



STATE OF RHODE ISLAND

DIVISION OF PUBLIC UTILITIES & CARRIERS

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July 22, 2021

Luly Massaro, Clerk
Public Utilities Commission
89 Jefferson Blvd.
Warwick, RI 02888

Re: Docket No. 4770 – Tariff Advice Filing Relating to DCFC Discount Pilot Provision

Dear Ms. Massaro,

The Division of Public Utilities and Carriers (“Division”) writes in connection with the request of The Narragansett Electric Company, d/b/a National Grid (“Company”) dated July 1, 2021 seeking approval of the R.I.P.U.C. 2247 in lieu of R.I.P.U.C. 2212. The Division has reviewed the filing, the existing and proposed tariff, the relevant terms of the Amended Settlement Agreement (“ASA”) in Docket No. 4770 and the Electric Transportation Evaluation and Annual Program Modification Report (“ETI Report”) dated October 30, 2020. The Division concurs with the Company’s contention that, as currently drafted, R.I.P.U.C. 2122 does not comport with the letter and intent Section 17(a)(iii) of the ASA. As noted, and for the reasons stated in the Company’s filing, the tariff limits enrollment in the DCFC Discount Pilot to Rate Year 1, although this was neither the intent of, nor comports with, the terms of the ASA.

On June 28, 2021, subject to a reservation of all of its rights, the Division consented to an extension of the ASA pursuant to Section C.21 of the ASA. Pursuant to the extension, “[b]ase rates shall remain at the current Rate Year 3 levels until new base distribution rates are in effect.” The Division consented to the extension to maintain base rates at the current level pending the Division’s review and decision in Docket No. D-21-09, *In Re: Petition of PPL Corp, et al. for Authority to Transfer Ownership of The Narragansett Electric Company to PPL Rhode Island Holdings, LLC and Related Approvals*.

The proposed amendments to R.I.P.U.C. 2212 corrects the tariff to align the enrollment periods of the DCFC Discount Pilot in the tariff with the enrollment periods originally intended in the ASA

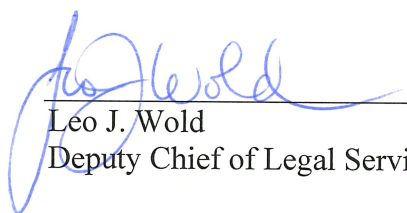
and as necessitated by the ASA's extension. The Company has also confirmed that it (and/or its successor) will, as part of the annual ETI Report, and with input from the PST Advisory Group, continue to assess "the appropriate level of discount for new participants" for any rate year¹ that the DCFC Discount Pilot is in place "based on enrollment data and lessons learned."

The Division recognizes that there remains a positive and growing balance in the DCFC Discount Pilot through the date of this correspondence, and the Company is maintaining the current discount level. The Pilot is well-managed; the Company properly accounts for DCFC Discount Pilot funds; and the amount accumulating per year is limited by the annual value defined in the ASA. Allowing customer accounts that complete enrollment beyond RY 1 to receive the discount makes sense in view of the extension of the ASA and the likely incremental demand for the discount (*e.g.*, RIPTA, *etc.*). The assurance that the Company (and/or its successor) will continue to perform the ETI Report for rate years beyond RYs 1, 2 & 3 also ensures that the discount will be appropriately tracked and can be appropriately adjusted each year based on "enrollment data and lessons learned" until new rates are approved by the Commission in the next general rate case.

Based on the foregoing, the Division recommends that the Commission approve the Company's July 1, 2021 Tariff Advice filing.²

Respectfully submitted,

Division of Public Utilities and Carriers



Leo J. Wold
Deputy Chief of Legal Services

cc: Service List

¹ The ASA appears to only require the inclusion of this recommendation in the ETI Report "[s]ixty days prior to enrollment for Rate Year 2 and Rate Year 3..." ASA § 17(a)(iii).

² To the extent that the Commission wishes to review the "appropriate level of discount for new participants" for the DCFC Pilot Discount, the Commission may wish to await the Company's RY 3 ETI Report.