November 2, 2021

VIA ELECTRONIC MAIL

Luly E. Massaro, Division Clerk
Rhode Island Division of Public Utilities and Carriers
89 Jefferson Boulevard
Warwick, RI  02888

RE:  Docket D-21-09 – Petition of PPL Corporation, PPL Rhode Island Holdings, LLC, National Grid USA, and The Narragansett Electric Company for Authority to Transfer Ownership of The Narragansett Electric Company to PPL Rhode Island Holdings, LLC and Related Approvals
Responses to Division Advocacy Section Data Requests – Set 11

Dear Ms. Massaro:

On behalf of National Grid USA and The Narragansett Electric Company (together, “National Grid”), enclosed are National Grid’s responses to the eleventh set of data requests issued by the Rhode Island Division of Public Utilities and Carriers (“Division”) Advocacy Section (the “Advocacy Section”) in the above-referenced proceeding.1

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

Very truly yours,

Jennifer Brooks Hutchinson

1 Although this is a Division filing, consistent with Public Utilities Commission’s filing requirements during the COVID-19 emergency period, National Grid is submitting an electronic version of this filing. National Grid will provide the Division Clerk with five hard copies within 24 hours and, if needed, additional hard copies of the enclosures upon request.
Enclosures

c: Docket D-21-09 Service List (electronic only)
   John Bell, Division
   Leo Wold, Esq.
   Christy Hetherington, Esq.
   Scott H. Strauss, Esq. (electronic only)
   Latif M. Nurani, Esq. (electronic only)
   Amber L. Martin Stone, Esq. (electronic only)
   Anree G. Little, Esq. (electronic only)
National Grid USA and The Narragansett Electric Company
Division 11-1

Request:

Referring to Attachment PPL-DIV 1-54-1 (Analysis of PPL’s Cost to Operate The Narragansett Electric Company), did PPL evaluate the differences in system construction standards, means and methods of construction and if so, provide a detailed copy of this analysis?

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 11-1.
National Grid USA and The Narragansett Electric Company
Division 11-2

Request:

Referring to Attachment PPL-DIV 1-54-1 (Analysis of PPL’s Cost to Operate The Narragansett Electric Company), provide all analyses of the differences in materials utilized between Narragansett Electric and PPL including but not limited to how PPL can create the same economies of scale for Narragansett Electric as National Grid currently has for purchasing, storage, material handling, supply chain and available stock for storms and other work flow taking place between the three National Grid jurisdictions at this time.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 11-2.

Prepared by or under the supervision of: Pamela Viapiano
National Grid USA and The Narragansett Electric Company
Division 11-3

Request:

Referring to Attachment PPL-DIV 1-54-1 (Analysis of PPL’s Cost to Operate The Narragansett Electric Company), provide all analyses of construction differences between PPL and Narragansett Electric and how PPL will transition work force training to PPL standards and the associated costs and timeline.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 11-3.
Request:

Is PPL going to transition the Narragansett construction standards to the PPL construction standards?

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 11-4.
National Grid USA and The Narragansett Electric Company
Division 11-5

Request:

Is PPL going to transition the Narragansett construction materials to the PPL construction materials?

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 11-5.
National Grid USA and The Narragansett Electric Company  
Division 11-6

Request:

Is PPL going to transition power line material and equipment purchases to a centralized PPL process and system or leave those purchases exclusively with PPL Rhode Island if the transaction is approved?

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 11-6.
National Grid USA and The Narragansett Electric Company  
Division 11-7

Request:

Referring to Attachment PPL-DIV 1-54-1 (Analysis of PPL’s Cost to Operate The Narragansett Electric Company), provide the details of the PPL analysis of the loss of efficiency in material purchases currently existing with the larger National Grid Company purchasing for multiple jurisdictions.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 11-7.
National Grid USA and The Narragansett Electric Company
Division 11-8

Request:

Referring to Attachment PPL-DIV 1-54-1 (Analysis of PPL’s Cost to Operate The Narragansett Electric Company), provide the details of the PPL analysis of the cost associated with training and work force efficiency losses while transitioning to PPL work practices and standards and material acquisitions. If PPL does not believe this is a cost then provide the analysis showing this is not a cost.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 11-8.
Request:

Referring to Attachment PPL-DIV 1-54-1 (Analysis of PPL’s Cost to Operate The Narragansett Electric Company), provide the cost to storm outage restoration process and durations due to a lack of surplus materials in stock to meet the needs of materials that would otherwise be available from the larger National Grid Company. If PPL does not believe this is a cost, then provide the analysis showing it is not a cost.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 11-9.
National Grid USA and The Narragansett Electric Company
Division 11-10

Request:

Referring to Attachment PPL-DIV 1-54-1 (Analysis of PPL’s Cost to Operate The Narragansett Electric Company), PPL states on page 8: PPL collaborated with National Grid to ensure it understood the specific work, activities and staffing levels required to operate Narragansett across electric, gas, customer and corporate functions. Provide the following information and analyses associated with the PPL effort:

a. The PPL distribution voltages and National Grid distribution voltages and impact on a synergy of construction standards, material standards and material surplus stock and ability to address outages and storm damage repairs.

b. The PPL information collected on all differences in standards and work activities and the time and cost associated to migrating to a PPL methodology and standard.

c. Provide a list of all activities and specific work evaluated and the details of that evaluation including but not limited to each difference between the companies and how they would be transitioned.

d. Provide a copy of the PPL bottom-up staffing model.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 11-10.
National Grid USA and The Narragansett Electric Company  
Division 11-11

Request:

If PPL proposes to transition Narragansett operations to the PPL construction standards including material standards, how many years does PPL expect this transition to take?

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 11-11.
National Grid USA and The Narragansett Electric Company
Division 11-12

Request:

If PPL plans on Narragansett and Rhode Island to stand alone on construction standards and materials, how has PPL evaluated the cost associated with a much smaller system standing alone versus the existing larger National Grid system?

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 11-12.
National Grid USA and The Narragansett Electric Company  
Division 11-13

Request:

Will Narragansett be responsible for all of its material and supply stocking requirements or will that be shared with PPL?

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 11-13.
National Grid USA and The Narragansett Electric Company
Division 11-14

Request:

How has PPL evaluated the cost and impact on reliability associated with storm outage restoration with materials and supplies having to be transported from Pennsylvania or Kentucky to Rhode Island rather than from the much closer supply chain and stock of National Grid currently?

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 11-14.
National Grid USA and The Narragansett Electric Company
Division 11-15

Request:

Does PPL believe that National Grid does not have an organization dedicated to serve the customers of Rhode Island?

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 11-15.
Request:

Narragansett has one of the best reliability statistics among all IEEE reporting utilities. Does PPL contend it will improve on the Narragansett already near the highest reliability level? If PPL does believe it can make such improvements, provide the details as to how that will be accomplished, at what cost, and the associated quantifiable benefits.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 11-16.
National Grid USA and The Narragansett Electric Company
Division 11-17

Request:

Explain in detail how PPL’s creation of a locally controlled and managed PPL Rhode Island will overcome the loss of economic and operational synergies which currently exist under National Grid’s ownership of Narragansett.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 11-17.
National Grid USA and The Narragansett Electric Company
Division 11-18

Request:

PPL has stated multiple times in its response to DIV 1-54 that it will make additional investment in the state and increase the amount of infrastructure investment in Rhode Island. What studies has PPL completed or reviewed that supports the PPL statements about increasing infrastructure investment? Additionally, what benefit cost analysis and reliability enhancement analysis has PPL completed to support its statement? Furthermore, has PPL completed any Narragansett area studies or ISR Plan and analysis to support its statement that it will increase the amount of infrastructure investments in Rhode Island?

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 11-18.
National Grid USA and The Narragansett Electric Company
Division 11-19

Request:

Regarding Attachment PPL-DIV-54-1, Table 7:

a. For each year from 2015 to 2020, provide PPL’s actual total costs for each category, the allocation factor calculations used to allocate costs to each operating company, and the amount assigned to each operating company. Provide the same information assuming that Narragansett is an additional operating company.

b. For each category, provide the analysis or assumptions to derive the estimated costs to be assigned to Narragansett, indicating the number of employees, amount of invested capital, and O&M expenses required in each category.

c. Provide the number of positions in each category that PPL expects will be filled by current National Grid employees.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 11-19.
National Grid USA and The Narragansett Electric Company  
Division 11-20

Request:

Attachment PPL-DIV 1-54-1, states (at 3) that the estimated costs to operate Narragansett represent a “steady state” after the 24 month transition period.

a. What are the estimated duplicative operating costs expected to be incurred during the transition period?

b. Does PPL intend to recover these duplicative operating costs from ratepayers?

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 11-20.
National Grid USA and The Narragansett Electric Company  
Division 11-21

Request:

Explain in detail what information National Grid shared with PPL as part of PPL’s statement (in its response to DIV 1-54 Supplement) that it collaborated with National Grid in the Analysis of PPL operating cost of Narragansett? Over what period of time did these discussions take place? Provide the names and titles of National Grid employees that participated in the discussions.

Response:

PPL Corporation and PPL Rhode Island Holdings, LLC have responded to this request in their response to Data Request Division 11-21.
National Grid USA and The Narragansett Electric Company
Division 11-22

Request:

Provide the last five years of the Narragansett IEEE reliability statistics including a comparison to all National Grid USA reporting utilities by year.

Response:

Please see Attachment NG-DIV 11-22.
<table>
<thead>
<tr>
<th>RI</th>
<th>Year</th>
<th>SAIFI</th>
<th>SAIFI target</th>
<th>SAIDI</th>
<th>SAIDI target</th>
<th>CAIDI</th>
<th>CAIDI target</th>
<th>IEEE based Criterion</th>
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<tr>
<td></td>
<td>2016</td>
<td>0.97</td>
<td>1.05</td>
<td>69.13</td>
<td>71.90</td>
<td>71.27</td>
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<td></td>
<td>2017</td>
<td>0.78</td>
<td>1.05</td>
<td>59.10</td>
<td>71.90</td>
<td>76.24</td>
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<tr>
<td></td>
<td>2018</td>
<td>1.00</td>
<td>1.05</td>
<td>65.11</td>
<td>71.90</td>
<td>65.04</td>
<td></td>
<td>Yes</td>
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<tr>
<td></td>
<td>2019</td>
<td>1.02</td>
<td>1.05</td>
<td>68.20</td>
<td>71.90</td>
<td>66.60</td>
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<td>2020</td>
<td>0.94</td>
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<th>CAIDI target</th>
<th>IEEE based Criterion</th>
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<td>2017</td>
<td>0.96</td>
<td>1.43</td>
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<td>153.98</td>
<td>123.66</td>
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<td>2020</td>
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<th>SAIDI</th>
<th>SAIDI target</th>
<th>CAIDI</th>
<th>CAIDI target</th>
<th>IEEE based Criterion</th>
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<th>Niagara Mohawk</th>
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<th>SAIDI*</th>
<th>SAIDI target</th>
<th>CAIDI*</th>
<th>CAIDI* target</th>
<th>IEEE based Criterion</th>
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<tr>
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<td>2017</td>
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<td>No</td>
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<tr>
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<td>2.07</td>
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<td>No</td>
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<tr>
<td></td>
<td>2019</td>
<td>1.02</td>
<td>1.08</td>
<td>2.07</td>
<td>2.03</td>
<td>2.10</td>
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<td>No</td>
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<tr>
<td></td>
<td>2020</td>
<td>1.04</td>
<td>1.08</td>
<td>2.11</td>
<td>2.03</td>
<td>2.10</td>
<td></td>
<td>No</td>
</tr>
</tbody>
</table>

*SAIDI and CAIDI is represented in hours
Request:

Does National Grid believe it has an organization dedicated to serving the customers in Rhode Island?

Response:

Yes. National Grid USA’s current organization is well established and dedicated to serving its customer base in Rhode Island. National Grid USA has a strong history and current focus on effectively operating and managing its gas and electric networks, managing energy supply, responding to customer and stakeholder needs, and delivering products and services to all customers. National Grid USA’s organization is set up to deliver customer solutions that meet current and future needs. Those solutions include efficiency programs, demand response, distributed generation, and clean energy technologies.

National Grid USA operates a “Shared Services” organizational model in many functions including the Customer “Front Office” (Contact Center), “Back Office” (Billing, Payments Processing, Collections, Accounts Management & Operations, Competitive Supplier Services, Revenue Assurance), Energy Procurement, and Business Services (Payroll, Benefits, Employee Services, Accounts Payable, Accounts Receivable, and parts of Supply Chain). National Grid USA believes its use of a Shared Services model achieves efficiencies and promotes continuous innovation and consistency of services across multiple companies. In other areas of its business including Electric and Gas operations and maintenance, Metering Services, and Sales & Solutions, National Grid USA uses local resources within Rhode Island to provide field operations and service, and to deliver programs such as Energy Efficiency, Demand Response, Distributed Energy Resources, Electrification of Transportation, and Consumer Advocacy. Local service technicians, account managers, advocates, sales teams, and job owners provide appropriate and valued direct support to both residential and business customers.
Does National Grid utilize the same or substantially similar construction and material standards in Rhode Island and Massachusetts?

Response:

Yes, National Grid USA uses the same construction and material standards in Rhode Island and Massachusetts.
Request:

Does National Grid share materials and supplies particularly during storm restoration between Rhode Island and Massachusetts?

Response:

There is no sharing practice between Rhode Island and Massachusetts. National Grid USA orders and obtains materials/stock/supplies in the normal course of business and places them in its main New England Central Distribution Center (“NEDC”) located in Massachusetts. Materials are dispensed from the NEDC as follows:

- For all business (whether blue-sky or emergency event), materials are dispensed from NEDC to Rhode Island or Massachusetts to meet business requirements in the respective jurisdiction. When the materials are dispensed from NEDC, the appropriate recipient operating company is charged accordingly.

- In emergency situations, material dispensing is enhanced using “storm kits,” which contain items crews use most frequently in restoration work. Storm kits are pre-packaged for quick dispensing to field crews. This is to accelerate emergency restoration efforts. The appropriate recipient operating company is charged accordingly.

If there is ever a requirement/need to move materials between states in the normal course of business, that is completed and the appropriate operating company is charged accordingly.
National Grid USA and The Narragansett Electric Company  
Division 11-26

Request:

Is it correct that National Grid has the capability to utilize spare power transformers and other equipment from Massachusetts with Rhode Island and is that equipment compatible across both jurisdictions?

Response:

Yes, National Grid USA has the capability to utilize spare power transformers and other equipment from Massachusetts in Rhode Island and that equipment is mostly compatible across both jurisdictions. National Grid USA strives to standardize its transformers and other equipment throughout its system as much as possible and efficiently hold spares to accommodate its anticipated system needs.
National Grid USA and The Narragansett Electric Company
Division 11-27

Request:

Is it correct that recently National Grid utilized a power transformer from Massachusetts to replace a failing transformer or failed transformer in Rhode Island and that the capacity and voltages were compatible and match the Rhode Island design?

Response:

Yes, National Grid USA utilized a power transformer in Massachusetts for a transformer failure in Rhode Island; the capacity and voltages were compatible with the Rhode Island design. Please also see National Grid USA’s and The Narragansett Electric Company’s response to Data Request Division 11-26.
National Grid USA and The Narragansett Electric Company
Division 11-28

Request:

Are the National Grid construction personnel trained and accustomed to performing storm repairs and other work on both the Rhode Island distribution system and Massachusetts distribution system?

Response:

Yes, the National Grid USA construction personnel are trained and accustomed to perform storm repairs and other work on both the Rhode Island distribution system and Massachusetts distribution system. The level of repairs will vary depending on their specific qualifications. For purposes of this request, National Grid USA and The Narragansett Electric Company deem “construction personnel” as line workers, who are the primary personnel that perform storm repairs and other work on the Rhode Island and Massachusetts electric distribution systems.
National Grid USA and The Narragansett Electric Company
Division 11-29

Request:

Provide a list of the total employees and staff members of National Grid that are typically involved in the development and preparation of Area Studies and the annual ISR Plan. This should include every aspect of the preparation from start to finish and every employee of every group or department, including management approvals. Provide the employee name, title, department, and general role in either or both processes. Specifically identify employees in Corporate Services. In cases where a section or group is consulted to develop Area Studies or the ISR Plan as opposed to an individual, indicate the group and approximate number of employees that contribute to the process (e.g. Environmental-3 employees and 1 manager, or Providence Area operations group -5 employees and 1 manager).

Response:

Involvement of individuals and departments in the development and preparation of Area Studies and the annual electric Infrastructure, Safety and Reliability Plan ("ISR Plan") represents a portion, but not all, of each individual’s responsibilities. In some instances, there are specific individuals who continually provide support, and in other instances the individuals vary depending on their specific role or issue.

Please see Attachment NG-DIV 11-29-1 for a list of employees of National Grid USA Service Company, Inc. or The Narragansett Electric Company, as applicable, and, in some instances, contractors who are typically involved in the development and preparation of Area Studies and the annual electric ISR Plan. The entity for which the employee works is noted in column (b).

Please see Attachment NG-DIV 11-29-2 for a list of departments that contribute to the development and preparation of Area Studies and the annual electric ISR Plan.
<table>
<thead>
<tr>
<th>(a) Department</th>
<th>(b) General Role</th>
<th>(c) Number of Individuals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plant Accounting</td>
<td>ISR Plan - Provides plant accounting policies and procedures. Provides Plant in Service, Cost of Removal and other accounting activity and balances as required.</td>
<td>4 analysts</td>
</tr>
<tr>
<td>General Accounting</td>
<td>ISR Plan - Provides general accounting policies and procedures.</td>
<td>as required</td>
</tr>
<tr>
<td>Finance</td>
<td>ISR Plan - financial support for actual and forecasted O&amp;M, plant in service, cost of removal, and capital spending Approval of budgeted spending within Annual Business Plan</td>
<td>2 Analysts</td>
</tr>
<tr>
<td>Legal</td>
<td>Legal support for various RI specific regulatory items</td>
<td>3 attorneys</td>
</tr>
<tr>
<td>Distribution Planning &amp; Asset Mgt</td>
<td>ISR Plan - in addition to specific individuals listed, additional support is required from at least two other department engineers who vary year to year based upon specific data requests received. Ownership and Engineering Strategy</td>
<td>2 engineers</td>
</tr>
<tr>
<td>Distribution Planning &amp; Asset Mgt</td>
<td>Area Studies - Area studies are primarily led and performed by Distribution Planning and Asset Management but involve numerous other departments across the company.</td>
<td>1 central planning engineer, 1 field engineer, 2 managers, 1 director, 1 Vice President</td>
</tr>
<tr>
<td>Control Center</td>
<td>Area Studies - individuals involved differ based upon the geographical assignments, expertise and workload.</td>
<td>1 outage coordinator, 1 dispatcher</td>
</tr>
<tr>
<td>Real Estate Services</td>
<td>Area Studies - individuals involved differ based upon the geographical assignments, expertise and workload.</td>
<td>1 Real Estate Rep</td>
</tr>
<tr>
<td>Permitting &amp; Licensing Team</td>
<td>Area Studies - individuals involved differ based upon the geographical assignments, expertise and workload.</td>
<td>1 Permitting &amp; Licensing PM</td>
</tr>
<tr>
<td>Project Development</td>
<td>Area Studies - individuals involved differ based upon the geographical assignments, expertise and workload.</td>
<td>1 project developer, 1 manager</td>
</tr>
<tr>
<td>Project Management</td>
<td>Area Studies - individuals involved differ based upon the geographical assignments, expertise and workload.</td>
<td>1 project manager, 1 manager</td>
</tr>
<tr>
<td>Resource Planning (Long Term)</td>
<td>Area Studies - individuals involved differ based upon the geographical assignments, expertise and workload.</td>
<td>1 long term resource planner</td>
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<tr>
<td>Resource Planning (Short Term)</td>
<td>Area Studies - individuals involved differ based upon the geographical assignments, expertise and workload.</td>
<td>2 short term resource planners (1 dline &amp; 1 Sub), 2 managers</td>
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<tr>
<td>Transmission Planning</td>
<td>Area Studies - individuals involved differ based upon the geographical assignments, expertise and workload.</td>
<td>1 engineer</td>
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<tr>
<td>Transmission Regional Control Strategy</td>
<td>Area Studies - individuals involved differ based upon the geographical assignments, expertise and workload.</td>
<td>1 outage coordinator</td>
</tr>
<tr>
<td>Transmission Asset Strategy</td>
<td>Area Studies - individuals involved differ based upon the geographical assignments, expertise and workload.</td>
<td>1 engineer</td>
</tr>
<tr>
<td>Options Solutions Engineering</td>
<td>Area Studies - individuals involved differ based upon the geographical assignments, expertise and workload.</td>
<td>2 substation engineers, 1 transmission line engineer, 1 substation O&amp;M engineer, 1 protection engineer, 1 manager</td>
</tr>
<tr>
<td>Environmental</td>
<td>Area Studies - individuals involved differ based upon the geographical assignments, expertise and workload.</td>
<td>1 environmental scientist</td>
</tr>
<tr>
<td>Non-Wires Alternative / Product Energy Services</td>
<td>Area Studies - individuals involved differ based upon the geographical assignments, expertise and workload.</td>
<td>1 engineer</td>
</tr>
<tr>
<td>Community and Customer Management</td>
<td>Area Studies - individuals involved differ based upon the geographical assignments, expertise and workload.</td>
<td>1 community &amp; customer manager</td>
</tr>
<tr>
<td>Distribution Design</td>
<td>Area Studies - individuals involved differ based upon the geographical assignments, expertise and workload.</td>
<td>1 distribution design supervisor, 2 distribution design engineers</td>
</tr>
<tr>
<td>Customer Reliability</td>
<td>Area Studies - individuals involved differ based upon the geographical assignments, expertise and workload.</td>
<td>1 engineer</td>
</tr>
<tr>
<td>Investment Management</td>
<td>Area Studies - individuals involved differ based upon the geographical assignments, expertise and workload.</td>
<td>1 investment management analyst</td>
</tr>
<tr>
<td>Operations</td>
<td>Area Studies - individuals involved differ based upon the geographical assignments, expertise and workload.</td>
<td>1 Overhead Line Manager, 1 Underground Line Manager, 2 Local OH supervisors, 2 Local UG Supervisors, 2 Substation O&amp;M supervisors, 1 Substation O&amp;M manager, 1 PTO supervisor, 1 PTO manager, 1 Telecom supervisor, 1 Telecom manager, 1 TLS Supervisor</td>
</tr>
<tr>
<td>Estimating Team - NE Electric Project Estimating</td>
<td>ISR Plan and Area Studies - Provides large project estimates and peer reviews</td>
<td>2 estimators</td>
</tr>
<tr>
<td>Operations - Elec M&amp;C</td>
<td>consult and inform as necessary</td>
<td>1 VP</td>
</tr>
<tr>
<td>PTO &amp; Substation NE</td>
<td>Support Plan</td>
<td>1 Director</td>
</tr>
<tr>
<td>AMI</td>
<td>Coordination of potential AMI matters</td>
<td>1 Director, 1 Lead Analyst</td>
</tr>
<tr>
<td>Project Management</td>
<td>ISR Plan - individuals involved complex project cost and variance updates</td>
<td>5 project managers</td>
</tr>
<tr>
<td>Substation O&amp;M Services</td>
<td>Substation O&amp;M support and variance explanations</td>
<td>4 Equipment Engineers</td>
</tr>
</tbody>
</table>