

**Docket No. 4770**  
**Thirty Fourth Set of Data Requests of the**  
**Division of Public Utilities and Carriers to National Grid**  
**March 12, 2018**

- 34-1. Are there any accounting rules or other requirements that the Company believes it has an obligation to follow – relating to the allocation of service company costs among affiliates in different jurisdictions for activities that will provide benefits to those affiliates – which determine the allocation of costs based on a condition that a benefitting affiliate may not be charged a share of the cost unless its applicable regulator has granted assurance of cost recovery in advance for the activity in question? If yes, please identify and explain the rule or requirement, and identify its origin.
- 34-2. Referring to the response to DIV 27-1 (Docket 4770), if the Massachusetts DPU and New York PSC did not provide assurance of cost recovery for the GIS Data System Enhancements for the Company's affiliates, is it the Company's position that Rhode Island can only go forward with the PST initiative if Rhode Island provides cost recovery to the Company for the entire initial project (as reflected in the Rhode Island Only cost estimate in the PST-1 filing)? If so, please provide all the reasons (whether legal or otherwise) why this is necessary for the Company to advance the initiative.
- 34-3. Referring to the response to DIV 27-3 (Docket 4770), the question asked: "Is it the Company's understanding that implementing the GIS Data System Enhancements is or will be an important component of providing electric service within the next three years?" The question then requested: "If yes, please explain why the Company is not simply going forward with the project much like the Company is doing in its gas business for Gas Business Enablement where it did not obtain regulatory approvals prior to advancement." The Company's response to DIV 27-3 never answered the question whether it would be important, but acknowledged that there would be benefits in the next three years and the Company's response to DIV 27-4 (Docket 4770) acknowledged that there would be benefits for distribution planning even if the DSCADA & ADMS project was not implemented yet. The response to DIV 27-3 also did not answer the second question that asked why the Company is not simply going forward with the project much like the Company is doing in its gas business for Gas Business Enablement where it did not obtain regulatory approvals prior to advancement. Please provide a responsive answer to each of the unanswered questions.
- 34-4. Referring to the response to DIV 8-57, DIV 8-59, and DIV 27-1 (Docket 4770), if the Commission declines to approve the proposed PST tracker (as proposed in Docket 4780) or another similar mechanism outside of base distribution rates that reconciles the costs of PST initiative, is it the Company's position that it will not proceed with the GIS Enhancements project if it does not have pre-approval of a rate recovery mechanism that assures all the costs will be recovered without any risk of regulatory lag between rate cases that might result in some annual costs not being covered in rates for a given year?

If yes, please explain why. If not, are there any conditions that the Company would insist upon prior to moving forward?

- 34-5. If the Service Company made the GIS Enhancements as proposed in PST-1, is it Narragansett Electric Company's position that making such enhancements would be prudent for the electric distribution business in Rhode Island? If yes, please explain why it would be prudent. If not, please explain why it would not be prudent.
- 34-6. Referring to the response to DIV 8-57, 8-59, and DIV 27-1 (Docket 4770), if the Commission declines to approve the proposed PST tracker (as proposed in Docket 4780) or another similar mechanism outside of base distribution rates that reconciles the costs of PST initiatives, is it the Company's position that it will not proceed with the feeder monitoring project if it does not have pre-approval of a rate recovery mechanism that assures all the costs will be recovered without any risk of regulatory lag between rate cases that might result in some annual costs not being covered in rates for a given year? If yes, please explain why. If not, are there any conditions that the Company would insist upon prior to moving forward?
- 34-7. Referring to the response to DIV 27-4 (Docket 4770), will there be benefits to distribution planning or other distribution business benefits if the System Data Portal project is implemented prior to the GIS Enhancements being implemented or completed? If yes, please identify the benefits. If not, please explain why not.
- 34-8. Referring to the response to DIV 8-57 (Docket 4770), please state whether the Company maintains that stakeholder participation makes it important that the GIS Enhancement costs be recovered through a fully reconciling PST tracker rather than base distribution rates and, if so, please explain why. In the response, please focus on what it is about the GIS Enhancement project itself that causes this need, as opposed to all PST initiatives generally.
- 34-9. Referring to the response to DIV 8-57 (Docket 4770), please state whether the Company maintains that stakeholder participation makes it important that the feeder monitoring project costs be recovered through a fully reconciling PST tracker rather than base distribution rates and, if so, explain why. In the response, please focus on what it is about the feeder monitoring project itself that causes this need, as opposed to all PST initiatives generally.
- 34-10. Referring to PST-1, Bates page 45, there is a statement about the System Data Portal, as follows: "The functionality and the look and feel of the portal will be similar to a system data portal recently deployed in National Grid's New York jurisdiction. Although utilization details continue to evolve in New York, best practices and lessons learned will be used to refine efforts in Rhode Island to the furthest extent possible." Please explain how the costs of the project were recovered in rates.

- 34-11. Has the Company's affiliate in New York implemented GIS Enhancements similar to what is being proposed as a PST initiative for the Company in Rhode Island? If yes, please describe and note any general differences (if any). If yes, please describe how the costs of the GIS Enhancements have been recovered in rates.
- 34-12. Referring to the response to DIV 27-7 (Docket 4770), the response indicates that the Cybersecurity projects proposed in PST-1 would not provide any benefits to the Company's affiliates in Massachusetts and New York. Please reconcile this statement with Table 3-21, which shows a lower cost to Rhode Island in a multi-jurisdictional scenario and the statement that there would be significant cost synergies if investments were coordinated. Is there a portion of the capital costs that would create a foundational system that could be used by the affiliates for their benefit at a later date? How is it possible that no future benefits could accrue to the other affiliates when the capital costs would be approximately \$10 million higher in the RI scenario, compared to the multi-jurisdictional?
- 34-13. Referring to the response to DIV 27-8 (Docket 4770), the question asked if the advanced analytics will be an important component of providing electric distribution service within the next three years. It also asked if the answer was yes, to explain why the Company is not simply going forward with advanced analytics much like the Company is doing in its gas business for Gas Business Enablement where it did not obtain regulatory approvals prior to advancement. The response did not answer the last question. Please provide a responsive answer.
- 34-14. Referring to the response to DIV 27-7 (Docket 4770), the response indicates that the advanced analytics project proposed in PST-1 would not provide any benefits to the Company's affiliates in Massachusetts and New York. Please reconcile this statement with Table 3-17, which shows a lower cost to Rhode Island in a multi-jurisdictional scenario. Is there a portion of the capital costs that would create a foundational system that could be used by the affiliates for their benefit at a later date?
- 34-15. Referring to the response to DIV 27-10 (Docket 4770), the response indicates that early implementation of the System Data Portal beyond the scope of the SRP "is limited by the Company's ability to secure and train the human resources necessary to perform the additional work." Is the Company saying that it is not capable of securing and training the human resources in the Rate Year to implement beyond the scope of the SRP because of this limitation? If so, please explain why not. If not, please explain what was meant by noting this as a limitation.
- 34-16. Referring to the response to DIV 27-5 (Docket 4770), why would the upgrades to the GIS and software not be capitalized?