



STATE OF RHODE ISLAND

DIVISION OF PUBLIC UTILITIES & CARRIERS

Legal Section
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June 8, 2021

Luly Massaro
Clerk
Public Utilities Commission
89 Jefferson Blvd.
Warwick, RI 02888

Re: Docket No. 5077

Dear Ms. Massaro,

The Division of Public Utilities and Carriers (“Division”) writes in connection with the “Data Requests to All Parties and Request for Comments” issued on June 3, 2021 (“Data Request”). The Data Request is more properly directed to The Narragansett Electric Company d/b/a National Grid (“Company”) which possesses unique engineering and legal expertise to wordsmith nuanced meanings of its own tariff. The Division, however, would observe the clause “referred to as the Electric Power System (‘Company EPS’),” along with the term “EPS,” have had longstanding usage and appear to be well understood in RIPUC 2180 by the Company and other interested parties.

The term “Affected System” is aimed at “[a]ny neighboring transmission distribution electric power system “other than the Company EPS...”). The elimination of the term “neighboring” along with the insertion of the clause “Affected System includes the transmission system in Rhode Island that is owned by The Narragansett Electric Company” attempt to clarify that the Company’s transmission plant is included within the definition “Affected System.” The Division believes the definition already incorporates this meaning; however, if the Company is amenable the Division does not oppose the proposed edits.

The Division does not oppose updating the IEEE Standard, where appropriate, or deleting the term "Local EPS".

Very truly yours,



Leo J. Wold
Deputy Chief of Legal Services

cc: Service List