Dear Ms. Massaro:

In relation to the above-referenced matter, I write this letter to update the Rhode Island Public Utilities Commission (“PUC”) and the Rhode Island Division of Public Utilities and Carriers (“Division”) on the status of National Grid’s¹ discussions with Verizon regarding Verizon’s contributions to vegetation management spending for fiscal year 2015 (April 1, 2014 to March 31, 2015). Pursuant to the Company’s settlement with the Division in this matter, the Company is required to provide this update to the PUC and the Division. *See* March 17, 2014 letter from National Grid to the PUC summarizing the settlement at p. 1-2. (Attachment 1).

On March 24, 2014, the Company sent a letter to Verizon enclosing the Company’s pruning and hazard tree removal work plan for FY 2015 (“FY 2015 Work Plan”) and requesting that Verizon identify joint-tree trimming work. *See* March 24, 2014 letter from National Grid to Verizon. (Attachment 2). On April 17, 2014, Verizon responded to the Company’s March 24 letter, noting that it would not benefit from the program-wide tree-trimming work identified in the Company’s FY 2015 Work Plan. *See* April 17, 2014 letter from Verizon to National Grid. (Attachment 3). Verizon noted, however, that it welcomed the opportunity to assess whether it would benefit from work on certain hazard trees.² Specifically, Verizon stated in part:

In light of our different needs, the information that you provided regarding a largely undifferentiated vegetation management plan spanning thousands of miles of circuit is not sufficient to determine a benefit to Verizon. Rather, if National Grid identifies trees that threaten the integrity of Verizon’s communications facilities because, for example, they threaten the integrity of the poles supporting Verizon’s facilities, Verizon would welcome the opportunity to assess whether it would benefit from participating in an effort to address such situations. As such,

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

² Hazard tree removal is 12.9% of Company’s vegetation management budget (\$1,000,000 out of \$7,726,000).

Verizon declines to participate at the program-wide level. Attachment 3 at p.1 (emphasis added).

On May 30, 2014, the Company responded to Verizon's April 17 letter, noting its disagreement with Verizon's position concerning joint tree trimming. See Attachment 4. In its May 30 letter, the Company stated in part: "[A]s a joint-pole owner, National Grid does not understand how Verizon could reasonably claim that Verizon does not derive a benefit from the work completed pursuant to National Grid's pruning and hazard tree removal work plan. Hazard trees are removed both during planned pruning efforts and also pursuant to separate hazard tree removal work." Attachment 4 at p. 1. Nonetheless, as noted in its May 30, 2014 letter, the Company is willing to meet with Verizon to discuss hazard tree removal work. The Company is currently awaiting Verizon's response to the Company's request for a meeting to discuss hazard tree removal and review one of the Company's hazard tree circuits. The Company's settlement with the Division requires that the Company consult with the Division by June 20, 2014 to explore its options should Verizon refuse to contribute to the Company's proposed tree-trimming work.

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 4473 Service List
Steve Scialabba
Leo Wold, Esq.

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 to the RI Division of Public Utilities and Carriers.

June 9, 2014

Joanne M. Scanlon

Docket No. 4473 National Grid's FY 2015 Electric Infrastructure, Safety and Reliability Plan - Service List as of 01/07/14

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File an original & 11 copies w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov	401-780-2107
	Cynthia.WilsonFrias@puc.ri.gov	
	Alan.nault@puc.ri.gov	

March 17, 2014

VIA HAND DELIVERY & ELECTRONIC MAIL

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

RE: Docket 4473 - National Grid's Proposed FY 2015 Electric Infrastructure, Safety, and Reliability ("ISR") Plan Settlement

Dear Ms. Massaro:

On behalf of National Grid,¹ I am filing this letter to notify the Rhode Island Public Utilities Commission ("PUC") that the Company and the Rhode Island Division of Public Utilities and Carriers ("Division") have reached agreement as to the only unresolved issue between the parties related to the FY 2015 Electric ISR Plan.

While the Company and the Division were able to reach agreement on the appropriate level of spending on the vegetation management budget in the FY 2015 ISR Plan, the issue of Verizon's contribution to tree-trimming spending has remained an open item. The parties have reached an agreement on that outstanding issue. In recognition of the Company's commitment to an agreed-upon action plan going forward, the parties now agree that there should be no downward adjustment to the recovery through ISR rates of the spending level for tree-trimming under the proposed FY 2015 ISR Plan without prejudice to the Division's right to reassert such a downward adjustment in future plans.

The Company has committed to an action plan under which it will within fifteen (15) days of the date hereof submit its FY 2015 vegetation management plan to Verizon and request appropriate reimbursement from Verizon for all proposed vegetation management work. Pursuant to the provisions of the joint pole agreement and applicable Intercompany Operating Procedure, Verizon will have 60 days to respond to the Company's request. The Company will provide an update to the Division and the PUC within fifteen (15) days after the expiration of the 60-day

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

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March 17, 2014
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period concerning Verizon's response. No later than fifteen (15) days thereafter, the Company shall consult with the Division to explore its legal options up to and including a civil lawsuit should Verizon refuse to contribute to the Company's proposed tree-trimming work. As the ISR process includes an annual reconciliation mechanism, any reimbursements received for tree trimming from Verizon will be credited to customers in the next annual ISR reconciliation filing.

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

Very truly yours,



Thomas R. Teehan

Enclosures

cc: Steve Scialabba, Division
Greg Booth, Division
Leo Wold, Esq.
James Lanni, Division
Al Contente, Division

March 24, 2014

Roland Fortin
Design Administrator
Verizon
459 Main St
Saugus, MA 01906
781 941-7911

Dear Mr. Fortin,

As outlined in Intercompany Operating Procedures (“IOP”) J Section 6, we are providing our pruning and hazard tree removal work plan for Rhode Island for fiscal year 2015 (April 1, 2014 to March 31, 2015). The attached list of circuits (Attachment 1) provides the circuit designations for both the pruning and hazard tree removal work plans. You can view the geographic area of each of these circuits online at:

<http://ngrid.maps.arcgis.com/apps/Solutions/s2.html?appid=dbeb6ac2d32f4da89e22a2cee512ca9d>

To navigate the maps, enter the circuit designation into the search tool in the top right corner of the application. The circuits highlighted in purple are scheduled to be pruned, and circuits in orange are scheduled for hazard tree removal work. In addition, we will be providing maps of these circuits in .pdf format on a CD which will be mailed separately. The maps provided on the CD include electrical equipment and other circuit information, but are otherwise identical to the maps provided online.

We have also enclosed as Attachment 2 an Exchange of Notice (“EON”) for this work. Pursuant to IOP J Section 6, please provide us, within 60 days, a suitable list of pole lines or major portions thereof that Verizon wants to be trimmed jointly.

Please contact me with any questions.

Regards,

Ryan Moe
Vegetation Specialist
National Grid



April 17, 2014

Mr. Ryan Moe
Vegetation Specialist
National Grid
40 Sylvan Road
Waltham, MA 02454

Re: Maintenance Tree Trimming Plan 2014-2015

Dear Mr. Moe:

Thank you for your letter, dated March 24 regarding National Grid's pruning and hazard tree removal work plan for Rhode Island for April 1, 2014 to March 31, 2015; the attached Exchange of Notice, dated March 26; and the attached list of circuits and maps to which National Grid's plan pertains. Having not been contacted by National Grid in previous years regarding this process, Verizon appreciates the opportunity to consider National Grid's vegetation management plans at the outset of its implementation.

Typically, as you know, National Grid and Verizon have each tended to its own tree trimming, as meaningful differences between National Grid's supply conductors and Verizon's communications networks inherently lead to different approaches to vegetation management. Tree branches seldom present a risk to Verizon's communications facilities. When constructing aerial facilities, Verizon first mounts a strong, taut metal cable, referred to as strand, from pole to pole. Verizon then attaches its facilities, which often consist of heavy cables containing twisted copper pairs, to that metal strand, which supports the weight of the line. As a general rule, therefore, a branch lying on or that falls on Verizon's cables will seldom break the line. This remains true in areas where Verizon has deployed fiber-optic cable, which Verizon typically lashes to the existing copper lines. By contrast, National Grid's less resilient supply conductors may break due to contact with tree limbs.

As a result, tree limb contact with supply conductors risks power outages and the public safety hazards of, for example, broken supply conductors, trees subject to catching on fire, and energized trees. National Grid addresses such risks through aggressive vegetation management programs designed and executed exclusively to address the safety and reliability needs of its electric system, without any consideration of Verizon's needs. The risk of a tree limb making contact with a communications cable is different; typically, there is little risk to Verizon service or the public at large from such an event. Verizon addresses the risk that it faces—largely the loss of customers in today's competitive communications marketplace—by routinely tending to its lines. Verizon empowers its crews to perform pruning work or, at times, to contract such work out in performing their daily tasks.

In light of our different needs, the information that you provided regarding a largely undifferentiated vegetation management plan spanning thousands of miles of circuit is not sufficient to determine a benefit to Verizon. Rather, if National Grid identifies trees that threaten the integrity of Verizon's communications facilities because, for example, they threaten the integrity of the poles supporting Verizon's facilities, Verizon would welcome the opportunity to assess whether it would benefit from participating in an effort to address such situations.

As such, Verizon declines to participate at the program-wide level. However, as noted above, if National Grid believes that there are areas where there would be a benefit for Verizon, we would appreciate receiving specific information on opportunities that might present a shared benefit. We look forward to continuing this dialogue.

Respectfully,

Brenden DeAndrade

Brenden DeAndrade
New England Joint Use & Licensing Manager

Cc: Michael Schneider (Assistant General Counsel)
Edward Gee (Director – Network Engineering)
Allison Cole (Region President – Consumer & Mass Business Markets)
John Bachmore (Director – Network Engineering & Operations)
Michael Donovan (Manager – Network Engineering & Operations)

May 30, 2014

Brenden DeAndrade
Verizon
Joint Use & Licensing | New England
125 High Street, Floor 3
Boston, MA 02110
O: (617) 743-1725
M: (617) 620-5723

RE: RI Maintenance Tree Trimming Plan 2014/2015

Dear Mr. DeAndrade:

Thank you for your response to my letter dated March 24, 2014 on behalf of The Narragansett Electric Company d/b/a National Grid (“National Grid”). Please consider this letter National Grid’s response to your letter dated April 17, 2014 on behalf of Verizon.

To my knowledge, Verizon has never shared its vegetation management plan with National Grid. In fact, National Grid has no record of Verizon ever undertaking preventative vegetation management work in Rhode Island. National Grid disagrees with Verizon’s characterization of National Grid’s vegetation management plan in Verizon’s April 17, 2014 letter. Further, as a joint-pole owner, National Grid does not understand how Verizon could reasonably claim that Verizon does not derive a benefit from the work completed pursuant to National Grid’s pruning and hazard tree removal work plan. Hazard trees are removed both during planned pruning efforts and also pursuant to separate hazard tree removal work.

Notwithstanding the disagreement regarding whether or not the tree trimming National Grid completes annually benefits Verizon, National Grid welcomes the opportunity to work with Verizon regarding potential hazard tree removals. Annually, National Grid assesses certain trees that, due to numerous factors, have the potential to cause damage to the system. These inspections are performed by ISA-certified arborists. National Grid anticipates that its ISA-certified arborists will have completed their review of the 49_56_54F1 line by June 20, 2014. At that time, National Grid will have identified hazard trees for removal. National Grid will contact Verizon in order to arrange a field review of each tree on line 49_56_54F1 to determine the risk and benefits to each party. National Grid intends to use this review and meeting regarding the 49_56_54F1 line to establish how National Grid and Verizon can confer on the other four (4) lines scheduled for preventative hazard tree removal work this year. National Grid will also remove additional hazard trees pursuant to 2014/2015 planned pruning related vegetation management work in Rhode Island.



By failing to participate in the preventative maintenance process, Verizon will not have the opportunity to review hazard trees removed on the sixty-eight (68) circuits in Rhode Island where pruning will take place in 2014/2015. Please advise me, no later than June 13, 2014, if Verizon would like to participate in a review of line 49_56_54F1 and provide me with dates when Verizon's representatives are available for such a review.

Regards,

Ryan Moe
Vegetation Specialist
National Grid