

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

IN RE: THE NARRAGANSETT ELECTRIC COMPANY D/B/A RHODE ISLAND ENERGY'S PETITION FOR AUTHORITY TO FORGIVE CERTAIN ARREARAGES FOR LOW-INCOME AND PROTECTED CUSTOMERS	Docket No. 22-08-GE
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PETITION OF THE NARRAGANSETT ELECTRIC COMPANY d/b/a RHODE ISLAND ENERGY FOR AUTHORITY TO FORGIVE CERTAIN ARREARAGE BALANCES FOR LOW-INCOME AND PROTECTED CUSTOMERS

Petitioner The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy”), by and through its undersigned attorneys, hereby petitions the Rhode Island Public Utilities Commission (the “Commission”) for authority to forgive certain arrearage balances accrued on the accounts of electric and gas distribution customers who receive service under the low-income rate classes and customers who qualify as protected under the Commission’s Rules and Regulations Governing the Termination of Residential Electric, Gas and Water Service, 810-RICR-10-00-1. As and for its petition, Rhode Island Energy states as follows:

Introduction and Background

1. Rhode Island Energy is both an electric and gas distribution company as defined in R.I. Gen. Laws § 39-30-2.

2. On or about May 4, 2021, PPL Corporation, PPL Rhode Island Holdings, LLC, (PPL Corporation and PPL Rhode Island Holdings, LLC are collectively referred to as “PPL”), National Grid USA (“National Grid”), and The Narragansett Electric Company (“Narragansett”) 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 percent of the outstanding shares of common stock of Narragansett (the “Transaction”).

3. After PPL, National Grid, and Narragansett filed the joint petition, the Division conducted an adjudicatory proceeding to consider whether to approve the Transaction under the statutory standard set forth in R.I. Gen. Laws § 39-3-25 (the “Division Approval Proceeding”).

4. Several other parties successfully intervened and participated in the Division Approval Proceeding, including Peter F. Neronha, Attorney General of the State of Rhode Island (the “Attorney General”).

5. On or about February 23, 2022, after discovery, consideration of pre-filed written testimony, four full days of evidentiary hearings, and post-hearing briefing, the Division issued a Report and Order approving the Transaction, with conditions (the “Division Approval Order”).

6. On or about February 24, 2022, the Attorney General filed an administrative appeal of the Division Approval Order in the Rhode Island Superior Court (the “Superior Court Appeal”) and moved for an emergency stay of the Division Approval Order pending resolution of the appeal.

7. On or about April 1, 2022, the Superior Court entered an order staying the Division Approval Order during the pendency of the Superior Court Appeal (the “Stay Order”).

8. On or about May 19, 2022, following substantial negotiations, PPL and the Attorney General reached a Settlement Agreement, pursuant to which PPL agreed to take certain additional actions and the Attorney General agreed to file: (a) a joint motion to vacate the Stay Order, and (b) a stipulation of dismissal, with prejudice, of the Superior Court Appeal. A true and accurate copy of the Settlement Agreement is attached as Attachment A to this petition.

9. On or about May 23, 2022, the joint motion to vacate the Stay Order and the stipulation of dismissal with prejudice were filed in the Superior Court, the Superior Court

entered an order vacating the Stay Order, and the Superior Court appeal was dismissed, with prejudice.

10. On or about May 25, 2022, PPL and National Grid closed the Transaction and PPL Rhode Island Holdings, LLC took ownership and control of Narragansett, rebranding it as Rhode Island Energy.

11. One of the terms of the Settlement Agreement negotiated between PPL and the Attorney General is:

Customer Arrearage Forgiveness. Within 30 days of closing, PPL shall seek PUC approval to forgive \$43.5 million in arrearages for low-income and protected residential customers, which represents 100% of the arrearages of over 90 days for those customers as of March 31, 2022.

12. Accordingly, to comply with its obligations under the Settlement Agreement, Rhode Island Energy (which is now under PPL ownership and control)¹ files this petition seeking authority from the Commission to forgive the \$43.5 million in arrearages for low-income and protected residential customers identified in the Settlement Agreement.

13. Rhode Island Energy proposes that, upon approval of this petition, it will immediately forgive those balances and remove those amounts from those customers' balances due.

Jurisdiction

14. The Commission has jurisdiction over this matter pursuant to its authority “to hold . . . hearings involving the . . . rates, . . . tolls, and charges . . . of . . . gas [and] electric distribution. . . utilities[,]” R.I. Gen. Laws § 39-1-3(a). Accordingly, the Company brings this

¹ The Narragansett Electric Company d/b/a Rhode Island Energy is a direct wholly owned subsidiary of PPL Rhode Island Holdings, LLC. PPL Rhode Island Holdings, LLC is an indirect wholly owned subsidiary of PPL Corporation.

petition pursuant to Rule 810-00-00-1.11(c) of the Commission’s Rules of Practice and Procedure for authority to provide the arrearage forgiveness called for under the Settlement Agreement in compliance with Rhode Island Energy’s duties under R.I. Gen. Laws § 39-2-2 and R.I. Gen. Laws § 39-2-3 not to engage in unjust rate discrimination or to give unreasonable preferences or prejudices.

Requested Authority

15. The Settlement Agreement provides for \$43.5 million in arrearage forgiveness to low-income customers and protected customers, which was equal to the total amount of arrearages for those classes of customers that was more than 90 days past due as of March 31, 2022. Attachment B to this petition is a report from the credit and collections team dated April 1, 2022, showing the accounts receivable from both gas and electric customers as of March 31, 2022. That report formed the basis for the amount and nature of the arrearage forgiveness set forth in the Settlement Agreement. Specifically, Rhode Island Energy added the amounts on this report that were 90 days or more past due for the “Protected Only” customers, “DPA and Protected” customers, “Low Income Only” customers, and “DPA and Low Income” customers to determine the amount of arrearage forgiveness it would agree to provide in the Settlement Agreement.² Those specific amounts are highlighted in yellow on Attachment B. If the Commission approves this petition, Rhode Island Energy proposes to forgive these arrearage amounts based on the balances as of March 31, 2022, without adjusting for any payments that may have been received since that date.

² The defined term “DPA” refers to a Deferred Payment Arrangement.

16. Low income customers are defined as those customers who: (a) receive electric distribution service under rate class A60, (b) gas distribution service under rate class 11, and (c) gas distribution service under rate class 13.

17. Protected customers are defined as those “residential customer[s] about whom the public utility has evidence that the customer is:

- a. unemployed as demonstrated through verification by [the Department of Labor and Training] that the person is currently receiving unemployment compensation;
- b. elderly or handicapped, as defined by § 1.4(K)(1)(a) of this Part [providing that public utilities may not terminate utility services to households in which all adults residents are 62 years of age or older or any resident is handicapped, without receiving prior written approval from the Division];
- c. recipients of Low Income Heating Assistance Program (LIHEAP) . . . ;
- d. seriously ill, as defined by § 1.2(A)(8) of this Part [defining “seriously ill” as “an illness that is life-threatening or that will cause irreversible adverse consequences to human health or that has a significant potential to become life threatening or to cause irreversible adverse consequences to human health”]; [or]
- e. living in a residence where there is domiciled a person under the age of two (2) years and there is a financial hardship.”

810-RICR-10-00-1.2.

18. “A utility ‘has evidence’ that a person is a Protected Status Customer when the utility has written verification from a legitimate agency that such person falls within one of the above-listed categories of Protected Status Customers (e.g., Rhode Island drivers [*sic*] license showing age, DLT photo identification card, a letter from a licensed physician showing that a

person is seriously ill or handicapped, a Social Security Number, written verification of LIHEAP enrollment, written verification of eligibility for food stamps)[.]” *Id.*

19. Rhode Island Energy seeks authority from the Commission to forgive arrearages in an amount equal to \$43.5 million to these classes of customers consistent with its obligations under the Settlement Agreement.

20. As part of this petition, Rhode Island Energy seeks a determination that providing this arrearage forgiveness to this subset of customers does not constitute undue rate discrimination under R.I. Gen. Laws § 39-2-2 or an unreasonable prejudice or preference under R.I. Gen. Laws § 39-2-3.

21. As support for this request, Rhode Island Energy states that the Commission already recognizes that it is appropriate to provide special protections and preferences for these customers.

22. With respect to low-income customers, the Commission has authorized low-income rate classes that provide electric and gas distribution service at lower rates than those Rhode Island Energy charges to other residential customers.

23. Also, with respect to low-income customers, as well as with respect to protected customers, the Commission has provided special protections regarding collections procedures and termination procedures through its Rules and Regulations Governing the Termination of Residential Electric, Gas and Water Service.

24. These accommodations demonstrate a recognition that it is reasonable and appropriate to provide additional relief to low-income and protected customers from the potential adverse consequences that could occur from the failure to pay utility bills.

25. Although Rhode Island Energy generally seeks to collect all amounts appropriately due from all customers, Rhode Island Energy's agreement to seek this arrearage forgiveness as part of the Settlement Agreement is, in part, a recognition that, as the State of Rhode Island continues to deal with consequences of the COVID-19 pandemic, and as new cost challenges have arisen associated with spikes in gas prices and inflation generally, it is reasonable and appropriate to provide some additional relief to these more vulnerable customers from aged arrearages.

WHEREFORE, Rhode Island Energy respectfully requests that the Commission issue an order:

1. Granting this petition;
2. Authorizing Rhode Island Energy to provide the requested arrearage forgiveness; and
3. Ordering such other relief or direction as the Commission deems just and appropriate under the circumstances.

Respectfully submitted,

The Narragansett Electric Company d/b/a Rhode Island Energy

By its Attorneys,

/s/ Celia B. O'Brien
Celia B. O'Brien (#4484)
Rhode Island Energy
280 Melrose Street, Third Floor
Providence, RI 02907
T: (401) 578-2700
COBrien@pplweb.com

/s/ Adam M. Ramos
Adam M. Ramos (#7591)
Hinckley, Allen & Snyder LLP
100 Westminister Street, Suite 1500
Providence, RI 02903
T: (401) 274-2000
F: (401) 277-9600
aramos@hinckleyallen.com

Dated: June 24, 2022

Attachment A

SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) is made on this 19th day of May, 2022 (the “Effective Date”), by and between PPL Corporation, PPL Rhode Island Holdings, LLC (PPL Corporation and PPL Rhode Island Holdings, LLC, collectively referred to as “PPL”), and Peter F. Neronha, Attorney General of the State of Rhode Island (the “Attorney General”) (collectively “the Parties”).

WITNESSETH:

WHEREAS, on February 23, 2022, the Rhode Island Division of Public Utilities and Carriers (the “Division”) issued a Report and Order in the matter captioned *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*, approving the transfer of ownership of The Narragansett Electric Company (“Narragansett”) to PPL under the authority granted to the Division under R.I. Gen. Laws §§ 39-3-24 and 39-3-25 (the “Division Approval Order”), which includes the Commitments PPL offered as conditions (the “Original Commitments”);

WHEREAS, on February 24, 2022, the Attorney General filed a complaint asserting an administrative appeal of the Division Approval Order in the Rhode Island Superior Court captioned *Peter Neronha Attorney General of the State of Rhode Island v. Rhode Island Division of Public Utilities and Carriers, Linda George, Administrator in her Official Capacity Only; National Grid USA; Narragansett Electric; PPL Corporation; and PPL Rhode Island Holdings LLC, C.A. No. PC-2022-01095* (the “Administrative Appeal”), and filed a motion seeking a stay of the Division Approval Order;

WHEREAS, on April 1, 2022, the Superior Court entered a Decision and Order entering a stay of the Division Approval Order (the “Stay Order”); and

WHEREAS, the Parties have determined that it is in their respective best interests in accordance with the terms contained herein to remove the Stay Order and withdraw the Administrative Appeal.

NOW THEREFORE, for good and sufficient consideration, the receipt and sufficiency of which is hereby acknowledged, PPL and the Attorney General, intending to be bound, agree as follows:

1. **Removal of Stay Order and Withdrawal of Administrative Appeal.** The Attorney General shall, on or before Monday, May 23, 2022:
 - a. File jointly with PPL, the Division, National Grid USA, and Narragansett, in the form attached to this Agreement as Exhibit A, a joint motion to vacate the Stay Order; and
 - b. File a Stipulation of Dismissal, with prejudice, signed by PPL, the Division, National Grid USA, and Narragansett, in the form attached as Exhibit B, withdrawing the Administrative Appeal.

2. **Terms and Conditions regarding rates and utility operations and the Act on Climate.** PPL agrees it will take the actions as set forth in Exhibit C, attached hereto (the “Additional Commitments”). The Additional Commitments are binding on PPL, can be enforced against PPL in the same manner as the Original Commitments in the Approval Order, and in all circumstances where the Additional Commitments impose requirements on PPL that exceed those set forth in the Original Commitments, PPL is bound by the terms of the Additional Commitments.

3. **Other Provisions.**

- a. This Agreement is for the benefit of the Parties only.
- b. The agreement by a Party to the terms of this Agreement shall not be construed as an agreement as to any matter of fact or law for any other purpose.
- c. All prior discussions and agreements with respect to the subject matter hereof are deemed merged in this Agreement, which alone constitutes the entire agreement between the Parties as to its subject matter.
- d. This Agreement may be executed in counterparts, and delivered in PDF format by electronic mail, with each counterpart constituting an original version of the Agreement.
- e. This Agreement embodies the entire agreement between the Parties, supersedes all prior agreements and understandings, if any, relating to the subject matter hereof, and may be amended only by an instrument in writing executed jointly by the Parties.
- f. The Parties recognize that legal damages are not an adequate remedy for any nonperformance under this Agreement and expressly covenant and agree that the rights guaranteed hereunder are enforceable in equity, whether by specific performance or other means. The Parties further hereby covenant and agree that each will not assert as an objection to enforcement of this Agreement that specific performance or other equitable enforcement is not available.
- g. If, from time to time, either Party does not enforce an obligation under this agreement in any one instance, such nonenforcement shall not be construed to

waive a right to future enforcement or to excuse any Party from an obligation under this Agreement.

- h. All Parties agree to the State of Rhode Island's disclosure of this Agreement and the terms and conditions of this Agreement, to the public.
- i. This Agreement shall be enforced, governed by and construed in accordance with the laws of the State of Rhode Island, without regard to choice of law principles.
- j. In the event that any provision of this Agreement conflicts with any applicable law, such conflict shall not affect the other provisions hereof that can be given effect without the conflicting provision, and to this end, the provisions hereof are declared to be severable.
- k. Each of the Parties warrants that it is duly authorized and empowered to enter into this Agreement, and the person executing this Agreement on behalf of each Party warrants that he or she is duly authorized and empowered to do so.

[SIGNATURES FOLLOW ON THE NEXT PAGE]

PPL CORPORATION

Date: May 20, 2022

By: Vincent Say

PPL RHODE ISLAND HOLDINGS, LLC

Date: May 20, 2022

By: Joseph B. Breyer

PETER F. NERONHA, ATTORNEY GENERAL
OF THE STATE OF RHODE ISLAND

Date: May __, 2022

By: _____

PPL CORPORATION

Date: May __, 2022

By: _____

PPL RHODE ISLAND HOLDINGS, LLC

Date: May __, 2022

By: _____

PETER F. NERONHA, ATTORNEY GENERAL
OF THE STATE OF RHODE ISLAND

Date: May 20, 2022

By:  _____

EXHIBIT A

STATE OF RHODE ISLAND
PROVIDENCE, SC

SUPERIOR COURT

PETER NERONHA ATTORNEY GENERAL
OF THE STATE OF RHODE ISLAND

Plaintiff

v.

C.A. No. PC-2022-01095

RHODE ISLAND DIVISION OF PUBLIC
UTILITIES AND CARRIERS, LINDA
GEORGE, ADMINISTRATOR IN HER
OFFICIAL CAPACITY ONLY; NATIONAL
GRID USA; NARRAGANSETT ELECTRIC;
PPL CORPORATION; AND PPL RHODE
ISLAND HOLDINGS, LLC

Defendants

JOINT MOTION TO VACATE STAY ORDER

Peter F. Neronha, Attorney General for the State of Rhode Island (the “Attorney General”), the Rhode Island Division of Public Utilities and Carriers, Linda George, Administrator, in her Official Capacity Only (the “Division”), National Grid USA (“National Grid”), The Narragansett Electric Company (“Narragansett”), PPL Corporation, and PPL Rhode Island Holdings, LLC (together with PPL Corporation, “PPL”) (collectively, the “Parties”) move this court to vacate its April 1, 2022 Order staying the Division of Public Utilities and Carriers’ Order 24322 (the “Approval Order”). The Court should vacate the stay because the Attorney General and PPL have reached a settlement. All parties, including the Division and National Grid, will file a Stipulation of Dismissal pursuant to Rule 41 of the Superior Court Rules of Civil Procedure immediately after the stay is lifted.

WHEREFORE, the Parties respectfully request that this Court immediately vacate the stay of the Approval Order.

Respectfully Submitted,

PETER F. NERONHA, ATTORNEY
GENERAL FOR THE STATE OF RHODE
ISLAND,
By,

/s/ Sarah W. Rice

Sarah W. Rice (#10465)

/s/ Nicholas M. Vaz

Nicholas M. Vaz (#9501)
Special Assistants Attorney General
Office of the Attorney General
150 South Main Street
Providence, RI 02903
srice@riag.ri.gov
nvaz@riag.ri.gov
(401) 274-4400 x 2054

PPL CORPORATION and PPL RHODE
ISLAND HOLDINGS, LLC
By their attorneys,

/s/ Gerald J. Petros

Gerald J. Petros (#2931)

Adam M. Ramos (#7591)

Hinckley, Allen & Snyder LLP
100 Westminster Street, Suite 1500
Providence, RI 02903
gpetros@hinckleyallen.com
aramos@hinckleyallen.com

NATIONAL GRID USA AND THE
NARRAGANSETT ELECTRIC
COMPANY,
By their attorney,

/s/ Robert J. Humm

Robert J. Humm
Keegan Werlin LLP
99 High Street, Suite 2900
Boston, Massachusetts 02110
Tel: (617) 951-1400
Fax: (617) 951-1354
rhumh@keeganwerlin.com

LINDA GEORGE, ADMINISTRATOR,
RHODE ISLAND DIVISION OF PUBLIC
UTILITIES & CARRIERS,
By her attorney,

/s/ Margaret L. Hogan, Esq. (#5006)

Rhode Island Division of Public Utilities &
Carriers
89 Jefferson Boulevard
Warwick, R.I. 02888
(401) 780-2120
Margaret.l.hogan@dpuc.ri.gov

EXHIBIT B

STATE OF RHODE ISLAND
PROVIDENCE, SC

SUPERIOR COURT

PETER NERONHA ATTORNEY GENERAL
OF THE STATE OF RHODE ISLAND

Plaintiff

v.

C.A. No. PC-2022-01095

RHODE ISLAND DIVISION OF PUBLIC
UTILITIES AND CARRIERS, LINDA
GEORGE, ADMINISTRATOR IN HER
OFFICIAL CAPACITY ONLY; NATIONAL
GRID USA; NARRAGANSETT ELECTRIC;
PPL CORPORATION; AND PPL RHODE
ISLAND HOLDINGS, LLC

Defendants

STIPULATION OF DISMISSAL

Pursuant to Rhode Island Superior Court Rule of Civil Procedure 41(1)(b), Peter F. Neronha, Attorney General for the State of Rhode Island (the “Attorney General”), the Rhode Island Division of Public Utilities and Carriers, Linda George, Administrator, in her Official Capacity Only (the “Division”), National Grid USA (“National Grid”), The Narragansett Electric Company (“Narragansett”), PPL Corporation, and PPL Rhode Island Holdings, LLC (together with PPL Corporation, “PPL”) (collectively, the “Parties”) hereby stipulate to the dismissal, with prejudice of this action, with each party to bear its own attorney’s fees and costs.

Respectfully Submitted,

PETER F. NERONHA, ATTORNEY
GENERAL FOR THE STATE OF RHODE
ISLAND,

By,

/s/ Sarah W. Rice

Sarah W. Rice (#10465)

/s/ Nicholas M. Vaz

Nicholas M. Vaz (#9501)

Special Assistants Attorney General
Office of the Attorney General

150 South Main Street

Providence, RI 02903

srice@riag.ri.gov

nvaz@riag.ri.gov

(401) 274-4400 x 2054

NATIONAL GRID USA AND THE
NARRAGANSETT ELECTRIC
COMPANY,

By their attorney,

/s/ Robert J. Humm

Robert J. Humm

Keegan Werlin LLP

99 High Street, Suite 2900

Boston, Massachusetts 02110

Tel: (617) 951-1400

Fax: (617) 951-1354

rhummm@keeganwerlin.com

PPL CORPORATION and PPL RHODE
ISLAND HOLDINGS, LLC

By their attorneys,

/s/ Gerald J. Petros

Gerald J. Petros (#2931)

Adam M. Ramos (#7591)

Hinckley, Allen & Snyder LLP

100 Westminster Street, Suite 1500

Providence, RI 02903

gpetros@hinckleyallen.com

aramos@hinckleyallen.com

LINDA GEORGE, ADMINISTRATOR,
RHODE ISLAND DIVISION OF PUBLIC
UTILITIES & CARRIERS,

By her attorney,

/s/ Margaret L. Hogan, Esq. (#5006)

Rhode Island Division of Public Utilities &
Carriers

89 Jefferson Boulevard

Warwick, R.I. 02888

(401) 780-2120

Margaret.l.hogan@dpuc.ri.gov

EXHIBIT C

PPL voluntarily makes the following additional commitments (the “Additional Commitments”) that provide additional benefits to the State of Rhode Island and the customers of The Narragansett Electric Company (“Narragansett”). PPL agrees that PPL will bear the incremental costs of these Additional Commitments. PPL will not seek recovery through any cost recovery mechanism of the incremental costs of these Additional Commitments, and will hold customers harmless from those incremental costs, both now and in the future.

1. Terms and Conditions regarding rates and utility operations.

- a. Customer Bill Credits. Within 60 days of closing, PPL shall provide a credit to all of Narragansett’s electric and gas distribution customers in the total amount of \$50 million. Based on the relative number of electric distribution customers and gas distribution customers, PPL will credit \$32.5 million to electric customers and \$17.5 million to gas customers. Each electric customer will receive the same credit, and each gas customer will receive the same credit.
- b. Customer Arrearage Forgiveness. Within 30 days of closing, PPL shall seek PUC approval to forgive \$43.5 million in arrearages for low-income and protected residential customers, which represents 100% of the arrearages of over 90 days for those customers as of March 31, 2022.
- c. Base Distribution Rates. In combination with its commitment that PPL will not file for a change in base distribution rates before three years after the Transaction’s closing, PPL shall not submit a request for a change in base rates unless and until there is at least 12 months of operating experience under PPL’s exclusive leadership and after the transition service agreements with National Grid terminate.
- d. Recovery of Transition Costs. The Approval Order includes a condition that limits Narragansett’s potential recovery of transition costs to no more than \$82,000,000. PPL now agrees that Narragansett will forgo potential recovery of any and all transition costs, reducing the total amount of potential transition cost recovery to \$0.
- e. Write-Off of Regulatory Asset for GBE and Cybersecurity/IT. PPL will write-off the regulatory assets currently recorded on Narragansett’s books for the Gas Business Enablement (“GBE”) project and for certain Cybersecurity/IT investments related to GBE, which as of April 30, 2022 were \$21.0 million, and will not seek to recover these regulatory assets from customers in any future proceeding.
- f. AMF Project Costs and Benefits. PPL will include in its plan for deployment of Advanced Meter Functionality (“AMF”):

- iii. PPL will ensure that at least one FTE’s responsibilities will include the improvement of uptake of available grant, discount, shut-off protection and arrearage management programs.
- iv. PPL will retain the escalated customer service resolution channels available for low-income customers since the approval of the Amended Settlement Agreement in Rhode Island Public Utilities Commission Docket No. 4770.
- v. PPL will maintain the resources described in paragraphs 1(h)(i) through 1(h)(iv) above at least until the next base distribution rate case.
- vi. To the extent the costs of providing these services described in paragraph 1(i) exceed the costs Narragansett currently incurs, PPL will not seek recovery of those additional costs unless requested and approved by the PUC on a going-forward basis in the next base distribution rate case.
- vii. To the extent that these services for low income services continue after the next Narragansett base distribution rate case, the Rhode Island Public Utilities Commission (the “PUC”) will determine any cost recovery for the continuation of such actions.
- j. Mutual Assistance. PPL will enter into a mutual assistance agreement between Narragansett and Massachusetts Electric Company and Nantucket Electric Company within 5 days of closing, which will provide Narragansett with access to storm response support upon request and will ensure Rhode Island is given first priority over all other unaffiliated utilities in the event mutual assistance is requested by PPL and/or Narragansett at the same cost as Narragansett would otherwise receive such assistance in the absence of the Transaction.

2. Terms and Conditions regarding decarbonization goals.

- a. Act on Climate Report.
 - i. PPL will within 60 days of the Transaction closing, PPL will retain a third-party consultant(s), to investigate and prepare the report described in Commitment 11 of the conditions ordered by the Division, which is hereinafter referred to as the “Narragansett Act on Climate Report” assessing Narragansett’s role in meeting the requirements of Rhode Island’s 2021 Act on Climate (“Act on Climate”), and to present a long-term strategy for the gas distribution system in light of the Act on Climate.

- ii. PPL will submit the Narragansett Act on Climate Report to the Division, the Rhode Island Public Utilities Commission (“RIPUC”) and the Attorney General within 12 months of the Transaction closing.
- iii. PPL will design the Narragansett Act on Climate Report to provide input to the Rhode Island Executive Climate Change Coordinating Council (“EC4”) as the EC4 develops the plans for the implementation of the requirements of the Act on Climate, including the update to the 2016 Greenhouse Gas Emissions Reduction Plan, to be delivered by the EC4 by December 31, 2022, and the 2025 Climate Strategy, to be delivered by the EC4 by December 31, 2025.

b. Stakeholder Engagement.

- i. PPL will establish and conduct a stakeholder engagement process within 90 days of Transaction closing to participate in the development of the Narragansett Act on Climate Report.
- ii. PPL will solicit the participation of all interested parties, including parties that intervened in this docket and/or that participated in either or both of the Power Sector Transformation Advisory Group and the Aquidneck Island Advisory Group.
- iii. PPL will have the third-party consultant(s) conduct an initial meeting to receive input on the scope of the topics and issues to be covered by the reports.
- iv. PPL will have the third-party consultant(s) meet and consult with the stakeholder group at least once every quarter to provide updates on the preparation of the reports and receive feedback and input.

c. Electric and Solar Growth Study. PPL will include in the Narragansett Act on Climate Report the results of a study to be conducted by the third-party consultant(s) analyzing potential capacity and opportunity for implementing and advancing battery storage, new solar development and EV charging stations, taking into account and mapping both ideal locations in Rhode Island and existing infrastructure that can be utilized to ensure effective implementation.

d. Energy Efficiency Program Use Study. PPL will include in the Narragansett Act on Climate Report:

- i. the results of a study analyzing the extent of current use of energy efficiency programs in residences of low-income customers as well as current outreach efforts to those customers; and

- ii. geographical mapping of the State showing the extent, frequency and use of energy efficiency programs by all customers throughout the state regardless of income.
- e. Future Investigation. To the extent that the RIPUC decides to open a docket to assess the future of the gas distribution business in Rhode Island, or any other party makes a request to the RIPUC to open such a docket, PPL will not object to the opening of such docket and, to the extent a report and a stakeholder process is mandated by such a docket, that report and process shall supersede the requirements of Sections 2(a) and 2(b), and any cost recovery for the costs Narragansett may incur in participating in any such docket shall be determined by the PUC.
- f. Available Funding for Infrastructure Improvements. PPL will actively pursue federal funding, including filing at least one grant proposal for funding available pursuant to the 2021 Infrastructure Investment and Jobs Act, to invest in updating and improving utility infrastructure to minimize the potential need for rate increases.
- g. Future Filings. PPL will include a written assessment of the potential impacts on the Act on Climate's requirements as part of any new filing, request, or proposal submitted to the RIPUC and/or the Division. PPL will not seek to recover incremental costs incurred for any such assessments conducted before the next base distribution rate case. The PUC will then determine whether, going forward, PPL is entitled to recovery of costs for future assessments of this type.
- h. Distributed Energy Resources Interconnection.
 - i. PPL will maintain all procedures and timelines already in place for the processing of DER interconnections.
 - ii. PPL will employ its best efforts to obtain the necessary regulatory approvals to implement smart grid systems and infrastructure to reduce the cost and time required for DER interconnections in Rhode Island as soon as practicable, and any cost recovery for such efforts will be subject to PUC review and approval.
- i. Contribution to Renewable Energy Fund. As a show of commitment to the 2030 Act on Climate Goals, PPL will contribute \$2.5 million from the holding company level within 30 days of closing to the Rhode Island Commerce Corporation's (Commerce RI) Renewable Energy Fund (REF) and not use any of the \$2.5 million to meet its pre-existing renewable energy credit (REC) goals in Rhode Island or any other state.

- j. Expert Support. As a show of commitment to the 2030 Act on climate goals, PPL will make available up to \$2.5 million from the holding company level for the Attorney General to use, if he deems it necessary, to retain experts either to evaluate the Narragansett Act on Climate Report, or, to the extent the RIPUC opens a docket to assess the future of the gas distribution business in Rhode Island as described in Section 2(e) above, to support the Attorney General's participation in any such docket.

Monthly Utility Credit and Collections
March 2022
RIPUC Docket No. 4770
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General Residential	Mar-21		Apr-21		May-21		Jun-21		Jul-21		Aug-21		Sep-21		Oct-21		Nov-21		Dec-21		Jan-22		Feb-22		Mar-22		
	Electric	Gas	Electric	Gas	Electric	Gas	Electric	Gas	Electric	Gas	Electric	Gas	Electric	Gas	Electric	Gas	Electric	Gas	Electric	Gas	Electric	Gas	Electric	Gas	Electric	Gas	
1	Number of Residential Accounts, includes discount rate and AMP accounts (Active and Final)																										
1.a	Number of ACTIVE Residential Accounts, includes discount rate and AMP accounts																										
1.b	Number of FINAL Residential Accounts, includes discount rate and AMP accounts																										
2	Total Billed, does not include ESCO																										
3	Average active residential account bill (line 2 / line 1.a)																										
4	Total Receipts																										
5	Total Number of Accounts Protected through SPECIAL PROTECTIONS																										
6	Number of Standard Accounts Protected																										
6.a	Elderly																										
6.b	Infant																										
6.c	Handicapped																										
6.d	Welfare																										
6.e	Unemployed																										
6.f	Seriously ill																										
7	Number of Low-Income Accounts Protected																										
7.a	Elderly																										
7.b	Infant																										
7.c	Handicapped																										
7.d	Welfare																										
7.e	Unemployed																										
7.f	Seriously ill																										
Delinquency (Includes Active and Pending final accounts)																											
8	Number of delinquent accounts with oldest arrears aged 30-59 Days after issuance of a bill																										
8.a	Number of accounts reported above that have an active DPA																										
8.b	Number of accounts reported above without an active DPA																										
9	Dollar Value of delinquent accounts with oldest arrears aged 30-59 Days after issuance of a bill																										
9.a	Dollar Value of accounts reported above that have an active DPA																										
9.b	Dollar Value of accounts reported above without an active DPA																										
10	Number of delinquent accounts with oldest arrears aged 60-89 Days after issuance of a bill																										
10.a	Number of accounts reported above that have an active DPA																										
10.b	Number of accounts reported above without an active DPA																										
11	Dollar Value of delinquent accounts with oldest arrears aged 90+ Days after issuance of a bill																										
11.a	Dollar Value of accounts reported above that have an active DPA																										
11.b	Dollar Value of accounts reported above without an active DPA																										
12	Number of delinquent accounts with oldest arrears aged 90+ Days after issuance of a bill																										
12.a	Number of accounts reported above that have an active DPA																										
12.b	Number of accounts reported above without an active DPA																										
13	Dollar Value of delinquent accounts with oldest arrears aged 90+ Days after issuance of a bill																										
13.a	Dollar Value of accounts reported above that have an active DPA																										
13.b	Dollar Value of accounts reported above without an active DPA																										
14	Total Number of delinquent accounts																										
14.a	Number of accounts reported above that have an active DPA																										
14.b	Number of accounts reported above without an active DPA																										
15	Total Dollar Value of delinquent accounts																										
15.a	Dollar Value of accounts reported above that have an active DPA																										
15.b	Dollar Value of accounts reported above without an active DPA																										
16	Total Dollar Value of current accounts																										
17	Total Active and Pending Final A/R																										
Collection Agencies																											
18	Number of cases referred to collection agencies																										
19	Number of new payments plans, not including AMP																										
20	Number of payment plans defaulted																										
21	Number of active payment agreements																										
21.a	Number of Active Step-plan agreements																										
21.b	Number of Company issued non-Step plans																										
21.c	Number of regulatory order non-Step plans																										
21.d	Number of Commission sanctioned "October Rule" payment plans																										
22	Number of new budget plans, not including AMP																										
Shut-Offs																											
23	Number of Accounts Sent Notice of Disconnection for non-payment																										
24	Number of Service Disconnections for non-payment																										
24.a	Number of Service Disconnections for non-payment on accounts with NO special protection																										
24.b	Number of Service Disconnections for non-payment on accounts WITH a special protection																										
24.c	Number of Service Disconnections for non-payment in excess of \$1000																										
24.d	Ratio of service disconnections for nonpayment to total Residential Customers																										
25	Average balance of Service Disconnections for non-payment																										
25.a	Average balance of Service Disconnections for non-payment on accounts with NO special protection																										
25.b	Average balance of Service Disconnections for non-payment on accounts WITH a special protection																										

	Mar-21		Apr-21		May-21		Jun-21		Jul-21		Aug-21		Sep-21		Oct-21		Nov-21		Dec-21		Jan-22		Feb-22		Mar-22			
	Electric	Gas	Electric	Gas	Electric	Gas	Electric	Gas	Electric	Gas	Electric	Gas	Electric	Gas	Electric	Gas	Electric	Gas	Electric	Gas	Electric	Gas	Electric	Gas	Electric	Gas		
Arrearage Management Program																												
56	Number of Accounts (total enrollees in the program)		1,047	350	1,043	359	1,189	440	1,493	634	1,567	730	1,652	785	1,702	805	1,655	746	1,584	668	1,475	597	1,383	532	1,292	522	1,182	485
57	Percent of low-income customers enrolled on the AMP		3.3%	1.8%	3.2%	1.8%	3.6%	2.1%	4.7%	3.1%	4.2%	3.0%	4.5%	3.3%	4.7%	3.5%	4.7%	3.2%	4.4%	2.9%	4.2%	2.6%	3.9%	2.3%	3.6%	2.2%	3.1%	2.0%
58	Total receipts paid by enrollees		\$131,439	\$28,206	\$120,460	\$29,354	\$114,770	\$28,481	\$188,470	\$39,659	\$294,065	\$48,360	\$403,797	\$65,048	\$339,565	\$61,208	\$184,428	\$58,039	\$201,062	\$78,149	\$144,015	\$51,068	\$159,146	\$44,191	\$125,614	\$41,140	\$153,250	\$49,310
59	Total receipts paid by LIHEAP		\$17,719	\$18,296	\$10,682	\$29,259	\$14,900	\$29,402	\$936	\$7,678	\$7,763	\$25,262	\$26,396	\$65,663	\$8,241	\$19,094	\$0	\$0	\$1,059	\$0	\$0	\$0	\$25,970	\$26,730	\$7,235	\$22,138	\$3,826	\$15,926
60	Total billed to program participants, includes both arrears payment and current bill		\$521,426	\$102,983	\$509,446	\$121,550	\$622,894	\$203,576	\$1,012,133	\$298,075	\$1,208,276	\$354,604	\$1,323,855	\$407,398	\$1,327,932	\$431,141	\$1,198,527	\$392,077	\$1,024,541	\$317,324	\$873,291	\$222,868	\$738,276	\$134,222	\$596,765	\$118,368	\$555,155	\$108,376
61	Number of newly enrolled customers		172	55	119	52	232	114	446	268	240	152	191	108	136	84	78	52	62	29	77	21	49	24	57	44	86	38
61.a	Number of newly enrolled customers: not associated with service restoration		172	55	119	52	232	114	446	268	240	152	191	108	136	84	78	52	62	29	77	21	49	24	57	44	86	38
61.b	Number of newly enrolled customers: associated with service restoration		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
62	Number of customers exited the program		157	64	105	38	105	48	186	118	121	54	100	52	116	56	106	96	118	109	111	76	127	100	107	55	121	51
62.a	Number of customers exited the program by default		96	34	70	27	62	27	79	40	78	28	51	37	57	44	62	84	62	91	77	67	99	89	79	41	77	35
62.b	Number of customers exited the program by cancellation		61	30	35	11	43	21	107	78	43	26	49	15	59	12	44	12	56	18	34	9	28	11	28	14	44	16
63	Number of customers successfully completing a 12-month program		53	17	23	8	34	14	44	23	56	18	35	9	30	9	35	10	35	10	51	5	54	11	56	7	86	27
63.a	Number of customers successfully completing a 12-month program with remaining arrears		53	17	23	8	34	14	44	23	56	18	35	9	30	9	35	10	35	10	51	5	54	11	56	7	86	27
63.b	Number of customers that have fully completed the program with full pay-down to zero arrears		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
64	Number of AMP-enrolled delinquent accounts with oldest arrears aged 60+ Days after issuance of a bill		937	289	1,048	355	1,074	370	1,290	555	1,438	684	1,389	717	1,385	719	1,345	652	1,246	550	1,189	488	1,029	376	949	359	892	346
65	Dollar Value of AMP-Enrolled delinquent accounts with oldest arrears aged 60+ Days		\$1,761,972	\$529,811	\$1,924,781	\$621,940	\$1,975,452	\$643,062	\$2,623,857	\$919,228	\$3,056,928	\$1,145,003	\$3,078,293	\$1,176,313	\$3,055,380	\$1,189,745	\$2,902,166	\$1,082,496	\$2,575,321	\$906,559	\$2,431,254	\$817,764	\$2,080,001	\$640,346	\$1,860,751	\$647,140	\$1,834,604	\$653,179
66	Number of AMP program participants receiving LIHEAP		20	24	15	40	16	39	1	10	10	34	36	90	8	24	0	0	1	1	0	0	36	42	9	31	7	24
67	Percent of AMP customers receiving LIHEAP payments		1.9%	6.9%	1.4%	11.1%	1.3%	8.9%	0.1%	1.6%	0.6%	4.7%	2.2%	11.5%	0.5%	3.0%	0.0%	0.0%	0.1%	0.1%	0.0%	0.0%	2.6%	7.9%	0.7%	5.9%	0.6%	4.9%

Attachment B

to
Petition for Arrearage Forgiveness

Produced in native Excel format