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January 25, 2023

**VIA HAND DELIVERY & ELECTRONIC MAIL**

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

**RE: Docket No. 22-39-REG 2023 Renewable Energy Growth Program  
Tariff and Rule Changes  
Responses to PUC Data Requests – 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) 709-3337.

Very truly yours,



Leticia C. Pimentel

Enclosure

cc: Docket 22-39-REG 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.



Heidi J. Seddon

January 25, 2023

Date

**Docket No. 22-39-REG – Renewable Energy Growth Program for Year 2023**  
**The Narragansett Electric Company & RI Distributed Generation Board**  
**Service List updated 11/15/2022**

<b>Parties' Name/Address</b>	<b>E-Mail</b>	<b>Phone</b>
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The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 22-39-REG  
In Re: 2023 Renewable Energy Growth Program Classes,  
Ceiling Prices, and Capacity Targets and  
2023 Renewable Energy Growth Program –  
Tariffs and Solicitation and Enrollment Process Rules  
Responses to the Commission’s Second Set of Data Requests  
Issued on January 4, 2023

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PUC 2-1

Request:

Please provide the definition of “over-subscription” and “under-subscription” RI Energy will use to determine whether capacity should be reallocated between classes, and specifically indicate whether the definition is statutory. Is there an economic or market-design reason that supports RI Energy’s definition?

Response:

Rhode Island Energy coordinated this response with the Rhode Island Office of Energy Resources.

Rhode Island Energy is using the terms “over-subscription” and “under-subscription” with the following understanding:

A class is under-subscribed if the sum of total awarded capacity and total applied-for-but-not-yet-awarded capacity is less than the approved allocation for that class.

A class is over-subscribed if the sum of total awarded capacity and total applied-for-but-not-yet-awarded capacity is more than the approved allocation for that class.

Where:

Total awarded capacity is the sum of capacity for all projects that have been awarded a Certificate of Eligibility.

Total applied-for-but-not-yet-awarded capacity is the sum of capacity for all projects that have submitted an application but have not yet been awarded a Certificate of Eligibility. Total applied-for-but-not-yet-awarded capacity is exclusive of projects that have applied but have been deemed ineligible and therefore would not be awarded a Certificate of Eligibility for their current application on file.

These definitions are not statutory. These definitions are based on program design and administration rather than economic or market design considerations. The objective of reallocating between classes based on over-subscription or under-subscription is to maximize program participation (in terms of capacity awarded). Rhode Island Energy is not proposing any material changes to program administration.

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PUC 2-2

Request:

Referencing response to PUC 1-1, the Company explained that no tariff or rule change is necessary because the Tariffs require the Applicant to provide information that includes but is not limited to several items. The Enrollment Rules state, in part: Section 2.1.3 Application Completeness and Timeliness: “Total Project development cost is defined as: ‘The expected all-in project capital cost, which should include all hardware, balance of plant, design, construction, permitting, interconnection, metering, development (including developer fee), interest during construction, financing costs and reserves. This figure should not account for any tax incentives, grants, or other cash incentives, which will be accounted for separately....”

- a. How will Applicants be made aware of the new requirement that they specify which tax credit bonuses, if any, they plan to qualify for?
- b. When and where will they need to provide this information?

Response:

- a. The Company intends to provide notice to Applicants through the Office of Energy Resources email serve list for Solar Stakeholders and also discuss this new requirement as an agenda item at the next available Solar Stakeholder meeting, yet to be scheduled.
- b. The Applicant will be required to provide this information as part of the application, at the time of submission.

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PUC 2-3

Request:

Referencing PUC 1-2, please explain how RI Energy determined that there were no net metering customers with two meters. As part of this response, please confirm there are no net metering customers in the 02917 ZIP code served by separate generation and load meters.

Response:

The Company’s response to PUC 1-2 inadvertently excluded four net metering customers with two meters. Upon further review of the data, of the four net metering customer accounts with two meters, none of the accounts are in the 02917 ZIP code. The Company will correct its response to PUC 1-2.