

Jennifer Brooks Hutchinson
Senior Counsel
PPL Services Corporation
JHutchinson@pplweb.com

280 Melrose Street
Providence, RI 02907
Phone 401-784-7288



September 12, 2022

VIA ELECTRONIC MAIL

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

**RE: Docket No. 5113 – The Narragansett Electric Company
Updated Advanced Metering Functionality Business Case**

**Docket No. 5114 – The Narragansett Electric Company
Grid Modernization Plan
Notices of Withdrawal**

Dear Ms. Massaro:

Pursuant to 810-RICR-00-00-1.12(C) of the Rhode Island Public Utilities Commission's ("PUC") Rules of Practice and Procedure, on behalf of The Narragansett Electric Company d/b/a Rhode Island Energy, enclosed are the following documents for filing with the PUC:

1. Notice of Withdrawal of The Narragansett Electric Company's Request for Approval of its Updated Advanced Metering Functionality Business Case filed with the PUC on January 21, 2021, in Docket No. 5113; and
2. Notice of Withdrawal of The Narragansett Electric Company's Request for Approval of its Grid Modernization Plan filed with the PUC on January 21, 2021, in Docket No. 5114.

Thank you for your attention to this matter. If you have any questions, please contact me at 401-316-7429.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Jennifer Brooks Hutchinson".

Jennifer Brooks Hutchinson

Enclosures

cc: Docket No. 5113 Service List
Docket No. 5114 Service List

**STATE OF RHODE ISLAND
RHODE ISLAND PUBLIC UTILITIES COMMISSION**

| | | |
|---|---|-----------------|
| The Narragansett Electric Company |) | |
| d/b/a Rhode Island Energy |) | Docket No. 5113 |
| Updated Advanced Metering Functionality |) | |
| Business Case |) | |

**NOTICE OF WITHDRAWAL OF
THE NARRAGANSETT ELECTRIC COMPANY’S REQUEST FOR APPROVAL
OF ITS UPDATED ADVANCED METERING FUNCTIONALITY BUSINESS CASE**

The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”) submits this Notice of Withdrawal of The Narragansett Electric Company’s request for approval of its Updated Advanced Metering Functionality Business Case (the “Updated AMF Business Case”), which resulted in the opening of this docket. The Company makes this filing in accordance 810-RICR-00-00-1.12(C) (“Rule 1.12(C)”) of the Rhode Island Public Utilities Commission’s (the “Commission”) Rules of Practice and Procedure, which provides:

A participant desiring to withdraw an application or petition filed with the Commission may file a notice of withdrawal with the Clerk. Such notice shall state the reasons for the withdrawal and conform to the requirements of this rule and §§ 1.6 and 1.8 of this Part. A certificate shall accompany every notice showing service on all participants. Unless otherwise ordered by the Commission for good cause, such notice shall, twenty (20) days after the filing thereof, be deemed to have effected the withdrawal of the application or petition, including amendments, if any; provided, however, that this paragraph shall not be construed as effecting without express permission of the Commission, withdrawal of any application or petition in any proceeding in which a hearing has been held or convened.

The Company filed the Updated AMF Business Case with the Commission on January 21, 2021, in accordance with Article II, Section C.16 of the Amended Settlement Agreement approved by

the Commission in the Company's last general rate case in Docket No. 4770. On May 4, 2021, PPL Corporation, PPL Rhode Island Holdings, LLC, (collectively "PPL"), National Grid USA ("National Grid"), and the Company filed a joint petition with the Rhode Island Division of Public Utilities and Carriers (the "Division") seeking approval of PPL Rhode Island Holdings, LLC's acquisition of 100% of the outstanding shares of common stock of the Company (the "Transaction"), which was assigned Docket No. D-21-09. At an Open Meeting on June 29, 2021, the Commission stayed consideration of the Updated AMF Business Case pending further consideration following the issuance by the Division of a final Order in Docket No. D-21-09. In its Order No. 24089 issued on July 14, 2021, the Commission noted that the Updated AMF Business Case would be "materially affected should the Division approve [the Transaction]. Therefore, it would be inefficient and a waste of resources to move forward with [this matter] at this time."¹ As part of the proceeding for approval of the Transaction, PPL committed that it would develop an updated AMF Business Case to replace the Company's original filing.²

The Transaction closed on May 25, 2022, at which time PPL Rhode Island Holdings, LLC took ownership and control of the Company, simultaneously rebranding it as Rhode Island Energy. The Company has been preparing its updated AMF Business Case and currently plans to file it with the Commission and the Division in the coming months but, in any event, no later than May 24, 2023.

Accordingly, the Company seeks to withdraw its Updated AMF Business Case filing in this docket pursuant to Rule 1.12(C) to facilitate the opening of a new docket once the Company

¹ See Order No. 24089 (July 14, 2021) at 4-5.

² See Report and Order No. 24322, IN RE: 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 (Docket No. D-21-09) (February 23, 2022) at 257 and 329 ("Narragansett will submit an updated proposed Grid Modernization Plan and AMF Business Case to the Division and PUC within twelve (12) months of the Transaction closing.").

files its updated AMF Business Case with the Commission and the Division. The Division is aware the Company is filing this Notice of Withdrawal.

Respectfully submitted,

**THE NARRAGANSETT ELECTRIC
COMPANY d/b/a RHODE ISLAND
ENERGY**

By its attorney,



Jennifer Brooks Hutchinson, RI Bar # 6176
Rhode Island Energy
280 Melrose Street
Providence, RI 02907
Tel. (401) 316-7429
JHutchinson@pplweb.com

Dated: September 12, 2022

**STATE OF RHODE ISLAND
RHODE ISLAND PUBLIC UTILITIES COMMISSION**

| | | |
|-----------------------------------|---|-----------------|
| The Narragansett Electric Company |) | |
| d/b/a Rhode Island Energy |) | Docket No. 5114 |
| Grid Modernization Plan |) | |
| |) | |

**NOTICE OF WITHDRAWAL OF THE NARRAGANSETT ELECTRIC COMPANY’S
REQUEST FOR APPROVAL OF ITS GRID MODERNIZATION PLAN**

The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”) submits this Notice of Withdrawal of The Narragansett Electric Company’s Request for Approval of its Grid Modernization Plan (the “GMP”), which resulted in the opening of this docket. The Company makes this filing pursuant to 810-RICR-00-00-1.12(C) (“Rule 1.12(C)”) of the Rhode Island Public Utilities Commission’s (the “Commission”) Rules of Practice and Procedure, which provides:

A participant desiring to withdraw an application or petition filed with the Commission may file a notice of withdrawal with the Clerk. Such notice shall state the reasons for the withdrawal and conform to the requirements of this rule and §§ 1.6 and 1.8 of this Part. A certificate shall accompany every notice showing service on all participants. Unless otherwise ordered by the Commission for good cause, such notice shall, twenty (20) days after the filing thereof, be deemed to have effected the withdrawal of the application or petition, including amendments, if any; provided, however, that this paragraph shall not be construed as effecting without express permission of the Commission, withdrawal of any application or petition in any proceeding in which a hearing has been held or convened.

The Company filed the GMP with the Commission on January 21, 2021, in accordance with Article II, Section C.15 of the Amended Settlement Agreement approved by the Commission in the Company’s last general rate case in Docket No. 4770. On May 4, 2021, PPL Corporation, PPL Rhode Island Holdings, LLC (collectively “PPL”), National Grid USA

(“National Grid”), and the Company filed a joint petition with the Rhode Island Division of Public Utilities and Carriers (the “Division”) seeking approval of PPL Rhode Island Holdings, LLC’s acquisition of 100% of the outstanding shares of common stock of the Company (the “Transaction”), which was assigned Docket No. D-21-09. At an Open Meeting on June 29, 2021, the Commission stayed consideration of the GMP pending further consideration following the issuance by the Division of a final Order in Docket No. D-21-09. In its Order No. 24089 issued on July 14, 2021, the Commission noted that the GMP would be “materially affected should the Division approve [the Transaction]. Therefore, it would be inefficient and a waste of resources to move forward with [this matter] at this time.”¹ As part of the proceeding for approval of the Transaction, PPL committed that it would develop an updated GMP to replace the Company’s original filing.²

The Transaction closed on May 25, 2022, at which time PPL Rhode Island Holdings, LLC took ownership and control of the Company, simultaneously rebranding it as Rhode Island Energy. The Company has been preparing its updated GMP and currently plans to file it with the Commission and the Division by the end of December 2022 but, in any event, no later than May 24, 2023.

Accordingly, the Company seeks to withdraw its GMP filing in this docket pursuant to Rule 1.12(C) to facilitate the opening of a new docket once the Company files its updated GMP with the Commission and the Division. The Division is aware the Company is filing this Notice of Withdrawal.

¹ See Order No. 24089 (July 14, 2021) at 4-5.

² See Report and Order No. 24322, IN RE: 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 (Docket No. D-21-09) (February 23, 2022) at 257 and 329 (“Narragansett will submit an updated proposed Grid Modernization Plan and AMF Business Case to the Division and PUC within twelve (12) months of the Transaction closing.”).

Respectfully submitted,

**THE NARRAGANSETT ELECTRIC
COMPANY d/b/a RHODE ISLAND
ENERGY**

By its attorney,



Jennifer Brooks Hutchinson, RI Bar # 6176
Rhode Island Energy
280 Melrose Street
Providence, RI 02907
Tel. (401) 316-7429
JHutchinson@pplweb.com

Dated: September 12, 2022

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

September 12, 2022

Date

The Narragansett Electric Company d/b/a Rhode Island Energy
Docket No. 5113 – Advanced Meter Functionality (AMF)
Docket No. 5114 – Grid Modernization Plan
Combined Service list updated 9/12/2022

| Name/Address | E-mail Distribution List | Phone |
|--|--|--------------|
| The Narragansett Electric Company d/b/a Rhode Island Energy Jennifer Hutchinson, Esq. 280 Melrose St. Providence, RI 02907 | JHutchinson@pplweb.com ; | 401-784-7288 |
| | JScanlon@pplweb.com ; | |
| | COBrien@pplweb.com ; | |
| | CAGill@RIEnergy.com ; | |
| | NSUcci@RIEnergy.com ; | |
| | KGrant@RIEnergy.com ; BESchuster@RIEnergy.com ; | |
| National Grid | Adam.Crary@nationalgrid.com ; | |
| | Melissa.Little@nationalgrid.com ; | |
| | Kristoffer.Kiefer@nationalgrid.com ; | |
| | Theresa.Burns@nationalgrid.com ; | |
| | Scott.McCabe@nationalgrid.com ; | |
| | Michael.Pini@nationalgrid.com ; | |
| Division of Public Utilities (Division) Leo Wold, Esq. Christy Hetherington, Esq. Division of Public Utilities and Carriers 89 Jefferson Blvd. Warwick, RI 02888 | Leo.Wold@dpuc.ri.gov ; | 401-780-2177 |
| | Christy.Hetherington@dpuc.ri.gov ; | |
| | Margaret.L.Hogan@dpuc.ri.gov ; | |
| | John.bell@dpuc.ri.gov ; | |
| | Linda.George@dpuc.ri.gov ; | |
| | Machaela.Seaton@dpuc.ri.gov ; | |
| | Al.mancini@dpuc.ri.gov ; | |
| | Paul.Roberti@dpuc.ri.gov ; | |
| | Thomas.kogut@dpuc.ri.gov ; | |
| | egold@riag.ri.gov ; | |

| | | |
|---|--|--------------|
| Office of Energy Resources (OER) Albert Vitali, Esq. Dept. of Administration Division of Legal Services One Capitol Hill, 4 th Floor Providence, RI 02908 Chris Kearns, OER | Albert.Vitali@doa.ri.gov ; | |
| | nancy.russolino@doa.ri.gov ; | |
| | Christopher.Kearns@energy.ri.gov ; | |
| | Shauna.Beland@energy.ri.gov ; | |
| | Matthew.Moretta.CTR@energy.ri.gov ; | |
| Original & 9 copies file w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888 | Luly.massaro@puc.ri.gov ; | 401-780-2107 |
| | Cynthia.WilsonFrias@puc.ri.gov ; | |
| | Alan.nault@puc.ri.gov ; | |
| | Todd.bianco@puc.ri.gov ; | |
| INTERESTED PERSONS | | |
| Jonathan Schrag Taconic Advisory Services LLC | jonathan.schrag@taconicadvisoryservicesllc.com ; | |
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