

STEVEN J. BOYAJIAN

One Financial Plaza, 14th Floor  
Providence, RI 02903-2485  
Main (401) 709-3300  
Fax (401) 709-3399  
sboyajian@rc.com  
Direct (401) 709-3359

Also admitted in Massachusetts

November 16, 2022

**VIA ELECTRONIC MAIL**

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

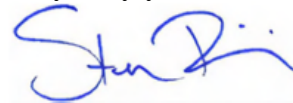
**RE: Docket 5210 - FY 2023 Gas Infrastructure, Safety, and Reliability Plan  
Quarterly Update - Second Quarter Ending September 30, 2022**

Dear Ms. Massaro:

On behalf of Rhode Island Energy,<sup>1</sup> I have enclosed an electronic version of the Company's fiscal year (FY) 2023 Gas Infrastructure, Safety, and Reliability (ISR) Plan quarterly update for the second quarter ending September 30, 2022.<sup>2</sup> Pursuant to the provisions of the approved FY 2018 Gas ISR Plan, the Company committed to providing quarterly updates on the progress of its Gas ISR program to the Rhode Island Public Utilities Commission and the Rhode Island Division of Public Utilities and Carriers.

Thank you for your attention to this matter. If you have any questions, please contact me at 401-709-3359.

Very truly yours,



Steven J. Boyajian

Enclosures

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

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<sup>1</sup> The Narragansett Electric Company d/b/a Rhode Island Energy ("Rhode Island Energy" or the "Company").

<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.

## **Gas Infrastructure, Safety, and Reliability Plan**

### **The Narragansett Electric Company**

#### **FY 2023 Quarterly Update**

#### **Second Quarter - Ending September 30, 2022**

##### **Executive Summary**

Fiscal year (“FY”) 2023 Gas Infrastructure, Safety and Reliability (“Gas ISR Plan” or the “Plan”) second quarter results (Attachment A) reflect that the Company<sup>1</sup> has spent approximately \$92.69 million of an estimated year-to-date (YTD) budget of \$102.92 million, resulting in a second quarter underspending variance of \$10.23 million. The total spending of \$92.69 million (see Attachments A & B) is comprised of \$89.77 million for the Gas ISR Plan, excluding the Southern Rhode Island Gas Expansion Project (“Gas ISR”) and \$2.92 million for the Southern Rhode Island Gas Expansion Project (“Gas Expansion Project”). To date, the \$92.69 million of actual spending represents 53 percent of the total FY 2023 annual Gas ISR Plan budget of \$175.66 million. As of September 30, 2022, the forecasted total year-end spend was \$164.98 million, which was \$10.68 million below the total budget of \$175.66 million.

The Gas ISR (excluding Gas Expansion Project) spend thru the end of the second quarter was \$89.77 million and includes actual spending of \$14.13 million out of an estimated YTD budget of \$26.01 million for Non-Discretionary work, resulting in a second quarter underspending variance of \$11.87 million. In addition, the spend thru the second quarter includes actual spending of \$75.64 million of an estimated YTD budget of \$72.70 million on Discretionary work, resulting in a second quarter overspending variance of \$2.93 million. Excluding the Gas Expansion Project, as of September 30, 2022, the forecasted year-end spend for the Gas ISR was

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<sup>1</sup> The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”).

\$159.71 million, which was \$9.16 million below the annual budget for Gas ISR. Forecast decreases in CSC/Public Works, Meter Purchases, Reactive Leaks, Reactive Main Replacement, Low Pressure System Elimination, Transmission Station Integrity, Pressure Regulating Facilities, Gas System Reliability, LNG (Exeter) categories, along with Public Works – Reimbursements (credits) that are forecasted to be higher than budget, are the primary drivers of the projected underspend. Decreases in those categories are partially offset by forecasted overspend in the Main Replacement (Proactive) - Leak Prone Pipe, Proactive Main Replacement – Large Diameter LPCI, Allens Avenue Multi Station Rebuild, Atwells Avenue, CSC/Public Works Reimbursable, and Tools & Equipment categories, along with the addition of the LNG – Portable Equipment Purchase category.

The Gas Expansion Project incurred spending thru the second quarter of \$2.92 million out of an estimated YTD budget of \$4.21 million, resulting in a second quarter underspending variance of \$1.29 million. As of September 30, 2022, the forecasted year-end spend was \$5.263 million, which was \$1.52 million below the annual budget for the Gas Expansion Project. Forecasted underspending in the Other Upgrades/Investments and Regulator Station Investment categories are the primary drivers of the projected underspending.

**FY 2023 Capital Spending by Category**

***Non-Discretionary Work<sup>2</sup>***

***Public Works Program – \$7.01 million variance under year-to-date budget***

Through the second quarter of FY 2023, the Company spent \$5.25 million, net reimbursements, against a projected year-to-date budget of \$12.26 million for the Public Works program, resulting in an underbudget variance of \$7.01 million. To date, for FY 2023, the Company has installed 1.2 miles of a plan of 8.1 miles of new replacement gas main and has abandoned 4.4 miles of a plan of 7.9 miles of leak-prone pipe through the Public Works program. The volume of workable work did not materialize in time to execute the budgeted volume of Public Works projects in FY 2023, mainly due to the timing of when the project requests were submitted into the Company, but the requested projects have now been received and the Company is in good position to execute that work in the in the remaining months of CY 2023 following the close of FY 2023 on March 31. The Company was able to shift the resources (crews and dollars) from Public Works into the Proactive Main Replacement program, which is the main driver of the Public Works underbudget variance and Proactive Main Replacement overbudget variance. The Company forecasts that FY 2023 Reimbursements (credits) will total \$4.30 million, which is \$2.87 million higher than budget. As a result, the Public Works Program category is projected to be underbudget by \$14.17 million at fiscal year-end.

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<sup>2</sup> Non-Discretionary programs include projects that are required by legal, regulatory code, and/or agreement, or are the result of damage or failure, with limited exceptions.

***Mandated Programs – \$4.85 million underspending variance to budget year-to-date***

Through the second quarter of FY 2023, the Company has spent approximately \$8.89 million of a projected YTD budget of \$13.74 million for Mandated Programs, resulting in an actual to budget variance of \$4.85 million. The primary drivers of the underspend in the Mandated category are lower than anticipated costs in the Purchase Meter, Reactive Main Replacement – Maintenance, and Transmission Station Integrity categories. For the Purchase Meter category, the Company is actively managing through supply chain challenges that are impacting the delivery of various sized gas meters and it may have an impact on the Company’s ability to receive certain larger size specialty meters from our suppliers in FY 2023. This category is forecast to be underbudget by \$1.86 million at fiscal year-end. The Reactive Main Replacement – Maintenance category is currently underspent YTD because the Oxbow Farms project in Middletown, Rhode Island has not yet started, as the Company is continuing to evaluate the approach for the project scope with the housing development owner. The Transmission Station Integrity program is currently underbudget and is forecasted to be underspent by \$4.14 million at fiscal year-end as the records review process (OPEX – Non-ISR) has taken longer than expected due to COVID-19 related delays, which have in turn delayed the ISR/Capital related activities. Additionally, the Scott Road project, which is a full station and heater replacement, is underbudget for FY 2023 as additional time has been required to coordinate the site and station design, which shifted some spending into the 9-month period of CY 2023 following the close of FY 2023 on March 31. As a result of the factors detailed above, the Mandated category is forecasted to be underbudget by \$11.52 million at fiscal year-end.

In June 2021, the Company, in collaboration with the Rhode Island Division of Public Utilities and Carriers (“Division”), developed and implemented a plan to continuously improve the Company’s tracking of its meter inventory and its purchasing strategies. This was implemented in compliance with the PUC’s Order in the Company’s FY 2022 Gas ISR Plan, Docket No. 5099. The first component of the plan is an enhanced process to track meter inventory. The

Company is conducting a manual count of the meter lab inventory each month until the Company has validated that the Maximo system is accurately capturing inventory data. The Company conducted a physical inventory count on June 10, 2021 to establish the baseline count. The chart below provides a summary of the meter lab inventory counts on June 10, 2021, and the closest date to the close of each quarter that followed, which were June 30, 2021, September 30, 2021, January 3, 2022, March 31, 2022, June 30, 2022, and September 30, 2022. The Company is continuing to review the variances between the physical counts and the meter inventory tracked in Maximo, and working to address factors that contribute to the variance, including the timing of when inventory is counted, when reports are run, and the timing of data cleanup in the Maximo system.

<b>Meter Lab Inventory</b>				
<b>Measure</b>	<b>Physical Count</b>	<b>Maximo</b>	<b>Variance</b>	<b>Variance %</b>
<b>Inventory as of 6/10/2021</b>	9,943	10,926	983	9%
<b>Inventory as of 6/30/2021</b>	9,156	9,988	823	8%
<b>Inventory as of 9/30/2021</b>	9,568	10,370	802	8%
<b>Inventory as of 1/3/2022*</b>	9,994	10,986	992	9%
<b>Inventory as of 3/31/2022</b>	11,724	12,605	881	7%
<b>Inventory as of 6/30/2022</b>	7,354	8,164	810	10%
<b>Inventory as of 9/30/2022</b>	6,513	7,452	939	13%

\*Due to Vacations, the Meter Lab gathered inventory data the first Monday after New Years.

***Damage/Failure Reactive Program – \$0.01 million variance to budget year-to-date***

Through the second quarter of FY 2023, the Company spent \$0 of a projected YTD budget of \$0.01 million for the Damage/Failure Reactive program, resulting in an under-budget variance of \$0.01 million. At this time, the Damage/Failure Reactive program category is forecasted to be on budget at fiscal year-end.

### ***Discretionary Work<sup>3</sup>***

#### ***Proactive Main Replacement Program – \$5.70 million overspending variance to budget year-to-date***

Through the second quarter of FY 2023, the Company spent approximately \$54.70 million of a projected YTD budget of \$49.00 million for the Proactive Main Replacement programs, resulting in an overspending variance of approximately \$5.70 million. To date, for FY 2023 in the Proactive Main Replacement (“MRP”) Program, the Company has installed 32.1 miles of new replacement gas main against a plan of 32.0 miles. Across all ISR programs, the Company has installed a total of 36.8 miles of new replacement gas main against a plan of 44.0 miles. Fiscal YTD, the Company has abandoned 18.6 miles in the MRP Program against a plan of 27.9 miles. Across all ISR programs, the Company has abandoned 23.0 miles against an overall plan of 36.4 miles. Although the Company is behind the YTD targets for installation and abandonment, good progress has been made on planned projects and construction work, in the mandated and reliability categories, which draw from the same resources required to abandon main. That clears the way to put the Company is in a good position to execute and achieve the installation and abandonment mileage targets for FY 2023. Additionally, as mentioned above in the Public Works categories and Maintenance category, the volume of FY 2023 work that was budgeted for those categories did not fully materialize to be executable within FY 2023. However, the Company was able to shift resources (crews and dollars) from Public Works and Maintenance to the Proactive Main Replacement programs, which is the primary driver of the overbudget variance in the Proactive Main Replacement programs.

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<sup>3</sup> Discretionary programs are not required by legal, regulatory code, or agreement, or a result of damage or failure, with limited exceptions.

Through the second quarter of FY 2023, the Proactive Main Replacement – Large Diameter LPCI Program is overbudget YTD and is forecast to exceed the budget by \$1.87 million at fiscal year-end. The original budget called for two Cast Iron Sealing Robot Joint (“CISBOT”) jobs, but based on Contractor availability, project readiness, moderate Company resource requirements for this type of work, and budget availability (offset by Public Works – Reimbursements), the Company is now forecasting to complete four CISBOT projects in FY 2023.

For the Atwells Avenue Project, the Company is on pace to have final restoration for Segments 1A and 1B completed by the end of Q3 FY 2023. As of the date of this report, the last steps to be completed are line striping (center lines and parking/valet lines) and receipt/payment of vendor invoices. The final restoration work for DePasquale Square was started in October 2022 and was completed in November 2022; this was completed ahead of schedule, so the \$0.40 million that was budgeted for this work has been added to the FY 2023 forecast included in this report and will be removed from the 9-month CY 2023 budget. Segment 3 of the project was budgeted to be completed in FY 2023, but the project has been deferred into the 9-month CY 2023 period, as the Company is continuing to work in close conjunction with Providence Water (replacing water pipe) and the City of Providence (replacing leak prone pipe ahead of municipal paving) to address the highest priority work, with the majority of the FY 2023 work being completed on the East Side area of Providence. The \$1.10 million associated with the Atwells Avenue Segment 3 work has been removed from the FY 2023 forecast and was included in the 9-month CY 2023 budget proposal as part of the proposed FY 2024 ISR Plan that the Company submitted to the Division in October 2022.

***Proactive Service Replacement Program – \$0.19 million underspending variance to budget year-to-date***

Through the second quarter of FY 2023, the Company spent \$0.17 million of a projected YTD budget of \$0.37 million for the Proactive Service Replacement Program (“SRP”), resulting in an



underspending variance of \$0.19 million. The Company is continuing to focus on replacing the remaining 25 copper services located in Cumberland; YTD 23 of the 25 copper services have been replaced. The customers/property owners of the final 2 copper services in Cumberland have been reluctant to allow their service replacements, but the Company continues to pursue those replacements. The Company has also replaced another 11 services as part of this program, which includes 1 high-pressure inside set, 7 steel services on plastic, and 3 services in the Providence area. The Company is also continuing to review the population of services that were originally included on the Proactive Service Replacement list and has been conducting written customer outreach as accounts are being confirmed as leak-prone services on main that is not leak-prone. At this time, the Proactive Service Replacement Program category is forecasted to be underbudget by \$0.37 million at fiscal year-end.

***Reliability Programs – \$2.57 million underspending variance to budget year-to-date***

Through the second quarter of FY 2023, the Company spent \$20.76 million of a projected YTD budget of \$23.33 million for Reliability programs, resulting in an underspending variance of \$2.57 million for this category. As of September 30, 2022, the Reliability programs were projected to be overbudget by \$1.33 million at fiscal year-end. The timing of work is the primary driver of the YTD underspending variance, as most categories that are currently underspent are still forecasted to be on or close to budget at fiscal year-end. The Pressure Regulating Facilities, LNG and Gas System Reliability categories are underbudget YTD, due to the timing of work, and are forecasted to remain underbudget at fiscal year-end. The Enbridge Heaters Replacement and Asset Transfer projects (Tiverton and Wampanoag Trail) are currently underbudget based on the timing of outgoing progress payments and those projects are forecasted to be slightly over budget at fiscal year-end due to bid pricing, which increased the total costs the Company will reimburse to Enbridge. The Allens Avenue Multi Station Rebuild project that flowed into FY 2023 from FY 2022 for work associated with the Chromatograph building and additional work associated with abandonment is forecasted to spend \$1.14 million

by fiscal year-end and had \$0 budgeted for FY 2023. The Tools & Equipment budget is also forecast to be overbudget at fiscal year-end by approximately \$0.86 million as certain specialty equipment that was ordered, but not delivered, in FY 2022, and will now be received in FY 2023. A review of the Company's tools & equipment was conducted as part of the separation from National Grid USA. The Company determined that certain specialty equipment needed to be purchased, in part, because Rhode Island Energy could no longer borrow the equipment from National Grid USA affiliates, such as The Boston Gas Company. Rhode Island Energy concluded that having full-time access to the equipment would enhance the safety and efficiency of capital projects. Examples of specialty equipment no longer available to be borrowed are Kleiss systems, T.D. Williamson equipment, and hole hogs.

The Company will also incur charges of \$7.00 million in FY 2023, which was not originally in the budget, for costs associated with down payments for Portable LNG Equipment that will primarily be used at the Cumberland LNG Facility. That equipment will be placed in service in the 9-month period of CY 2023 following the close of FY 2023 on March 31. The Company currently contracts the Portable LNG Equipment and Operations for the Cumberland facility and that contract, which was originated in 2018 and was extended during the COVID-19 pandemic, expires at the close of Winter 2022-2023. The Company has performed a cost-benefit and operational analysis of entering into a new contract versus purchasing new Portable LNG Equipment and operating it internally. The Company has determined that purchasing the equipment is in the best interest of Rhode Island gas customers from several perspectives:

- Cost:
  - o Predictable costs for rate payers – not subject to increasing market fluctuations;  
and
  - o Equipment has resale value if no longer needed for Cumberland or the overall Rhode Island Energy territory.

- System Reliability:
  - o Available to serve Cumberland site during the winter of upcoming years;
  - o Available to support Cumberland LNG's long term solution during construction (in scenario where permanent LNG facilities are permitted for that site); and
  - o Can serve all Rhode Island Energy customers and respond to system issues or pipeline operations without having to request proposals or rely on availability of contractors and equipment which may not be readily available in the region.
- Operational:
  - o Operation will have increased system redundancy with multiple pumps (as opposed to the single pump system that the Company presently rents;
  - o Two vaporizers will provide redundancy with plant's fixed vaporizers;
  - o SCADA integration will allow full monitoring of the pumper units inside the control room for enhanced safety;
  - o Rhode Island Energy LNG team has extensive experience operating fixed LNG equipment. Bringing Portable LNG operations in-house will position company to expedite response to system needs; and
  - o Equipment is portable and can be moved to support the system anywhere in the state as necessary.

### **FY 2023 Southern Rhode Island Gas Expansion Project Spending by Category**

#### ***Construction***

##### ***Pipeline – \$0.27 million underspending variance to budget year-to-date***

Through the second quarter of FY 2023, the Company spent \$0.13 million of a projected YTD budget of \$0.39 million for the Gas Expansion Project – Main Installation, resulting in an underspending variance of \$0.27 million for this category. The spending in this category for FY

2023 is for closeout costs related to the Main Installation final restoration. This category is forecast to be on budget at fiscal year-end.

### ***Other Upgrades/Investments***

#### ***Maximum Operating Pressure (MOP) Project, Launcher/Receiver, Installation of Remote Operating Valve (ROV) – \$0.21 million underspending variance to budget year-to-date***

Through the second quarter of FY 2023, the Company spent \$0.001 million of a projected YTD budget of \$0.21 million for the Other Upgrades/Investments category, resulting in an underspending variance of \$0.21 million for this category. In FY 2023, the Company will be completing closeout activities for the Maximum Operating Pressure project and is forecasted to be under budget by approximately \$0.05 as actual costs are projected to be lower than budget. The Company budgeted \$0.35 million for the Launcher-Receiver/ Install ROV portion of this budget for investigation and design work but is forecasted to be under budget by \$0.30 million at fiscal year-end. The Company is conducting additional analysis to determine the viability of the Launcher-Receiver and/or Remote Operated Valve (“ROV”) within Rhode Island Energy’s operating system and is not planning to progress this work during CY 2023 or CY 2024. At this time, the Other Upgrades/Investments category is projected to be underbudget at fiscal year-end by \$0.38 million.

### ***Regulator Station Investment***

#### ***Updates to Cranston Regulator Station, Cowesett Regulator Station, and New Regulator Station – \$0.81 million underspending variance to budget year-to-date***

Through the second quarter of FY 2023, the Company spent \$2.80 million of a projected YTD budget of \$3.61 million for the Regulator Station Investment category, resulting in an underspending variance of \$0.81 million for this category. The YTD focus of this category has been Upgrades at the Cowesett Regulator Station. The new regulator pit at this location is

forecasted to be gassed-in in Q3 FY 2023, which is ahead of schedule. The spending related to the New Regulator Station near the Cowesett Regulator Station is forecasted to be underbudget by \$0.65 million at fiscal year-end; the FY 2023 activity will be focused on survey work, design work, and identifying desired station location(s), so the project materials purchasing will likely be deferred until FY 2024 to align with future project construction. This deferral has been incorporated into the FY 2024 ISR Plan submitted to the Division in October 2022. The Cranston Regulator Station Upgrades project is forecasted to be under budget by \$0.50 million at fiscal year-end as some elements of the project scope/construction plan required re-design to accommodate stop gas work on Rhode Island Energy's system versus the transmission company's system. At this time, the Regulator Station Investment category is projected to be underbudget by \$1.15 million at fiscal year-end.

### ***Plant-in-Service Forecast***

As of the close of Q2 FY 2023, the Company is forecasting to place Capital Additions In-Service of \$154.52 versus a target of \$164.47, resulting in a forecasted under-target variance of \$9.95million. The FY 2023 In-Service forecast may increase by \$5.23 million if the Take Station Enhancement Program - Tiverton Gate Station Ownership Transfer ("Tiverton GS Heater & Asset Transfer") is able to be brought online before the close of FY 2023.

Attachment A  
RIPUC Docket No. 5210  
FY 2023 Gas Infrastructure, Safety, and Reliability Plan  
FY 2023 Quarterly Update

Attachment A - Summary

**The Narragansett Electric Company  
d/b/a Rhode Island Energy - RI Gas  
Capital Spending by Investment Categories - Summary  
FY 2023 through September 30, 2022  
(\$000)**

Categories	FYTD			FY 2023 - Total		
	Budget	Actual	Variance	Budget	Forecast	Variance
<b>NON-DISCRETIONARY</b>						
Public Works <sup>1</sup>	\$12,256	\$5,248	(\$7,008)	\$20,600	\$6,433	(\$14,167)
Mandated Programs	\$13,738	\$8,886	(\$4,853)	\$28,360	\$16,845	(\$11,515)
Damage / Failure (Reactive)	\$13	\$0	(\$13)	\$25	\$25	\$0
<b>NON-DISCRETIONARY TOTAL</b>	<b>\$26,007</b>	<b>\$14,134</b>	<b>(\$11,873)</b>	<b>\$48,985</b>	<b>\$23,303</b>	<b>(\$25,682)</b>
<b>DISCRETIONARY</b>						
Proactive Main Replacement	\$49,002	\$54,703	\$5,700	\$78,918	\$94,486	\$15,568
Proactive Service Replacement	\$366	\$172	(\$194)	\$600	\$230	(\$370)
Reliability	\$23,335	\$20,761	(\$2,574)	\$40,363	\$41,692	\$1,329
<b>SUBTOTAL DISCRETIONARY (Without Gas Expansion)</b>	<b>\$72,703</b>	<b>\$75,635</b>	<b>\$2,932</b>	<b>\$119,881</b>	<b>\$136,408</b>	<b>\$16,527</b>
Southern RI Gas Expansion Project	\$4,207	\$2,921	(\$1,286)	\$6,789	\$5,264	(\$1,525)
<b>DISCRETIONARY TOTAL (With Gas Expansion)</b>	<b>\$76,910</b>	<b>\$78,557</b>	<b>\$1,647</b>	<b>\$126,670</b>	<b>\$141,672</b>	<b>\$15,002</b>
<b>CAPITAL ISR TOTAL (Base Capital - Without Gas Expansion)</b>	<b>\$98,710</b>	<b>\$89,769</b>	<b>(\$8,941)</b>	<b>\$168,866</b>	<b>\$159,711</b>	<b>(\$9,155)</b>
<b>CAPITAL ISR TOTAL (With Gas Expansion)</b>	<b>\$102,917</b>	<b>\$92,691</b>	<b>(\$10,226)</b>	<b>\$175,655</b>	<b>\$164,975</b>	<b>(\$10,680)</b>
<b>Additional Capital Investments</b> (Not currently included in the ISR)	\$1,250	\$51	(\$1,199)	\$3,500	\$539	(\$2,961)

( ) in Variance column denotes an underspend

1. Public Works Program includes reimbursements which will be credited as received throughout the year.



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.



\_\_\_\_\_  
Brenda L. Vucci

November 16, 2022

Date

**Docket No. 5210- RI Energy's FY 2023 Gas Infrastructure, Safety and Reliability (ISR) Plan - Service List 8/15/2022**

Name/Address	E-mail Distribution	Phone
<p><b>The Narragansett Electric Company d/b/a Rhode Island Energy</b></p> <p>Jennifer Hutchinson, Esq. 280 Melrose Street Providence, RI 02907</p> <p>Steve Boyajian, Esq. <b>Robinson &amp; Cole LLP</b> One Financial Plaza, 14th Floor Providence, RI 02903</p>	<a href="mailto:JHutchinson@pplweb.com">JHutchinson@pplweb.com;</a>	401-784-7288
	<a href="mailto:COBrien@pplweb.com">COBrien@pplweb.com;</a>	
	<a href="mailto:JScanlon@pplweb.com">JScanlon@pplweb.com;</a>	
	<a href="mailto:JMOBrien@rienergy.com">JMOBrien@rienergy.com;</a>	
	<a href="mailto:PLaFond@rienergy.com">PLaFond@rienergy.com;</a>	
	<a href="mailto:NKocon@rienergy.com">NKocon@rienergy.com;</a>	401-709-3359
	<a href="mailto:SBriggs@pplweb.com">SBriggs@pplweb.com;</a>	
	<a href="mailto:JOliveira@pplweb.com">JOliveira@pplweb.com;</a>	
	<a href="mailto:SBoyajian@rc.com">SBoyajian@rc.com;</a>	
	<a href="mailto:HSeddon@rc.com">HSeddon@rc.com;</a>	
<p><b>National Grid</b> Amy Smith Melissa Little Lee Gresham Ryan Scheib</p>	<a href="mailto:Amy.Smith@nationalgrid.com">Amy.Smith@nationalgrid.com;</a>	
	<a href="mailto:Melissa.Little@nationalgrid.com">Melissa.Little@nationalgrid.com;</a>	
	<a href="mailto:mei.sun@nationalgrid.com">mei.sun@nationalgrid.com;</a>	
	<a href="mailto:Theresa.Burns@nationalgrid.com">Theresa.Burns@nationalgrid.com;</a>	
	<a href="mailto:Michael.Pini@nationalgrid.com">Michael.Pini@nationalgrid.com;</a>	
	<a href="mailto:Nathan.Kocon@nationalgrid.com">Nathan.Kocon@nationalgrid.com;</a>	
	<a href="mailto:Ryan.Scheib@nationalgrid.com">Ryan.Scheib@nationalgrid.com;</a>	
<p><b>Division of Public Utilities &amp; Carriers</b> Leo Wold, Esq.</p>	<a href="mailto:Leo.Wold@dpuc.ri.gov">Leo.Wold@dpuc.ri.gov;</a>	401-780-2130
	<a href="mailto:Margaret.L.hogan@dpuc.ri.gov">Margaret.L.hogan@dpuc.ri.gov;</a>	
	<a href="mailto:Al.mancini@dpuc.ri.gov">Al.mancini@dpuc.ri.gov;</a>	
	<a href="mailto:John.bell@dpuc.ri.gov">John.bell@dpuc.ri.gov;</a>	
	<a href="mailto:Linda.george@dpuc.ri.gov">Linda.george@dpuc.ri.gov;</a>	
	<a href="mailto:Robert.Bailey@dpuc.ri.gov">Robert.Bailey@dpuc.ri.gov;</a>	
	<a href="mailto:Michelle.Barbosa@dpuc.ri.gov">Michelle.Barbosa@dpuc.ri.gov;</a>	
	<a href="mailto:Machaela.Seaton@dpuc.ri.gov">Machaela.Seaton@dpuc.ri.gov;</a>	



	<a href="mailto:Paul.roberti@dpuc.ri.gov">Paul.roberti@dpuc.ri.gov;</a>	
	<a href="mailto:egolde@riag.ri.gov">egolde@riag.ri.gov;</a>	
Rod Walter, CEO/President Rod Walker & Associates	<a href="mailto:Rwalker@RWalkerConsultancy.com">Rwalker@RWalkerConsultancy.com;</a>	706-244-0894
<b>Office of Energy Resources</b> Al Vitali, Esq.	<a href="mailto:Albert.vitali@doa.ri.gov">Albert.vitali@doa.ri.gov;</a>	
	<a href="mailto:nancy.russolino@doa.ri.gov">nancy.russolino@doa.ri.gov;</a>	
	<a href="mailto:Christopher.Kearns@energy.ri.gov">Christopher.Kearns@energy.ri.gov;</a>	
	<a href="mailto:Shauna.Beland@energy.ri.gov">Shauna.Beland@energy.ri.gov;</a>	
	<a href="mailto:Anika.Kreckel.CTR@energy.ri.gov">Anika.Kreckel.CTR@energy.ri.gov;</a>	
<b>File an original and five copies</b> Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick RI 02888	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov;</a>	401-780-2107
	<a href="mailto:Patricia.lucarelli@puc.ri.gov">Patricia.lucarelli@puc.ri.gov;</a>	
	<a href="mailto:Todd.bianco@puc.ri.gov">Todd.bianco@puc.ri.gov;</a>	
	<a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov;</a>	
PPL Electric Utilities Ronald Reybitz Stephen Breininger	<a href="mailto:rjreybitz@pplweb.com">rjreybitz@pplweb.com;</a>	
	<a href="mailto:skbreininger@pplweb.com">skbreininger@pplweb.com;</a>	