



STATE OF RHODE ISLAND

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November 3, 2021

**VIA ELECTRONIC MAIL AND HAND DELIVERY**

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

**Re: Docket No. 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**

Dear Ms. Massaro:

Enclosed please find an original and one copy of the Advocacy Section of the Division of Public Utilities' ("Advocacy Section") Pre-Filed Direct Testimony in the above captioned case.

This filing includes Direct Testimony, with applicable exhibits, appendices and reference sources, from five consultants retained by the Advocacy Section to provide expertise to its review of this Petition. These consultants are Mr. Michael R. Ballaban, Mr. Gregory L Booth, Mr. David J. Effron, Mr. Matthew I. Kahal and Mr. Bruce R. Oliver.

Of the five testimony packets being filed, several contain reference to business information provided by the petitioners (referred to herein as "PPL" and "Grid") over the course of discovery which PPL and/or Grid classify as confidential and proprietary and for which formal Motions for Protective Treatment were made. As such, in the interest of protecting from public disclosure this information, the Advocacy Section is providing for the docket one original unredacted complete set of Direct Testimony in a sealed envelope marked "**Contains Privileged and Confidential Information – Do Not Release.**" The Advocacy Section will also provide the unredacted version of this testimony to designated legal counsel for petitioners, in keeping with our agreed-upon practice when the parties circulated confidential materials during discovery. A public, redacted

version of this testimony will be provided to the Docket No. D-21-09 Service List via electronic mail. We will provide hard copies by request only.

Thank you for your efforts and attention to this filing.

Very truly yours,



Christy Hetherington  
Chief Legal Counsel  
RI Division of Public Utilities and Carriers  
89 Jefferson Blvd  
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Enclosures

cc: Docket No. D-21-09 Service List via electronic mail

**Docket No. D-21-09 PPL Corp., PPL RI Holdings, LLC, National Grid USA and  
The Narragansett Electric Co. (collectively, Applicants) – Petition to Transfer  
Ownership and Related Approvals**

**Service List Updated 10/8/2021**

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