

September 23, 2022

VIA HAND DELIVERY & ELECTRONIC MAIL

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

RE: Docket No. 22-05-EE
Investigation of Misconduct by The Narragansett Electric Company Relating to
Past Payments of Energy Efficiency Program Shareholder Incentives
Responses to Division Record Request No. 5 (Re-file)

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”), I have enclosed the Company’s response to the Division of Public Utilities and Carriers’ Record Request No. 5. This is a re-filing of a previously submitted response and was inadvertently omitted from an earlier production.

The Company renews both its Motion Objecting to Record Request No. 5 (“RR-5”) and its Motion for Protective Treatment of Confidential Information contained in its response to RR-5 filed on January 21, 2022 and this refiled response is being filed subject to those motions. Therefore, the Company has provided a confidential version of this response and a public version without the privileged and confidential information contained in the attachment.

Luly E. Massaro, Commission Clerk
September 23, 2022
Page 2 of 2

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

Sincerely,



Steven J. Boyajian

Enclosure

cc: Docket 22-05-EE Service List
Margaret L. Hogan
John Bell, Division
Joel Munoz, Division

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate were 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.

Heidi J. Seddon

September 23, 2022

Date

Docket No. 22-05-EE – PUC Investigation of Utility Misconduct or Fraud by The Narragansett Electric Co. Service list updated 8/26/2022

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	priscilla@greenenergyconsumers.org;	

January Hearings - Record Request No. 5 (Supplemental)

Request:

Please provide any reports the Company received or has done related to the items of noncompliance described in the Company's response to PUC 5-4

Original Response:

Part 1 – Manufacturer Non-Compliance:

The Company has identified one responsive record, referred to as "Attachment Jan RR 5-1" for identification purposes, related to the subject matter of noncompliance with certain program rules by one program participant serving as a manufacturer/distributor of energy efficient lighting products as described in the Company's response to PUC 5-4(a). The Company is asserting legal privilege to Attachment Jan RR 5-1. See Motion of the Narragansett Electric Company Objecting to Record Request No. 5 from the Public Utilities Commission.

Part 2- Out-Of-Period Invoices:

The Company has identified two responsive records, referred to as "Attachment Jan RR 5-2-A" and "Attachment Jan RR 5-2-B" for identification purposes, related to the subject matter of out-of-period invoices as described in the Company's response to PUC 5-4(e). The Company is asserting legal privilege for Attachment Jan RR 5-2-A and Attachment Jan RR 5-2-B. See Motion of the Narragansett Electric Company Objecting to Record Request No. 5 from the Public Utilities Commission.

Notwithstanding the Company's objection, in an effort to provide the Public Utilities Commission ("PUC") with the information contained in Attachment Jan RR 5-2-A and Attachment Jan RR 5-2-B without providing legally privileged documents, the Company has attached redacted versions of Attachment Jan RR 5-2-A and Attachment Jan RR 5-2-B. Please note redacted Attachment Jan RR 5-2-A and redacted Attachment Jan RR 5-2-B are confidential and the Company is seeking protective treatment from public disclosure. In addition, the Company has attached an Excel spreadsheet, referenced as Attachment Jan RR 5-2-C, which shows the impact to the shareholder incentive after placing the out-of-period invoices back into the appropriate rebate payment year as described in the Company's response to PUC 5-4(e).

Supplemental Response:

Part 1 – Manufacturer Non-Compliance:

The Narragansett Electric Company (“Narragansett”) identified one responsive record, referred to as “Attachment Jan RR 5-1” for identification purposes, related to the subject matter of noncompliance with certain program rules by one program participant serving as a manufacturer/distributor of energy efficient lighting products as described in the response to PUC 5-4(a). Narragansett is asserting legal privilege to Attachment Jan RR 5-1. *See Motion of the Narragansett Electric Company Objecting to Record Request No. 5 from the Public Utilities Commission.*

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The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-20-NG
In Re: 2022 Annual Efficiency Plan
Response to Record Requests
Issued at the Commission's Evidentiary Hearings
On January 10, 11, and 13, 2022

Attachment RR-5 (Re-file)

REDACTED

The Company is providing an Excel version of Attachment RR-5-2C