

Raquel J. Webster Senior Counsel

January 9, 2022

#### **BY ELECTRONIC MAIL**

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

## RE: Docket 5210 - Proposed FY 2023 Gas Infrastructure, Safety and Reliability Plan Responses to Data Requests – OER Set 1

Dear Ms. Massaro:

I have enclosed the electronic version of National Grid's<sup>1</sup> responses to the Office of Energy Resources' ("OER's") First Set of Data Requests in the above-referenced matter.<sup>2</sup>

The Company's response to OER 1-1 is pending.

Thank you for your attention to this matter. If you have any questions, please contact me at 781-472-0531.

Very truly yours,

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Raquel J. Webster

Enclosures

cc: Docket 5210 Service List Leo Wold, Esq. Al Mancini, Division John Bell, Division Rod Walker, Division

<sup>&</sup>lt;sup>1</sup> The Narragansett Electric Company d/b/a National Grid.

 $<sup>^2</sup>$  Per a communication from Commission counsel on October 4, 2021, the Company is submitting an electronic version of this filing followed by six (6) 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 9, 2022 Date

# Docket No. 5210- National Grid's FY 2023 Gas Infrastructure, Safety and Reliability (ISR) Plan - Service List 1/20/2022

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# <u>OER 1-2</u>

## Request:

On Bates Pages 43-44, the Company describes Public Works projects. What are the factors for determining which replacement projects will be combined with Public Works projects?

## Response:

The Public Works Program consists of work driven by the various State, Municipal and thirdparty entities that require the company to replace infrastructure that will be impacted by their construction. Public Works-sponsored main replacements are reactive and separate from the Proactive Main Replacement program.

Public Works replaces main based on the following criteria:

- 1. Existing mains that are in direct conflict with municipal or state planned work, i.e., bridge replacements.
- 2. During planned municipal/state work (water/sewer/drain/street reconstruction/street reclamation), streets with leak prone pipe are evaluated for replacement to prevent future leaks on newly paved roads.
- 3. Cast Iron gas mains that are encroached by third party construction are replaced.

## <u>OER 1-3</u>

Request:

What is the expected lifespan of the new and upgraded infrastructure that is planned to be installed as a part of the Southern Rhode Island Gas Expansion Project?

## Response:

It is common for pipelines to be designed for expected lifetimes of 50 to 100 years. With proper maintenance and inspection, National Grid has existing distribution assets that have been successfully operating in excess of 100 years, and existing transmission assets over 50 years. Refer to the response to PUC 2-3, the expected lives of mains and services are 60 and 50 years based on Docket 4770 amended settlement agreement.

## <u>OER 1-4</u>

## Request:

Is the infrastructure installed in the Southern Rhode Island Gas Expansion Project compatible with hydrogen blending and/or renewable gas? If so, please provide a breakdown of what elements of the infrastructure are compatible with hydrogen blending and/or renewable gas and to what percentage (ex. 5% hydrogen blend).

## Response:

The Company is currently participating in research projects with various groups including the Gas Technology Institute and the National Renewable Energy Laboratory to develop standards for the use of coated steel pipes for the transportation of hydrogen and renewable natural gas. Once standards have been established, the Company will be able to evaluate its existing system and planned system upgrades for use with hydrogen and renewable gas.

National Grid anticipates the research to be completed in Quarter 4 of Calendar Year 2023.

## <u>OER 1-5</u>

#### Request:

To what extent are proposed investments in FY23 in the gas distribution system compatible with hydrogen blending? Please specify the percentage of new investments that are compatible with hydrogen blending and to what level of hydrogen mixing (ex. 5% or 10% hydrogen blend).

## Response:

The Company is currently participating in research projects with various groups including the Gas Technology Institute and the National Renewable Energy Laboratory to develop standards for the use of polyethylene pipes for the transportation of hydrogen and renewable natural gas. Once standards have been established, the Company will be able to evaluate its existing system and planned system upgrades for use with hydrogen and renewable natural gas. National Grid anticipates the research to be completed in Q4 of 2023.

## <u>OER 1-6</u>

#### Request:

Does the Company propose any activities in FY23 to proactively plan for gas system optimization (e.g. strengthening branches to support pockets of customers for whom Renewable Natural Gas is the only viable decarbonized option, trimming branches and supporting electrification for pockets of customers who have access to other viable decarbonized options)? If not, what was the decision-making process and why were these alternate options decided against?

## Response:

The Company did not propose any proactive plan for gas system optimization in FY23. However, the Company is pursuing potential pathways to decarbonize and will look to propose appropriate strategies and measures in the future.

## <u>OER 1-7</u>

#### Request:

Did the Company consider alternate decarbonization options beyond decarbonized fuel (i.e., geothermal and/or district heating) for FY23? If so, please describe this consideration. If not, why were such alternatives not considered?

## Response:

The Company is currently engaged with multiple stakeholders in evaluating the best path forward for sustainable energy delivery for our customers through resilient investment in our infrastructure. The Company agrees that geothermal and/or district heating is likely to play a pivotal role in decarbonization of energy and is working on a strategy for future ISR filings.