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

Re: Docket No. 5192 – Block Island Utility District Tariff Advice Filing re Net Metering Tariff

Dear Luly:

As you know, our office represents Block Island Utility District (“BIUD”).

Enclosed for filing in this matter please find BIUD’s responses to the Commission’s record request. An original and five (5) copies are enclosed.

If you need any further information, please do not hesitate to contact me.

Very truly yours,


Leah J. Donaldson

Encl.

Cc: Service List

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

IN RE: BLOCK ISLAND UTILITY DISTRICT :
TARIFF ADVICE FILING TO ADD : **DOCKET NO. 5192**
NET METERING TARIFF :

**BLOCK ISLAND UTILITY DISTRICT’S RESPONSE
TO PUBLIC UTILITY COMMISSION’S RECORD REQUEST**

- 1-1. Please review the filings in Docket No. 4387 (In re: Block Island Net Metering Policy). In addition to the policy, BIPCo responded to two sets of data requests. In particular, the second set of data requests addressed how BIPCo credited customers.
- a. Please explain whether the mechanics of measuring usage and crediting (not the credit amount) accounts is the same now. If not, please explain.
 - b. Please review the information provided in the responses pertaining to the crediting of:
1) generation up to 100% of usage; 2) generation between 100%-125% of usage; and
2) generation in excess of 125% of usage. For each of those 3 crediting categories, please explain whether BIUD follows the same crediting practices today. If not, please explain.
 - c. For those crediting categories where BIUD does not follow the same crediting practice today as what was described in Docket No. 4387, is BIUD technically capable of effectuating the crediting policy described in Docket No. 4387 given its current metering infrastructure? Please explain.

RESPONSE:

- a. When comparing the response to DIV 1-11 in this Docket and the response to Commission 2-1 from Docket 4387, it appears that there are differences in the mechanics of measuring usage and crediting accounts.

In Docket 4387, the response included a sample bill that showed a net kWh for when the credit was less than 100%. The bill itself did not show the purchased kWh and generated/delivered kWh but only the net of the two. In addition, the sample bill did not show any kWh on the bill when the credit was greater than 100%. The credit was shown as negative “Misc. Charge” which was calculated as generation/delivered kWh (capped at 125%) less the kWh purchased from BIPCo, which was then multiplied by BIPCo’s avoided cost rate (the monthly fuel charge “FAC”). For example, the sample June bill in response to Commission 2-1 from Docket 4387 showed a Misc. Charge of -\$13.64 (46.75 net kWh x FAC of \$0.2918). The purchased kWh was 187 and the generated/delivered kWh was 333. The capped generated/delivered kWh would be 233.75 (187 x 125%), so the net would be 47 kWh (234 capped generated/delivered less 187 purchased).

In Docket 5192, the example included sample bills that showed purchased kWh, generated/delivered kWh along with the net kWh. When the credit was less than

100%, the billed multiplied the various rates by the net kWh. When the credit was greater than 100% (the net amount shows as negative kWh), the net kWh is only applied to the avoided cost rate (which is currently Transmission and Purchase power cost rates). The example in DIV 1-11 shows the net amount and not the capped net.

After further analysis of BIUD’s billing system, it appears that the 125% cap is not programmed in BIUD’s billing system and is therefore not being applied currently. We are not sure when this change occurred. We expect it occurred during late 2016 or early 2017 when changes to net metering billing system occurred.

b. BIUD will treat each case as shown below:

1) Generation to 100% of Usage:

Single Meter - Existing Tariff			
Generation = 100% Usage			
Consumption = 300 kWh Delivered 300 kWh			
	<u>Rate</u>	<u>Billed Use</u>	<u>Amount</u>
Customer Charge			\$10.00
Plant & Distribution Charge	\$0.0895	0	\$0.00
Transmission Charge	\$0.0852	0	\$0.00
Power Supply Service	\$0.0740	0	\$0.00
RI Renewable Fund	\$0.0003	0	<u>\$0.00</u>
TOTAL CHARGES			\$10.00

2) Generation between 100-125%:

Single Meter - Existing Tariff			
Generation = 110% Usage			
Consumption = 300 kWh Delivered 330 kWh			
	<u>Rate</u>	<u>Billed Use</u>	<u>Amount</u>
Customer Charge			\$10.00
Plant & Distribution Charge	\$0.0895	0	\$0.00
Transmission Charge	\$0.0852	(30)	(\$2.56)
Power Supply Service	\$0.0740	(30)	(\$2.22)
RI Renewable Fund	\$0.0003	0	<u>\$0.00</u>
TOTAL CHARGES			\$5.22

3) Generation above 125% of usage:

Single Meter - Existing Tariff			
Generation = 100% Usage			
Consumption = 300 kWh Delivered 400 kWh			
Capped at 125%			
	<u>Rate</u>	<u>Billed Use</u>	<u>Amount</u>
Customer Charge			\$10.00
Plant & Distribution Charge	\$0.0895	0	\$0.00
Transmission Charge	\$0.0852	(75)	(\$6.39)
Power Supply Service	\$0.0740	(75)	(\$5.55)
RI Renewable Fund	\$0.0003	0	\$0.00
TOTAL CHARGES			(\$1.94)

- c. Not at this time. The net metering billing process described in Docket 4387 was a manual process because the old system did not have the capability of auto-calculating a 125% cap on net kWh. Similarly, BIUD’s current billing system has not been programmed to auto-calculate a 125% cap for net metering billing.

If needed, BIUD could effectuate the crediting policy (i.e. 125% cap) described in Docket No. 4387. BIUD’s metering infrastructure and billing systems provide a wide range of flexibility. The cost for custom programming to enable auto-calculation of a 125% cap for net metering billing would be roughly \$5,000-\$7,500. However, the resulting capped credits would be difficult to display on members’ bills and would likely cause confusion for net metering members.

BIUD would prefer to revise its existing net metering policy to reflect its current crediting practice.

Prepared by Jeffery M. Wright and David G. Bebyn