KEEGAN WERLIN LLP

ATTORNEYS AT LAW

99 HIGH STREET, SUITE 2900

BOSTON, MASSACHUSETTS 02110

(617) 951-1400

TELECOPIER:

(617) 951-1354

February 4, 2022

VIA HAND DELIVERY & ELECTRONIC MAIL

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

RE: Docket 4770 – Application of The Narragansett Electric Company d/b/a National Grid for Approval of a Change in Electric and Gas Base Distribution Rates

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a National Grid ("the Company"), enclosed are the Company's responses to the Second Set of Data Requests issued by the Public Utilities Commission regarding the Company's Direct Current Fast Charging Discount Tariff Advice filing.

Sincerely,

John K. Habib

John K. Habib, Esq.

Cc: Dkt. 4770 Service List
Bonnie Raffetto, Esq.

Certificate of Service

I hereby certify that a copy of the cover letter and/or any materials accompanying this certificate were electronically transmitted and/or hand delivered to the individuals listed below.

John K. Habib

Dated: February 4, 2022

National Grid Docket No. 4770 (Rate Application) & Docket No. 4780 (PST)
Combined Service list updated 11/29/2021

Docket No. 4770 Name/Address	E-mail Distribution List	Phone
National Grid Jennifer Hutchinson, Esq. Celia O'Brien, Esq. National Grid 280 Melrose St. Providence, RI 02907 Electric Transportation: Bonnie Crowley Raffetto, Esq. Nancy Israel, Esq. National Grid 40 Sylvan Road Waltham, MA 02451	Jennifer.hutchinson@nationalgrid.com; Andrew.marcaccio@nationalgrid.com; Celia.obrien@nationalgrid.com; Najat.coye@nationalgrid.com; Joanne.scanlon@nationalgrid.com; Bill.Malee@nationalgrid.com; Theresa.burns@nationalgrid.com; Ann.leary@nationalgrid.com; Scott.mccabe@nationalgrid.com; kate.grant2@nationalgrid.com; Timothy.roughan@nationalgrid.com; Jason.Small@nationalgrid.com; bonnie.raffetto@nationalgrid.com; nancy.israel@nationalgrid.com;	781-907-2153 401-784-7288
Adam Ramos, Esq. Hinckley Allen 100 Westminster Street, Suite 1500 Providence, RI 02903-2319	aramos@hinckleyallen.com;	401-457-5164
John Habib, Esq. Keegan Werlin LLP 99 High Street, Suite 2900 Boston, MA 02110	jhabib@keeganwerlin.com;	617-951-1400
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; Christy.Hetherington@dpuc.ri.gov; Margaret.L.Hogan@dpuc.ri.gov; John.bell@dpuc.ri.gov; Linda.George@dpuc.ri.gov; Al.mancini@dpuc.ri.gov; Thomas.kogut@dpuc.ri.gov;	401-780-2140
Tim Woolf Jennifer Kallay Synapse Energy Economics	twoolf@synapse-energy.com; jkallay@synapse-energy.com;	617-661-3248

22 Pearl Street Cambridge, MA 02139	mwhited@synapse-energy.com;	
David Effron Berkshire Consulting 12 Pond Path North Hampton, NH 03862-2243	Djeffron@aol.com;	603-964-6526
Gregory L. Booth, PLLC 14460 Falls of Neuse Rd. Suite 149-110 Raleigh, N. C. 27614	gboothpe@gmail.com;	919-441-6440
Linda Kushner L. Kushner Consulting, LLC 514 Daniels St. #254 Raleigh, NC 27605		919-810-1616
Office of Energy Resources (OER) Albert Vitali, Esq. Dept. of Administration Division of Legal Services One Capitol Hill, 4th Floor Providence, RI 02908	Albert.Vitali@doa.ri.gov ; nancy.russolino@doa.ri.gov; Christopher.Kearns@energy.ri.gov; Nicholas.Ucci@energy.ri.gov ; Carrie.Gill@energy.ri.gov;	401-222-8880
Conservation Law Foundation (CLF) Max Greene, Esq. Conservation Law Foundation 235 Promenade Street Suite 560, Mailbox 28 Providence, RI 02908	mgreene@clf.org;	401-228-1904
Dept. of Navy (DON) Kelsey A. Harrer, Esq. Office of Counsel NAVFAC Atlantic, Department of the Navy 6506 Hampton Blvd. Norfolk, VA 23508-1278	kelsey.a.harrer@navy.mil;	757-322-4119
Kay Davoodi, Director Larry R. Allen, Public Utilities Specialist Utilities Rates and Studies Office NAVFAC HQ, Department of the Navy 1322 Patterson Avenue SE Suite 1000 Washington Navy Yard, D.C. 20374	khojasteh.davoodi@navy.mil; larry.r.allen@navy.mil;	

Ali Al-Jabir Maurice Brubaker Brubaker and Associates	aaljabir@consultbai.com;	
New Energy Rhode Island (NERI) Seth H. Handy, Esq. Handy Law, LLC 42 Weybosset St. Providence, RI 02903	seth@handylawllc.com;	401-626-4839
	helen@handylawllc.com;	
The RI League of Cities and Towns c/o Jordan Day and Jennifer Slatterly	jday@rileague.org;	401 272-3434
PRISM & WCRPC c/o Jeff Broadhead, Executive Director	jslattery@rileague.org;	
Newport Solar c/o Doug Sabetti	jb@wcrpc.org;	401-792-9900
Green Development, LLC c/o Hannah Morini	doug@newportsolarri.com;	401.787.5682
Clean Economy Development, LLC c/o Julian Dash	hm@green-ri.com;	
ISM Solar Development, LLC c/o Michael Lucini	jdash@cleaneconomydevelopment.com ;	
Heartwood Group, Inc. c/o Fred Unger	mlucini@ismgroup.com;	401.435.7900
	unger@hrtwd.com;	401.861.1650
Energy Consumers Alliance of NE James Rhodes Rhodes Consulting 860 West Shore Rd. Warwick, RI 02889	jamie.rhodes@gmail.com;	401-225-3441
Larry Chretien, PPL	larry@massenergy.org;	
Acadia Center Amy Boyd, Esq. Acadia Center 31 Milk St., Suite 501 Boston MA 02109-5128	aboyd@acadiacenter.org;	

Hank Webster Policy Advocate & Staff Attorney Acadia Center 144 Westminster Street, Suite 203 Providence, RI 02903-2216	hwebster@acadiacenter.org;	
Northeast Clean Energy Council Jeremy McDiarmid, NECEC Dan Bosley, NECEC Sean Burke		401-724-3600
	jmcdiarmid@necec.org;	
	dbosley@necec.org;	
	sburke@necec.org;	
The George Wiley Center Jennifer Wood Rhode Island Center for Justice 1 Empire Plaza, Suite 410 Providence, RI 02903 Camilo Viveiros, Wiley Center	jwood@centerforjustice.org;	401-491-1101
	georgewileycenterri@gmail.com;	
	Camiloviveiros@gmail.com;	
	chloechassaing@hotmail.com;	
Wal-Mart Stores East & Sam's East, Inc. Melissa M. Horne, Esq. Higgins, Cavanagh & Cooney, LLC 10 Dorrance St., Suite 400 Providence, RI 20903 Gregory W. Tillman, Sr. Mgr./ERA Walmart	mhorne@hcc-law.com;	401-272-3500
	Greg.tillman@walmart.com;	479-204-1594
AMTRAK Clint D. Watts, Esq. Paul E. Dwyer, Esq. McElroy, Deutsch, Mulvaney & Carpenter 10 Dorrance St., Suite 700 Providence, RI 02903 Robert A. Weishaar, Jr., Esq. Kenneth R. Stark, Esq.	CWatts@mdmc-law.com;	401-519-3848
	PDwyer@mdmc-law.com;	
	BWeishaar@mcneeslaw.com;	
	KStark@mcneeslaw.com;	
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 ;	
	Emma.rodvien@puc.ri.gov;	
	John.harrington@puc.ri.gov;	

DOCKET NO. 4780		
ChargePoint, Inc. Edward D. Pare, Jr., Esq. Brown Rudnick LLP One Financial Center Boston, MA 02111 Anne Smart, Charge Point, Inc.	EPare@brownrudnick.com; Anne.Smart@chargepoint.com; Kevin.Miller@chargepoint.com;	617-856-8338
Direct Energy Craig R. Waksler, Esq. Eckert Seamans Cherin & Mellott, LLC Two International Place, 16th Floor Boston, MA 02110 Marc Hanks, Sr. Mgr./GRA Direct Energy Services,	cwaksler@eckertseamans.com; dclearfield@eckertseamans.com; Marc.hanks@directenergy.com;	617-342-6800 413-642-3575
INTERESTED PERSONS		
EERMC Marisa Desautel, Esq	marisa@desautelesq.com; guerard@optenergy.com;	401-477-0023
Hank Webster Policy Advocate & Staff Attorney Acadia Center 144 Westminster Street, Suite 203 Providence, RI 02903-2216	hwebster@acadiacenter.org;	
Frank Epps, EDP	Frank@edp-energy.com;	
Matt Davey	mdavey@ssni.com;	
Nathan Phelps	nathan@votesolar.org;	
Radina Valova, Pace Energy & Climate Ctr.	rvalova@law.pace.edu;	
Lisa Fontanella	Lisa.Fontanella@spglobal.com;	
Janet Gail Besser, SEPA (Smart Electric Power Alliance)	jbesser@sepapower.org;	
Frank Lacey, EAC Power	frank@eacpower.com;	
PPL Electric Utilities Ronald Reybitz Stephen Breininger	rjreybitz@pplweb.com; skbreininger@pplweb.com;	

2-1

Request:

Referencing the Company's response to PUC 1-2, please provide supporting detail for the Capital Investment Expense related to the Charging Demonstration in the following categories:

a. Make ready work in RY 1, 2, 3.

b. Forecasted make ready work to achieve targets approved by Commission in Amended Settlement Agreement.

c. Incremental make ready work above the targets approved in the Amended Settlement Agreement in Rate Years 4-7.

Response:

a.- c. Please refer to Attachment PUC 2-1. Page 1 summarizes the actual and projected make - ready capital investments placed or to be placed into service during Rate Year (RY) 1 through RY 7 (Lines 1 through 7) and the related revenue requirements on that investment (Line 22) as provided in the Company's response to PUC 1-2. The Company has also provided on Page 1 (Lines 12 through 16) the make-ready investments approved to achieve targets included in the Amended Settlement agreement, along with the approved revenue requirement on that investment (Line 23). On Page 2 of Attachment PUC 2-1, the RYs 1, 2 and 3 actual EDC Make Ready and Premise Make Ready capital costs are presented by expense types as well as by average cost per port.

The Narragansett Electric Company
d/b/a National Grid
CHARGING DEMONSTRATION PROGRAM

1 ACTUAL/PROJECTED CAPITAL INVESTMENT

		(a)	(b)	(c)	(d)	(e)	(f)=(d)=+(e)	(g)	(h)	(i)	(j)=sum of (a) ~(c)+ sum of (f)~(i)
2		Actual			Projected						
3		**RY1**	**RY2**	**RY3**	**RY3 Applicants**	**RY4 Applicants**	**RY4 Total**	**RY5**	**RY6**	**RY7**	**Total**
4	**Charging Infrastructure CAPEX spending** EDC Make ready	$1,434	$106,765	$55,745	$326,693	$305,180	$631,873	$305,180	$305,180	$305,180	$1,711,357
5	Premise Make Ready	$123,870	$1,461,801	$801,468	$974,336	$2,611,451	$3,585,787	$2,611,451	$2,611,451	$2,611,451	$13,807,279
6	Labor	$17,891	$115,101	$108,918		$108,918	$108,918	$108,918	$108,918	$108,918	$677,582
7	Total	**$143,195**	**$1,683,667**	**$966,131**	$1,301,029	$3,025,549	**$4,326,578**	**$3,025,549**	**$3,025,549**	**$3,025,549**	**$16,196,218**

8

9 APPROVED CAPITAL INVESTMENT

		(a)	(b)	(c)	(d)=(a)+(b)+(c)
11		Approved			
12		**RY1**	**RY2**	**RY3**	**Total**
13	**Charging Infrastructure CAPEX spending** EDC Make ready	$136,285	$340,713	$885,854	$1,362,852
14	Premise Make Ready	$323,142	$807,855	$2,100,422	$3,231,419
15	Labor	$365,321	$270,627	$276,040	$911,988
16	Total	**$824,748**	**$1,419,195**	**$3,262,316**	**$5,506,259**

17

18 REVENUE REQUIREMENT ON CAPITAL INVESTMENT

		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)=sum of (a) ~(g)
20		Actual			Projected				
21		**RY1**	**RY2**	**RY3**	**RY4**	**RY5**	**RY6**	**RY7**	**Total**
22	**Actual/Projected**	$8,897	$126,241	$334,084	$670,057	$1,218,586	$1,617,572	$1,998,672	$5,974,109
23	**Approved**	$47,102	$201,799	$516,607	$516,607	$516,607	$516,607	$516,607	$2,831,936

Column Notes:

Lines 4 through 7
- (a) Att. PUC 1-2, Page 7, Lines 1 through 5
- (b) Att. PUC 1-2, Page 10, Lines 1 through 5
- (c) Att. PUC 1-2, Page 13, Lines 1 through 5
- (f) Att. PUC 1-2, Page 16, Lines 1 through 5
- (g) Att. PUC 1-2, Page 19, Lines 1 through 5
- (h) Att. PUC 1-2, Page 22, Lines 1 through 5
- (i) Att. PUC 1-2, Page 25, Lines 1 through 5

Lines 13 through 16
- (a) RIPUC Docket Nos. 4770/4780, Compliance Attachment 5.1, Page 2 of 10, Lines 1 through 5
- (b) RIPUC Docket Nos. 4770/4780, Compliance Attachment 5.1, Page 4 of 10, Lines 1 through 5
- (c) RIPUC Docket Nos. 4770/4780, Compliance Attachment 5.1, Page 6 of 10, Lines 1 through 5

Line Notes:

22 (a) through (c) = Att. PUC 1-2, Page 2, Line 7; (d) = Att. PUC 1-2, Page 3, Line 7; (e) through (g) = Att. PUC 1-2, Page 4, Line 7

23 RIPUC Docket Nos. 4770/4780, Compliance Attachment 5.1, Page 1 of 10, Line 20
Approved recoveries in Rate Years 4 through 7 assume recovery continues at Rate Year 3 levels until the Company's next distribution rate plan becomes effective.

The Narragansett Electric Company
d/b/a National Grid
Re: ELECTRIC TRANSPORTATION INITIATIVE
Power Sector Transformation (PST)
Rate Years Ending August 31, 2019 - 2021 Investment

		(a)	(b)	(c)	(d)
1	**EDC Costs (Make-Ready)**				
2	**Expense Type**	**RY1**	**RY2**	**RY3**	**Total**
3	AFUDC	$5	$280	$201	$486
4	Contractor and Consultant	$740	$9,040	$3,856	$13,636
5	Labor and Benefit	$578	$58,592	$27,433	$86,603
6	Material		$9,177	$9,492	$18,670
7	Overhead	$112	$19,275	$11,282	$30,669
8	Transportation		$10,399	$3,480	$13,880
9	**Grand Total**	**$1,434**	**$106,765**	**$55,745**	**$163,944**
10	EDC Cost by Project				
11	Level 2 Port				$55,518
12	DCFC Port				$108,426
13	Number of Ports				
14	Level 2 Port				281
15	DCFC Port				12
16	Average EDC Cost per Port				
17	Level 2 Port				$198
18	DCFC Port				$9,036
19					
20	**Premise Work Costs (Make-Ready)**				
21	**Expense Type**	**RY1**	**RY2**	**RY3**	**Total**
22	AFUDC			$45,209	$45,209
23	Contractor	$123,870	$1,461,801	$667,457	$2,253,128
24	Overhead			$88,803	$88,803
25	**Total**	**$123,870**	**$1,461,801**	**$801,468**	**$2,387,139**
26	Premise Work Cost by Project				
27	Level 2 Port				$1,837,340
28	DCFC Port				$549,799
29	Average Premise Work Cost per Port				
30	Level 2 Port				$6,539
31	DCFC Port				$45,817
32	Total average Make Ready Cost per Port				
33	Level 2 Port				**$6,736**
34	DCFC Port				**$54,852**

Line notes:

3~8	Per Company's books	22~24	Per Company's books
9	Sum of Lines 3 through 9	25	Sum of Lines 22 through 24
11	Per Company's records	15	Per Company's records
12	Line 9- Line 11	16	Line 9- Line 11
14,15	Docket No. 4770-B ETI Testimony, Page 15, Table 2	30	Line 27÷ Line 14
17	Line 11÷ Line 14	31	Line 28÷ Line 15
18	Line 12÷ Line 15	33	Line 17 + Line 30
		34	Line 18 + Line 31

2-2

Request:

Is the Company unilaterally reallocating funding between Electric Transportation Initiative (ETI) programs or between capital and O&M in Rate Year 4 and beyond?

Response:

The Company is not unilaterally reallocating funding between Electric Transportation Initiative (ETI) programs or between capital and O&M in Rate Year 4 and beyond. RY4 mirrors RY 3 ETI funding levels in accordance with the Amended Settlement Agreement and the extension approved by the Division on June 30, 2021. Please also see the Company's response to PUC Data Request 2-21.

2-3

Request:

Referencing Bates page 59 of the Amended Settlement Agreement, does the Company agree the Commission approved funding in rates to support the number of ports listed in each chart? If not, why not?

Response:

Yes, the Company agrees that the Commission approved funding in rates to support the number of ports listed in each chart on Bates page 59.

2-4

Request:

Referencing the ETI Rate Year 3 Annual Report (Nov. 3, 2021), Section 2.2, Table 1, please confirm that if the RY 3 approved ports are activated, the Company will have achieved 299 ports out of the 320 target ports.

Response:

The Company is projecting to achieve 299 Level 2 ports for Rate Years 1 through 3 out of the targeted 320 Level 2 ports if all the RY3 approved ports are activated.

2-5

Request:

Referencing Section 2.5 of the ETI Rate Year 3 Annual Report, is the Company proposing to add an additional 252 Level 2 ports in Rate Year 4?

a. If so, what is the basis for adding ports in excess of the 320 for which funding was approved? What was the basis for the Rate Year 4 goals?

b. Please include documentation supporting the need for the additional chargers above the originally approved funding for 320 in light of the fact that the EV adoption rate has been below the expected targets (Section 2.9 Table).

c. Were the Rate Year 4 Goals ever presented to the Commission for funding approval? If not, why not?

Response:

a. Yes, the Company is proposing to add an additional 252 Level 2 ports in Rate Year 4 in excess of the 320. Please see the Company's response to Data Request 2-21 regarding the basis for the extension of the ETI program under the existing terms and conditions of the current Rate Plan at Rate Year 3 levels until new base distribution rates are in effect. In accordance with the ASA and the Division's approval, the Company utilized the Rate Year 3 budgets and the segment goals established per the ASA to calculate the Rate Year 4 segment goals. The Company used the following guidelines to calculate the Rate Year 4 goals, which were shared during a Technical Session on September 24, 2020:

- The Rate Year 4 budget is based on the Rate Year 3 budget, as outlined in the ASA;
- Actual installations costs from Rate Years 1 and 2 were used instead of the estimated costs in the original budgets;
- The Rate Year 4 budget is allocated similarly to the Rate Year 1-3 budget with 2/3 for Level 2 sites and 1/3 for DCFC sites;
- All segments from Rate Year 1-3 are included in the Rate Year 4 goals; and
- The Rate Year 1-3 ports per segment ratios are the same in Rate Year 4 to the extent possible.

The table below is a comparison of Rate Year 1-3 Goals and Rate Year 4 Goals.

Proposed Targets for EV Charging Infrastructure Program

Segment	RY1-3 Ports Goal	Ports Ratio	RY4 Ports Goal	Ports Ratio	TOTAL
Corporate light-duty fleet	24	8%	20	8%	$ 195,200
Government light-duty fleet	24	8%	20	8%	$ 195,200
Public transit stations	60	19%	46	18%	$ 448,960
Environmental Justice	36	11%	28	11%	$ 388,696
MUD	36	11%	28	11%	$ 299,180
Workplaces	140	44%	110	44%	$ 1,073,600
Total L2 Ports	**320**		252		$ 2,600,836

Segment	RY1-3 Ports Goal	Ports Ratio	RY4 Ports Goal	Ports Ratio	TOTAL
Municipal school buses	3	7%	1	6%	$ 137,150
Other heavy-duty (port, airport)	8	17%	2	12%	$ 174,300
Rideshare company charging hub	5	11%	2	12%	$ 149,300
Public transit buses	10	22%	5	29%	$ 435,750
Public DCFC	20	43%	7	41%	$ 435,050
Total DCFC Ports	**46**		17		$ 1,331,550

RY 4 Totals	269		$ 3,932,386
RY4 with Labor/Marketing			**$ 4,261,039**

The original "per port" costs in the budget were higher than actual Level 2 projects versus the actual "per port" numbers, allowing the Company to project to install more ports at a lower cost in RY4. For DCFC sites, though, the Company has seen per station costs higher than the original budget because the budget had projected installing 5 stations per site when in RY1-3 the Company had seen customers installing either 1 or 2 stations per site.

b. Per the ASA the Company may continue to operate under the existing terms and conditions of the current Rate Plan at Rate Year 3 levels until new base distribution rates are in effect. As noted in (a) above the Company calculated its goals based on the Rate Year 3 budgets and segments. Please also see the Company's response to PUC Data Request 2-12 for an explanation of per vehicle per port calculations.

c. The Company presented the Rate Year 4 goals to the Commission during a technical session on September 24, 2020. The Company also presented the Rate Year 4 goals to the PST Advisory Committee in September 2020 and presented progress towards the Rate Year 4

goals on a monthly basis beginning in September, 2021. The Company also provided the Rate Year 4 budgets to the Commission in the Company's response to Docket 4770, PUC 3-10 Attachment PUC-3-10-4 (dated September 18, 2020).

2-6

Request:

Why does the Company believe Rhode Island needs more than the originally funded 320 Level 2 charging stations in Rate Year 4?

Response:

Please see the Company's response to Data Request 2-5.

2-7

Request:

Referencing the ETI Rate Year 3 Annual Report (Nov. 3, 2021), Section 2.2, Table 2, please confirm that if the RY 3 approved ports are activated, the Company will have achieved 31 ports out of the 46 target ports.

Response:

The Company will have achieved 31 ports in Rate Years 1 through 3 out of the 46 targeted DCFC ports should all of the ports be activated.

2-8

Request:

Referencing Section 2.5 of the ETI Rate Year 3 Annual Report, is the Company proposing to add an additional 17 DCFC ports in Rate Year 4? If so, what is the basis for adding ports in excess of the 46 for which funding was approved?

Response:
Yes the Company is proposing to add an additional 17 DCFC ports in Rate Year 4. Please see the Company's response to Data Request 2-5 for the basis for adding the ports.

2-9

Request:

What was the basis for the Rate Year 4 goals?

a. Please include documentation supporting the need for the additional chargers above the originally approved funding for 46 in light of the fact that the EV adoption rate has been below the expected targets (Section 2.9 Table).

b. Were the Rate Year 4 Goals ever presented to the Commission for funding approval? If not, why not?

Response:

a. Please see the Company's response to Data Request 2-5 and the Company's response to Data Request 2-12.
b. Please see the Company's response to Data Request 2-5.

2-10

Request:

Why does the Company believe Rhode Island needs more than the originally funded 46 DCFC ports in Rate Year 4?

Response:

Please see the Company's response to Data Request 2-5 and the Company's response to Data Request 2-12.

2-11

Request:

Has the Company reviewed the availability of other sources of funding to support make ready work or other charging station infrastructure?

a. If so, how did the availability of that funding affect the Company's Rate Year 4 goals?

b. If not, why did the Company not consider the availability of other funding sources?

Response:

Yes, the Company reviewed other available sources of funding. At the time of filing, the other relevant funding sources, of which the Company was aware, were those offered through Electrify RI and federal tax incentives. These incentive programs did not impact the Company's Rate Year 4 goals, as both had been available throughout the term of the Company program. Successful coordination with OER and the Electrify RI program has helped the Company leverage its program funds, reduce the burden on ratepayers, and maximize the benefits of the Company's offerings.

2-12

Request:

What is the Company's most recent estimate of the number of publicly accessible ports needed per electric vehicle (by level, if applicable)? Please provide supporting documentation.

Response:

The Company has not estimated the number of publicly accessible ports needed per electric vehicle. However, the Company believes that the additional ports requested for RY4 would be insufficient to support the Rhode Island ZEV MOU target.

Industry research and tools can help estimate the number of publicly accessible charging ports needed per electric vehicle, however these tools give a wide range of results based upon numerous factors such as the distribution of passenger vehicles versus commercial vehicles (including medium and heavy duty vehicles), the share of battery electric vehicles (BEVs) versus plug-in hybrid electric vehicles (PHEVs), the typical battery size and driving range per battery charge of BEVs and PHEVs on the road, the fast charging capabilities of the vehicles and chargers, the share of drivers with access to at-home or private charging, the geographic density of a region, the share of all vehicles that are EVs, the number of highway miles requiring "corridor charging", typical driving behaviors, the relative economics of owning and operating charging stations at different power levels (e.g., Level 2, DCFC-50kW, DCFC-150kW, etc.), and backup power, emergency response, and resiliency considerations. Comprehensive EVSE needs assessments for a region can also involve significant resources, as demonstrated by California's AB 2127 research efforts.[1]

Shown below is a summary of high-level vehicle-to-port ratios from various industry sources. Because of the direct tradeoff between the number of public ports and private charging ports, industry reports often include 'shared private' ports in these ratios, such as ports at workplaces or multi-unit dwellings.

- California AB 2127 EV Charging Infrastructure Assessment[2]
  - ~7 EVs per public and shared private port
  - ~150 BEVs per public DCFC

[1] See California's AB 2127 public reports, available at https://www.energy.ca.gov/programs-and-topics/programs/electric-vehicle-charging-infrastructure-assessment-ab-2127
[2] Based upon Figure 1 of the Assembly Bill 2127 Electric Vehicle Charging Infrastructure Assessment - Analyzing Charging Needs to Support Zero-Emission Vehicles in 2030 (Commission Report), available at https://efiling.energy.ca.gov/getdocument.aspx?tn=238853

- Medium and Heavy Duty EVs: ~1.1 vehicles per port

- Bloomberg New Energy Finance (BNEF) 2021 EV Outlook, United States vehicle-to-port forecast[3]
  - 2020: ~20 EVs per public port and ~63 BEVs per public DCFC port
  - 2030: ~19 EVs per public port and ~115 BEVs per public DCFC port
  - 2040: ~28 EVs per public port and ~205 BEVs per public DCFC port
- EVI-Pro Lite[4]
  - ~20 EVs per public and workplace port
  - ~330 BEVs per public DCFC port

[3] BNEF's EV Outlook is part of a proprietary subscription service. The reported ratios of vehicles per port are based upon Figures 118 and 325 of the 2021 EV Outlook.
[4] The EVI Pro Lite tool is available online at https://afdc.energy.gov/evi-pro-lite. Example results are shown for Rhode Island with 43,000 EVs, 80% at-home charging access, 77% of vehicles as BEV-250, 5% as PHEV-40, and 18% as PHEV-20 and partial support for PHEVs.

2-13

Request:

How many electric vehicles can be supported by the 320 Level 2 ports and the 46 DCFC for which funding was approved? How many would be supported if the Company met the Rate Year 4 goals listed in the 2.9 Table?

Response:

The number of vehicles a given charging port can support is determined by several factors, as discussed in the Company's response to Data Request 2-12. The Company does not have an estimate of the number of electric vehicles these ports are capable of supporting.

2-14

Request:

How many more vehicles can these chargers support than are expected to be registered in Rhode Island in Rate Year 4?

Response:

Please see the Company's response to Data Requests 2-12 and 2-13.

In the early days of the transition to electric vehicles, the Company recommends focusing on providing sufficient charging access, through both public and private charging, and overcoming specific customer barriers to transportation electrification required to enable widespread EV adoption, rather than focusing on a single vehicle-to-port ratio. A vehicle-to-port ratio does not reflect the challenges to owning and operating EVs that individual customers face. For instance, high vehicle-per-port ratios for a region can reflect a mature, efficient, and well-utilized public charging network, but they can also represent an insufficient number of ports serving the EVs on the road.

2-15

Request:

Why is the Company proposing to end the Off-Peak Charging Rebate but is proposing to expand the Charging Station Demonstration Program where each had three-year targets for which funding was approved?

Response:

The Company is still assessing whether to end the Off-Peak Charging Rebate pilot. Unlike the Charging Station Demonstration Program, the Off-Peak Rebate program is a proof-of-concept pilot to assess whether incentivizing Rhode Island EV drivers would lead to a statistically significant shift in charging at off-peak times. To date, the Company has collected three years' worth of charging data, including a year of data demonstrating that incentives are successful in delaying charging events to off-peak times.

Please see the Company's response to Data Request 2-5 for basis for continuing the Charging Station Demonstration Program.

2-16

Request:

When was the decision made to end the Off-Peak Charging Rebate?

Response:

The Company has not yet come to a final determination whether to end the Off-Peak Charging Rebate pilot at the end of Rate Year 4. Currently, the Company is exploring additional areas of study to address lessons learned from the initial pilot within the terms of the ASA. For example, the Company is seeking further information from the program vendor on ways to address timer peaks (i.e., new peak demand events created by the current off-peak incentive structure).

2-17

Request:

Please provide the Company's estimate for avoided capacity, transmission, and distribution cost, and any other benefits, as a result of the shift in demand resulting from the Off-Peak Charging Rebate.

Response:

The Company has not estimated the avoided capacity, transmission, and distribution cost resulting in demand shifts resulting from the Off-Peak Charging Rebate program.

2-18

Request:

Referencing the Company's response to Division 1-4 in Docket No. 5209, the Company stated, "The potential system impacts with increased EV charging are similar to any increasing load impacts. These impacts are largely related to capacity and voltage constraints. However, certain EV charging segments are conducive to intelligent management to reduce these system impacts. The Company has demonstrated how this feature of EV charging load can be leveraged in its SmartCharge Rhode Island program. In that program Customers are financially incentivized to charge their EVs during off-peak periods, there-by increasing utilization of existing assets and minimizing system impacts."

a. Is the SmartCharge Rhode Island program the name of the Electric Vehicle Off-Peak Charging Demonstration Program?

b. If the answer to a is yes, is this the same program the Company is proposing to end in August 2022?

c. If the answer to b is yes, how does the Company anticipate addressing the concerns expressed in the quoted portion of the response after August 31, 2022?

Response:

a. Yes.

b. It is the same program; however, the Company has not reached a final determination on whether to end or continue the program at this time. Please see the Company's response to Data Request 2-16 for further explanation.

c. As noted in section b above, the Company has not yet reached a final determination whether to end or continue the Off-Peak Charging Demonstration Program.

Prepared by or under the supervision: Anthony Carloni

2-19

Request:

Please confirm that the Make-Ready work adds to the Company's rate base upon which it earns a return.

Response:

Yes, the Make-Ready work adds to the Company's rate base upon which it earns a return.

2-20

Request:

Did ratepayers fund National Grid's request to DNV to explore National Grid's ownership of charging stations as described in Finding #10 of DNV's report?

Response:

DNV's exploration of National Grid's ownership of charging stations was within the scope and cost of the survey conducted as part of evaluation report. The cost of the evaluation report was a cost of the program, however, there were no specific costs associated with the questions associated with National Grid's ownership. .

2-21

Request:

Please quote the language from the Amended Settlement Agreement upon which the Company is relying to spend in excess of the allowed annual funding after Rate Year 4.

Response:
In accordance with Article II Section C.21.b. of the Amended Settlement Agreement (ASA) the Company may continue to operate under the existing terms and conditions of the current Rate Plan at Rate Year 3 levels until new base distribution rates are in effect. Article II Section C.2.b.i states:

"b. If the Division provides its consent to an extension of the term of this Rate Plan, the Division may specify another date upon which new base distribution rates are to become effective beyond September 1, 2022 in its place, but is not required to do so.

i. To the extent new base distribution rates resulting from the filing of the Company's next general rate case are not in effect by September 1, 2022, the Settlement Agreement shall remain in effect during the interim and if required, the Performance Incentive Mechanism provision shall be extended to cover the additional interim period."

The Rate Plan approved in the ASA was extended on June 30, 2021 and the Division agreed that the ASA would remain in effect and that the Company will continue to operate under the existing terms and conditions of the current Rate Plan at Rate Year 3 levels until new base distribution rates are in effect. Therefore, in accordance with Section 20 b. i. the Rate Year 4 budget mirrors the Rate Year 3 budget for the ET Initiative which includes the four ET programs, Evaluation, and Strategic Electrification Marketing Initiative.

PUC 2-22

Request:

Section 20.d of the Amended Settlement Agreement states:
To the extent the base distribution rate allowances allocated to the program exceed the actual costs incurred, the Company shall record the difference to a regulatory liability account. To the extent the deferral was caused by a reasonable delay in implementation, the deferral shall be applied to program cost incurrence when the program costs are later incurred. To the extent the deferral was caused by a cost reduction or funds not spent for reasons other than a reasonable delay, the deferral shall be held for the benefit of customers and the PUC shall determine how it shall be applied against other programs or costs that otherwise might have been borne by customers….

a. Has the Company recorded the annual rate allowances that exceeded the costs each year to a regulatory liability account? If not, why not?

b. If the Company is claiming that the deferral was caused by a reasonable delay in implementation, please explain the Company's rationale.

c. Please explain the basis upon which the Company relies to propose to expand certain programs beyond the targets that were approved in the Amended Settlement Agreement and end others without any approval by the Commission.

Response:

a. Yes, the Company has recorded the annual rate allowances that exceed the costs of delivering the Electric Transportation Initiatives to a regulatory liability account, specifically FERC account 254.

b. The Company has projects for both Level 2 and DCFC segments which were approved before August 31, 2021 but were not activated due to delays on the customer side of the installation. Delays include shipment delays in EVSE equipment, make-ready electrical equipment and electric bus lead times for RIPTA and the Town of Westerly. As shown in the Company's Annual Report and Testimony 4770-B, the Company had approved 18 Level 2 ports and 19 DCFC ports which make up the deferral account balance.

c. Please refer to the Company's responses to Data Requests 2-5 and 2-16.

Prepared by or under the supervision of: Anthony Carloni and Melissa Little