

March 26, 2021

**VIA ELECTRONIC MAIL**

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

**RE: Docket 5113 – Updated Advanced Metering Functionality Business Case  
Docket 5114 – Grid Modernization Plan  
National Grid’s Response and Objection to Division’s Motion**

Dear Ms. Massaro:

On behalf of National Grid<sup>1</sup> and in accordance with the Rhode Island Public Utilities Commission Rule 810-RICR-00-00-1.16(D), enclosed is the Company’s Response to the Rhode Island Division of Public Utilities and Carriers’ Opposition to the Consolidation of Docket Nos. 5113 and 5114 and Objection to Motion to Stay Docket No. 5114 in the above-referenced proceeding.<sup>2</sup>

Thank you very much for your time and attention to this matter. If you have any questions, please contact me 401-784-7288.

Very truly yours,



Jennifer Brooks Hutchinson

Enclosures

cc: Docket 4770/4780 Service List  
John Bell, Division  
Leo Wold, Esq.

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<sup>1</sup> The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

<sup>2</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 five hard copies filed with the Clerk within 24 hours of the electronic filing.

STATE OF RHODE ISLAND

RHODE ISLAND PUBLIC UTILITIES COMMISSION

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THE NARRAGANSETT ELECTRIC	)	
COMPANY, D/B/A NATIONAL GRID'S	)	
UPDATED ADVANCED METERING	)	DOCKET NO. 5113
FUNCTIONALITY BUSINESS CASE	)	
	)	
THE NARRAGANSETT ELECTRIC	)	
COMPANY, D/B/A NATIONAL GRID'S	)	DOCKET NO. 5114
GRID MODERNIZATION PLAN	)	

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**RESPONSE OF THE NARRAGANSETT ELECTRIC COMPANY D/B/A NATIONAL GRID TO THE RHODE ISLAND DIVISION OF PUBLIC UTILITIES AND CARRIERS' OPPOSITION TO THE CONSOLIDATION OF DOCKET NOS. 5113 AND 5114 AND OBJECTION TO MOTION TO STAY DOCKET NO. 5114**

National Grid<sup>1</sup> submits this memorandum in accordance with the Rhode Island Public Utilities Commission (PUC) Rule 810-RICR-00-00-1.16(D) (Rule 1.16(D)) in response to the Rhode Island Division of Public Utilities and Carriers' (Division) Opposition to the Consolidation of Docket Nos. 5113 and 5114 and hereby objects to the Division's Motion to Stay Docket No. 5114 (Division Motion).<sup>2</sup> As a threshold matter, the Company supports consolidation of the dockets. Consideration of the dockets at the same time will streamline the PUC's review of the

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<sup>1</sup> The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

<sup>2</sup> The Company acknowledges that since the filing of the Division's Opposition to the Consolidation of Docket Nos. 5113 and 5114 and Motion to Stay Docket No. 5114 (Division's Motion), National Grid announced the sale of its Rhode Island utility business to PPL Corporation (the PPL Transaction). The Company is not addressing the potential implications of the PPL Transaction in this Response. This Response addresses the merits of the Division's recommendations as contained in the Division Motion filed on March 17, 2021.

Company's Updated Advanced Metering Functionality (AMF) Business Case and Grid Modernization Plan (GMP) filings and achieve certain efficiencies (e.g. discovery).

Also, in this response, the Company wishes to clarify certain statements in the Division Motion regarding the nature the GMP and Updated AMF Business Case filings. Finally, the Company objects to the Division Motion with respect to staying Docket No. 5114 and to their proposal to delay a decision on the Updated AMF Business Case on grounds that (1) the Amended Settlement Agreement (ASA) approved by the PUC at its Open Meeting on August 24, 2018 in Docket Nos. 4770 and 4780<sup>3</sup> explicitly contemplated that the Updated AMF Business Case and GMP would be considered in conjunction with each other; and (2) delaying consideration of the Updated AMF Business Case until a potential next rate case is inconsistent with the ASA and overlooks the stated need to advance a metering solution in Rhode Island to address the pending asset condition issues facing the existing automated meter reading (AMR) fleet.

## **I. BACKGROUND**

On January 21, 2021, National Grid separately filed its Updated AMF Business Case and GMP in Docket Nos. 5113 and 5114, respectively. The two filings were the culmination of a multi-year collaborative effort, which included engagement with multiple stakeholders, including the Division, through the AMF/GMP Subcommittee of the Power Sector Transformation (PST) Advisory Group (PST Subcommittee), a stakeholder group established as part of the ASA. The ASA specifically required the Company to file the GMP "within a reasonable time after, or in conjunction with, the filing of the Updated AMF Business Case ... to allow the PUC to consider

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<sup>3</sup> See Docket Nos. 4770 and 4780, Report and Order No. 23823 (May 5, 2020).

the GMP and Updated AMF Business case together.”<sup>4</sup> Based on stakeholder and PUC feedback, the Company worked to establish a tighter integration between the Updated AMF Business Case and the GMP to create one holistic plan designed to address unmet customer needs, among other needs for Rhode Island.<sup>5</sup>

On March 15, 2021, the PUC issued an Open Meeting Notice to discuss and vote on the consolidation of Docket Nos. 5113 and 5114. On March 17, 2021, the Division filed the Division Motion opposing consolidation of the dockets and, contrary to the ASA, recommending the PUC delay consideration of AMF until the next rate case and defer consideration of the GMP until after the PUC has issued a decision on the Company’s Updated AMF Business Case. In its filing, the Division cites the “significant time and resources” it will take to properly review and analyze both filings and that consolidation will render such review and preparation of testimony impracticable.<sup>6</sup> In addition, the Division makes certain statements and characterizations regarding the foundational nature of AMF to grid modernization as a basis for its recommendation to stay the GMP filing until after the Updated AMF Business Case is completed.<sup>7</sup> For the reasons set forth below, the Company opposes the Division’s recommendations.

## **II. LEGAL STANDARD**

Rule 1.16(D) provides that “[a]ny party objecting to a written motion filed pursuant to this rule shall, within ten (10) days of the service of the motion, file an objection thereto in writing setting forth in detail the grounds for the objection.”

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<sup>4</sup> ASA at 48; *see also* Report and Order No. 23823 at 22 (“The PUC found that an Advanced Metering Functionality Business Case to be integral to any Grid Modernization Plan. Therefore, the parties were encouraged to file the two as close together as possible.”).

<sup>5</sup> The integration between AMF and the GMP roadmap is fully discussed in Section 4 of the Company’s Updated AMF Business Case.

<sup>6</sup> *See* Division Motion at 1.

<sup>7</sup> *See Id.* at 3.

### III. ARGUMENT

#### 1. The GMP is not solely dependent on approval of AMF.

The Division's characterizations regarding the foundational nature of AMF to mean that grid modernization would not be possible without AMF, and that the timing of the filings as set forth in the Paragraph 15(b) of the ASA was somehow a recognition of "the likely inconsistent nature of the [GMP and Updated AMF Business Case] filings," are simply incorrect.<sup>8</sup> The Division provides no meaningful support for either characterization.

Beginning with the ASA, the PUC and the settling parties recognized the interrelated nature of the GMP and Updated AMF Business Case. The PUC required the settling parties to include certain elements in the Updated AMF Business Case, among which included, "[i]dentification of what functionalities the AMF will achieve that *are part of* the grid modernization plan [sic] and which *are in addition* to the Grid Modernization Plan."<sup>9</sup> The Company affirmed this approach with stakeholders as part of the PST Subcommittee.<sup>10</sup>

Toward that end, the Company's filings identify 15 key grid modernization functionalities, noting that "AMF is foundational to three" of those functionalities, while providing "significant enhancements to several others."<sup>11</sup> The two proposals, although interrelated, are not solely dependent on one another. Accordingly, the Division's characterization of the GMP and Updated AMF Business Case as sequential proposals has no basis in either the ASA or the Company's filings.

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<sup>8</sup> See Division Motion at 2, f.n 1; see also Report and Order No. 23823 *supra* note 3 (providing additional support that the timing of the filing was, in no way, a recognition by either the settling parties or the PUC that the GMP and Updated AMF Business Case were "inconsistent" with one another).

<sup>9</sup> Report and Order No. 23823 at 23, f.n. 76 (emphasis added); See also Article II, Section C.16.b.iv of the ASA (incorporating the required elements for the Updated AMF Business Case).

<sup>10</sup> See Updated AMF Business Case, Table 2-1 at Bates Page 83 ("Feedback that a list of interrelated functionalities should appear in the filing. Agreement that simultaneous filings make these relationships easier to understand.").

<sup>11</sup> Docket No. 5113, Testimony and Attachments of Kristoffer P. Kiefer & Stephen Lasher (AMF Testimony) at 24; see also Updated AMF Business Case at Bates Pages 106-109.

## **2. The GMP and Updated AMF Business Case should be considered together.**

As discussed above, the PUC found that the GMP and Updated AMF Business Case should be considered “as close together as possible.”<sup>12</sup> The settling parties likewise “recognize[d] that the Company’s GMP and associated Company proposals will be subject to consideration by the PUC in a separate docket *in conjunction with* the Updated AMF Business Case....”<sup>13</sup> The Company, along with input from the PST Subcommittee developed and filed its proposals in accordance with the PUC’s direction and the ASA. As set forth above, nothing in the filings supports the Division’s statements that the GMP is wholly contingent on approval of the Updated AMF Business Case, and therefore, should be placed on hold until after the PUC issues a decision on the Company’s Updated AMF Business Case.

Moreover, the Division incorrectly states that “specific GMP projects will be proposed in future ISR dockets only after the AMFs [sic] are implemented.”<sup>14</sup> Rather, the Company provides a detailed overview of GMP solutions and the anticipated cost recovery filings, including those that may be part of future Infrastructure, Safety, and Reliability (ISR) dockets beginning in fiscal year 2022.<sup>15</sup> Delaying consideration of GMP, until after a decision on AMF (which the Division is also proposing to delay), represents a material deviation from the approach the Company outlined in its filings and would continue to delay important GMP-related investments and the associated customer benefits.

The Company, therefore, submits that the GMP and Updated AMF Business Case should be considered together, either as a consolidated docket or at the same time on parallel tracks.

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<sup>12</sup> Report and Order No. 23823 *supra* note 3.

<sup>13</sup> ASA at 50 (emphasis added).

<sup>14</sup> Division’s Motion at 3 (emphasis in original).

<sup>15</sup> See Updated AMF Business Case at Bates Pages 109-110.

**3. The Division’s proposal to delay consideration of AMF until the Company’s next rate case is inconsistent with the ASA and the need to identify a clear metering strategy for the aging fleet of AMR assets.**

The ASA required the Company to “file the Updated AMF Business Case with the PUC for review and approval of the funding necessary to deploy statewide AMF in Rhode Island in a timeframe consistent with the Updated AMF Business Case . . . .” during the term of the current multi-year rate plan (MRP).<sup>16</sup> The Division describes the Company’s use of a September 1, 2021 revenue requirement as establishing an “artificial” deadline for the PUC’s completion of the Updated AMF Business Case docket. As required by the ASA, the Company developed a revenue requirement for the AMF proposal and aligned the requirement with the next rate year, understanding that the PUC would ultimately consider the proposal on its own schedule. While the Company agrees with the Division that there is no deadline by which the PUC must complete its review and render a decision on the Company’s AMF proposal, the settling parties clearly contemplated that such review would take place during the current MRP.

Furthermore, as set forth in the Updated AMF Business Case and supporting testimony, approximately 60 percent of the existing AMR meters in Rhode Island are expected to reach the end of their estimated 20-year useful life on or before calendar years 2023-2024.<sup>17</sup> Recognizing this, the Company sought to align its AMF proposal with that schedule, accounting for time to complete PUC review, ramp-up the project, and complete back-office work prior to meter installation. The Division’s proposal to delay AMF consideration by six months to a potential rate filing in September 2021 (and, therefore, a decision on AMF by nearly 18 months) is inconsistent

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<sup>16</sup> Article II, Section C.16.iv of the ASA, Bates Page 54. While the ASA provided a deadline for the filing by February 1, 2019, the Company sought and received PUC approval for extensions of this date through January 31, 2021. Interim Rate Year 4 of the current MRP will commence on September 1, 2021 and end August 31, 2022.

<sup>17</sup> AMF Testimony at Bates Pages 7, 9; Updated AMF Business Case at Bates Page 101.

with efforts to align the meter strategy and asset planning efforts, and, practically speaking, may lead to cost inefficiencies resulting in higher costs for the Company's customers.

If such a delay were to occur, the Company would need to continue to monitor the health of the AMR meters, adjusting metering purchases as necessary to account for any uptick in meter failures. The purchase and installation of new AMR meters over this period would lead to additional stranded asset costs if the AMF proposal is then later approved. Alternatively, if the PUC does not approve the Company's AMF proposal, the Company will face challenges in quickly pivoting to develop a meter replacement strategy premised on an aging technology, and procuring such assets, which are in increasingly limited supply. This could result in higher costs for customers. For these reasons, the Company maintains that the PUC should consider the Updated AMF Business Case proposal separate from a future base distribution rate case proceeding.

#### **IV. CONCLUSION**

For the foregoing reasons, National Grid respectfully requests that the PUC deny the Division's Motion to Stay Docket No. 5114 and, instead, continue to consider the Company's Updated AMF Business Case and GMP as two interrelated proposals, deserving of review separate from, and in advance of, a future base distribution rate case proceeding.

[Signature page following]



Respectfully submitted,

**THE NARRAGANSETT ELECTRIC  
COMPANY d/b/a NATIONAL GRID**

By its attorney,

A handwritten signature in blue ink, appearing to read "Jennifer Brooks Hutchinson", with a long horizontal flourish extending to the right.

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Dated: March 26, 2021

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.



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Joanne M. Scanlon

March 26, 2021

Date

**National Grid Docket No. 4770 (Rate Application) & Docket No. 4780 (PST)  
Combined Service list updated 12/2/2020**

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