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Also admitted in Massachusetts

November 9, 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. 22-33-EE - 2023 Annual Energy Efficiency Plan
Responses to PUC Data Request – Set 2**

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 responses to the Public Utilities Commission’s Second Set of Data Requests in the above-referenced docket.

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 22-33-EE Service List

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.

Leticia Pimentel

Leticia C. Pimentel

November 9, 2022
Date

Docket No. 22-33-EE – Rhode Island Energy’s Energy Efficiency Plan 2023 Service list updated 10/24/22

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The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-33-EE
In Re: 2023 Annual Energy Efficiency Plan
Responses to the Commission's Second Set of Data Requests
Issued on October 19, 2022

PUC 2-1

Request:

Please provide the total legal expenses that are included in the Company's 2023 budget that was filed in this docket.

Response:

The Company did not include any legal expenses in its 2023 budget filed in this docket.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-33-EE
In Re: 2023 Annual Energy Efficiency Plan
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PUC 2-2

Request:

Please provide a best estimate/forecast of the total legal expenses the Company expects to incur in 2023 and that the Company expects to allocate and recover from the energy efficiency fund for program year 2023. Please breakdown the forecasted cost from in-house counsel and the forecasted cost from outside counsel separately. Please provide a schedule showing how the estimates were calculated.

Response:

The Company does not expect to allocate any legal expenses for recovery from the energy efficiency fund for program year 2023.

The Narragansett Electric Company
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PUC 2-3

Request:

Please provide the total legal expenses incurred by the Company that were allocated to and recovered from the energy efficiency fund for each of the program years 2019, 2020, and 2021. Please breakdown the cost incurred from in-house counsel and the cost incurred from outside counsel separately, if any.

Response:

With respect to in-house counsel, none of the value of in-house counsel's work was allocated and charged to the energy efficiency fund for the years 2019 through 2021.

With respect to outside counsel, the Company paid fees related to the development and approval of the Company's Energy Efficiency plan as follows: 2019 - \$0.00; 2020 - \$67,591; and 2021 - \$19,700. These dates and amounts reflect the date of payment of fees by the Company and not necessarily the program year for which the fees were incurred, and the 2020 amounts include fees paid in early 2020 for work on the 2019 Energy Efficiency Plan. These legal expenses were allocated across applicable programs as Program, Planning & Administrative charges included in the 2020 and 2021 reported expenses, and they were subsequently recovered from the Energy Efficiency Fund.

PUC 2-4

Request:

Please provide a forecast of the total legal expenses the Company expects to have incurred in 2022 and that the Company expects to allocate and recover from the energy efficiency fund for program year 2022. Please breakdown the costs from in-house counsel and the cost from outside counsel separately. Please provide a schedule showing how the estimate was calculated.

Response:

The Company's outside counsel's charges are not forecasted for inclusion in a particular Energy Efficiency program year. From January through May 2022, the Company paid \$46,893 in fees and expenses for outside counsel's work with respect to the Energy Efficiency program. This was primarily for work performed in 2021 in connection with the 2022 Annual Energy Efficiency Plan.

The Company's outside counsel has estimated its fees and expenses for the period of September through December 2022, for work performed in connection with the 2023 Annual Energy Efficiency Plan, to be \$36,000. This forecast was not provided for the purpose of allocation to and recovery from the Energy Efficiency Fund but for ordinary budgetary purposes. Outside counsel's forecast of fees and expenses was calculated based upon the review of prior years' fees for work on the Company's Energy Efficiency Plan. There was no specific calculation made to develop this estimate.

Given the timing of Annual Energy Efficiency Plan filings, ordinarily fees incurred in a given calendar year will be for work on the following year's plan. For example, unless outside counsel's work on the 2023 plan continues into calendar year 2023, the Company expects that fees for work performed in the latter part of 2022 would be for work concerning the 2023 Energy Efficiency Plan.

Legal expenses are not forecasted separately in connection with development of Energy Efficiency Plan budgets. They are encompassed within the forecasts of Program Planning & Administration expenses.

The Company's in-house counsel does not charge time to the energy efficiency program for recovery through the energy efficiency fund.

PUC 2-5

Request:

The Income Eligible Multifamily section of the table on Bates page 144 indicates that the Income 2023 Eligible Multifamily program budget contains a \$900,000 incentive for a single “Heat Pumps – Oil” project. What is this project, and how was the \$900,000 incentive level determined?

Response:

Currently, the incentive is a proxy for what may be experienced in the marketplace and is the result of developing a technical proposal for a housing authority's oil central heating system that was failing. This specific housing authority requested that the replacement project be developed with heat pumps planned as the new heating source. The Income Eligible Multifamily program determines incentives based on 100% of project cost, and the proposal showed a project cost of approximately \$900,000. Because the Company does not know whether the project will be completed before the 2023 Plan has been reviewed and approved by the Commission, the \$900,000 incentive is representative of what the Company believes exists within the low-income multifamily housing sector in Rhode Island.