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Rhode Island Energy™
a PPL company

May 3, 2023

VIA ELECTRONIC MAIL

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

RE: Docket No. 23-05-EL – The Narragansett Electric Company d/b/a Rhode Island Energy Tariff Advice to Amend the Net Metering Provision - Proposal for Administration of Excess Net Metering Credits
Responses to Division Data Requests – Set 1

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the "Company") enclosed are the Company's responses to the Division of Public Utilities and Carriers' First Set of Data Requests in the above-referenced matter.

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

Sincerely,

Andrew S. Marcaccio

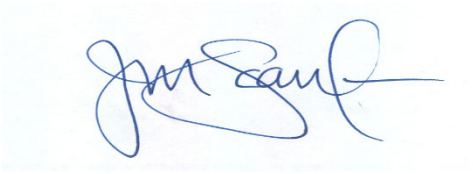
Enclosures

cc: Docket No. 23-05-EL 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

May 3, 2023
Date

Docket No. 23-05-EL Rhode Island Energy – Net Metering Provision, RIPUC No. 2268
Service List updated 4/13/2023

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Division 1-1

Request:

Please explain the specific methods the Company will use to estimate the renewable facility production ("Estimated Generation")? For example, will the Company rely on standard assumptions regarding irradiation, system characteristics, and a tool such as PV Watts? How will the method be vetted?

Response:

The Company intends to estimate the renewable facility production "Estimated Generation" by relying on a tool such as PV Watts or another equivalent method that is vetted and accepted in the industry. For standalone sites that only have negligible site load, the onsite consumption can be assumed to be zero, and therefore the net meter reading provides the Estimated Generation.

Division 1-2

Request:

Please explain the specific methods the company will use to determine Estimated Consumption? For example, will this involve reviewing meter data from periods prior to the installation of the Eligible Net Metering System?

Response:

The Company intends to determine the "Estimated Consumption" with historical data. This would be based on the three-year average usage prior to the installation of the Eligible Net Metering System.

Division 1-3

Request:

How will the Company determine whether using the Estimated Generation or Estimated Consumption is most appropriate? Will the Company perform both calculations and compare the results?

Response:

The Company intends to use historic data to obtain the Estimated Consumption variable and will perform the reconciliation analysis by using the Estimated Consumption and the Net Generation variables.

Division 1-4

Request:

Please state whether the Company will include an interest component to the billing charge and provide the reasoning for the Company's decision.

Response:

The Company is not proposing to include an interest component to the billing charge as the Customer does not receive interest on the credits that remain on the bill for future use. In addition, the current Net Metering Provision tariff does not include interest for the reconciliation process.

Division 1-5

Request:

Please provide the following for customers that will be assessed a billing charge:

a. In 2023, what is the approximate billing month that the charge will appear on customer's bills?

b. Will the charge occur in a single monthly bill, or will it be spread out over more than one bill?

c. In years subsequent to 2023, what month does the Company expect to include the billing charge on customer's bills?

Response:

a. The Company is considering several IT/billing methods to execute the billing charge considering that this will be an annual process. Regardless of the selected approach, the Company expects to be able to assess the billing charge (stemming from the CY 2022 reconciliation) to applicable net metering customers during a billing cycle that falls between September and December of 2023.

b. The charge assessed to applicable net metering customers will occur in a single monthly billing cycle. If any customer ends up with a large debit balance, upon customer request, the Company will provide the customer with a payment plan option.

c. In years subsequent to 2023 (beginning with the CY 2023 reconciliation), the Company expects to be able to assess the billing charge to applicable net metering customers during a billing cycle that begins in August or September.

   Please note that the reason why the response to (a) and (c) differ is because the Company is conducting the annual volumetric method reconciliation and assessing the correlating billing charge for the first time this year and may need additional time to execute.

Division 1-6

Request:

On page 17 of the testimony, the Company indicates that the reconciliation component of the net metering charge will be updated each October and set to zero each April. Please explain the rational for using a 6 month instead of a 12-month period for the reconciliation component of the net metering charge.

Response:

The Company's primary rational for reflecting the Calendar Year reconciliation component of the net metering charge over a 6 month period (October to March) was to align with the same Calendar Year base net metering charge that ends in March of each year, to the extent possible. For example, all base net metering charges and reconciliation adjustments for Calendar Year 2022 would be recovered or passed back to customers by March 31, 2024, rather than the reconciliation portion carrying over to September 2024 which would overlap with the Calendar Year 2023 base net metering charge.

The reconciliation component described in the testimony to be reflected in the net metering charge from October to March was based on the timing of the initial reconciliations being completed by August 1st of each year. As indicated on Page 12, IV. Cost Recovery, (3), of the proposed Net Metering Provision Tariff No. 2268, the Company proposes to reflect the reconciliation adjustment "through the Net Metering Charge for a period of up to twelve (12) months". If the reconciliations are completed sooner than August 1st, the Company can consider beginning to reflect the adjustment sooner than October 1st, increasing the initial proposed 6 month period.

Prepared by or under the supervision of: Stephanie Briggs

Division 1-7

Request:

Page 15 of testimony, lines 4 through 9 describe the process for dealing with any remaining excess credits.

a. What situation/ fact pattern would result in remaining excess credits after the reconciliation? The tariff in section II (12) states that the Company "may" issue payments for this remaining amount. How would the Company determine when to issue payments? Will the Company allow for the Net Metered Account to request payment (versus rolling the credits over)?

b. The testimony states that these payments will be made at the annual average Last Resort Service rate. For the 2022 reconciliation please provide detailed calculations for the annual average Last Resort Service rate for Residential customers that would be used for this. Did the company consider an alternative to a simple annual average, such as an average that considers the seasonality in monthly generation and weights the monthly LRS rate based on the contribution of monthly generation as a percentage of annual generation?

Response:

a. A situation in which the customer produces more generation than consumption in the range of 100-125% may result in remaining excess credits after the reconciliation. This will be unique to each net metering customer and depend on a few factors such as the generation to consumption ratio (i.e. the % within the 100-125% range), the value of the generation at the time it was produced, the value of the generation at the time it was consumed, the value of charges, fixed fees, and taxes on the bill. The Company proposes to issue payments on an annual basis directly following the annual reconciliation.

b. Please see Attachment DIV 1-7 for the Residential Last Resort Service annual average for Calendar Year 2022. The Company did not consider an alternative other than the simple annual average.

Residential Last Resort Service Rate

	Calendar Year 2022												
	January	February	March	April	May	June	July	August	September	October	November	December	Average
Base LRS	0.10491	0.10491	0.10491	0.07174	0.07174	0.07174	0.07174	0.07174	0.07174	0.17149	0.17149	0.17149	0.10497
LRS Adj Factor	(0.00512)	(0.00512)	(0.00512)	(0.00318)	(0.00318)	(0.00318)	(0.00318)	(0.00318)	(0.00318)	(0.00318)	(0.00318)	(0.00318)	(0.00367)
LRS Admin Factor	0.00238	0.00238	0.00238	0.00233	0.00233	0.00233	0.00233	0.00233	0.00233	0.00233	0.00233	0.00233	0.00234
Total LRS	0.10217	0.10217	0.10217	0.07089	0.07089	0.07089	0.07089	0.07089	0.07089	0.17064	0.17064	0.17064	0.10365

Division 1-8

Request:

Schedule EJRS-1 contains formulas on the top of page 2 to demonstrate how the Company proposes to estimate the ratio of Generation to Consumption. In these formulas, the Company uses a term called "Net Generation". Please confirm that "Net Generation" will be a positive number for situations in which the Consumption exceeded the Generation and a negative number for situations in which the Generation exceeded the Consumption.

Response:

The Company confirms that Net Generation will be a positive number for situations in which the Consumption exceeds the Generation and a negative number for situations in which the Generation exceeds the Consumption.

Division 1-9

Request:

Tariff Schedule B now contains additional language: "Total estimated generation to consumption ratio (shall be as close to 100% as feasible, any ratio between 100% - 125% will be subject to partial billing charge and any ratio greater than 125% will be subject to a full billing charge)." Given that this provision may impact a project's ability to be granted authority to interconnect ("ATI"), how will the determination of whether "as close to 100% as feasible" was achieved? Did the Company consider allowing the sum of the allocations to beneficial Net Metering Accounts to exceed 100%, with a provision whereby the actual allocations would be distributed on a prorated basis, based on each Net Metering Account's share of the total allocations (effectively oversubscribing to ensure full utilization if actual consumption is lower than expected)? If not, why not?

Response:

The determination of "as close to 100% as feasible" will be made based on comparing the following data submitted by the customer on the Schedule B: estimated annual generation in kWh of Eligible Net Metering System and the three-year average kWh usage for the account(s) associated with the Eligible Net Metering System Site.

The Company did not consider allowing the sum of the allocations to exceed 100% on a prorated basis since credits are allocated monthly, but the generation to consumption ratio is determined annually.

Division 1-10

Request:

Please comment on the impact of the potential deployment of AMF meters on the proposed annual reconciliation process and whether this will allow RIE to automate this reconciliation process for all Net Metering customers and potentially accelerate the annual timeline for completing this reconciliation.

Response:

Presently, the Company receives a monthly Net kWh read for billing Net-Metered customers. The two primary impacts of the potential deployment of AMF meters would be the ability to capture 15-minute energy values for both kWh Received (from the customer) and kWh Delivered (to the customer). AMF data could be beneficial to any future plans for automation or acceleration of the annual timeline.