

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
280 Melrose Street  
Providence, RI 02907



January 17, 2023

**VIA ELECTRONIC MAIL AND HAND DELIVERY**

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

**RE: Docket No. 22-53-EL - Proposed FY 2024 Electric Infrastructure, Safety, and Reliability Plan (21-Month Plan for Period April 2023 through December 2024)**

**Docket No. 22-54-NG – Proposed FY 2024 Gas Infrastructure, Safety, and Reliability Plan (21-Month Plan for Period April 2023 through December 2024)**

**The Narragansett Electric Company’s Joint Brief in Response to PUC Memorandum**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”), enclosed is the Company’s joint brief concerning the Company’s proposed FY 2024 Electric and Gas Infrastructure, Safety, and Reliability Plans in response to the Public Utilities Commission (“PUC”) Memorandum dated January 3, 2023.

Thank you for your attention to this transmittal. If you have any questions or concerns, please do not hesitate to contact Andrew Marcaccio at 401-784-4263 or Jennifer Brooks Hutchinson at 401-784-7288.

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrew S. Marcaccio".

Andrew S. Marcaccio

A handwritten signature in blue ink, appearing to read "Jennifer Brooks Hutchinson".

Jennifer Brooks Hutchinson

Enclosures

cc: Docket No. 22-53-EL Service List  
Docket No. 22-54-NG Service List  
John Bell, Division

**STATE OF RHODE ISLAND  
BEFORE THE PUBLIC UTILITIES COMMISSION**

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**IN RE: PROPOSED FY 2024 ELECTRIC  
INFRASTRUCTURE, SAFETY, AND  
RELIABILITY PLAN**

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RIPUC Docket No. 22-53-EL

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**IN RE: PROPOSED FY 2024 GAS  
INFRASTRUCTURE, SAFETY, AND  
RELIABILITY PLAN**

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RIPUC Docket No. 22-54-NG

**RESPONSE TO BRIEFING QUESTION**

On January 3, 2023, the Public Utilities Commission (“PUC”) asked The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”) to respond to the following Briefing Question in relation to its Fiscal Year (“FY”) 2024 Electric Infrastructure, Safety, and Reliability (“ISR”) Plan (“Electric ISR Plan”) and its FY 2024 Gas ISR Plan (“Gas ISR Plan” and, together with the Electric ISR Plan, the “ISR Plans”) proposing 21-month spending plans for investments:

How are the Proposed 21-month plans that span two fiscal years (FY 2023 and FY 2024) filed as the FY 2024 Proposed Electric Infrastructure Safety and Reliability Plan and the Proposed FY 2024 Gas Infrastructure Safety and Reliability Plan made by Rhode Island Energy on December 22, 2022 consistent with the statutory requirement to file a spending plan for the following fiscal year?

This memorandum explains why the Company’s proposed 21-month ISR Plans are consistent with the statutory requirement.

**I. INTRODUCTION**

As a threshold matter, the Company’s proposed ISR Plans do not span two fiscal years for ISR Plan purposes. When it was owned by National Grid USA (“National Grid”), the Company filed, and on March 29, 2022, the PUC approved, the Company’s FY 2023 ISR Plans.

Shortly thereafter, on May 22, 2022, PPL Rhode Island Holdings, LLC, an indirect subsidiary of PPL Corporation, closed on the acquisition of 100 percent of the outstanding shares of common stock of the Company (the “Acquisition”) and rebranded the Company as Rhode Island Energy.<sup>1</sup> Under National Grid’s prior ownership, the Company’s fiscal year ran from April 1 through March 31 of each year. Now, under PPL ownership, the Company’s fiscal year runs from January 1 to December 31 of each year.

When the PUC approved the Company’s FY 2023 ISR Plans, which were filed and approved when the Company was still under National Grid ownership, it approved plans that end on March 31, 2023, consistent with National Grid’s fiscal year. Consequently, the Company’s current FY 2024 ISR Plans cover the period beginning with the end of the approved FY 2023 ISR Plans through the end of FY 2024 (i.e., April 1, 2023, through December 31, 2024), consistent with PPL’s fiscal year. These ISR Plans, therefore, cover an extended fiscal year as a one-time adjustment to align future ISR filings with the Company’s new fiscal year. The nine additional months included in this one-time extended fiscal year fall neither within the approved FY 2023 ISR Plans nor within the Company’s new 2024 fiscal year. This use of an extended fiscal year is common and accepted practice when adjusting for ownership changes like the Acquisition and is consistent with the letter and spirit of the Revenue Decoupling statute, R.I. Gen. Laws § 39-1-27.7.1.

There are three main reasons that the Company’s proposed extended fiscal year for the FY 2024 ISR Plans is consistent with the Revenue Decoupling statute and appropriate in these circumstances. First, nothing in the statutory language or the PUC’s regulations prohibits the use of an extended, 21-month fiscal year. While the PUC’s regulations are silent on the use of an

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<sup>1</sup> In this memorandum, the Company refers to itself as being under “PPL ownership” after the Acquisition.

extended fiscal year, the plain language of the statute provides for the possibility of an extended fiscal year. In addition, there is substantial authority demonstrating that the use of an extended fiscal year is common and appropriate when a company experiences a change in control. Thus, based on the plain language of the statute and the weight of other authority, the Company's use of an extended fiscal year for the FY 2024 ISR Plans to cover the entire time-period from the end of the currently approved FY 2023 ISR Plans through the end of its FY 2024 is appropriate and consistent with the types of one-time adjustments that are occasioned by a transition of corporate control.

Second, the Company's proposed ISR Plans satisfy the substantive requirements of R.I. Gen. Laws § 39-1-27.7.1, including the requirement that the Company establish a "rate-reconciliation mechanism that includes a reconcilable allowance for the anticipated capital investments and other spending pursuant to the annual pre-approved budget as developed in accordance with subsection (d) of this section." R.I. Gen. Laws § 39-1-27.7.1(c)(2). Although the Company has presented 21-month spending plans for its extended FY 2024 ISR Plans, the ISR Plans contain the reconciliation mechanism required by R.I. Gen. Laws § 39-1-27.7.1.

Third, the use of a one-time, 21-month extended fiscal year for FY 2024 is more reasonable and less burdensome for all parties than the alternative option to align future ISR Plan filings with the Company's new fiscal year. Going through full ISR Plan development and review processes now for a nine-month period to cover the rest of calendar year 2023, followed shortly thereafter by another full ISR Plan development and review process for FY 2024 would be unduly burdensome for the Company, as well as the Division of Public Utilities and Carriers (the "Division"), other parties, and the PUC. The pre-filing review and consultation process with the Division and the following hearing process before the PUC are time and resource-intensive

endeavors for all involved. To avoid this strain on Company and regulatory resources, the Company has prepared comprehensive ISR Plans that cover the proposed extended FY 2024. Further, the rate-reconciliation method remains in place and the PUC retains its prudence review authority over the investments made and for which the Company seeks recovery. This provides the same level of protection for customers as the alternative, but less efficient, process of preparing nine- and twelve-month ISR plans. Moreover, the proposed 21-month ISR Plans provide greater rate consistency by smoothing out the rate impacts for the proposed investments.

## **II. APPLICABLE LAW**

The Revenue Decoupling statute, R.I. Gen. Laws § 39-1-27.7.1(c), requires that the Company file ISR Plans for its gas and electric distribution businesses for “each fiscal year.” The statute further specifies that the Company must consult with the Division about the ISR plans “[p]rior to the beginning of each fiscal year,” and outlines the required contents of the plan. R.I. Gen. Laws § 39-1-27.7.1(d). Subsections (c) and (d) state, in pertinent part:

(c) The proposals shall contain the following features and components:

....

(2) An annual infrastructure, safety, and reliability spending plan for each fiscal year and an annual rate-reconciliation mechanism that includes a reconcilable allowance for the anticipated capital investments and other spending pursuant to the annual pre-approved budget as developed in accordance with subsection (d) of this section.

(d) *Prior to the beginning of each fiscal year, gas- and electric-distribution companies shall consult with the division of public utilities and carriers regarding their infrastructure, safety, and reliability spending plan for the following fiscal year, addressing the following categories:*

(1) Capital spending on utility infrastructure;

(2) For electric distribution companies, operation and maintenance expenses on vegetation management;

(3) For electric distribution companies, operation and maintenance expenses on system inspection, including expenses from expected resulting repairs; and

(4) Any other costs relating to maintaining safety and reliability that are mutually agreed upon by the division and the company.

The distribution company shall submit a plan to the division and the division shall cooperate in good faith to reach an agreement on a proposed plan for these categories of costs for the prospective fiscal year within sixty (60) days. . . .

*See R.I. Gen. Laws §§ 39-1-27.7.1(c)-(d) (emphasis added).*

### **III. ARGUMENT**

#### **A. The Revenue Decoupling statute allows for an extended fiscal year.**

There are three main reasons that the Revenue Decoupling statute’s requirement that the Company file an “annual [ISR plan] for each fiscal year” is consistent with the Company’s proposed, extended, 21-month fiscal year for its FY 2024 ISR Plans. First, the term “fiscal year” is not defined in this statute, and the plain language and context of the statute demonstrate that its definition encompasses time periods other than 12 months. The fact that ISR plans must be submitted “annually” does not mandate a twelve-month ISR plan period, because the term “annual” is used in conjunction with the term “fiscal year,” which should be read, in this instance, as referring to a 21-month period. Second, nothing about the required contents of ISR plans mandates a twelve-month time-period. Third, the specific timing of ISR plans is not critical to their primary purpose—to ensure that the Company is regularly investing in upgrades to the distribution system to ensure its safe and reliable operation.

i. The term “fiscal year” is flexible.

Although ordinarily a “fiscal year” encompasses “an accounting period of 12 months,”<sup>2</sup> the term’s meaning is not static. In fact, the Oxford definition of “fiscal year” is “a year as reckoned for taxing or accounting purposes.”<sup>3</sup> Corporations and governments commonly use fiscal years that are longer—or shorter—than twelve months in certain circumstances, and an extended fiscal year is an appropriate and common response to major corporate changes.

For example, an extended fiscal year is common when there has been a change in company control, or when a company is responding to changes in legislation or regulations.<sup>4</sup> *See, e.g., In Re Lockheed Martin W. Dev. Lab’ys, Armed Services Board of Contract Appeals*, No. 51452, 02-1 B.C.A. (CCH) ¶ 31803 (Mar. 21, 2002) (“After Loral purchased WDL from Ford Aerospace, WDL went through a 15 -month fiscal year so that its next fiscal year would coincide with Lora’s[.]”); *see also* R.I. Gen. Laws § 44-5-2.3 (“Notwithstanding any other provisions of this chapter, in connection with the change of Scituate’s fiscal year from April 1 to June 30, the town may levy a tax for its extended fiscal year in excess of four percent (4.0%) in excess of the amount levied and certified by the town for the prior year, and such tax levy may cover a period of sixteen (16) months. . . . ‘Extended fiscal year’ means the period April 1, 2023

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<sup>2</sup> “Fiscal year.” Merriam-Webster.com Dictionary, Merriam-Webster, <https://www.merriam-webster.com/dictionary/fiscal%20year>. (accessed 13 Jan. 2023).

<sup>3</sup> “Fiscal year.” The Oxford Pocket Dictionary of Current English. . Retrieved January 17, 2023 from Encyclopedia.com: <https://www.encyclopedia.com/humanities/dictionaries-thesauruses-pictures-and-press-releases/fiscal-year> (accessed 16 Jan. 2023).

<sup>4</sup> Similarly, companies may change their fiscal years to respond to, or take advantage of, certain economic conditions. *See S.C. Pub. Serv. Auth. v. Citizens & S. Nat. Bank of S.C.*, 300 S.C. 142, 386 S.E.2d 775 (1989) (affirming the right of public utility to change fiscal year to a calendar year and finding that change did not impair contracts with bondholders); *World Radio Lab'ys, Inc. v. Coopers & Lybrand*, 251 Neb. 261, 270, 557 N.W.2d 1, 7–8 (1996) (“In addition to reducing inventory, World Radio also changed its fiscal year to end in February 1986, rather than June 1986. As such, financial statements were prepared for a “stub year,” representing the 36–week period of June 2, 1985, through February 1, 1986. . . . According to Northwall, the creation of these short-term financial statements was necessary for World Radio’s survival.”).

to June 30, 2024.”); *In the Matter of Admin. of the N. Am. Numbering Plan & N. Am. Numbering Plan Cost Recovery Contribution Factor & Fund Size*, 15 F.C.C. Rcd. 3691, 3692 (1999) (“In order to shift the NANP funding period to accommodate the April 1 revenue filing date, the PUC mandated that the Fiscal Year 2000 funding period cover the sixteen-month period from March 2000 through June 2001.”). Thus, “fiscal year” does not *exclusively* refer to a twelve-month period.

The General Assembly is presumed to have known when it drafted the Revenue Decoupling statute that each company defines its own “fiscal year,” that companies may change their fiscal years from time to time, and that such a change could result in a longer- or shorter-than-twelve-month fiscal year on occasion. *See Peter Scotti & Assocs., Inc. v. Yurdin*, 276 A.3d 915, 927 (R.I. 2022) (“[T]he General Assembly ‘is presumed to be aware of the state of existing relevant law when it enacts or amends a statute.’”); 31A C.J.S. Evidence § 274 (“One is presumed to know those things which are matters of common knowledge as well as matters which the person should know and had the opportunity to know.”).

- ii. The purpose of ISR plans does not mandate a 12-month investment planning period.

None of the categories of investments required by R.I. Gen. Laws § 39-1-27.7.1(d) requires that the ISR Plans cover a 12-month period. So long as these expenses are addressed in a manner that is consistent with the Company’s accounting practices, the goal of “enhanc[ing] the safety and reliability of the Company’s Rhode Island electric distribution system” is met. RIPUC Docket No. 4218, Order No. 20582 (approving the Company’s first ISR plan after enactment of the Revenue Decoupling statute, R.I. Gen. Laws § 39-1-27.7.1, and noting that the ISR plan was ““designed to enhance the safety and reliability of the Company’s Rhode Island electric distribution system.””). The Company’s FY 2024 ISR Plans meet these requirements.



Thus, there is no statutory requirement that ISR plans be limited to fiscal years with a duration of twelve months.

Rather, the plain language of the Revenue Decoupling statute focuses on the *contents* of the ISR plans more than the specific timeline they cover. The reference to “fiscal year” provides a framework for the Company to ensure it: (a) regularly plans for necessary safety and reliability investments; (b) consults with the Division about these proposed investments expenditures; and (c) has a deadline by which to file its ISR plans. *See* R.I. Gen. Laws § 39-1-27.7.1(d) (“*Prior to the beginning of each fiscal year, gas- and electric-distribution companies shall consult with the division of public utilities and carriers regarding their infrastructure, safety, and reliability spending plan. . . .*”) (emphasis added). There is no reason that an ISR plan spanning more than twelve months would not meet the statute’s requirements, goals, and purposes or interfere with the ability to assess whether “the investments and spending . . . are reasonably needed to maintain safe and reliable distribution service over the short and long term.” *See* R.I. Gen. Laws §§ 39-1-27.7.1(a), (d).

- iii. The use of the term “annual” in conjunction with ISR plan filings does not imply that ISR plans may only cover a twelve-month period.

Here, for ISR plan purposes, the Company’s FY 2024 will run from April 1, 2023, through December 31, 2024. The Company already submitted and received approval of its FY 2023 ISR Plans (*see* RIPUC Docket Nos. 5209 and 5210), and, therefore, the Company’s subsequent ISR plans address FY 2024. Because of the dates identified in the FY 2023 ISR Plans, and to align with the Company’s current fiscal year, the subsequent ISR Plans address the 21-month period between April 1, 2023, and December 31, 2024. Accordingly, it is appropriate

that the Company’s FY 2024 ISR Plans cover the extended 21-month fiscal year (for ISR plan purposes) from April 1, 2023, through December 31, 2024.<sup>5</sup>

**B. The proposed 21-month FY 2024 will not interfere with the Company’s annual revenue reconciliation requirements.**

The proposed extended fiscal year will not interfere with the Company’s annual reconciliation of the “the anticipated capital investments and other spending pursuant to the annual pre-approved budget.” R.I. Gen. Laws § 39-1-27.7.1(c)(2). The ISR Plans maintain the rate reconciliation filing following the end of the plan period as has been the case for each prior fiscal year since the inception of the ISR plan. In other words, the Company will submit rate-reconciliation filings in August 2023 in relation to the FY 2023 ISR Plans approved by the PUC when the Company was under National Grid ownership; and the next ISR plan rate-reconciliation filings will occur in 2025, following the end of the FY 2024 ISR Plan periods. Because the term “annual” is used in conjunction with the term “fiscal year” in the statute, as further explained below, the 21-month FY 2024 will have no impact on the Company’s ability to meet its “annual rate reconciliation” obligations under the statute.<sup>6</sup> The Revenue Decoupling statute uses the word “annual” as an adjective to describe “*fiscal year*”—not to describe “calendar year” or “twelve month-period.” R.I. Gen. Laws § 39-1-27.7.1(c)(2). Had the General Assembly intended to mandate that annual rate-reconciliation mechanism for ISR plans must

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<sup>5</sup> The Company is not arguing that it may unilaterally extend its fiscal year beyond 12 months at any time. Rather, the Company’s position is that an extended fiscal year is appropriate and preferable in certain circumstances, including when such extensions are necessary to effectuate a change in corporate control, as is the case here.

<sup>6</sup> Insofar as the Division or PUC has concerns that projecting investments over a 21-month period is riskier or less reliable than projecting those same investments over a twelve-month period, the risk lies with the Company, not customers. The Company will not receive full cost-recovery until the end of the 21-month plan period, and, moreover, if the Company’s costs exceed amounts approved in its ISR Plans, the PUC retains its authority to review the prudence of those additional expenses in the reconciliation filing.

cover exactly a twelve-month period, it would have said so explicitly, as it did elsewhere in the statute.

Subsection (c)(1) of the statute sets forth the requirements of the revenue decoupling mechanism and states that distribution companies must “reconcile[] *annually* the revenue requirement allowed in the company’s base distribution-rate case to revenues actually received *for the applicable twelve-month (12) period*[.]” R.I. Gen. Laws § 39-1-27.7.1(c)(1) (emphasis added). In contrast, subsection (c)(2) requires “[a]n annual infrastructure, safety, and reliability spending plan for *each fiscal year* and an *annual* rate reconciliation mechanism[.]” R.I. Gen. Laws § 39-1-27.7.1(c)(2) (emphasis added). Likewise, subsection (d)—which sets forth the substantive contents of the ISR plan filings—requires the Company to develop an ISR plan “for the following *fiscal year*” and consult with the Division “[p]rior to the beginning of each *fiscal year*.” R.I. Gen. Laws § 39-1-27.7.1(d) (emphasis added). That the General Assembly specifically referred to an “applicable twelve-month (12) period” in R.I. Gen. Laws § 39-1-27.7.1(c)(1) when addressing revenue decoupling, but used the term “fiscal year” in R.I. Gen. Laws § 39-1-27.7(c)(2) when discussing the time-period covered by a company’s ISR plan, demonstrates that the time period for the ISR plans and the rate-reconciliation mechanism could cover a period different from a 12-month period. *See Rossi v. Employees’ Ret. Sys.*, 895 A.2d 106, 113 (R.I. 2006) (noting that within a single statute, “two terms must have different meanings; otherwise ... [one of the terms] would be redundant.”); *Ruggiero v. City of Providence*, 893 A.2d 235, 238 (R.I. 2006) (holding that in interpretation of legislation, “we must presume that the drafters intended every word ... to have a useful purpose and to have some force and effect,” such that different terms must be interpreted to have different meanings).

Here, the word “annual” is used in both subsections, but in conjunction with another term. For the ISR plans and rate-reconciliation mechanism, the term “annual” – which has a plain and ordinary meaning of “once every year” – refers to each fiscal year. It does not refer to the “applicable twelve-month (12) period” as it does for revenue decoupling mechanisms. Accordingly, to give meaning to every word, it is necessary to recognize that “fiscal year” is not constrained to only a 12-month period, as explained, *supra*.

**C. Submitting multiple ISR Plans for this 21-month period would be unduly burdensome, unnecessary, and not in the best interest of customers.**

The alternative to the Company’s proposal for an extended FY 2024 for ISR plan purposes would be unduly burdensome. It would require filing supplemental FY 2023 ISR Plans (which is not contemplated by the statute) that cover the nine-month period March 31, 2023, to December 31, 2023, followed shortly thereafter by FY 2024 ISR Plans covering the twelve-month period from January 1, 2024, through December 31, 2023. This would require the Company to prepare and submit multiple ISR plan filings within the space of only a few months, and it would require the Division, the PUC, and any other interested stakeholders to engage in an additional regulatory review and evaluation process in an already congested regulatory calendar.

In addition to being unduly burdensome, it also is unnecessary. The Company has prepared a comprehensive 21-month plan with investment proposals and spending plans with justifications. If the Company were to be required to divide the plans into multiple plans covering the shorter time periods, then the content would not change – but the time and effort by all interested parties and regulators would be doubled. The Company’s FY 2024 ISR Plans for the 21-month period provide the necessary opportunity to review and evaluate the investment proposals. In addition, the PUC’s review of the cost recovery and reconciliation processes

provide the necessary protections for customers, as specifically provided for, and contemplated by, the Revenue Decoupling statute.

Finally, in addition to all of the above, requiring multiple ISR plan filings of different lengths in such a short period may have a negative impact on customers with respect to rate stability. For example, if the Company were to divide the FY 2024 Gas ISR Plan into separate 9-month and 12-month plans, the bill impact for a 9-month rate would be a 9.2 percent, followed by a bill impact for a 12-month rate of -3.5 percent. This is because the 9 months that are used in the rate design for the 9-month rate (i.e., April to December) represent only 50 percent of the annual throughput and the other three months (i.e., January to March) represent the other 50 percent. Hence, to collect the required level of revenue over those 9-months requires a much higher rate than it would otherwise be if 12 months were utilized. This also explains why the 12-month calendar year 2024 rate is lower than the 9-month calendar year 2023 rate even though it has a higher revenue requirement. In contrast, under the Company's proposal the equivalent annual bill impact to the average residential heating customer is 6.6 percent and is achieved using a single 21-month rate. Ultimately, while both the 21-month rate and the 9-month plus 12-month rates are designed to collect the same level of revenue over 21-months and have equivalent 21-month bill impacts to customers, the 21-month rate provides customers with greater rate stability than the 9-month plus 12-month rates.

Accordingly, the Company's one-time proposal for an extended fiscal year for ISR plan purposes is both permissible under the law and the most efficient and effective means of meeting the purpose of the ISR plans to enhance the safety and reliability of the electric and gas distribution systems.

#### IV. CONCLUSION

The Revenue Decoupling statute, R.I. Gen. Laws § 39-1-27.7.1, uses the term “fiscal year” to describe the time period that ISR plans must cover. The plain language of the statute does not limit a fiscal year to a twelve-month period, and none of the substantive requirements in the statute mandates the use of a twelve-month fiscal year. The proposed 21-month FY 2024 for the ISR Plans does not change the fact that the Company’s proposed investments and spending are “reasonably needed to maintain safe and reliable distribution service over the short and long term.” R.I. Gen. Laws § 39-1-27.7.1(d). Where, as here, the Company has experienced a change in control, R.I. Gen. Laws § 39-1-27.7.1 allows the Company’s ISR Plans to cover an extended fiscal year, and it is reasonable for the PUC to permit the ISR Plans to cover that extended period of time as a one-time mechanism to align the future ISR plans to the Company’s new fiscal year. The proposed extended fiscal year here is a *one-time* occurrence; at the conclusion of FY 2024, the Company will revert to the more typical 12-month fiscal year for future ISR plan filings.

Respectfully submitted,

**THE NARRAGANSETT  
ELECTRIC COMPANY d/b/a  
RHODE ISLAND ENERGY**

By its attorneys,



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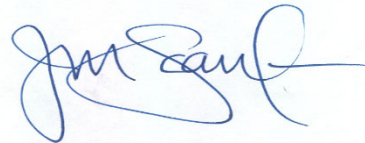
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Andrew S. Marcaccio (#8168)  
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Dated: January 17, 2023

**CERTIFICATE OF SERVICE**

I hereby certify that on January 17, 2023, I delivered a true copy of the foregoing Motion via electronic mail to the parties on the Service Lists for Docket No. 22-53-EL and Docket No. 22-54-NG.



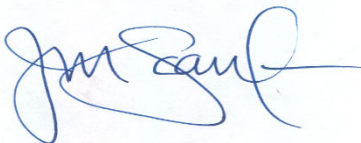
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Joanne M. Scanlon

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.



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Joanne M. Scanlon

January 17, 2023

Date

**Docket No. 22-53-EL – RI Energy’s Electric ISR Plan FY 2024  
Service List as of 1/5/2023**

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