

October 14, 2022

VIA ELECTRONIC MAIL

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

RE: Docket Nos. 4770 & 4780 – The Narragansett Electric Company d/b/a
Rhode Island Energy Electric and Gas Distribution Rate Filing
Advanced Metering Functionality Workshop
Rhode Island Energy Presentation and Follow-up

Dear Ms. Massaro:

On behalf of Rhode Island Energy, ¹ I have enclosed an electronic version of the Company's Advanced Metering Functionality ("AMF") presentation that the Company provided to the Public Utilities Commission ("Commission") at the AMF Workshop on September 1, 2022. ² Also, enclosed is an electronic version of additional information that the Company prepared as a follow-up to the Commission's questions and feedback during the AMF Workshop. Rhode Island Energy is making this informational filing to assist the Commission with posting these files to its website in the above-referenced dockets.

Thank you for your attention to this matter. If you have any questions, please contact me at (401) 316-7429.

Sincerely yours,

Jennifer Brooks Hutchinson

Jemen Burg High

Enclosure

cc: Docket 4770 Service List Linda George, Division John Bell, Division Al Mancini, Division Christy Hetherington, Esq.

¹ The Narragansett Electric Company d/b/a Rhode Island Energy (Rhode Island Energy or the Company).

² Per a communication from Commission counsel on October 4, 2021, the Company is sending an electronic version of this filing followed by six (6) hard copies filed with the Clerk within 24 hours of the electronic filing.



Advanced Meter Functionality Overview RI Public Utility Commission Technical Session

September 1, 2022

Agenda

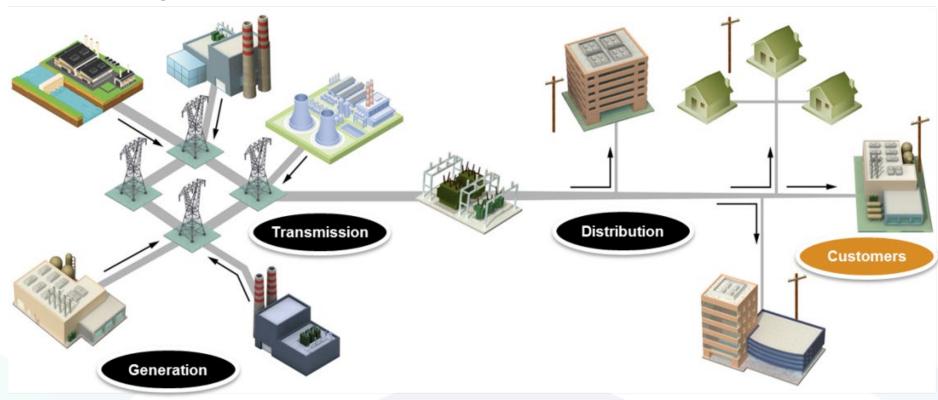


- Introductions, overview and approach
- Technology and deployment plan
- Customer engagement
- Benefits and costs
- Revenue requirements / cost recovery
- Filing discussion and next steps

Background: Today



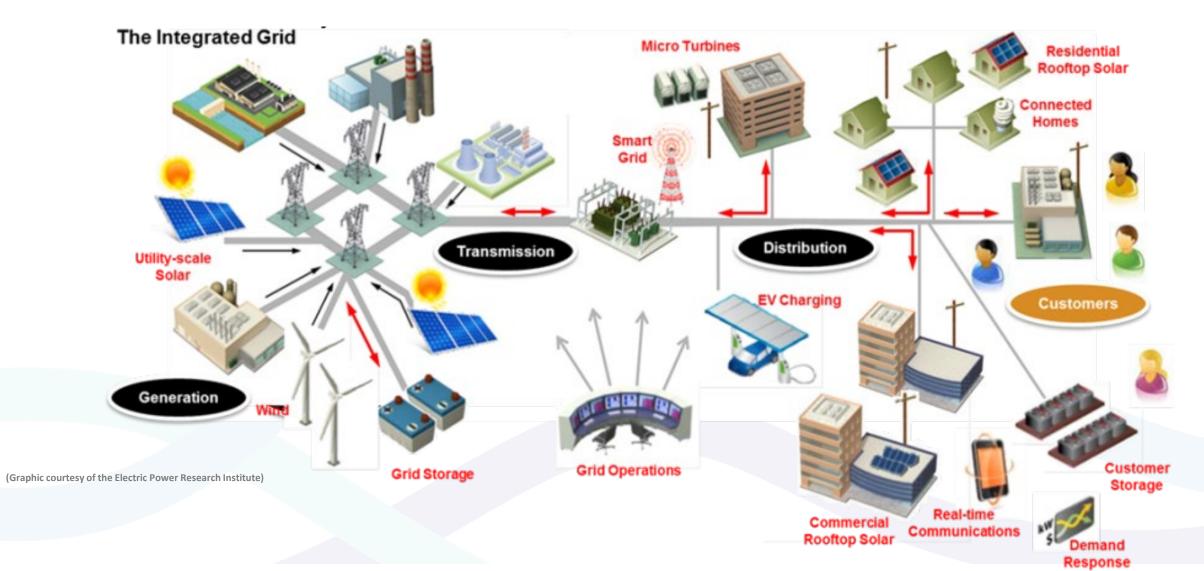
The Grid Today



(Graphic courtesy of the Electric Power Research Institute)

Background: Tomorrow

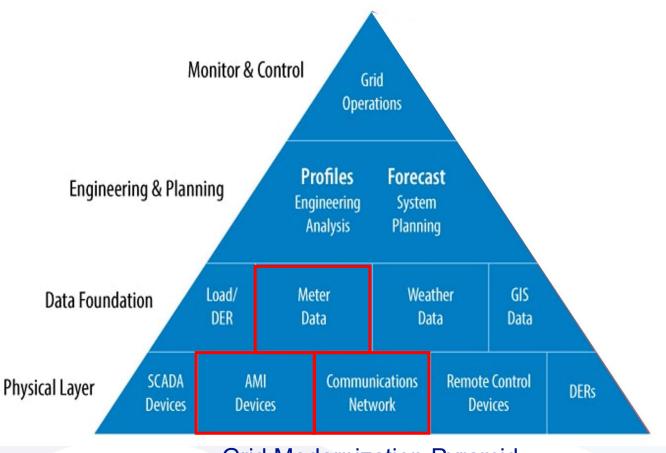




Position for Future Success



- Develop infrastructure that enables longterm goals and objectives
- Work towards the grid modernization pyramid to achieve capability to successfully operate in the new world
- Recognize evolving needs and identify capability gaps
- Define ideal characteristics and apply technology to meet requirements
- Leveraging existing infrastructure and capabilities where possible
- Integrate to optimize value streams



Grid Modernization Pyramid

AMF is foundational and an enabling platform

AMF Business Case Summary



AMF is foundational to RIE achieving a vision of enabling clean, fair, and affordable energy future.

Need:

- Operational: Approximately 60% of the AMR meters are at the end of their design life.
- Environmental: Achieve clean energy mandate of Net-zero carbon emissions in Rhode Island
- Customer Expectations: Manage energy usage; superior customer experience.
- Modernized System: Increased visibility/control (planning, integration, management).

Value:

- BCA developed and refined consistent with the Docket 4600 Framework.
- Net benefits: \$ 734.6 million NPV (opt-in)
- Net costs: \$189.6 million NPV
- BCA Ratios: 3.9 (opt-in)

Accountability:

- Delivering AMF at a cost not to exceed that proposed in 2021 by National Grid in Docket 5113
- Provide a BCA that is at least as positive as the BCA in the same docket
- Annual reporting with semi-annual project updates

AMF Business Case Overview



Scope:

- Replace ~525,000 electric AMR meters with AMF meters over a 3 ½ year deployment
- Design and build a fixed, secure IP-based radio frequency (RF) mesh network
- Back-office IT systems are developed to receive and process AMF data
- Electric AMF functionality necessary to to achieve customer, utility and clean energy objectives

Anticipated Outcomes:

- Additional customer capabilities to manage their energy usage
- A technologically-advanced, state-of-the-art metering infrastructure
- The requisite tools and technology required to achieve clean energy goals
- An enabling platform to position for future grid modernization, gas AMF and more

Our AMF Approach

Rhode Island Energy™

- Presents the need to replace the AMR system with a proposal having costs and benefits over 20-years
- Utilized National Grid Updated Business Case (Docket 5113) and addressed ASA items
- Factored in PPL AMF deployment experience, costs, business impacts, processes and systems
- Incorporated pricing estimates from suppliers
- Updated BCA assumptions with current information
- Created a detailed deployment plan and system release schedule harmonized with TSA developments
- Factor in feedback from collaboration with stakeholders

Amended Settlement Agreement (ASA)

1	A refined and updated AMF business plan, benefit-cost analysis (BCA), and a detailed customer engagement plan
2	An updated AMF deployment schedule with a BCA (using Societal Cost Test) for different meter deployment periods
3	Revenue Requirement for AMF deployment
4	Deployment proposals, a proposal for cost recovery of AMF, and any activities associated with implementation of AMF
5	A proposal to allocate AMF costs among rate classifications
6	Assumptions upon which a proposal for Time-Varying rates will be based
7	A Data Governance Plan regarding customer, NPP, and third-party access to system and customer data in place with access to quality customer and billing data, along with appropriate privacy and security protections
8	Updated costs for AMF deployment based on information gained from procurement efforts
9	Transparent, updated benefit cost analysis that fully incorporates the Docket 4600 framework
10	Investigation of alternative business models and ownership models
11	Analysis of data latency
12	Deployment details
13	Role of non-regulated power producers, including articles to share customer information and customer engagement
14	Ownership model for assets and telecom
15	Detailed AMF functionalities, how RI will achieve these functionalities, and a timeline for when those functionalities are available
16	Identification of the most cost-effective way to achieve the functionalities, and how the functionalities align to policy objectives
17	Explanation of whether the realization of those functionalities align to policy objectives will require additional future work and costs over 20 years
18	Identification of what functionalities the AMF will achieve that are part of the grid modernization plan and which are in addition to the Grid Modernization Plan
19	Identification of which functionalities are dependent on full-scale roll out instead of a targeted roll out
20	Business case based on both a RI-only scenario and RI/New York scenario
21	A business case based on the length (duration) of meter deployment
22	Identification of the critically linked parts of grid modernization and AMF
23	Identification of whether the AMF solution would allow for proper net metering according to the tariff

RIE Benefits from PPL AMF Insights



PPL Full-Scale Automated Meter Reading Experience includes several million meters over the last two decades:

- PPL First Generation in PA: 2002 2004
- PPL Second Generation in PA: 2015 – 2020
- LG&E KU Full Scale Launch in KY: Sept. 2022 - 2025

PPL Offers Many Insights:

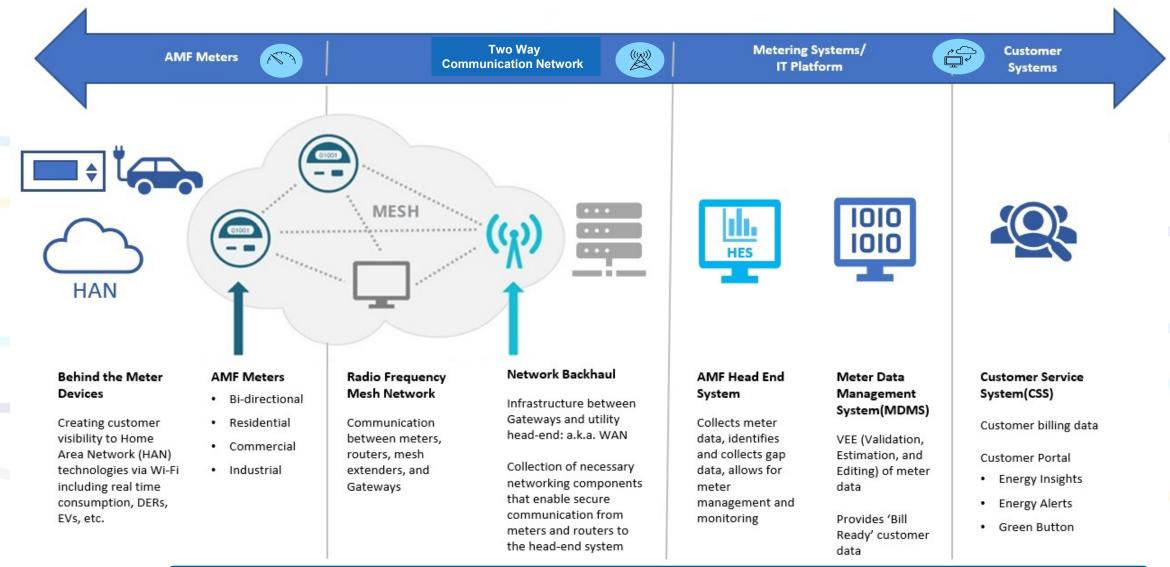
- AMF Meter Implementation
- Back-Office Systems Deployment and Integration
- Communication Network Design/Implementation
- People, Process, and Tools
- DER Management and Monitoring
- Integration with grid modernization

RIE Benefits:

- Implementation Cost Efficiencies
- Functionality Efficiencies
- Lessons Learned and Best Practices
- Vendor Relations and Purchasing Power
- Operational Efficiencies
- Shared Network Services
- Analytics

Full Scale AMF Technology Elements





Full-scale is the only fit-for-purpose solution that supports all enhanced functionalities



Network – All RF Mesh / Analysis of Alternatives



networking components

that enable secure

communication from

meters and routers to

the head-end system

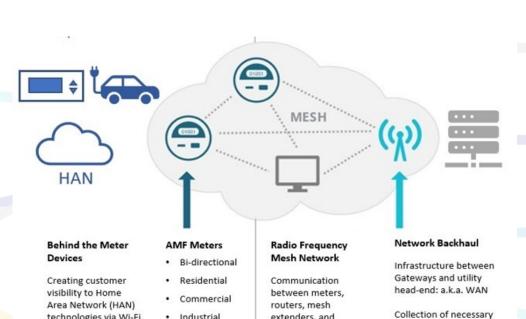


All RF-Mesh Network

- Successful all RF-Mesh deployment in Pennsylvania (1.4M meters)
- **Minimizes types** of meters **deployed** (operational efficiencies)
- Long technology lifecycle
- Will utilize a cellular network as backhaul unless RIE fiber is available, in which case it will be used.
- Dedicated utility-owned network

Alternatives evaluated:

- End-to-End Cellular
 - Meter cost more expensive
 - Short technology lifecycle, monthly recurring data plans
- Mesh to Fiber
 - Low amount of RIE fiber
 - High cost to deploy fiber
- Fiber to Home



extenders, and

Gateways

technologies via Wi-Fi

including real time

consumption, DERs,

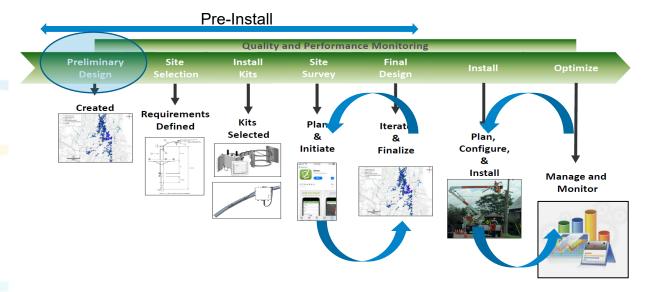
EVs, etc.

Industrial



Rhode Island Energy™

Two-Way Communication Network Staging and Deployment



Preliminary RF Network Design Completed

- Provides estimated count of network gateway hardware and potential locations
- Example design input parameters: meter location, pole/antenna heights, topography, land-use, and hop count

Substation / High-Capacity Network Gateways (~90)



- Communicates with 4000-6000 endpoints (meters)
- Multiple antennas
- Battery backup power
- Gateway from head-end system to RF Mesh

Pole-Mounted Network Equipment



Routers (~1060)

- Extends RF mesh coverage
- Small backup battery



Network Gateways (~390)

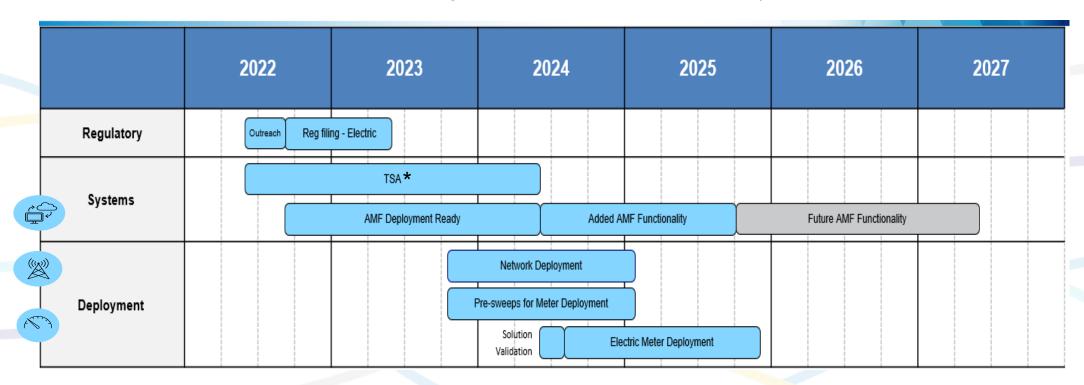
- Communicates with ~2000 endpoints (meters)
- Gateway from head-end system to RF Mesh

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AMF Deployment



AMF Deployment Schedule (3 ½ Years)

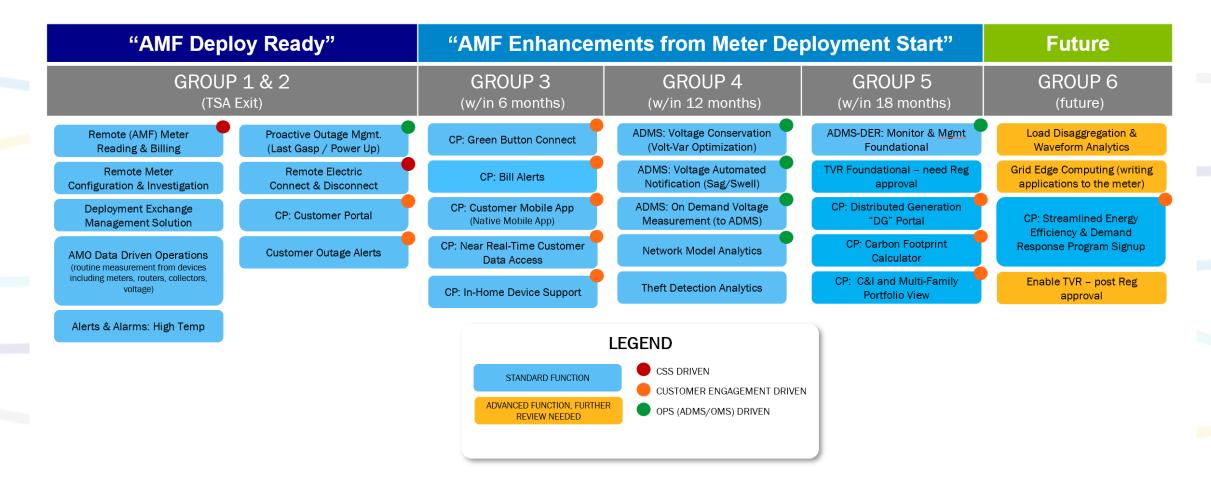


^{*} TSA is the "Transition Service Agreement" where National Grid operates and maintains its back-office systems for RIE customers for up to two years after PPL closed on the transaction to acquire Narragansett Electric Company.



AMF Functionality Roadmap





AMF Functionality working definitions are included in the Appendix

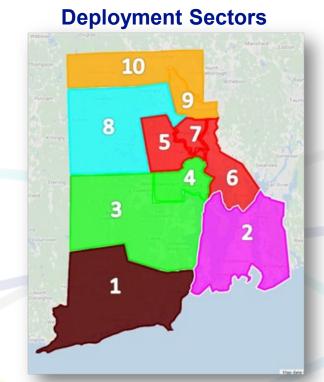


Deployment by Sector



Considerations for Deployment Sector Rollout:

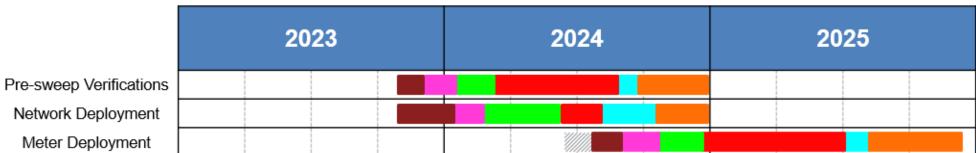
- Allows time to address hard-to-access indoor meter situations
- Homogenous mix of service and meter types at the start of the project
- Avoids heavily populated areas in the initial stages to reduce complexity
- Prioritizes higher density DER areas



Sequence No.	Sector
1	Westerly
2	Middletown
3	North Kingstown - W
4	North Kingstown - E
5	Providence -W
6	Providence - E
7	Providence
8	Chopmist
9	Lincoln - E
10	Lincoln - W

Deployment Sector Schedule

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AMF Reporting

- Suite of reporting metrics designed to provide a transparent assessment progress of AMF implementation in key areas
- Focus is on providing reporting metrics for three key areas:
 - Implementation
 - Customer
 - Operations
- AMF Program Report proposed to be provided at the end of the year with a mid-year project status update meeting



DRAFT Reporting Metrics

Major Project Release progress	Benefit Category	Benefit Metric
Meter Pre-Sweep Completions Counts of Completed Pre-Sweeps Network Deployment Counts of Completed Device Installs Meter Deployment Counts of Completed Exchanges Meter Base Repairs Counts of Meter Bases requiring repairs prior to meter exchange Sector Completion Sector Acceptance Status Program Spend Costs Breakdown Summary for key categories of the AMF Program Counts and reasons for customer contacts to the AMF Program Counts and reasons for customer contacts to the AMF Program Counts of customer Signing up for Customer Portal access Customer Portal Enrollments Counts of customers signing up for Customer Portal access Customer Surveys / Customer Satisfaction Breakdown of Customer Satisfaction Breakdown of Customer Satisfaction Customers Accessing Green Button Connect Data Counts of customers who have exported their Green Button Connect data Customers who Opt out of AMF meter Count of customers who have exported their Green Button Connect data Customers who Opt out of AMF meter Count of customers who have elected to Opt Out from receiving an AMF meter Billing Read Rate Register meter reads expected vs. delivered Interval Read Rate Register meter reads expected vs. delivered MDMS estimates sent to Billing Percentage of meters requiring estimates for billing Remote Switch Performance Percentage success rates of remote switches Last Gasp Alerting Percentage of Last Gasp alerts successfully delivered to the OMS (Outage Management System)	Program Implementation	Major Project Release progress
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Last Gasp Alerting Percentage of Last Gasp alerts successfully delivered to the OMS (Outage Management System)		Remote Switch Performance
Percentage of Last Gasp alerts successfully delivered to the OMS (Outage Management System)		Percentage success rates of remote switches
Management System)		Last Gasp Alerting
		Percentage of Last Gasp alerts successfully delivered to the OMS (Outage
		Management System)
VVO metric		VVO metric
Number of feeders with AMF deployed that have implemented Volt Var		Number of feeders with AMF deployed that have implemented Volt Var
Optimization		Optimization

3 Phases of Customer Engagement



Before

During

After

PHASE 1

PHASE 2

PHASE 3

Global Early Awareness Network and Meter Installation

Advanced Features and Services

Inform stakeholders about the features and benefits of the new AMF system and meters

Prepare customers and community stakeholders for installations in their area

Engage customers to take advantage of new programs and service offerings

Starting Summer 2023

Starting Winter 2024

Starting Fall 2025

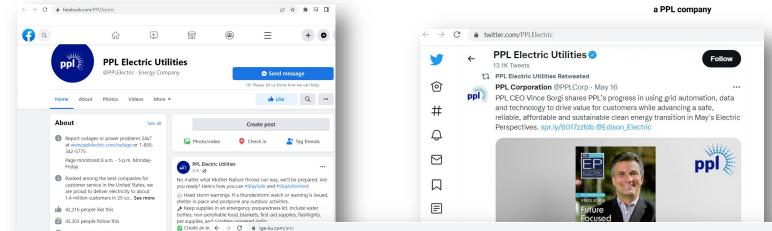
Communication Platforms

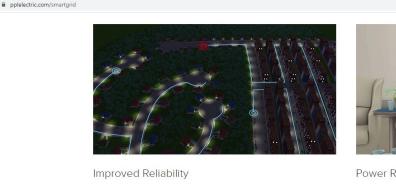


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Target Platforms:

- Website, Customer Portal & Social Media
- Direct Mail
- Email
- Phone
- Pamphlets, Door Hangers





· Smart grid technology senses power outages

Customers have

http://pplelectric.com/

Power Restored Faster

The smart grid system restores power to many affected customers in minutes
 before repairs are made

Project background

The Kentucky Public Service Commission recently approved our request to fully deploy Advanced Metering Infrastructure (AMI) which includes the installation of new, advanced meters for our more than 1.3 million customers.

LOF KU ≡ Billing & payment Start, stop or move service Outages Contact Q

What's an advanced meter?

Advanced meters give customers more timely information on their energy use. Customers can access a customized online dashboard that can help them track and compare their energy usage by day, week, month or year.

While most meters record a running total of the energy used, an advanced meter can record energy usage data in 15-, 30- or 60-minute increments. Generally, the meter will communicate this usage information to LG&E and KUs data network system several times a day.



working hard over the next 5 years to integrate AMI with our existing systems to

What is an Advanced Meter?

No're a

Examples of PPL customer communications offered through multiple platforms

nols and services

ccess to detailed and nage their energy usage, and tailored recommendations that can save them money. Additionally, we'll be

Bill Pay | My Account

BUSINESS USE ©Rhode Island Energy

Customer engagement

/ usage data

Customer Portal



3 Key Components of the Customer Portal

Personalized Insights

- Ability to view current and historical energy usage in a graphical format
- Analytics weather, price, and carbon intensity
- Bill education how to review and analyze an energy bill
- Share billing and energy data with third parties via GBC



- Assists customers with their pricing plans and energy expenses through calculators, reporting, and forecasting
- Ability to set communication preferences for notifications related to energy usage, highusage alerts, and future energyrelated events (e.g., critical peak pricing events)

Integrated Customer Actions

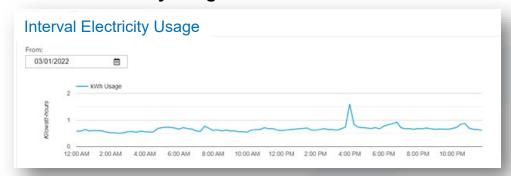
- Empowers customers to take educated actions based on the personalized insights and tools within the Portal.
- Enrollment in demand response and energy efficiency programs
- Purchases from established marketplaces for energy-saving technologies

Customer Portal – Interval Usage Reporting



- Customer will have the ability to view interval usage data
- Energy analysis provide the ability to show trends
- Customer energy data can be exported at 15 min intervals

Customer hourly usage:



Data latency and availability

- 15-minute <u>raw</u> customer data will be available for viewing on the Customer Portal within 45 min
- Billing quality (VEE) data will be available within 24 hours
 - * Raw data initial cut of meter data
 - * VEE data data that has undergone Validation, Estimation, and Editing

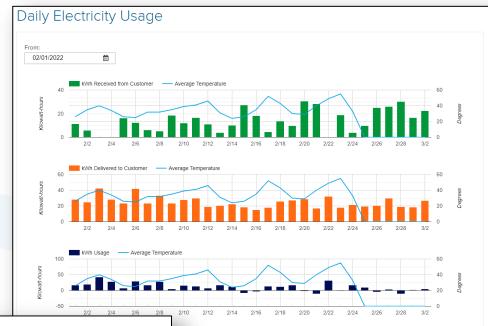
15 minute customer data export:

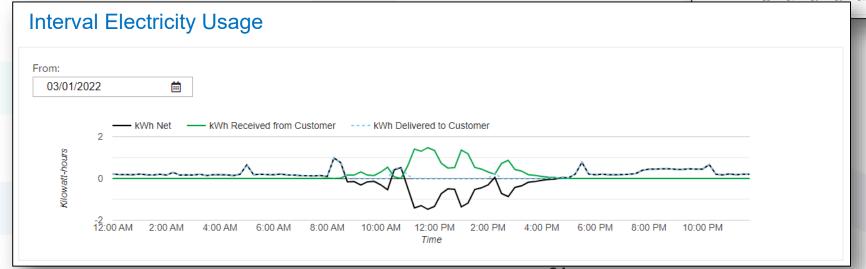
Α	В	С	D	E	F	G	H	1	J	K	L	M	N	0	Р	Q	R	S	Т	U	V	W	X
ccount Number	Meter Number	Date	Min	Max	Total	12:00 AM	12:15 AM	12:30 AM	12:45 AM	1:00 AM	1:15 AM	1:30 AM	1:45 AM	2:00 AM	2:15 AM	2:30 AM	2:45 AM	3:00 AM	3:15 AM	3:30 AM	3:45 AM	4:00 AM	4:15 AM
5782049026	301334557	07/26/2022	0.08	0.84	17.09	0.16	0.16	0.2	0.17	0.17	0.14	0.16	0.16	0.16	0.14	0.14	0.16	0.16	0.13	0.12	0.16	0.45	0.
5782049026	301334557	07/25/2022	0.1	1.12	20.18	0.2	0.2	0.16	0.17	0.17	0.19	0.18	0.2	0.19	0.15	0.17	0.14	0.18	0.17	0.19	0.17	0.15	0.1
5782049026	301334557	07/24/2022	0.11	1.42	30.66	0.19	0.18	0.21	0.18	0.19	0.17	0.16	0.19	0.19	0.18	0.15	0.2	0.2	0.21	0.18	0.18	0.18	J 0.1
5782049026	301334557	07/23/2022	0.06	1.12	15.94	0.19	0.46	0.17	0.15	0.2	0.19	0.19	0.2	0.18	0.16	0.18	0.2	0.17	0.17	0.15	0.17	0.17	7 0.10
5782049026	301334557	07/22/2022	0.06	1.69	27.08	0.21	0.18	0.16	0.2	0.18	0.19	0.2	0.16	0.17	0.19	0.18	0.15	0.14	0.16	0.16	0.2	0.12	2 0.1
5782049026	301334557	07/21/2022	0.05	0.68	17.06	0.21	0.21	0.19	0.19	0.2	0.21	0.17	0.18	0.16	0.21	0.18	0.19	0.17	0.18	0.18	0.16	0.17	0.1
5782049026	301334557	07/20/2022	0.1	1.32	20.65	0.16	0.18	0.14	0.17	0.16	0.13	0.15	0.15	0.16	0.14	0.13	0.14	0.15	0.15	0.11	0.15	0.16	0.1
5782049026	301334557	07/19/2022	0.07	0.67	17.5	0.16	0.14	0.12	0.12	0.12	0.12	0.14	0.16	0.14	0.12	0.12	0.11	0.14	0.15	0.47	0.13	0.13	3 0.
5782049026	301334557	07/18/2022	0.06	1.43	20.05	0.14	0.13	0.14	0.15	0.14	0.13	0.12	0.2	0.44	0.1	0.15	0.15	0.13	0.12	0.13	0.14	0.12	0.1
5782049026	301334557	07/17/2022	0.06	1.3	20.11	0.17	0.14	0.12	0.16	0.14	0.13	0.15	0.14	0.14	0.12	0.11	0.15	0.12	0.11	0.13	0.16	0.13	0.1
5782049026	301334557	07/16/2022	0.06	0.76	16.58	0.11	0.13	0.15	0.45	0.11	0.14	0.13	0.15	0.11	0.1	0.15	0.15	0.09	0.11	0.15	0.12	0.08	0.1
5782049026	301334557	07/15/2022	0.06	1.2	16.47	0.16	0.19	0.51	0.13	0.15	0.15	0.16	0.15	0.13	0.15	0.16	0.13	0.12	0.16	0.15	0.11	0.16	0.14
5782049026	301334557	07/14/2022	0.08	1.86	20.78	0.13	0.14	0.17	0.17	0.11	0.13	0.16	0.13	0.12	0.13	0.14	0.13	0.12	0.14	0.14	0.14	0.09	0.13
5782049026	301334557	07/13/2022	0.08	0.87	17.71	0.17	0.15	0.18	0.15	0.13	0.14	0.14	0.16	0.12	0.12	0.14	0.16	0.44	0.12	0.16	0.11	0.12	2 0.14
he information cont	ained in this file is	intended for t	he conf	idential	use by	the custome	r and third p	arties autho	rized by the	customer t	o receive th	ne informati	on. Any una	authorized (use is prohi	bited.							

Net Metering Customers



- Net Metering information will be available in the Customer Portal
- Customers will have visibility into Received, Delivered, and Net Usage channels
- Contact Center agent will have ability to see same data when working with customers
- Yields billing process efficiencies





Supplier Portal



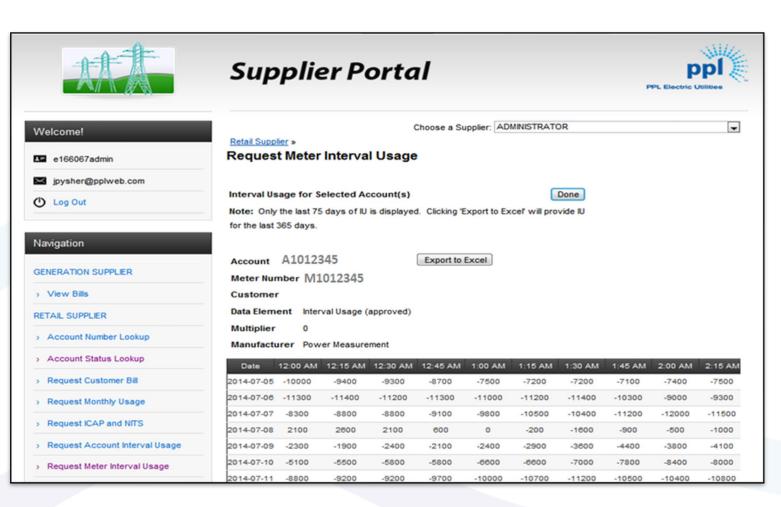
Available for all Non-regulated Power Producers (NPPs) licensed in Rhode Island.

NPPs will be able to view their customers' metering and billing data including:

- Customer billing details
- Monthly usage summary and interval
- Historical interval usage
- Load Profile
- Meter Constant

Additional Benefits

- Supplier management of Rate Ready offerings
- Ability to update contact information
- Visibility to EDI transaction lifecycles



Customer Engagement Plan – Meter Opt-Out



- RIE Customers will be able to Opt-out from receiving an AMF meter
- Full adoption is the goal: awareness and education will be provided
- Customers who Opt-out of an AMF meter will be subject to charges
- For those customers who Opt-Out, the Company will continue to provide information on AMF
- AMF Business Case assumes 1% Opt-Out based upon benchmarking results

AMF Opt-Out



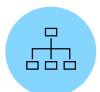
PPL Data Governance Plan



- Defines pertinent policies addressing data privacy, data governance, information classification, and Cybersecurity and enterprise security standards
- Supports critical infrastructure and vital business functions including AMF
- Framework includes a comprehensive set of principles and standards:
 - ✓ Data Governance Policy
 - ✓ PPL Standards of Integrity
 - ✓ PPL Responsible Behavior Program
 - ✓ Information Security
 - ✓ Information Classification and Handling
 - ✓ Electronic Information Security

- ✓ Records Management
- ✓ PPL Cybersecurity Policy
- ✓ PPL FERC Standards of Conduct
- ✓ PPL Enterprise Information Security Policy
- ✓ Data Security Standard
- Designed to ensure the data generated by the Company and through its AMF:
 - Collected, managed, stored, transferred, and protected in a way that preserves customer privacy
 - Practices are consistent with cybersecurity requirements
 - Facilitates access to further operational requirements
 - Enables grid modernization and clean energy objectives
- AMF Security and Data Privacy review is planned to identify where further alignment is needed

AMF Cost Review



Overview



Meter

⊞ Hardware Installs

⊞ Pre-Sweeps

■ Program Management

⊞ Repairs



Network

⊞ Hardware

⊞ Installs

■ Program Management

■ Steady State Operations

ADMS & OMS

Analytics

ECSS

E Customer Engagement

⊞ CyberSecurity

⊞ Deployment Exchange Mgt.

Grid Edge & Load Dissag.

Headend

MDMS

Middleware

⊞ Program Management

⊞ Steady State Operations



Program

Systems

⊞ Change Management

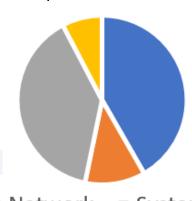
⊞ Program Management



AMF 20-Year Nominal Cost \$288.52M*



AMF 20-Year NPV \$189.64M*



Network Systems Meter Program

* Compared to NG of \$289.35 nominal and 192.60 NPV

25 Benefits and costs BUSINESS USE ©Rhode Island Energy

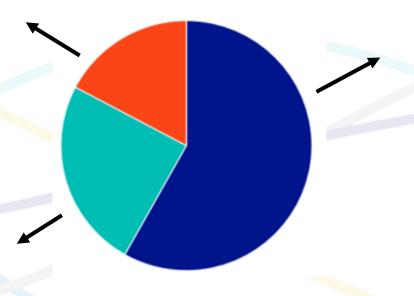
AMF Benefit Components



AMF 20-Year Nominal Benefit = \$1,117.1M AMF 20-Year NPV Benefit = \$734.6M

Societal Benefits

- Non-Embedded CO2 Benefits
- Non-Embedded NOx Benefits
- Public Health Benefits
- Cross-DRIPE Benefits



Direct Customer Benefits

- Energy Insights Electric Bill Savings
- Faster Outage Notification Savings

Utility Benefits

- Avoided AMR Costs
- Avoided Personnel
- Energy Cost Savings
- Capacity Cost Savings
- Transmission Cost Savings
- Distribution Cost Savings
- DRIPE Benefits
- Monetized CO2 Benefits

Complies with Docket 4600 requirements

AMF Benefits by Program





	Benefit Program
1	Direct Customer Benefits
2	Avoided AMR & Sensor Utility Costs
3	Energy Insights Savings
4	VVO/CVR Benefits
5	EV/TVR Benefits
6	Whole House TOU/CPP

1 Direct Customer Benefits



The RIE Direct Customer benefits for RIE are higher than those calculated by National Grid because RIE included two significant benefits that were not quantified in the NG 2021 BCA.

- Energy Insights
 - Electric reductions of 1.5% by participating customers
 - Included energy savings in Utility savings
 - Remainder of the savings applied as Electric Bill Reductions
- Faster Outage Notification
 - 22-minute reduction in overall customer outage time
 - Used ICE calculator to estimate savings per customer group
 - Applied savings/customer group to customers in RIE



2 Avoided Utility Costs



Avoided utility costs primarily come from avoiding the expense of replacing the AMR metering system, avoiding voltage sensors that are needed for increased visibility and to implement VVO, and utility efficiencies

- The existing AMR system needs to be replaced. By proceeding with AMF, this expense is avoided.
- 50-75% of the voltage sensors for Volt/Var optimization are avoided due to AMF inputs.
- Utility efficiencies were estimated by reviewing National Grid assumptions and making adjustments after factoring in PPL experiences

AMF Benefits - August 1, 2022 NPV (\$M) → \$734.6



3 Energy Insights Savings



Assumed that customers who have near real-time electricity usage information will reduce that usage, particularly as phone apps are developed making more sophisticated energy information available with time.

BCA based upon:

- 1.5% energy savings for participating customers
- 50% of residential customers participating
- 25% of commercial customers participating
- AESC 2021 for avoided costs except for DRIPE and Cross DRIPE benefits

RIE will experience fuel savings as a result of these reductions, and the customers will save on their electricity bills. The amount that customers would save on their bills was included in Direct Customer Benefits after subtracting out the RIE's energy cost savings.



4 Volt VAR Optimization and CVR Benefits

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- Meters produce accurate voltage readings at the customer service delivery points
- Visibility of voltage provided by the meters enhances the ability for voltage conservation to reduce demand and energy use through conservation voltage reduction (CVR). The advanced Volt-VAR Optimization (VVO) control schemes coordinate multiple voltage regulating devices that will be located on a circuit via Grid Mod investments to achieve optimal voltage performance.
- The BCA assumed:
 - 0.5% energy savings on feeders with CVR
 - 0.165% capacity savings
 - AESC 2021 avoided costs for energy, capacity, nonembedded CO2, monetized CO2, NOx, Public Health, transmission and distribution
 - National Grid values for DRIPE and Cross-DRIPE benefits



5 EV / TVR Benefits



AMF provides functionality to implement Time Varying Rates (TVR) in the future if approved through a separate proceeding.

The following assumptions were used to calculate the benefits from TVR for Electric Vehicles (EVs):

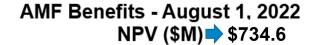
- Number of EVs were forecast to meet 2040 goal of 80% GHG reduction
- Assumed TVR was Opt-In with 20% EV owners participating
- Used AESC 2021 avoided costs for energy, capacity, nonembedded CO2, monetized CO2, NOx, Public Health, transmission and distribution
- Applied National Grid values for DRIPE and Cross-DRIPE benefits
- Assumed the peak savings increase from 28% to 60% over course of analysis



6 Whole House TOU / Critical Peak Pricing

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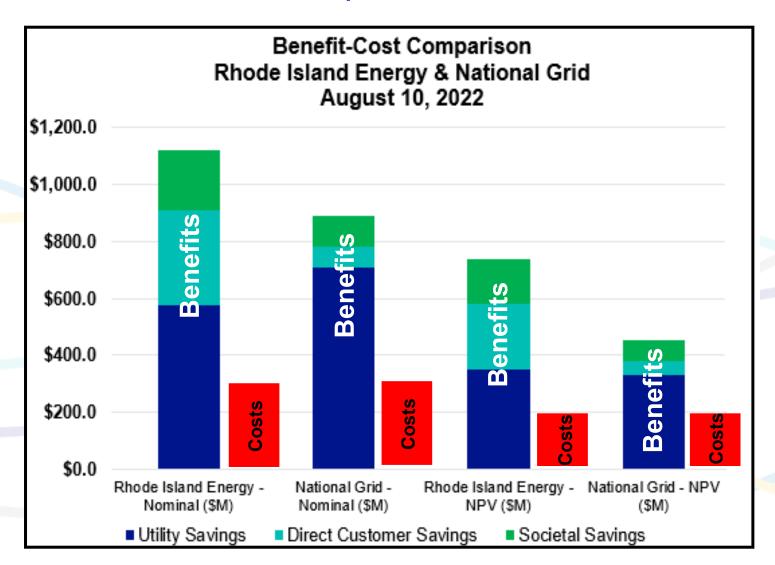
- RIE analyzed a whole house TOU/CPP with Opt-In and Opt—Out approach. Participation is significantly different with the two approaches: 20% of eligible customers will participate in Opt-In while 85% of the eligible customers will participate in Opt-Out.
- Both groups ultimately reduce their peaks by the same amount
- RIE took the most conservative scenario for this BCA that includes 20% of customers participate as Opt-In utilizing the following assumptions:
 - Capacity savings = 20% of residential peak for CPP
 - Energy shift: Averaged National Grid values for low and high,
 Opt-In
 - Applied Transmission & distribution avoided cost values from AESC 2021 report
 - Utilized National Grid values CO2, NOx, Public Health, DRIPE and cross-DRIPE benefits





Benefits & Costs: Comparison to National Grid





Nominal (\$M)	RIE	NG
πα (φιτι)		
Utility Savings	\$ 574.8	\$ 708.89
Direct Customer		
Savings	\$ 331.9	\$ 70.77
Societal Savings	\$ 210.4	\$ 109.73
Total Savings	\$ 1,117.1	\$ 889.4
AMF Costs	\$ 288.7	\$ 289.4
Benefit / Cost Ratio	3.9	3.1
NPV (\$M)	RIE	NG
NPV (\$M) Utility Savings	\$ RIE 352.4	NG \$ 333.50
	\$ 	
Utility Savings	\$ 	
Utility Savings Direct Customer	352.4	\$ 333.50
Utility Savings Direct Customer Savings	\$ 352.4 225.5	\$ 333.50 \$ 48.46
Utility Savings Direct Customer Savings Societal Savings	\$ 352.4 225.5 156.7	\$ 333.50 \$ 48.46 \$ 72.90

BCA ratio 3.9. Sensitivities are all positive. AMF Business Case assumptions are conservative.

Revenue Requirements



- Total revenue requirement for 20 years is approximately \$320m*
 - Comprised of incremental AMF related capital in-service and O&M costs
 - Reduced for costs already recovered in base rates
 - Reduced to credit customers with 80% of projected AMF-driven operational cost savings until reflected in the next base rate case (similar to NG proposal)
- Modeled over 20 years, peak year of revenue requirement is expected to be year 4
 of cost recovery, declines after that
- Customer allocation consistent with methodology approved in last distribution base rate case (Docket No. 4770)

* Based on preliminary numbers

Pricing and Customer Considerations



Pricing Considerations:

- Amended Settlement Agreement (Docket No. 4770) provides for reopening for AMF cost recovery
- Consideration is being given to an alternative proposal to establish a separate AMF factor (per-kWh volumetric)
 - Price based on revenue requirement using historical costs (actual dollars spent)
 - Change price every ~6 months
 - Roll then current rate base into next distribution base rate case

Potential Benefits to Customers from Proposal:

- Pays only for what the company has already spent or placed in-service
- Given a longer time before a distribution base rate case, customers could receive the operational
 cost savings timely through pricing mechanism if savings realized quicker or more than forecast
- As spend decreases, customer will see a decrease in the factor
- Smaller (though more frequent) price changes for customers

Updated AMF Comparison: RIE and National Grid



Similarities

- Deployment period of 3 ½ years
- Fixed IP-based RF mesh communication system
- Full-scale technical solution
- AMF Opt-out assumption 1%
- Alternative business analysis
- Used the NG BCA framework applying Docket 4600 requirements
- Customer Engagement Plan
- Data latency assumptions
- Assumptions designed to meet clean energy goals
- TVR assumed in a separate filing

Differences

- Broader interpretation of AMF as enabling platform
- More robust, future-proofed communication system
- Cellular communications is not needed for meters
- Meter unit costs are slightly higher than the NG filing
- More functionality, sooner, leveraging prior PPL integration and experience
- Added pre-sweeps as a deployment activity
- Update meter bases where needed
- More operational savings with PPL business impacts
- Quantification of reduced time for outage notification and customer savings from energy insight
- Used AESC 2021 report rather than 2018 report
- VVO saves .5% energy savings
- TVR used Opt-In values for Whole House and EV

AMF Enables the GMP: Coordinated Business Plans



AMF enables GMP:

- Granular interval data
- Voltage data
- Remote connect / disconnect
- Automatic notification of outages
- Interaction with customers and in-home technologies
- Remote configuration

GMP Outcomes:

- Fault location, isolation and automatic restoration
- Improved outage restore process
- Safety and operational efficiencies
- Improved power quality
- Volt / Var optimization
- Increased hosting capacity
- Dynamic pricing to incent behaviors
- Demand response
- DER visibility and management
- Greater DER interconnection flexibility

AMF and GMP business plans coordinate benefit and timing assumptions

Rhode Island Stakeholder Collaboration



PST Advisory AMF & GMP Subcommittee Meetings and Preliminary Agendas

Stakeholder Collaboration (i.e., Subcommittee meetings and discussions)

Obtain Feedback and Seek Alignment on Proposals and Approaches

Aug 2, 2022

September 2022

Jun 21, 2022

- RI Division and OER Meeting
- Introductions
- Proposed timeline
- Preliminary agenda for PST meetings
- AMF Introduction and overview of key areas
- · GMP Introduction and coordination

- PST Advisory Meeting
- Introductions
- PPL Background and Experience
- Full Scale Enabling Platform

July 14, 2022

- Detailed Deployment Plan
- Functionality Timing
- ASA coverage
- · AMF cost review
- · GMP study scope and approach
- GMP forecast analysis

- PST Advisory Meeting
- · Prior meeting will drive agenda
- AMF Customer Engagement Plan
- AMF Opt-out
- AMF Customer value streams
- AMF Auto-notification
- · AMF Benefits

PST Advisory Meeting

Review Initial, Refined and Final Proposals

- Prior meeting will drive agenda
- AMF Data access, privacy, governance

Aug 16, 2022

- AMF Cyber Security
- AMF Cost and Benefit Recap
- Cost Recovery and Revenue Requirements
- GMP scenario analysis
- GMP solution development
- GMP ISR Coordination plans

Sept 1, 2022

PUC Technical Session

File AMF

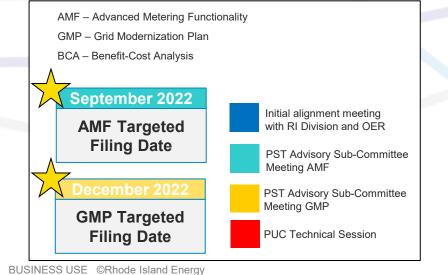
- · AMF Includes Business Case. Testimonies and BCA
- · Coordinate with GMP execution plan and BCA

w/o Oct 20, 2022

- PST Advisory Meeting
- · Prior meeting will drive agenda
- GMP Alternative recommendation
- GMP BCA review

December 2022

- File GMP
- GMP Includes Business Case. Testimonies and BCA
- · Coordinate with ISR and AMF details

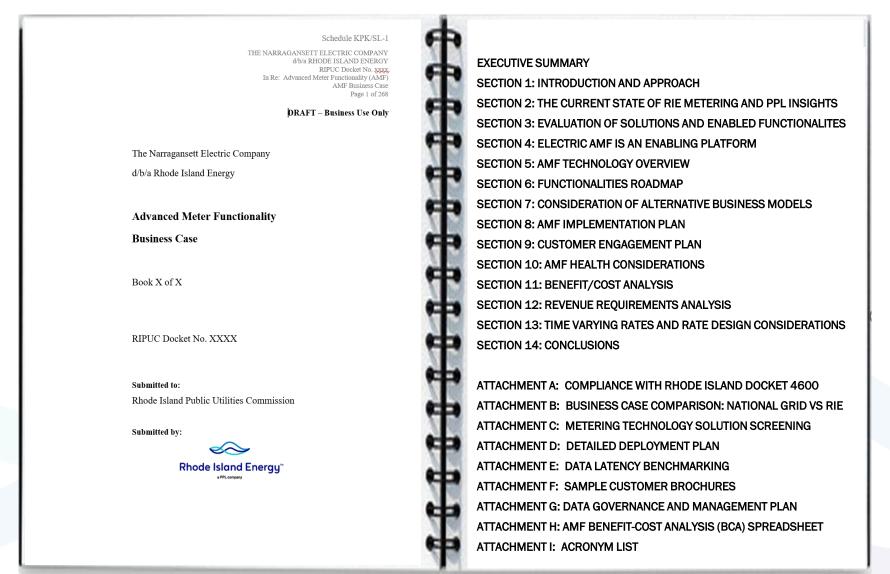


39 Filing discussion and next steps

Incorporate Feedback into the AMF Business Case and File

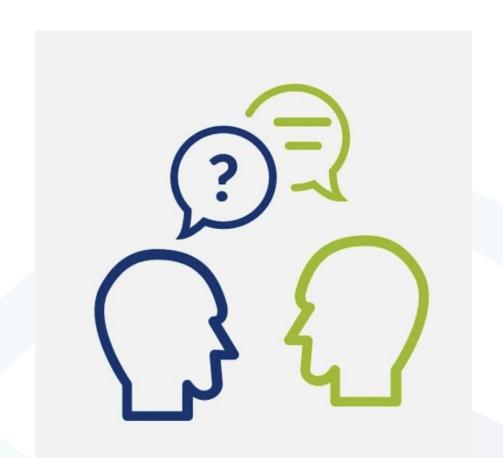


a PPL company



Discussion and Next Steps









Appendix

Functionality Available at TSA Exit



AND	
AMR or AMF Functionality	Working Definition
Remote (AMF) Meter Reading & Billing	Reading and billing interval energy usage at standard latency using AMI meters.
Remote Meter Configuration & Investigation	Remote "over-the-air" firmware and software updates & investigation of meter malfunctions. Proactively enabled energy data analytics and reactively enabled by alerts and alarming
Deployment Exchange Management Solution	The Meter Deployment Vendor solution (TBD) to status and update the accounts that have been exchanged as part of the AMF deployment. Traditionally this involves exchanging of a "Population file" and synchronizing with the customer system and other asset systems to reflect the newly installed AMF meter.
AMO Data Driven Operations	Implementation of operational dashboards to manage and facilitate the Smart Grid Network and associated endpoints. For example, population configuration management, population firmware levels, installed endpoint inventory, reading percentages, interval completeness, and overall network health.
Alerts & Alarms: High Temp	Alerting & Alarming - Alerting when configurable internal temperature is reached and sending to work management system for disposition
Proactive Outage Management (Last Gasp / Power-up)	Alerting operations when meter experiences an outage, or power is restored via the OMS system.
Remote Electric Connect & Disconnect	Activation of remote electric meter switch to turn on/off service; meter tamper alerts and usage analytics.
CP: Customer Portal	Customer-facing usage data availability, usage analytics, normative comparisons, and other data-driven customer experience features. Provide omni-channel access and continuous improvement through an agile and iterative development approach that incorporates on-going customer experience updates.
Customer Outage Alerts	Proactive communication of outages identified in the OMS system to customers.

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Enhanced Functionality During Meter Deployment



AMR or AMF Functionality	Working Definition
CP: Green Button Connect	Enables customers to provide for the automated transfer of customer energy usage data at standard latency to authorized third parties.
CP - Bill Alerts	Alerts for variety of customer needs. Examples include projected high-bill (consumption and/or costs), prediction of peak demand or usage, and customizable threshold alert at various points during a billing period.
CP: Customer Mobile App (Native Mobile App, IHD)	Extension of the customer portal to a native Android/iOS mobile application.
CP: Near Real-Time Customer Data Access	Availability of near real-time raw usage data through the customer portal. This allows 15-minute electrical raw usage data, available within 45 minutes, updated with bill quality data within 24 hours.
CP: In-Home Device Support	Enable communications between a customer owned In Home Device and the AMF meter
ADMS: Voltage Conservation (Volt-Var Optimization)	Providing interval meter voltage and reactive power data to the ADMS to support conservation voltage reduction (CVR) and Volt-Var Optimization (VVO). This also includes new ADMS functionality to implement CVR and VVO.
ADMS: Voltage Automated Notification (Sag/Swell)	Configurable real-time alert for momentary under or over voltage on a meter, integrated to ADMS for immediate action.
ADMS: On Demand Voltage Measurement (to ADMS)	ADMS function to ping networked electric devices and meters for voltage measurements.
ADMS-DER: Monitor & Management	Monitor & management of distributed energy resource (DER) inverter-based infrastructure (<u>i.e.</u> battery banks, solar PV, net-meters).

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Enhanced Functionality During Meter Deployment – Cont'g

-11	nanceu i unc	chonanty During Meter Deployment – Cont	Rhode Island Energy™ a PPL company
	AMR or AMF Functionality	Working Definition	
	Network Model Analytics	MDMS functionality to support analysis of the network, identifying outlier issues for investigation (i.e. circuits missing a meter, mis-associated	

Functionality	Working Definition
Network Model Analytics	MDMS functionality to support analysis of the network, identifying outlier issues for investigation (<u>i.e.</u> circuits missing a meter, mis-associated meters).
Theft Detection Analytics	MDMS functionality to identify outlier patterns and settlement issues that indicate potential energy theft.
CP: Distributed Generation "DG" Portal	Customer portal functionality that creates an integrated marketplace for customer research of solar PV adoption, A customer completes an online survey/audit and numerous estimates are provided for customer's review and subsequent selection of options from qualified thirdparty service providers/installers.
CP: Carbon Footprint Calculator	Customer portal functionality that creates an ability for customers to calculate carbon footprint based on usage data and actions to better manage usage.
CP: C&I and Multi- Family Portfolio View	Customer portal functionality that enables (1) a portfolio view of C&I facilities as well as properties for multifamily unit owners and managers, (2) search/sort, aggregate data and insights, assist with evaluation, measurement, and verification ("EM&V"), and (3) usage normalization on variables such as production, sq. ft., occupancy, weather.

Future Functionality



AMR or AMF Functionality	Working Definition
CP: Streamlined Energy Efficiency & Demand Response Program Signup	Reduce program marketing spend by targeting customers who are eligible, have a higher probability of participating, and represent the highest potential load shed or shift based on specific consumption. Outreach and communications costs can be reduced by utilizing personalized channels, rather than mass marketing efforts.
Time Varying Rates (TVR) Foundational	Interval meter data with VEE integrated to billing systems and billing system functionality to support Time Variable Rate billing.
Load Disaggregation & Waveform Analytics	Provide a breakdown of electricity consumption by appliance or end-use for educational purposes and/or recommended actions to save, available through the customer portal. Meter waveform data from a representative sample of bellwether meters for general analytics use.
Grid Edge Computing (writing applications to the meter)	Metering platform for customer- and grid-facing software applications at the meter.
Enabled Time Varying Rates ("TVR")	Customer engagement and approved regulatory framework to support Time Variable Rate billing options to customers.

Acronyms



a PPL company

•	ADMS = Advanced Distribution Ma	anagement System

- AESC = Avoided Energy Supply Cost
- AMF = Advanced Meter Functionality
- AMI = Advanced Meter Infrastructure
- AMR = Automatic Meter Reading
- ASA = Amended Settlement Agreement
- ASHP = Air Source Heat Pump
- BAU = Business as Usual
- BCA = Benefit Cost Analysis
- C&I = Commercial and Industrial
- CEP = Customer Engagement Plan
- CGR = Connected Grid Router
- CO2 = Carbon Dioxide
- CP = Customer Portal
- CPP = Critical Peak Pricing
- D = Distribution
- DCFC = Direct Current Fast Charging
- DER = Distributed Energy Resource
- DERMS = Distributed Energy Resource Management System
- DG = Distributed Generation
- DLM = Dynamic Load Management
- DPAM = Distribution Planning & Asset Management
- DPL = Dayton Power and Light
- DR = Demand Response
- DRIPE = Demand Reduction Induced Price Effect
- DSCADA = Distributed Supervisory Control and Data Acquisition
- EC4 = Executive Climate Change Coordinating Council •
- EE = Energy Efficiency
- EDI = Electronic Data Interchange
- EHP = Electric Heat Pump
- EIA = Energy Information Administration
- EPO = Energy Profiler Online

- ESB = Enterprise Service Bus
- EV = Electric Vehicle
- FAN = Field Area Network
- FLISR = Fault Location Isolation and Service Restoration
- GBC = Green Button Connect
- GBD = Green Button Download my data
- GHG = Greenhouse Gas
- GIS = Geographical Information Systems
- GMP = Grid Modernization Plan
- HAN = Home Area Network
- HCA = Hosting Capacity Analysis
- HES = Head End System
- HVAC = Heating, Ventilation, and Air Conditioning
- ICAP = Installed Capacity
- ICE = Interruption Cost Estimate
- IoT = Internet of Things
- IP = Internet Protocol
- ISA = Interconnection Service Agreement
- ISO NE = Independent System Operator New England
- IT = Information Technology
- KY = Kentucky
- LDV = Light Duty Vehicle
- LVA = Locational Value Analysis
- MA = Massachusetts
- MDM = Meter Data Management
- MV/LV = Medium Voltage/Low Voltage
- NEM = Net Energy Metering
- NMPC = Niagara Mohawk Power Corporation
- NPP = Non-Regulated Power Producer
- NY = New York
- NWA = Non-Wires Alternative
- OER = RI Office of Energy Resources
- OMS = Outage Management Systems

- PA = Pennsylvania
- PBR = Performance-Based Regulation
- PI Historian = Plant Information Historian
- PIM = Performance Incentive Mechanism
- PLC = Power-Line Communication
- PPL = Pennsylvania Power and Light
- PSE&G = Public Service Electric & Gas
- PSR = Platform Service Revenue
- PST = Power Sector Transformation
- PUC = Public Utilities Commission
- PV = Photovoltaic
- REC = Renewable Energy Credit
- REV = Reforming the Energy Vision
- RF = Radio Frequency
- RGGI = Regional Greenhouse Gas Initiative
- RI = Rhode Island
- RIE = Rhode Island Energy
- RMD = Residential Methane Detector
- RTP = Real Time Pricing
- RTU = Remote Terminal Unit
- SaaS = Software as a System
- SCT = Societal Cost Test
- SME = Subject Matter Expert
- ToC = Table of Contents
- TOU = Time Of Use
- TSA = Transition Service Agreement
- TVR = Time Varying Rate
- VDER = Value of Distributed Energy Resources
- VMT = Vehicle Miles Traveled
- VPP = Variable Peak Pricing
- VVO/CVR = Volt-Var Optimization/Conservation Voltage Reduction
- WACC = Weighted Average Cost of Capital



Rhode Island Energy AMF Workshop Follow-Up

October 14, 2022

Follow Up Items From 9/1/2022 AMF Workshop



- A request was made by Chairman Gerwatowski to provide the link to the LG&E KU AMF Website link [slide 3]
- A request was made by Chairman Gerwatowski to provide access to the Pennsylvania portals. The data in the portals is actual customer data, which Rhode Island Energy/PPL treats as confidential for privacy reasons; therefore, in lieu of access to the portals, Rhode Island Energy is providing additional screen shots to further illustrate the functionality in these portals. [slides 4 13]
 - Customer Portal [slides 4 11]
 - Supplier Portal [slides 12, 13]
- A question was asked by Commissioner Anthony on how the replacement of existing test meters would impact
 RIE's ability to perform the Load Research function. A clarification has been provided. [slide 14]
- A slide was presented on the Energy Insights Savings benefits, and it incorrectly stated that the customer would "experience fuel savings". A correction has been made to indicate 'Electricity Market cost savings': [slide 15]
- A clarification was requested by John Bell, Division on the meter channels that will be available on AMF meters
 for net metering customers. Revised definitions on kWh Delivered, kWh Received, and kWh Net have been
 provided. [slide 16]

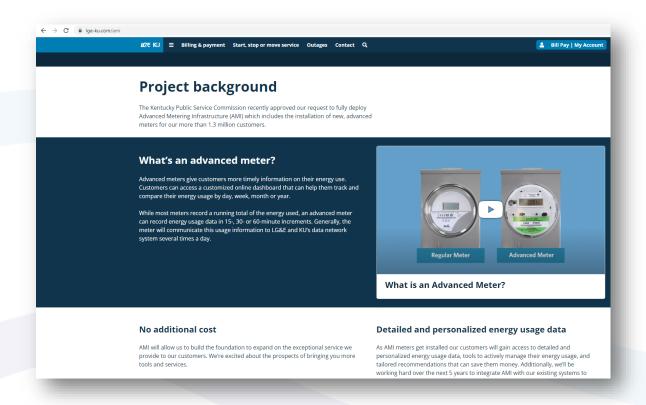
LG&E KU AMI Website



A link to the KU Smart Meter Portal as requested by Chairman Gerwatowski

Link: https://lge-ku.com/meter-upgrade

- The LG&E KU Smart Meter webpage builds off of PA's Meter Rollout website by providing more concise program information for customers including the following program details:
 - Meter Upgrade Impact map
 - "My Meter Dashboard" Features and Benefits <u>Videos</u>
 - FAQ section to answer common questions about Smart Meters



PA Customer Portal



Rhode Island Energy™

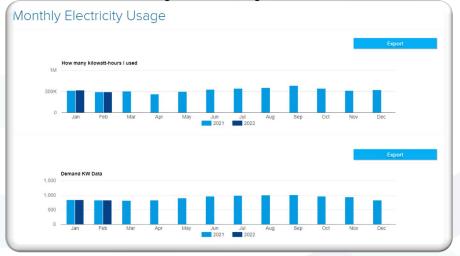
Examples of the PA Customer Portal are contained in slides 4-13 to provide additional context to the benefits and insight customers will receive with the AMF Program

The PA Customer Portal provides reporting for both Residential and Commercial customers in Summary and Hourly increments and offers the ability to export data

Residential Monthly Summary



Commercial Monthly Summary

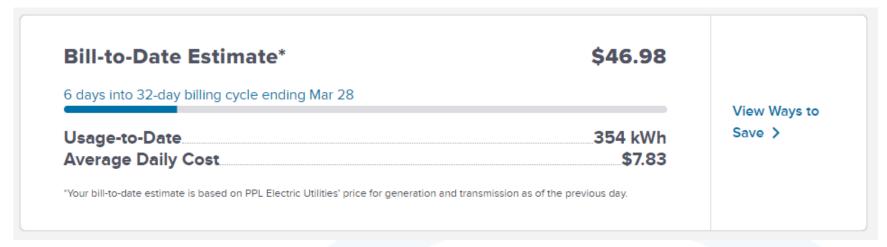




PA Customer Portal - Bill-to-Date Estimate

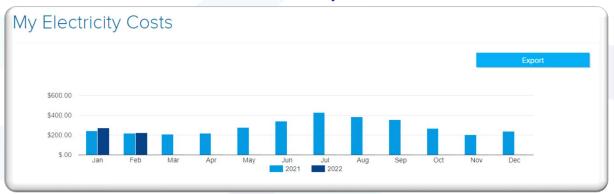


Customers can see their spending before they are billed



This feature is currently based on the PPL price to compare

Or historical costs over a period of time



PA Customer Portal – Monthly Usage at a Glance



A rolling graph allows customers to compare year-over-year

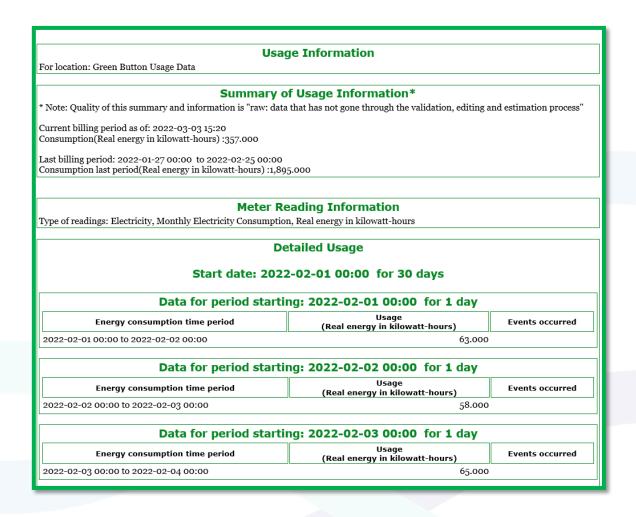


If customers hover (or tap) on the graph, they see the temperature and kWh

PA Customer Portal – Green Button data



Data is available to download in Green Button format

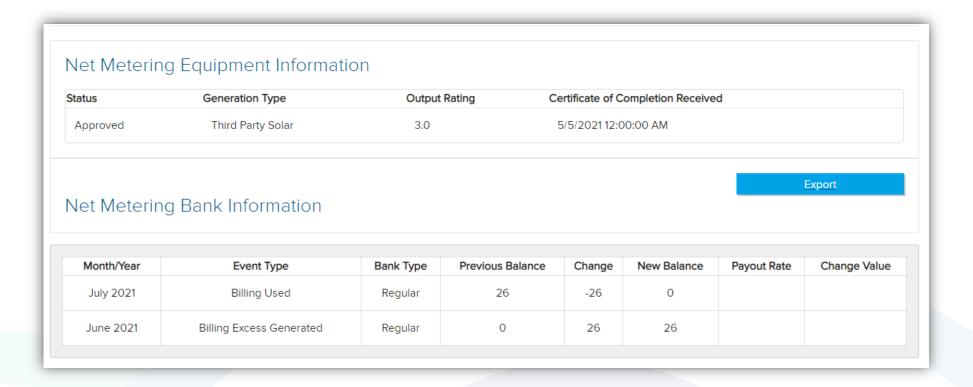




PA Customer Portal – Net Metering Monthly Usage



Net metering customers can see information about their equipment and meter bank



PA Customer Portal – Usage Summary



Business customers have 4 years of demand information available

Usage Summary Export Usage Summary Avg. Temperature Billed Days in bill KW Demand Total kWh Used Avg. kWh/Day **Electricity Costs** 29 831 27 02/04/2022 486,000 16.759 \$3,199.21 01/06/2022 31 841 527,400 17,013 \$3,225.40 40 12/06/2021 32 824 538,200 16.819 \$3.197.23 43 29 59 11/04/2021 941 523,800 18.062 \$3,491.04 29 69 10/06/2021 965 570,600 19,676 \$3,601.70

PA Customer Portal – Customer Service Representatives



- Customer Service Representatives [CSR's] can view all the same graphs as customers, including bill-to-date
- CSR's can change daily usage to view many months at once
- CSR's can additionally view tables of interval usage, daily reads, and the meter reading history
- CSR's can complete a profile and decision tool to evaluate high bill complaints

PA Customer Portal – CSR View



Data may also be exported; net metering will show all 3 read types

Note: Weekends shown in bold. Actual meter reads display in black. Estimated meter reads display in orange. Estimates may change. Read types: NET=kWh Net (Received from Customer-Delivered to Customer). DEL=kWh Delivered to Customer. REC=kWh Received from Customer.

	Read				12:00	12:15	12:30	12:45	1:00	1:15	1:30	1:45	2:00	2:15	2:30	2:45	3:00	3:15
Date	Type	Min	Max	Total	AM	AM	AM	AM	AM	AM	AM	AM	AM	AM	AM	AM	AM	AM
2/25/2022	NET	-0.03	0.36	16.47	0.13	0.22	0.15	0.13	0.22	0.12	0.2	0.17	0.12	0.25	0.12	0.19	0.19	0.13
2/25/2022	DEL	0.01	0.36	16.59	0.13	0.22	0.15	0.13	0.22	0.12	0.2	0.17	0.12	0.25	0.12	0.19	0.19	0.13
2/25/2022	REC	0	0.04	0.12	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2/24/2022	NET	-0.04	0.41	13.45	0.24	0.13	0.12	0.23	0.1	0.14	0.21	0.12	0.13	0.2	0.11	0.18	0.15	0.11
2/24/2022	DEL	0	0.41	13.71	0.24	0.13	0.12	0.23	0.1	0.14	0.21	0.12	0.13	0.2	0.11	0.18	0.15	0.11
2/24/2022	REC	0	0.04	0.25	0	0	0	0	0	0	0	0	0	0	0	0	0	0
			^ 45	0 55	^ 47	^ 47	^ ^^	^ 47	^ 47			0.44	^ ^					

PA Supplier Portal

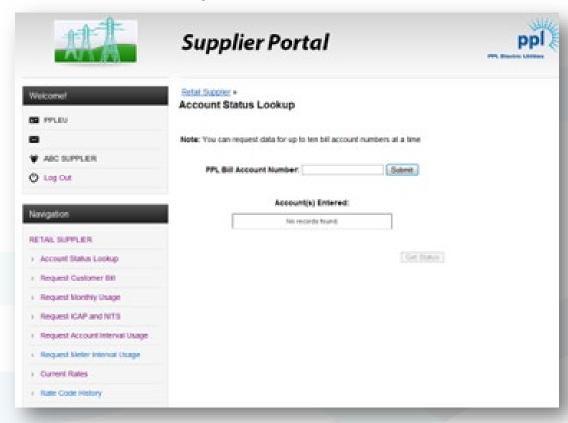


Slides 12 & 13 are specific to the additional benefits received by Non-Regulated Power Producers (NPPs) from the AMF Program

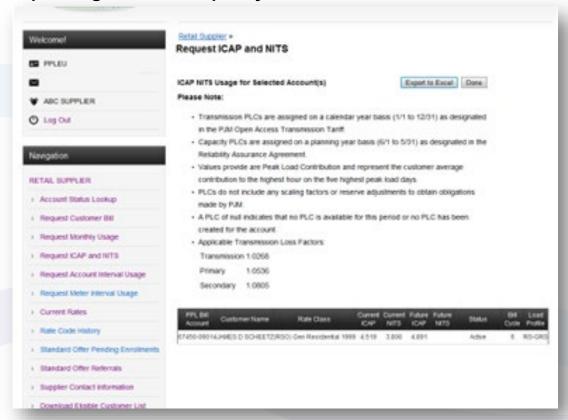
PPL company

The Supplier Portal can be used for both Suppliers and Energy Marketers to analyze and provides relevant energy program offerings to customers.

Account Status Lookup:



Requesting Installed Capacity:

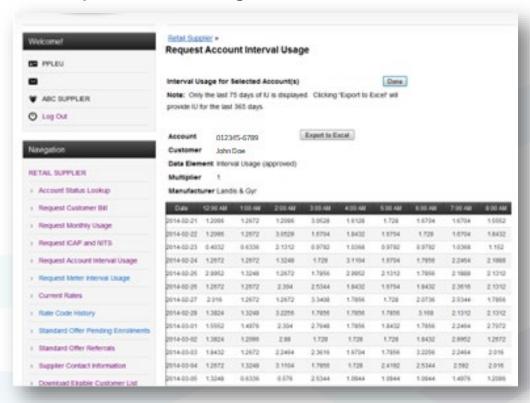


PA Supplier Portal Cont'd

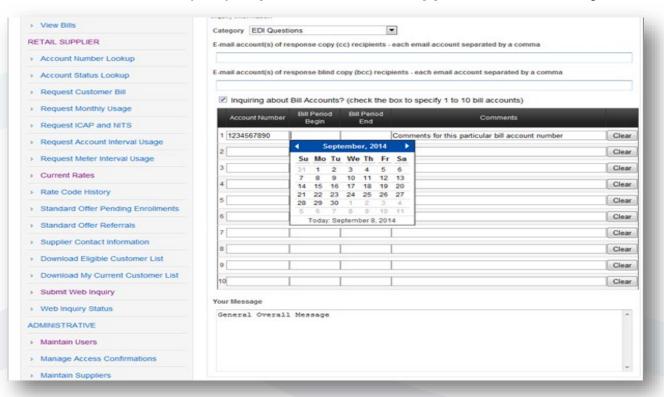


The Portal also provides visibility into customer energy consumption patterns and billing data for the Supplier's customer base and allows the Supplier to submit inquiries to the Utility via a web ticketing system to help manage the customer billing process.

Consumption Pattern Insights:



Market Transaction(EDI) inquiries between Supplier and the Utility:



Load Research Meters Clarification



A question was asked by Commissioner Anthony: "What will happen to the test meter population used to provide Load Curve Analysis during AMF Deployment?"

- The current population of test meters are used to provide interval data to support Load research on a select pool of customers (residential/small commercial).
- Rhode Island Energy will continue to perform Load research during AMF deployment; no data will be lost due to the AMF meter exchanges.
- As AMF meters begin replacing AMR, the pool of meters that can support Load research will increase as all meters will provide 15-minute interval data.

RIE Energy Insights Savings



A previous slide presented on the Energy Insights Savings incorrectly stated that the customer would "experience <u>fuel savings</u>". Note the correction updated below as '<u>Electricity Market cost savings</u>':

It is assumed that customers who have timely access to electricity usage information will modify their consumption patterns by better understanding when electricity usage is at its highest and the cost implications of higher usage.

The BCA is based upon:

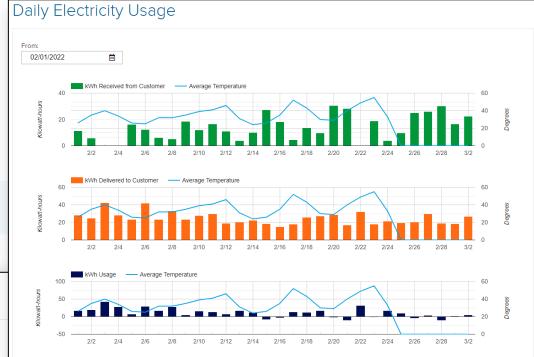
- 1.5% kWh electricity savings for participating customers
 - Assumption of 50% of residential customers participating
 - Assumption of 25% of commercial customers participating
- RIE will realize <u>Electricity Market cost savings</u> as a results of these reductions.
 - AESC 2021 was used to calculate the avoided Electricity Market costs.
- Customers will save 1.5% on their total bill.
- The amount that customers would save on their bills was included in Direct Customer Benefits after subtracting out RIE's Electricity Market savings.

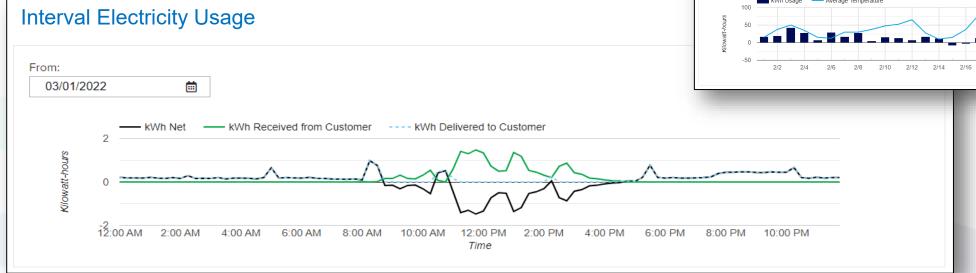
Net Metering Customers

Rhode Island Energy™

Clarifying 'Delivered' vs. 'Received' for Net Metering Customers

- Net Metering information will be available in the Customer Portal Net Metering information is broken into 3 views:
 - **kWh Delivered** Total energy <u>delivered to the customer</u> from the Utility.
 - kWh Received Total energy <u>received by the Utility</u> from the customer.
 The received energy is excess energy, meaning the generated energy
 first powers the customer's home or business and any remaining excess
 energy is sent to the Utility.
 - kWh Net kWh Delivered minus kWh Received Net is used for billing calculation.





Certificate of Service

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

Joanne M. Scanlon

October 14, 2022

Date

Narragansett Electric Co. d/b/a RI Energy - Docket No. 4770 (Rate Application) & Docket No. 4780 (PST)

Combined Service list updated 8/31/2022

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