

**The Narragansett Electric Co. d/b/a National Grid's Proposed  
Power Sector Transformation (PST) Vision and Implementation Plan**

Docket 4780

**Request for Information**

**Requesting Party:** New Energy Rhode Island (NERI)  
**To:** National Grid  
**Request No.:** NERI-1  
**Date of Request:** February 27, 2018  
**Response Due Date:** March 20, 2018  
**Subject/Panel:** Modern Grid (Book 1, Chapters 3 and 10; Technical Conference 01/26/18;  
Pre-filed testimony; Work Papers)

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1. Reference the Company's statement during the January 26, 2018 Technical Conference on the "Modern Grid" (the "01/26 Conference"), during which the Company stated that it does not plan to create a Power Sector Transformation ("PST") department within the Company.
  - a. Please describe whether the Company intends to integrate the PST programs and investments into overall staffing, management, training, operations, and cost recovery in a holistic and forward-thinking way.
  - b. If the answer to 1(a) is "yes," please describe how the Company intends to do so.

**Response can be found on Bates page(s) 1.**

2. Reference Chapter 3, p. 16, and the Company's statement during the January 26 Conference that the Company proposes to "align" various programs and filings going forward, but does not intend to "fully integrate" all of them into a single filing.
  - a. Please provide a list of all of the various programs and filings that would be included in this process of alignment.
  - b. Please describe how the Company proposes to align the various interrelated programs and filings in the future.
  - c. Please describe the stakeholder process the Company proposes to use in soliciting feedback regarding aligning its programs and filings, including timelines and process stages.

**Response can be found on Bates page(s) 2.**

3. Please provide a list of which components and programs of the PST would be open to stakeholder engagement, and which components and programs the Company would seek to develop without stakeholder input.

**Response can be found on Bates page(s) 3.**

4. In the recent Docket 4774 (REG program), the record included a Company presentation where screening for locational incentives did not include consideration of any assets scheduled for upgrade due to their age or condition.
  - a. Please explain why the Company did not include consideration of assets needing improvement / upgrade.
  - b. Is the Company's alternatives analysis only between non-wires alternatives and recently improved and high performing assets?

**Response can be found on Bates page(s) 4.**

**SUPPLEMENTAL Response can be found on Bates page(s) 1.**

5. Has the Company conducted, or did the Company rely on any existing analyses to determine whether any components or programs of the Grid Modernization proposal could be provided by third-party providers? If yes:
  - a. Please list and provide copies of those studies.
  - b. Did the Company identify any Grid Modernization components or programs that could be open to market competition to enhance value? If not, why not?

**Response can be found on Bates page(s) 5-7.**

NERI 1-4 (Supplemental)

Request:

In the recent Docket 4774 (REG program), the record included a Company presentation where screening for locational incentives did not include consideration of any assets scheduled for upgrade due to their age or condition.

- a. Please explain why the Company did not include consideration of assets needing improvement / upgrade.
- b. Is the Company's alternatives analysis only between non-wires alternatives and recently improved and high performing assets?

Response:

On March 9, 2018, the Company filed an objection to this data request because it is beyond the scope of the Docket No. 4780 proceeding. The Company's objection is currently pending before the Public Utilities Commission.

Supplemental Response:

- a. The Company does not include assets needing improvement or upgrade, typically referred to as "asset condition" projects, in its screening for locational incentives for distributed energy resources (DERs) because DERs cannot improve the deteriorated condition of a distribution system asset and the reliability for customers served from these assets would be impacted negatively if the asset was not replaced. The majority of the distribution system in Rhode Island operates as a radial distribution network and is subject to interruption caused by the failure or unavailability of any in-line asset, such as a transformer, switchgear, overhead wire, or underground cable. This approach aligns with the System Reliability Procurement definitions outlined in the System Reliability Procurement Standards, Section 2.3.A.i, which the Public Utilities Commission approved in Docket No. 4684.
- b. No. Non-wires alternatives are considered for load and contingency (system capacity and performance) driven projects so long as the existing distribution system assets are suitable for continued reliable operation for the duration of the study horizon. Referencing the response to part a. above, non-wires alternatives are not considered as alternatives to address asset condition needs.