280 Melrose Street Providence, RI 02907 Phone 401-784-7263



January 12, 2023

VIA ELECTRONIC MAIL

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

RE: Docket No. 22-50-EL - The Narragansett Electric Company's Tariff Advice to Provide RGGI Bill Credits to A-60 Customers Clarification of Eligible Customer Group for February RGGI Bill Credit

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the "Company") this letter represents a request for clarification related to a vote taken by the Public Utilities Commission ("PUC") during an Open Meeting on December 20, 2022 in connection with the above-referenced docket. The purpose of the request is to clarify the group of customers who will be eligible to receive the February 2023 Regional Greenhouse Gas Initiative ("RGGI") bill credit. The Company is requesting that the eligible group of customers be all A-60 customers who are issued a bill in February regardless of whether or not they were enrolled in the A-60 rate class during the November and December 2022 billing periods.

Background

On November 23, 2022, the Company filed a proposed tariff¹ to govern the utilization of RGGI auction proceeds to provide bill credits to customers in the A-60 rate class during the month of February 2023 ("Feb RGGI Tariff"). It was the Company's intent that the eligible customer group as described in the Feb RGGI Tariff be all A-60 customers who are issued a bill in February 2023. On December 20, 2022, the PUC approved the Feb RGGI Tariff as filed. However, based on the position memorandum issued by the Division of Public Utilities and Carriers ("Division") dated December 16, 2022,² and commentary by the PUC at the December 20, 2022 Open Meeting, the Company believes its intent was not aligned with how the Division and the PUC interpreted the Feb RGGI Tariff's eligible customer group.

Requested Action

The Company respectfully requests that the PUC find that the Company's interpretation of the approved Feb RGGI Tariff is acceptable meaning the eligible group of customers will be

¹ See https://ripuc.ri.gov/sites/g/files/xkgbur841/files/2022-11/2250-RIE-Tariff-RGGIBillCredit%2011-23-22_0.pdf

² See https://ripuc.ri.gov/sites/g/files/xkgbur841/files/2022-12/2250-DIV-Memo%2012-16-22.pdf

Luly E. Massaro, Commission Clerk Docket No. 22-50-EL – Tariff Advice to Provide RGGI Bill Credits to A-60 Customers January 12, 2023 Page 2 of 2

all A-60 customers who are issued a bill in February. The Company believes no additional action is needed in terms of amending the prior vote or the language of the approved Feb RGGI Tariff.

No Objections to Requested Action

The Company held a virtual meeting with representatives of the Division and the Office of Energy Resources ("OER") prior to filing this letter. The Division and OER did not have any objections to the Company executing the approved Feb RGGI Tariff in alignment with the Company's intent meaning the eligible group of customers will be all A-60 customers who are issued a bill in February.

Thank you for your attention to this filing. If you have any questions, please contact me at 401-784-4263.

Sincerely,

Che & m

Andrew S. Marcaccio

Enclosures

cc: Docket No. 22-50-EL via Docket No. 4978 Service List

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

January 12, 2023 Date

Docket No. 4978 – Narragansett Electric Co. d/b/a Rhode Island Energy – 2021 Last Resort Service Procurement Plan Service List updated 8/29/2022

Name/Address	E-mail Distribution	Phone
The Narragansett Electric Company d/b/a Rhode Island Energy Andrew Marcaccio, Esq. Celia B. O'Brien, Esq. 280 Melrose Street Providence, RI 02907	AMarcaccio@pplweb.com;	401-784-4263
	COBrien@pplweb.com;	
	JHutchinson@pplweb.com;	
	JScanlon@pplweb.com;	
	BLJohnson@pplweb.com;	
	SBriggs@pplweb.com;	
	JOliveira@pplweb.com;	
	NSUcci@RIEnergy.com;	
	JMRouland@pplweb.com;	
National Grid	James.Ruebenacker@nationalgrid.com;	
	James.Calandra@nationalgrid.com;	
	Theresa.Burns@nationalgrid.com;	
	Scott.McCabe@nationalgrid.com;	
	Daniel.Gallagher@nationalgrid.com;	
Division of Public Utilities Gregory S. Schultz, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	gSchultz@riag.ri.gov;	401-274-4400
	Christy.Hetherington@dpuc.ri.gov;	
	Margaret.L.Hogan@dpuc.ri.gov;	
	John.Bell@dpuc.ri.gov;	
	Al.Mancini@dpuc.ri.gov;	
	Al.Contente@dpuc.ri.gov;	
	Paul.Roberti@dpuc.ri.gov;	
	Machaela.Seaton@dpuc.ri.gov;	
	Michelle.Barbosa@dpuc.ri.gov;	

	Thomas.kogut@dpuc.ri.gov;	
	EGolde@riag.ri.gov;	
	<u> </u>	
Office of Energy Resources	jkeoughjr@keoughsweeney.com;	401-724-3600
<i>5</i> v	Albert.vitali@doa.ri.gov;	
Joseph Keough, Jr.	Christopher.Kearns@energy.ri.gov;	
Keough & Sweeney, Ltd.	steven.chybowski@energy.ri.gov;	
41 Mendon Ave.	jkeoughjr@keoughsweeney.com;	
Pawtucket, RI 02861	Nancy.Russolino@doa.ri.gov;	
Albert Vitali, Esq. Division of Legal Services One Capitol Hill, Fourth Floor Providence, RI 02908	jdalton@poweradvisoryllc.com;	
Christopher Kearns		
Good Energy LLC James G. Rhodes, Esq. 205 Governor St. Providence, RI 02906	jamie.rhodes@goodenergy.com;	401-225-3441
RI Attorney General Office	<u>nvaz@riag.ri.gov;</u>	247-4400
Nicholas Vaz, Esq.		Ext. 2297
Alison B. Hoffman, Esq. 150 South Main St. Providence, RI 02903	AHoffman@riag.ri.gov;	Ext. 2116
George Wiley Center	jwood@centerforjustice.org;	
Jennifer L. Wood, Executive Director R.I. Center for Justice	georgewileycenterri@gmail.com;	
R.I. Center for Justice	georgewneycentern(@gman.com,	
1 Empire Plaza, Suite 410 Providence, RI 02903	<u>camiloviveiros@gmail.com;</u>	
File an original & 9 copies w/: Luly E. Massaro, Commission Clerk	Luly.Massaro@puc.ri.gov;	401-780-2017
John Harrington, Counsel	Alan.Nault@puc.ri.gov;	
Public Utilities Commission	Emma.Rodvien@puc.ri.gov;	—
89 Jefferson Blvd.	Todd.Bianco@puc.ri.gov;	
Warwick, RI 02888	John.Harrington@puc.ri.gov;	
Victoria Scott, Governor's Office	Victoria.Scott@governor.ri.gov;	
Marc Hanks, Direct Energy	Marc.Hanks@directenergy.com;	