

May 22, 2023

BY FIRST-CLASS MAIL & ELECTRONIC MAIL

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

RE: Docket 23-17-EL– Residential Assistance Recovery Filing

Dear Ms. Massaro:

On behalf of Rhode Island Energy,¹ I have enclosed the supplemental pre-filed direct testimony of Stephanie A. Briggs relating to the Company's Residential Assistance Recovery filing, which the Company submitted on May 15, 2023.

Thank you for your attention to this filing. If you have any questions, please contact me at 401-709-3337.

Very truly yours,



Leticia C. Pimentel

Enclosures

cc: Leo Wold, Esq.
John Bell, Division

¹ The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”).

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

May 22, 2023
Date

Docket No. 23-17-EL – Rhode Island Energy – 2023 Residential Assistance Recovery Filing Service List updated 5/22/2023

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**THE NARRAGANSETT ELECTRIC COMPANY
d/b/a RHODE ISLAND ENERGY
RIPUC. DOCKET NO. 23-17-EL
RESIDENTIAL ASSISTANCE RECOVERY FILING
WITNESS: STEPHANIE A. BRIGGS**

SUPPLEMENTAL PRE-FILED DIRECT TESTIMONY

OF

STEPHANIE A. BRIGGS

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1 **I. Introduction**

2 **Stephanie A. Briggs**

3 **Q. Please state your full name and business address.**

4 A. My name is Stephanie A. Briggs, and my business address is 280 Melrose Street,
5 Providence, Rhode Island 02907.

6

7 **Q. Please state your position and responsibilities in that position.**

8 A. I am employed by PPL Services Corporation (“Services Corporation”) as a Senior
9 Manager of Revenue and Rates. The Services Corporation provides administrative,
10 management and support services to PPL Corporation (“PPL”) and its subsidiary
11 companies, including The Narragansett Electric Company d/b/a Rhode Island Energy
12 (“Rhode Island Energy” or the “Company”). My current duties include responsibility for
13 revenue requirements and rates calculations for the Company.

14

15 **Q. Did you file prefiled direct testimony in this proceeding?**

16 A. Yes. On March 15, 2023, I filed pre-filed direct testimony to support the Company’s
17 proposal of a revised Arrearage Management Adjustment Factor (“AMAF”) and Low-
18 Income Discount Recovery Factor (“LIDRF”) and reconciliations. In that testimony, I
19 also presented proposed changes to the Company’s Residential Assistance Provision
20 (“RAP”) Tariff, R.I.P.U.C. No. 2239.

21

1 **II. Purpose and Structure of Supplemental Testimony**

2 **Q. What is the purpose of your supplemental direct testimony and how is it organized?**

3 A. The purpose of my supplemental direct testimony is to provide the basis for, and an
4 explanation of, the Company's proposal to revise the RAP Tariff. This supplemental
5 testimony: (1) explains why the Company is proposing to revise the tariff; (2) explains
6 the nature of the proposed revision and describes the current method of calculating the
7 adjusted allowable bad debt as part of the calculation of the Recoverable Arrearage
8 Forgiveness Amount; and (3) explains how the Company's proposal will change the
9 calculation of the Recoverable Arrearage Forgiveness Amount in Schedule NECO-1,
10 Page 2 and why such a change is appropriate.

11
12 **Q. Are you presenting any additional schedules in support of the proposed changes to
13 the RAP Tariff?**

14 A. Yes. In addition to Schedule NECO-6, which was filed with the Public Utilities
15 Commission ("Commission") on May 15, 2023, in this proceeding and which reflects the
16 proposed revisions to the RAP Tariff,¹ the Company is presenting the following schedule:
17 Schedule NECO-7 Company Response to Commission's Follow-up to Record
18 Request No. 7 in Docket No. 5073

¹ Schedules NECO-1 through NECO-6 were filed with the Commission on May 15, 2023, as part of the Company's Residential Assistance Recovery filing ("2023 RAR Filing").

1 **Q. As a preliminary matter, please briefly summarize the arrearage forgiveness cost**
2 **recovery provision of the RAP Tariff related to the Arrearage Management**
3 **Program (“AMP”).**

4 A. As provided in the RAP Tariff, the amount of arrearage forgiven by the Company for
5 unsuccessful participants in the AMP is fully recoverable. For successful participants in
6 the AMP, the RAP Tariff requires the Company to perform a bad debt test to determine
7 how much, if any, of the arrearage forgiven by the Company for those participants is
8 recoverable. In basic terms, the bad debt test compares the forecasted amount of bad debt
9 that the Company recovers through rates to the actual amount of net charge offs. To the
10 extent that the actual amount of net charge offs exceeds the bad debt allowance in rates,
11 the Company can potentially recover from customers the lesser of (i) the actual amount of
12 arrearage forgiven for successful AMP participants or (ii) the actual amount of net charge
13 offs that exceeds the bad debt allowance in rates.

14
15 **Q. Please briefly explain why the Company is proposing to revise the RAP Tariff and**
16 **the nature of the proposed revisions.**

17 A. The RAP Tariff specifies those rates for which there is an allowance for bad debt that is
18 incorporated into the applicable factors (i.e., Last Resort Service,² Transmission, Energy
19 Efficiency, Renewable Energy Growth, and Long Term Contracting for Renewable
20 Energy Recovery). Receivables purchased through the Purchase of Receivables (“POR”)

² Last Resort Service is referred to as Commodity Rates on Schedule NECO-1, Page 2.

1 Program are not specifically listed as having a forecasted allowance for bad debt. This
2 leaves an ambiguity in the RAP Tariff that would result in POR charge offs not being
3 offset by a corresponding POR allowance for bad debt. The potential impact of not
4 including POR in the allowable bad debt could cause the Arrearage Management
5 Adjustment Factor to be higher than it would be if POR bad debt was not taken into
6 account in the calculation of allowable bad debt as further described in Section III, below.
7 The Company proposes to revise the RAP Tariff to remove this ambiguity and to prevent
8 the charge offs from being reflected on only one side of the bad debt test calculation at a
9 detriment to customers.

10
11 **III. Tariff Modifications**

12 **Q. Please describe the nature of the changes the Company is proposing to the**
13 **RAP Tariff, R.I.P.U.C. No. 2239.**

14 A. The Company's proposed changes to the RAP Tariff for effect July 1, 2023,
15 reflect the addition of the bad debt recovered through POR to the calculation of
16 the adjusted allowable bad debt in Section XII. AMP Cost Recovery.

17
18 **Q. Please describe the current method of calculating the adjusted allowable bad**
19 **debt in the calculation of the Recoverable Arrearage Forgiveness Amount.**

20 A. Currently, the calculation of adjusted allowable bad debt begins with the distribution rates
21 uncollectible amount as determined in the Company's last general rate case (Docket No.

1 4770). This amount is then adjusted to include the current Calendar Year (“CY”)
2 allowances included in rates for Last Resort Service, Transmission, Renewable Energy
3 Growth, Long Term Contracting for Renewable Energy Recovery, and Energy Efficiency
4 programs. The total of the allowances described in the previous sentence is the total
5 allowable bad debt, as shown on Schedule NECO-1, Page 2, Line 8, which is then
6 compared to actual net charge-offs for the CY to determine if the Company is entitled to
7 recover any amounts of arrearage forgiven for AMP successful participants.
8

9 **Q. Please describe how the Company is proposing to calculate the adjusted allowable**
10 **bad debt going forward.**

11 A. The Company is not proposing a different methodology for calculating the adjusted
12 allowable bad debt. The Company is proposing to include the POR bad debt in its total
13 allowable bad debt calculation as reflected on Schedule NECO-1, Page 2, Line 7. The
14 total allowable bad debt on Schedule NECO-1, Page 2, Line 8, reflects the amount of bad
15 debt that is allowed to be collected through rates. Therefore, the Company is proposing
16 to include the POR bad debt in the calculation.
17

18 **Q. Please briefly describe the POR Program.**

19 A. In Docket No. 5073, the Commission approved the Company’s POR Program for effect
20 April 1, 2022. Through the POR Program, the Company purchases, at a discounted rate,
21 the accounts receivable of nonregulated power producers operating in the Company’s

1 service territory. The discounted rate, called the Standard Complete Billing Percentage,³
2 includes an uncollectible percentage component.
3

4 **Q. Please describe how the implementation of the POR Program on April 1, 2022,**
5 **impacted the Company’s decision to propose to change the RAP Tariff at this time.**

6 A. In PUC Docket No. 5073 – Retail Energy Supply Association (“RESA”) Petition for
7 Implementation of POR Program, the Company provided a response to the Commission’s
8 Follow-up Record Request No. 7, indicating that the bad debt test in the AMP should
9 include the POR associated bad debt in the adjusted allowable bad debt and actual net
10 charge offs (see Schedule NECO-7). Because the POR Program was implemented on
11 April 1, 2022, CY 2022 was the first year the Company would have the additional bad
12 debt related to the POR Program included rates. Therefore, the Company’s 2023 RAR
13 Filing for CY 2022 includes the POR bad debt in the bad debt test for the first time.
14

15 **Q. Please describe the impact of including POR-related bad debt in the total allowable**
16 **bad debt and the effect of the proposed tariff revision.**

17 A. Including the POR-related bad debt in the total allowable bad debt would increase the
18 total allowed amount in rates in the bad debt test on Schedule NECO-1, Page 2, Line 8.
19 The actual bad debt charge offs associated with the receivables purchased by the
20 Company as part of the POR Program are included in the Total Actual Net Charge Offs

³ See Terms and Conditions for Nonregulated Power Producers, R.I.P.U.C. 2249..

1 for CY 2022 on Schedule NECO-1, Page 2, Line 9. As a result, the effect of the
2 Company's proposed tariff revision is that the allowed POR-related bad debt and the
3 actual charge offs related to POR bad debt are both reflected in the comparison
4 calculation to determine if actual net charge offs are more than the bad debt allowed in
5 rates.

6
7 **Q. What could occur if the Company did not include the POR bad debt amount in the**
8 **adjusted allowable bad debt?**

9 A. If the Company did not include the POR bad debt amount in the adjusted allowable bad
10 debt as proposed, the total allowed bad debt in the bad debt test would be lower. When
11 compared to the total actual net charge offs as part of the bad debt test, which include the
12 actual POR-related bad debt, the result would be a smaller difference between allowable
13 bad debt and actual net charge offs. This could result in the bad debt test being met and
14 allowing the Company to recover an amount of AMP Successful Participants Arrearage
15 Forgiveness (see Schedule NECO-1, Page 2, Line 11) in the total Recoverable Arrearage
16 Forgiveness Amount (see Schedule NECO-1, Page 2, Line 15). This would increase the
17 factor to be charged to customers. In addition, if the bad debt test would have already
18 been met regardless of inclusion of the POR bad debt in the allowance, the inclusion of
19 the POR amount in the allowance would increase the amount of AMP Successful
20 Participants Arrearage Forgiveness in the factor to be recovered from customers.

21

1 **Q. Does the Company believe a revision to the RAP Tariff is necessary for the**
2 **implementation of this change?**

3 A. Yes. A revision to the RAP Tariff is necessary to expressly add POR-related bad debt to
4 the list of components of the calculation of adjusted allowable bad debt in the section of
5 the tariff that specifies the method of calculating adjusted allowable bad debt. This tariff
6 revision would remove ambiguity and ensure that the calculation of adjusted allowable
7 bad debt is performed in the manner that benefits customers.

8

9 **IV. Conclusion**

10 **Q. Does this conclude your supplemental direct testimony?**

11 A. Yes.



Andrew S. Marcaccio
Senior Counsel

July 7, 2021

VIA ELECTRONIC MAIL

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

**RE: Docket 5073 – Retail Energy Supply Association (RESA)
Petition for Implementation of Purchase of Receivables Program
Response to Follow-up Record Request No. 7**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a National Grid (“National Grid” or the “Company”) enclosed please find an electronic version¹ of the Company’s response to the Commission’s Follow-up Record Request No. 7 in the above-referenced matter.

Thank you for your attention to this filing. If you have any questions or concerns, please do not hesitate to contact me at 401-784-4263.

Sincerely,

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

Andrew S. Marcaccio

Enclosures

cc: Docket 5073 Service List
Jon Hagopian, Esq., Division
John Bell, Division

¹ Per Commission counsel’s update on October 2, 2020, concerning the COVID-19 emergency period, the Company is submitting an electronic version of this filing. The Company will provide the Commission Clerk with five (5) hard copies and, if needed, additional hard copies of the enclosures upon request.

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 5073
In Re: Retail Energy Supply Association (RESA)
Implementation of Purchase of Receivables Program
Response to Commission's Follow-Up to Record Requests
Issued at the Evidentiary Hearing
On June 17, 2021

National Grid
Follow-Up Record Request No. 7

RR-7 (Grid) Does the AMP threshold write-off test affect the POR uncollectible percentage or does POR affect the calculation of the AMP write-off threshold test? Is there any shifting of risks between groups of customers as a result of the threshold write-off test in the context of POR?

National Grid Response:

The AMP threshold write-off test does not affect the POR uncollectible percentage. The approval of a No-Recourse POR program would affect the calculation of the AMP-write off threshold test. Pursuant to the Residential Assistance Provision, R.I.P.U.C. No. 2239, at the end of each calendar year, the Company performs a test to determine if the amount of bad debt for the year exceeds the adjusted allowable bad debt allowances in the Company's rates. This allowable bad debt recovery is calculated using the distribution uncollectible amount determined in the last general rate case, updated for the current calendar year allowances includes in the rates for Last Resort Service, transmission, Renewable Energy Growth, Long Term Contracting for Renewable Energy Recovery, and Energy Efficiency. To the extent the actual amount of net charge offs for the year in the test includes bad debt associated with the receivables purchased by the Company, the allowable bad debt recovery in the test will need to be adjusted to include the amount of the discount taken on the purchased suppliers accounts receivables during the calendar year through the uncollectible percentage ("UP") component of the Standard Complete Billing Percentage. With the modification of the threshold test to incorporate the POR program's UP discount taken on purchased accounts receivable, the Company does not believe there is a shift of risk between groups of customers.

Follow-Up Request:

Please provide an illustrative example of the underlined portion of the response.

Response:

Please see Attachment RR-7 for an illustrative example of the underlined portion of the response. For the purposes of this response, the Company has modified page 2 of Schedule DEG-1 which was filed by the Company in its Residential Assistance Recovery Filing in Docket No. 5156. The threshold test is calculated on lines (1) through (10) of the attachment. In the underlined portion of the response, "the actual amount of net charge offs in the test year" is presented on line (9) of the attachment. "The allowable bad debt recovery in the test," as modified for the POR program, is presented on lines (1) through (8). Lines (1) through (6).

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 5073
In Re: Retail Energy Supply Association (RESA)
Implementation of Purchase of Receivables Program
Response to Commission's Follow-Up to Record Requests
Issued at the Evidentiary Hearing
On June 17, 2021

National Grid
Follow-Up Record Request No. 7, page 2

present the current components of the allowable bad debt recovery, including allowance in base distribution rates on line (1), adjusted by allowances included in the rates for Last Resort Service, transmission, Renewable Energy Growth, Long Term Contracting for Renewable Energy Recovery, and Energy Efficiency, on lines (2) through (6), respectively. To the extent the actual amount of net charge offs for the year in the test on line (9) includes bad debt associated with the receivables purchased by the Company, the Company would include an allowance for uncollectibles retained by the Company from non-regulated power producers through the uncollectible percentage ("UP") component of the standard complete billing percentage ("SCBP"). For illustrative purposes, the Company is presenting this additional POR allowance on line (7), which is now included in the calculation of Total Allowable Bad Debt presented on line (8).

The Narragansett Electric Company
Calculation of Recoverable Arrearage Foregiveness Amount
Illustrative Modification to Threshold Test for Calendar Year

Uncollectible Recovery from:

(1)	Rate Year Base Distribution Rates	\$4,338,446
(2)	Calendar Year Commodity Rates	\$4,658,934
(3)	Calendar Year Transmission Rates	\$2,448,431
(4)	Calendar Year Energy Efficiency Program Factor	\$1,177,164
(5)	Calendar Year Long Term Contract Renewable Energy Recovery Factor	\$570,095
(6)	Calendar Year RE Growth Factors	\$238,906
(7)	Calendar Year Purchase of Receivables (POR) Uncollectible Percentage (UP) Component of Standard Complete Billing Percentage Discount - ILLUSTRATIVE	\$500,000
(8)	Total Allowable Bad Debt	\$13,931,976
(9)	Total Actual Net Charge Offs (Including Net Charge Offs Associated with POR)	\$8,838,343
(10)	Actual Above / (Below) Allowable Bad Debt	(\$5,093,632)
(11)	Amount of AMP Successful Participants Arrearage Foregiveness	\$493,702
(12)	Recoverable Arrearage Foregiveness Due to AMP Successful Participants	\$0
(13)	Recoverable Arrearage Foregiveness Due to AMP Unsuccessful Participants (Cancelled)	\$47,744
(14)	Recoverable Arrearage Foregiveness Due to AMP Unsuccessful Participants (Default)	<u>\$357,571</u>
(15)	Total Recoverable Arrearage Foregiveness Amount	\$405,315

(1) R.I.P.U.C. Docket No. 4770, August 16, 2018 Compliance Filing, [Compliance Attachment 2, Schedule MAL-3, Page 3, Line (11) Column (c) of \$4,279,125, plus May 30th Second Compliance Filing Attachment 2, Schedule 1-ELEC, Page 2, Line 7, Column (d) of \$48,263] ÷ 12 x 8

R.I.P.U.C. Docket No. 4770, August 16, 2018 Compliance Filing, [Compliance Attachment 2, Schedule MAL-3, Page 3, Line (11) Column (e) of \$4,329,551, plus May 30th Second Compliance Filing Attachment 2, Schedule 1-ELEC, Page 2, Line 7, Column (d) of \$31,011] ÷ 12 x 4

(2) R.I.P.U.C. Docket No. 5127 Schedule NG-5, Page 6, Column (f) + Page 7, Column (f) + Page 8, Column (f)

(3) R.I.P.U.C. Docket No. 5127 Schedule NG-15, Page 1, Line (7)

(4) Page 3, Section 1, Line (13), Column (a)

(5) R.I.P.U.C. Docket No. 5127 Schedule NG-18, Page 3, Column (f)

(6) R.I.P.U.C. 5156 Schedule DEG-1 Page 3, Section 2, Line (3), Column (a)

(7) **ILLUSTRATIVE AMOUNT**

(8) Sum of Lines (1) through (7)

(9) R.I.P.U.C. 5156 Schedule DEG-1 Page 4, Column (d)

(10) Line (9) - Line (8)

(11) R.I.P.U.C. 5156 Schedule DEG-1 Page 5, Line (6)

(12) If Line (10) > 0 then Min of Line (10) or Line (11), Else 0

(13) R.I.P.U.C. 5156 Schedule DEG-1 Page 5, Line (4)

(14) R.I.P.U.C. 5156 Schedule DEG-1 Page 5, Line (2)

(15) Line (12) + Line (13) + Line (14)

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

July 7, 2021
Date

**Docket No. 5073 – Retail Energy Supply Association Petition for Implementation of Purchase of Receivables Program
Service List updated 5/17/2021**

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