

February 26, 2020

BY HAND DELIVERY & ELECTRONIC MAIL

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

RE: Docket 4996 - Proposed FY 2021 Gas Infrastructure, Safety, and Reliability Plan Responses to PUC Data Requests - Set 3

Dear Ms. Massaro:

On behalf of National Grid,¹ I have enclosed 10 copies of the Company's response to the PUC's Third Set of Data Requests in the above-referenced docket.

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

Very truly yours,



Raquel J. Webster

Enclosures

cc: Docket 4996 Service List
Leo Wold, Esq.
John Bell, Division
Al Mancini, Division
Rod Walker, Division

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

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4996
In Re: Gas Infrastructure, Safety, and Reliability Plan FY2021
Responses to the Commission's Third Set of Data Requests
Issued on February 24, 2020

PUC 3-1

Request:

On December 11, 2019, the Division issued a "Notice of Concern: Copper Services" to the Company. In that Notice, the Company was directed to respond in writing within thirty days of receipt of the notice. (See Exhibit C to DPUC Consultant Rod Walker's testimony.)

Please provide a copy of the Company's response(s) to this Notice of Concern.

Response:

Please see Attachment PUC 3-1 for a copy of the above-referenced Notice of Concern.

Delivered Electronically

January 9, 2020

Robert Bailey
Rhode Island Division of Public Utilities & Carriers
89 Jefferson Blvd
Warwick, RI 02888

RE: – DIMP – Copper Services

Bob:

Below is our response to the Notice of Concern dated December 11, 2019 regarding Copper services:

On November 13, 2019, the Division inspected the Company's Distribution Integrity Management Plan (DIMP) Rev. 8, dated August 2, 2019 for Compliance with the Federal Pipeline Safety Regulations CFR 49 Part §192.107 (d) What are the required elements of an integrity Management Plan? Per Part §192.107 (d) Identify and implement measures to address risks. Each operator shall, "Determine and implement measures designed to reduce the risks from failure of its gas distribution pipeline."

Based on the inspection, the Division identified four concerns regarding copper services:

The Division's first concern notes that "copper services have the highest risk scoring in the DIM Plan with risk scores of 7.46, 6.10, and 5.97" (per page 24 of RI DIM plan).

In response to the Division's first concern, the high-risk scores associated with the copper services is due to the manner the Risk Raking Algorithm performs the risk analysis where low inventories with fewer failures exaggerates the risk ranking scores. It is an inherent issue with rates.

The Division's second concern notes that "Page 43 of the **2018 System Integrity Report, 2009-2018 Service Leak Repairs**, Rhode Island reported 29 leaking copper gas services. On page RI-43, Appendix E, in the DIM Plan the Company reported, of the 29 leaks, 6 were classified as grade 1 leaks, the Company classifies a grade 1 leak as any readings of natural gas within 5 feet of a foundation of a house or building. The 6 grade 1 leaks are determined to be well above the standard deviation of "1" as shown on the chart. (see Exhibit "B"). The Chart states, Baseline Rolling Average since 2008 + 0.5 standard Deviation (1 for 2008-2017). A Comment at the bottom of the page RI-43 the Company states, "We are monitoring the cause and will take appropriate action if the number keeps increasing".

In response to the Division's second concern, the Company has not experienced a high number of copper service leaks in the Rhode Island service territory (refer to Exhibit "A" 2009-2018 Copper Service Inventory and Leak Data). Two copper service leaks were reported from 2009-2016, and nine from 2017-2018. The nine leaks were all concentrated on Water St, Warren, Rhode Island, as also noted in Division's letter of concern. The Company believes that the cause of these leaks was due to the Public Works Project that took place in this area which started in early 2017. The town was replacing the water

line that runs parallel and in close proximity to the gas main for the majority of the project. The disruption of the soil, vibration, exposure of the copper services, etc. may have contributed to the high number of leaks received during this timeframe. Throughout this project, the Company's Damage Prevention Department worked in conjunction with the contractor and town of Warren to ensure the facilities were marked to minimize damages.

The referenced 29 service leaks listed on page 43 of the 2018 System Integrity Report refers to 29 leaks on coated steel services, and not on copper services. In 2018, Rhode Island Reported a total of 6 leaks on copper services. Regarding the comment at the bottom of page RI-43 of the 2018 DIMP, the Company is implementing a Proactive Service Replacement Program to replace leak prone services on non-leak prone mains starting in Fiscal Year 20/21 construction season. The Proactive Service Replacement Program will be added to the 2019 DIMP revision.

The Division's third concern notes that "On page RI-48, 2018 Regional Distribution Assessment, the Company in conclusion states, "There are no immediate causes for concern that would warrant changes to DIMP". In addition, the Division also states that "based on this information has serious concerns related to the remaining 189 copper services in Rhode Island".

In response to the Division's third concern, the Company has created a Proactive Service Replacement Program that will replace leak prone services on non-leak prone pipe. There is a total of 176 copper service on non-leak prone mains in Rhode Island that will be eliminated through this program starting in Fiscal Year 20/21 construction season. The remaining 13 copper services are on leak prone main which will be replaced as part of the Lean Prone Pipe Replacement Program and/or by a leak repair.

The Division's fourth concern notes that "On page RI-34 of the DIM Plan, section PROACTIVE SERVICE REPLACEMENT, the Company references an older risk-based high-pressure steel service replacement program that was focused on inside meter sets that penetrated the foundations of homes and businesses. Since this program apparently is no longer in operation the Division requests the Company reevaluate your DIM Plan conclusion stated on page RI-48, **2018 Regional Distribution Integrity Assessment**, the Company in conclusion states, "There are no immediate causes for concern that would warrant changes to DIMP". The Division also states that "The above data when reviewed in its entirety paints a similar picture from a risk standpoint as did the former steel service replacement program.

In response to the Division's fourth concern, the Company will incorporate the new Proactive Service Replacement Program in the 2019 DIMP revision.

Please let me know if you have any additional questions or concerns.

Thank you,

Regina Maddox

Regina Maddox
Manager - Gas Pipeline Safety and Compliance

Cc: Stephen Bell, Director – Gas Pipeline Safety

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



Joanne M. Scanlon

February 26, 2020

Date

Docket No. 4996 - National Grid's FY 2021 Gas Infrastructure, Safety and Reliability (ISR) Plan - Service List 1/7/2020

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| File an original & nine (9) copies w/: Luly E. Massaro, Commission Clerk Margaret Hogan, Commission Counsel Public Utilities Commission 89 Jefferson Blvd. Warwick RI 02888 | Luly.massaro@puc.ri.gov ; | 401-780-2107 |
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