

February 12, 2021

**VIA ELECTRONIC MAIL**

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

**RE: Docket 5098 - Proposed FY 2022 Electric Infrastructure, Safety, and Reliability Plan Responses to PUC Data Requests – Set 2**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a National Grid (“National Grid” or the “Company”), enclosed<sup>1</sup>, please find the Company’s responses to the Public Utilities Commission’s Second Set of Data Requests, containing one request, in the above-referenced matter.

Thank you for your attention to this transmittal. If you have any questions or concerns, please do not hesitate to contact me at 401-784-4263.

Sincerely,



Andrew S. Marcaccio

Enclosures

cc: Docket 5098 Service List  
John Bell, Division  
Greg Booth, Division  
Tiffany Parenteau, Esq.  
Al Contente, Division

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<sup>1</sup> Per Commission counsel’s update on October 2, 2020, concerning the COVID-19 emergency period, the Company is submitting an electronic version of this filing followed by an original and five hard copies filed with the Clerk within 24 hours of the electronic filing.

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 12, 2021  
Date

**Docket No. 5098 - National Grid's Electric ISR Plan FY 2022  
Service List as of 1/28//2021**

<b>Name/Address</b>	<b>E-mail Distribution</b>	<b>Phone</b>
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<p><b>File an original &amp; five (5) copies w/:</b> Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888</p>	<p><a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a>;</p>	<p>401-780-2107</p>
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<p>Matthew Sullivan, Green Development</p>	<p><a href="mailto:ms@green-ri.com">ms@green-ri.com</a>;</p>	

PUC 2-1

Request:

Based on the Commission's review of data responses in the Gas ISR in Docket 5099, it appears the Company may be calculating the FY 2022 Gas ISR revenue requirement by including expenditures related to projects that have not yet been placed into service nor are expected to be in service in FY 2022. Please indicate whether the Company is calculating the FY 2022 Electric ISR revenue requirement by including expenditures related to projects that have not yet been placed into service nor are expected to be in service in FY 2022. If so, please recalculate the FY 2022 Electric ISR revenue requirement based on the principle that recovery of capital investment costs does not begin until the capital asset to which the capital expenditures apply are placed into service or are projected to be placed in service during the applicable rate year (i.e., FY 2022). Please provide appropriate schedules reflecting the recalculation.

Response:

The Company is calculating the FY 2022 Electric ISR Plan revenue requirement by including expenditures related to projects that have been placed into service or are expected to be placed into service in FY 2022.

"Non-Discretionary Capital Investment" refers to capital investment related to the Company's commitment to meet customer requests, fix failed equipment and statutory and/or regulatory obligations.

"Discretionary Capital Investment" refers to capital investment, other than 'Non-Discretionary' Capital Investment defined above. The amount of discretionary capital investment the Company includes in its calculation of the revenue requirement must be no greater than the cumulative amount of discretionary project spending as approved by the PUC. This means discretionary investment is limited to the lesser of actual cumulative discretionary capital additions or spending, or cumulative discretionary spending approved by the PUC.

For purposes of the annual ISR Plan revenue requirement, the Company limits the amount of both non-discretionary and discretionary capital investment included in ISR rate base to the amount of incremental capital investment either placed or expected to be placed into service during the upcoming fiscal year. In the ISR reconciliation filing for that fiscal year, the Company will perform the test described above on discretionary capital investment dollars to determine the lesser of the actual cumulative discretionary capital additions or spending, or cumulative discretionary spending approved by the PUC which will determine the level of capital investment included in the ISR revenue requirement calculation.