

National Grid USA and The Narragansett Electric Company
Division 1-37

Request:

Presently the Narragansett-owned transmission assets are, for operational purposes, integrated into the New England Power Company (NEP) d/b/a National Grid transmission system pursuant to Schedule III-B of NEP's FERC Electric Tariff. Please:

- a. Explain whether the Narragansett-owned transmission assets will continue to be integrated with National Grid's transmission system for operational purposes post-acquisition; and
- b. If Narragansett's transmission assets will no longer be integrated with National Grid's transmission system post-Transaction, please identify who will operate Narragansett's transmission assets that are subject to local control; and
- c. Provide any Documents related to the operation of Narragansett's transmission assets post-Transaction.

Response:

- a. During a transition period after PPL Rhode Island Holdings, LLC's ("PPL Rhode Island") acquisition of The Narragansett Electric Company ("Narragansett") from National Grid USA (the "Transaction") has closed, Narragansett-owned electric transmission assets will continue to be integrated with the electric transmission system of National Grid USA transmission-owning subsidiaries in New England. During this transition period, Narragansett-owned electric transmission assets will continue to be operated by NEP pursuant to an integrated facilities agreement in Schedule III-B of NEP's FERC Electric Tariff No. 1 for operational purposes and for the provision of open access transmission service. During this transition period, NEP will also continue to serve as a Participating Transmission Owner for Narragansett-owned electric transmission assets under the Transmission Operating Agreement with ISO New England, Inc. This transition period is currently anticipated to run through the end of June 2022.
- b. Please see PPL Corporation and PPL Rhode Island's response to Division 1-37, part (b).
- c. Please see PPL Corporation and PPL Rhode Island's response to Division 1-37, part (c).

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National Grid USA and The Narragansett Electric Company
Division 1-38

Request:

Witness Gregory N. Dudkin states (at 11:20-12:1) that "PPL Electric Utilities' operation and maintenance costs in 2020 are substantially the same level they were in 2011." Please provide the basis for this statement and all supporting data, including annual Operation & Maintenance expense for PPL Electric Utilities for the years 2011 through 2020.

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 1-38 for the requested information.

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National Grid USA and The Narragansett Electric Company
Division 1-39

Request:

Please provide any plans developed by PPL or PPL RI “to modernize and harden the Rhode Island electric grid and facilitate the transition to more renewable energy resources, greater energy efficiency, better demand and load control, and electrification of the transportation sector,” as referenced in the testimony of Gregory N. Dudkin (at 31:7-11).

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 1-39 for the requested information.

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National Grid USA and The Narragansett Electric Company
Division 1-40

Request:

Referencing the Testimony of Lonnie Bellar at 7:4-7, identify the “nearly 20 gas operations functions” and provide all Documents related to the plans for which PPL and Narragansett are currently “crafting [integration and transition] plans.”

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 1-40 for the requested information.

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National Grid USA and The Narragansett Electric Company
Division 1-41

Request:

Referencing Mr. Bellar's testimony at 10:12-14, please identify whether PPL intends to continue the Gas Business Enablement Program as it currently exists after the close of the Transaction, or whether it will discontinue that program (whether partially or entirely).

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 1-41 for the requested information.

National Grid USA and The Narragansett Electric Company
Division 1-42

Request:

Referencing Mr. Bellar's testimony at 11:4-6, please:

- a. Provide the date by which the PPL expects to have established the "Rhode Island-dedicated gas control center";
- b. Provide the most recent cost estimate for the PPL gas control center; and
- c. Please confirm that none of those costs will be charged to ratepayers. If that is not the case, please identify the cost components that PPL plans to recover from ratepayers, and state the basis for such recovery.

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 1-42 for the requested information.

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National Grid USA and The Narragansett Electric Company
Division 1-43

Request:

Referencing Mr. Dudkin's statement in his testimony (at 30:12-14) that "PPL will work to integrate Narragansett into its existing operations and make infrastructure investments that will enhance reliability and resiliency," please provide any plans or Documents related to such integration.

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 1-43 for the requested information.

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Division 1-44

Request:

Please state whether PPL has identified any compatibility issues with integrating the existing Narragansett/National Grid and PPL information systems. Please provide any analyses, assessments, or studies of compatibility issues, including any plans that have been developed to address identified or perceived incompatibilities. In addition, please (a) provide any cost estimates associated with resolving any incompatibilities; and (b) confirm that PPL does not intend to recover the costs of addressing any such incompatibilities from Narragansett ratepayers.

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 1-44 for the requested information.

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Division 1-45

Request:

Following the close of the Transaction, will Narragansett be included in any mutual assistance agreements among the PPL family of companies? If so, please provide copies of any such agreements.

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 1-45 for the requested information.

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National Grid USA and The Narragansett Electric Company
Division 1-46

Request:

Referencing Mr. Dudkin's testimony at 28:5-6, please state when PPL expects to take over the provision of each of the following services:

- a. meter data services;
- b. mutual assistance for storm response;
- c. electricity procurement;
- d. engineering; and
- e. asset management.

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 1-46 for the requested information.

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Request:

Please provide a copy of Schedule 6.9 to the Newquay Disclosure Schedule.

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 1-47 for the requested information.

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National Grid USA and The Narragansett Electric Company
Division 1-48

Request:

Please provide PPL's projections of the number of direct Narragansett employees for each of the three years following the close of the Transaction.

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 1-48 for the requested information.

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National Grid USA and The Narragansett Electric Company
Division 1-49

Request:

Assuming PPL will need to pay comparatively higher salaries (or offer improved benefit packages) to retain employees of National Grid or its affiliates, including the Service Company, who currently provide services to Narragansett, please explain whether PPL will treat any such wage increases (or the costs of improved benefits) as part of acquisition premiums or transaction costs for which PPL has agreed in its petition not to seek to recover in customer rates.

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 1-49 for the requested information.

National Grid USA and The Narragansett Electric Company
Division 1-50

Request:

Provide any projections for Narragansett's annual Administrative and General ("A&G") costs, including costs allocated to Narragansett through cost sharing arrangements with National Grid, PPL, or either of their affiliates, through the transition period of the Transaction. In addition:

- a. If the projections show an increase over Narragansett's current annual A&G costs, to what extent are these costs considered acquisition premiums or transaction costs for which PPL has agreed not to seek to recover in customer rates.

Response:

At this point in time, National Grid USA does not have projections for The Narragansett Electric Company's ("Narragansett") annual A&G costs through the transition period of PPL Rhode Island Holdings, LLC's acquisition of Narragansett from National Grid USA because the nature, timing, and extent of transition services have not yet been finalized.

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National Grid USA and The Narragansett Electric Company
Division 1-51

Request:

Provide all Documents, including estimates or data, studies, workpapers, reports, and information, related to the permanent headcount reduction that would be attributable to PPL's proposed implementation of smart grid technology. Please delineate the portion of this permanent headcount reduction that is estimated to be direct Narragansett employees.

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 1-51 for the requested information.

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National Grid USA and The Narragansett Electric Company
Division 1-52

Request:

Please provide the two most recent reports assessing employee satisfaction and workplace climate for LG&E and KU.

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 1-52 for the requested information.

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National Grid USA and The Narragansett Electric Company
Division 1-53

Request:

Please provide the two most recent reports assessing employee safety for LG&E and KU.

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 1-53 for the requested information.

National Grid USA and The Narragansett Electric Company
Division 1-54

Request:

Referencing the testimony of Mr. Sorgi's testimony at 9:10-12, in which he states: "We also believe that infrastructure investments and a more localized operating model under PPL's ownership will create jobs and support economic development in Rhode Island," please:

- a. Explain PPL's "localized operating model,"
- b. Provide any analyses or comparisons performed assessing the PPL model against how Narragansett is currently managed;
- c. Quantify the number of jobs PPL expects that will be created, including any supporting data, studies, workpapers, reports, and information; and
- d. Please provide any data, studies, workpapers, reports, and information to support PPL's claim that the Transaction will result in economic development.

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 1-54 for the requested information.

National Grid USA and The Narragansett Electric Company
Division 1-55

Request:

Referencing the discussion in Mr. Sorgi's testimony (at 16:18-17:2) regarding remaining "effects bargaining" needed to resolve issues with bargaining units prior to the close of the Transaction, please:

- a. Identify with specificity the "effects bargaining issues" that need to be resolved prior to the close of the Transaction;
- b. Provide current status of negotiations to resolve the "effects bargaining issues";
- c. State whether the Transaction is contingent upon successful resolution of the "effects bargaining issues"; and
- d. If the Transaction is not contingent upon successful resolution of the "effects bargaining issues," explain what impact, if any, would the failure to resolve the "effects bargaining issues" have on the Transaction.

Response:

Please see PPL Corporation and PPL Rhode Island Holdings, LLC's response to Data Request Division 1-55 for the requested information.