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June 5, 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. 22-05-EE - 2023 Annual Energy Efficiency Plan  
Responses to PUC Data Requests – Set 3 (Full Set)**

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 Third Set of Data Requests (Full Set) in the above-referenced docket.

Thank you for your attention to this matter. If you have any questions, please contact me at (401) 709-3359.

Very truly yours,



Steven J. Boyajian

Enclosure

cc: Docket 22-05-EE 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

June 5, 2023

Date

**Docket No. 22-05-EE – Rhode Island Energy’s Energy Efficiency Plan 2023 Service list updated 4/6/2023**

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Issued on April 21, 2023

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PUC 3-1

Request:

Regarding the customer impact model used to estimate the customer impact of out-of-period invoices (described in Part C of Section IV of the Report), does the model restore both the cost and the value of savings of out-of-period invoices to the appropriate periods, just the out-of-period costs, just the out-of-period benefits, or something else? Please explain.

Response:

The customer impact model described in the Report on Investigation of Out-of-Period Invoicing Within the Rhode Island Energy Efficiency Program (2012-2021) (the "Report") restores the cost and the associated value of energy efficiency program savings to the appropriate periods, and then uses both of those values to recalculate performance incentives based on the then-current performance incentive model. The cost restored is determined by using the out-of-period percentages outlined in the Report, at Section IV, Part B. The associated volume of savings is restored based on the annual relationship of the filed implementation expense as compared to savings by energy efficiency program. In other words, the customer impact model developed a ratio at the program level to establish savings yielded by each dollar of implementation expense. The relationship between these estimated changes to reported implementation expenses and savings was then used to estimate the resulting impact on performance incentive earnings.

PUC 3-2

Request:

For each annual program year where the Company identified out of period invoicing in any EE program, provide the total earned incentive that actually was attributed to that specific program for each year and originally claimed by the Company. Provide this information for both the gas and electric programs.

Response:

As explained in the Report on Investigation of Out-of-Period Invoicing Within the Rhode Island Energy Efficiency Program (2012-2021) (the "Report"), the investigation conducted by National Grid USA ("National Grid") confirmed that out-of-period invoicing occurred in Rhode Island energy efficiency programs from 2012 to 2021 across the three energy efficiency program sectors (Residential, Low-Income, and Commercial and Industrial).

Neither National Grid nor The Narragansett Electric Company ("Narragansett") prepared or maintained an analysis of earned performance incentives attributable to each individual program for each year. For program years 2012 to 2021, Narragansett earned its performance incentives by sector, and not by program. Accordingly, the calculation of the earned performance incentive occurred at the sector level rather than at the individual program level. The performance incentive mechanism involved a complex calculation, with several variables (e.g., target savings, actual savings, target adjustments, aggregated sector budgets, actual spending, and earning thresholds and caps) that interacted with each other to determine the earned performance incentive by sector, in any year.

Due to the complexity of the calculation, as outlined in the annual energy efficiency plans and year-end reports, a straightforward mathematical allocation of the earned performance incentives from the sector-level to the individual programs would not produce an accurate representation of an "earned" incentive for each individual program. For example, the earned performance incentive for a sector was impacted by the 75 percent savings threshold and 125 percent savings cap, whereas each individual program was not impacted by the threshold or cap. Because performance was evaluated by sector, individual programs may go over budget without influencing Narragansett's incentive for the program's sector, so long as the sector as a whole remained under-budget and achieved its savings targets. Moreover, during many of the years in this review period, a sector's savings target was adjusted by a formula if actual spend for the sector was below 95 percent of the planned budget, and achieved savings exceeded the planned target (i.e., 100 percent), which had a corresponding effect on the ability to earn additional performance incentive up to the cap. Individual programs were not subject to the same conditions, which skews the calculation.

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In an effort to be responsive to this request, National Grid has prepared Attachment PUC 3-2, which provides the requested information at the sector level as it is maintained in Table E-4 and Table G-4 in Narragansett's energy efficiency year-end reports for program years 2012 through 2020. To the extent the Public Utilities Commission seeks the information at the program level, as indicated in the request, National Grid has prepared the tables provided in response to Data Requests PUC 3-6 (Attachment PUC 3-6) and PUC 3-7 (Attachment PUC 3-7). These tables provide simple mathematical allocations of the earned performance incentive amounts based on the share of sector-level savings attributed to each program for the electric and gas portfolios, respectively. The information in the tables is subject to the conditions explained above – including that the amounts do not provide a true and exact representation of the allocation; the amounts do not incorporate the actual spend adjustments; and the total earned performance incentive is subject to the thresholds and caps – in addition to any other conditions that may apply.

**Electric**

|              | Energy Incentive                |                                     |                         | Demand Incentive                |                                     |                         | Total         |
|--------------|---------------------------------|-------------------------------------|-------------------------|---------------------------------|-------------------------------------|-------------------------|---------------|
|              | Income Eligible Residential (1) | Non-Income Eligible Residential (2) | Commercial & Industrial | Income Eligible Residential (3) | Non-Income Eligible Residential (4) | Commercial & Industrial |               |
| 2012         | \$ 212,353                      | \$ 1,091,075                        | \$ 1,165,984            |                                 |                                     |                         | \$ 2,469,411  |
| 2013         | \$ 483,236                      | \$ 1,281,391                        | \$ 1,253,054            |                                 |                                     |                         | \$ 2,997,681  |
| 2014         | \$ 586,811                      | \$ 1,460,075                        | \$ 2,176,435            |                                 |                                     |                         | \$ 4,223,321  |
| 2015         | \$ 420,809                      | \$ 1,289,782                        | \$ 1,473,993            | \$ 189,756                      | \$ 552,764                          | \$ 606,256              | \$ 4,533,360  |
| 2016         | \$ 489,449                      | \$ 1,218,569                        | \$ 1,321,449            | \$ 209,764                      | \$ 522,621                          | \$ 366,182              | \$ 4,128,034  |
| 2017         | \$ 514,021                      | \$ 1,262,532                        | \$ 1,808,179            | \$ 224,560                      | \$ 562,471                          | \$ 458,085              | \$ 4,829,847  |
| 2018         | \$ 306,396                      | \$ 1,360,195                        | \$ 1,685,635            | \$ 222,875                      | \$ 604,938                          | \$ 760,363              | \$ 4,940,402  |
| 2019         | \$ -                            | \$ 1,547,259                        | \$ 585,876              | \$ 282,706                      | \$ 677,522                          | \$ 196,775              | \$ 3,290,237  |
| 2020         | \$ -                            | \$ 1,791,519                        | \$ 660,275              | \$ -                            | \$ 790,881                          | \$ -                    | \$ 3,242,675  |
| <b>Total</b> | \$ 3,013,074                    | \$ 12,282,398                       | \$ 12,130,878           | \$ 1,129,660                    | \$ 3,711,297                        | \$ 2,387,661            | \$ 34,654,968 |

**Gas**

|              | Energy Incentive                |                                     |                         | Total         |
|--------------|---------------------------------|-------------------------------------|-------------------------|---------------|
|              | Income Eligible Residential (1) | Non-Income Eligible Residential (2) | Commercial & Industrial |               |
| 2012         | \$ 55,680                       | \$ 244,851                          | \$ 285,505              | \$ 586,036    |
| 2013         | \$ 245,420                      | \$ 467,137                          | \$ 255,672              | \$ 968,229    |
| 2014         | \$ 296,232                      | \$ 602,108                          | \$ 473,768              | \$ 1,362,108  |
| 2015         | \$ 314,067                      | \$ 653,036                          | \$ 419,976              | \$ 1,387,079  |
| 2016         | \$ 314,692                      | \$ 700,514                          | \$ 481,863              | \$ 1,496,869  |
| 2017         | \$ 351,774                      | \$ 768,481                          | \$ 513,276              | \$ 1,633,531  |
| 2018         | \$ 398,873                      | \$ 781,073                          | \$ 361,309              | \$ 1,541,255  |
| 2019         | \$ 475,618                      | \$ 699,735                          | \$ 404,766              | \$ 1,580,119  |
| 2020         | \$ -                            | \$ 347,732                          | \$ -                    | \$ 347,732    |
| <b>Total</b> | \$ 2,442,357                    | \$ 5,264,666                        | \$ 3,195,934            | \$ 10,902,957 |

**Notes:**

- (1) In 2012 and 2013, the sector was titled "Low Income Residential."
- (2) In 2012 and 2013, the sector was titled "Non-Low Income Residential."
- (3) In 2015 and 2016, the sector was titled "Low Income Residential."
- (4) In 2015 and 2016, the sector was titled "Non-Low Income Residential."



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PUC 3-3

Request:

Please re-run the customer impact model for an alternative scenario wherein the Company restores the cost of out-of-period invoices to the appropriate period but not the associated savings or benefits. Share all results, including the resulting customer impact in dollars. To illustrate the model run being requested, consider the following hypothetical example: the Company finds an out-of-period invoice for \$100,000 that was originally counted towards the 2019 EEP but should have been counted towards the 2018 EEP. The \$100,000 invoice was associated with 100,000 kWh of savings, which delivered \$200,000 of benefits. In the requested model run, the Company should restore the \$100,000 to the 2018 EEP and remove the 100,000 kWh savings and \$200,000 of benefits from the 2019 EEP. The performance incentive earnings should be recalculated based on the restoration of the \$100,000 of cost to the 2018 EEP with no associated savings benefits in 2018. For purposes of this model run, out-of-period savings and benefits should be removed from the years to which they were originally attributed and not restored to the appropriate years.

Response:

National Grid USA ("National Grid") understands the exploratory request to run the customer-impact model for an alternative scenario. As indicated in the question, the alternative scenario would restore the invoiced costs associated with out-of-period invoices to the appropriate period, but not the associated savings, thereby bifurcating the impact of payments and savings. Further, this exploratory request contemplates completely removing the associated savings from the analysis.

National Grid has concerns with this request because the underlying premise of the hypothetical scenario is counterfactual. The hypothetical that this alternative scenario appears to be testing is: what would the customer impact be if the invoices were not subject to the out-of-period invoicing practice and instead remained in their original program year, but the associated savings were treated as if they were non-existent and removed? In other words, if spending and savings are bifurcated, such that out-of-period expenses are moved back into the appropriate period (i.e., the previous year) and savings are not realized, would the savings, and therefore the annual performance incentives, be nullified? This is not a valid hypothetical because it yields an implausible result.

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PUC 3-3, Page 2

By design, energy savings and program expenses are inextricably linked, such that it would not have been possible to bifurcate energy savings from program expenses and still achieve the primary objective of the energy efficiency programs to efficiently deliver savings. As the two drivers used to calculate the performance incentive, savings and expenses must be counted *in the same year* to produce an accurate result.

By restoring program expenses to a prior period without restoring the associated savings, the alternative scenario disconnects implementation expenses from energy savings, which is not how the energy efficiency programs and performance incentive calculation operate. To efficiently deliver savings through the energy efficiency programs, the calculation must align both activities in a single annual period.

Moreover, the payment of invoices in the year in which the invoices should have been paid should not result in a reduction to earned performance incentives under the energy efficiency programs, because that is counterfactual to the operation of the programs. Specifically, the hypothetical in this request implies that employees would have followed *correct* procedure for the invoices, yet any savings that would follow from that correct procedure are removed from the equation, creating an outcome that is not plausible for the Residential Upstream Lighting program, because the savings are calculated directly from the invoiced amounts and should be processed in the same period.

To the extent that the question may be aimed at creating a range of possible outcomes in order to enable a resolution of this proceeding, National Grid appreciates and supports that purpose. However, taking a counterfactual approach would not produce a reliable result. National Grid would welcome the opportunity to meet with the Public Utilities Commission and the other parties to this proceeding in a technical session to discuss the methodology applied in the Report on Investigation of Out-of-Period Invoicing Within the Rhode Island Energy Efficiency Program (2012-2021) filed on March 10, 2023, or to further explain why the methodology proposed in this request is counterfactual, or to discuss the most efficient process for resolving the outstanding issues in this proceeding.

PUC 3-4

Request:

For the Residential Upstream Lighting (RUL) program, please explain the following in terms of how the Company actually treated expenses and savings in program years 2012-2021:

- a. For purposes of calculating actual performance incentive earnings, what specific program activity triggered the claiming of savings in a given program year: the delivery of lighting products to the retail point of sale by a participating vendor, the retail sale of those delivered lighting products, the installation of those delivered lighting products at customers premises, or something else?
- b. For purposes of calculating actual performance incentive earnings, was the specific program activity that triggered the booking of costs the same as your answer to part a? If no, explain any differences.
- c. Did the program activity that triggered the claiming of savings or costs change at any point during the 2012 – 2021 time period? If yes, please explain.
- d. Where does the Company document its rules and/or practices around what program activity triggered the claiming of savings and costs? Please provide a copy of such documentation for each of the 4 subprograms for program years 2012-2021.

Response:

- a. For purposes of calculating the actual performance incentive earnings for the Residential Upstream Lighting (“RUL”) program during program years 2012 to 2021, The Narragansett Electric Company’s (“Narragansett”) payment of the invoice triggered the claiming of savings and expenses in a given program year. Payment of an invoice was recorded when the invoice was released from the InDemand system into the SAP system and posted in SAP, which generated payment.

Energy savings, demand savings (in certain years), and program implementation expenses were the three elements exclusively involved in the calculation of the actual performance incentive earnings for electric energy efficiency programs, such as the

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RUL program. Accordingly, actual energy, demand savings and expenses must be claimed in the same year to accurately complete the performance incentive calculation. When the payment of an invoice occurred in a different calendar year than when the activities included in the invoice occurred (e.g., the invoice was paid in January 2023 and the activities included in the invoice occurred in December 2022), Narragansett followed the process summarized in the response to Data Request Division 8-7. In other words, where activity in an invoice occurred in December, the expense for the activity was accrued for in December, and the invoice was paid before the mid-January cutoff date, then the savings and expenses for those transactions counted toward the prior year. However, where activity in an invoice occurred in December and the expense for the activity was accrued for December, but the invoice was paid after the mid-January cutoff date, then the savings and expenses for those transactions counted toward the year in which the payment was made. Accruals do not trigger the claiming of savings and expenses for purposes of calculating the actual performance incentive earnings, because an accrual is not an actual payment that closes out the transaction.

- b. Yes, for purposes of calculating the actual performance incentive earnings, the RUL program activity that triggered the recording of expenses is the same as the answer in part (a), above.
- c. No, the program activity that triggered the claiming of savings and expenses did not change during the 2012 to 2021 time period.
- d. It is not clear what this request is referring to by “each of the 4 subprograms” with respect to the RUL program. The RUL program acted as a standalone program. To the extent this is referring to the four unique and distinct subprograms for the Large Commercial Retrofit program, please see the response to Data Request PUC 3-5.

Narragansett and National Grid have not located any records in effect between 2012 and 2021 that specifically document Narragansett's rules or practices around what program activity triggered the claiming of savings and expenses for purposes of calculating the performance incentive. However, Narragansett's annual energy efficiency plans and year-end reports explain that the performance incentive is calculated by comparing target savings and target expenses to *actual* savings and *actual* expenses for each program year.

PUC 3-5

Request:

In Part D of Section IV of the Report, the Company explains that identifying and quantifying the impacts of out-of-period invoicing in programs other than Residential Upstream Lighting (RUL) “challenging” due to the less formalized nature of invoicing and that “the results of any effort [to develop a logical and accurate sampling routine to develop an out-of-period percentage for non-RUL programs] would not be reliable or sufficiently representative.” The Company highlights the Large Commercial Retrofit program as an example of a non-RUL program for which estimating quantifying the impacts of out-of-period invoicing would be a “futile exercise.” Regarding the Large Commercial Retrofit program, please explain the following in terms of how the Company actually treated expenses and savings in program years 2012-2021:

- a. For purposes of calculating actual performance incentive earnings, what specific program activity or activities triggered the claiming of savings in a given program year: completed installation of a portion of the retrofit project, completed installation of the entire retrofit project, inspection of the installation, or something else? In the Report, the Company explains that there are 4 subprograms in the Large Commercial Retrofit Program and that each subprogram is distinct “in terms of... milestones to trigger accruals and payments.” In your response, please address whether the specific program activity or activities that triggered the claiming of savings differed between subprograms.
- b. For purposes of calculating actual performance incentive earnings, was the specific program activity or activities that triggered the booking of costs the same as your answer to part a? If no, explain any differences.
- c. Did the program activity or activities that triggered the claiming of savings and costs change at any point during the 2012 – 2021 time period? If yes, please explain.
- d. Where does the Company document its rules and/or practices around what program activity or activities triggered the claiming of savings and costs? Please provide a copy of such documentation for each of the 4 subprograms for program years 2012-2021.

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Response:

- a. For purposes of calculating the actual performance incentive earnings for all energy efficiency programs in Rhode Island during program years 2012 to 2021, including the Large Commercial Retrofit (“LCR”) addressed in this response and the Residential Upstream Lighting program addressed in the response to Data Request PUC 3-4, The Narragansett Electric Company’s (“Narragansett”) payment of the invoice triggered the claiming of savings and expenses in a given program year. Payment of an invoice was recorded when the invoice was released from the InDemand system into the SAP system and posted in SAP, which generated payment.

Energy savings, demand savings (in certain years), and program implementation expenses were the three elements exclusively involved in the calculation of the actual performance incentive earnings for electric energy efficiency programs, and energy savings and program implementation expenses were the two elements exclusively involved in the calculation of the actual performance incentive earnings for gas energy efficiency programs. Accordingly, actual savings and expenses must be claimed in the same year to accurately complete the performance incentive calculation. When payment of an invoice occurred in a different calendar year than when the activities included in the invoice occurred (e.g., the invoice was paid in January 2023 and the activities included in the invoice occurred in December 2022), Narragansett followed the process summarized in the response to Data Request Division 8-7. In other words, where activity in an invoice occurred in December, the expense for the activity was accrued for in December, and the invoice was paid before the mid-January cutoff date, then the savings and expenses for those transactions counted toward the prior year. However, where activity in an invoice occurred in December and the expenses for the activity were accrued for December, but the invoice was paid after the mid-January cutoff date, then the savings and expenses for those transactions counted toward the year in which the payment was made. Accruals do not trigger the claiming of savings and expenses for purposes of calculating the actual performance incentive earnings, because an accrual is not an actual payment that closes out the transaction.

The trigger for claiming savings and expenses for purposes of the performance incentive calculation did not differ between subprograms.

As explained in the Report on Investigation of Out-of-Period Invoicing Within the Rhode Island Energy Efficiency Programs (2012-2021) (the “Report”), and in the responses to Data Requests PUC 3-6 and PUC 3-7, the LCR program had many different activity points that could not be objectively assessed for the presence of out-of-period invoicing conduct and, ultimately, computing the annual results for the program to isolate the impact of out-of-period invoicing on customers. Therefore,

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although payment of the invoice triggered the claiming of savings and expenses in a given program year for purposes of calculating the performance incentive, these different activity points impacted the timing of Narragansett's ability to claim payments for the LCR program.

- b. Yes, for purposes of calculating the actual performance incentive earnings, the LCR program activity that triggered the recording of expenses is the same as the answer in part (a), above.
- c. No, the program activity that triggered the claiming of savings and expenses for the LCR program did not change during the 2012 to 2021 time period.
- d. Narragansett and National Grid have not located any records in effect between 2012 and 2021 that specifically document Narragansett's rules or practices around what program activity triggered the claiming of savings and expenses for purposes of calculating the performance incentive. However, Narragansett's annual energy efficiency plans and year-end reports explain that the performance incentive is calculated by comparing target savings and target expenses to *actual* savings and *actual* expenses for each program year.

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PUC 3-6

Request:

For program years 2012 – 2021, provide a breakdown of the earned electric efficiency performance incentive by individual program, in tabular form. Omit individual programs that did not generate an earned incentive. For each individual program, express the earned incentive in dollars and as a percentage of the total earned incentive in the given program year. For each individual program, describe whether the Company retains documentation of the necessary invoices or other source material to substantiate in total the calculation of the earned incentives in each program year. Provide your responses in the following format:

|                          | (a)                              | (b)   | (c)   | (d)   |
|--------------------------|----------------------------------|---|---|---|
|                          | Earned Incentive in Program Year | % of Total Earned Incentive in Program Year | Does the Company possess invoices and/or other source material to substantiate <u>in total</u> the calculation of the earned incentives in column (a) for this program? | Is the Company able to substantiate the earned incentives in column (a) for this program using the invoices and/or other source material from column (c)? |
| <b>Program Year 2012</b> |                                  |   |   |   |
| Program 1                |                                  |   |   |   |
| Program 2                |                                  |   |   |   |
| ...                      |                                  |   |   |   |
| <b>Program Year 2021</b> |                                  |   |   |   |
| Program 1                |                                  |   |   |   |
| Program 2                |                                  |   |   |   |

Response:

a. & b.

As explained in the response to Data Request PUC 3-2, The Narragansett Electric Company (“Narragansett”) and National Grid USA (“National Grid”) do not develop, nor maintain, the electric energy efficiency performance incentive earned by individual program. For program years



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2012 to 2021, Narragansett earned its performance incentives by sector, and not by program. Accordingly, the calculation of the earned performance incentive occurred at the sector level rather than at the individual program level. The performance incentive mechanism involved a complex calculation, with several variables (e.g., target savings, actual savings, target adjustments, aggregated sector budgets, actual spending, and earning thresholds and caps) that interacted iteratively to determine the earned performance incentive by sector, in any year.

Due to the complexity of the calculation, a straightforward mathematical allocation of the earned performance incentives from the sector-level to the individual programs would not produce an accurate representation of an “earned” incentive for each individual program. Nor would it produce an accurate representation of the percentage of an “earned” incentive for each individual program compared to the sector-level earned performance incentive. For example, the earned performance incentive for a sector was impacted by the 75 percent savings threshold and 125 percent savings cap, whereas each individual program was not impacted by the threshold or cap. Because performance was evaluated by sector, individual programs may go over budget without influencing Narragansett’s incentive for the program’s sector, so long as the sector as a whole remained under-budget and achieved its benefits targets. Moreover, a sector’s savings target was adjusted by a formula if actual spend for the sector was below 95 percent of the planned budget, and achieved savings exceeded the planned target (i.e., 100 percent), which had a corresponding effect on the ability to earn additional performance incentive up to the cap. Individual programs were not subject to the same conditions, which skews the calculation.

In an effort to be responsive to this request, the table prepared by National Grid in Attachment PUC 3-6 provides a simple mathematical allocation of the earned electric performance incentive amounts based on the share of sector-level savings attributed to each program from 2012 through 2020.<sup>1</sup> The information in Attachment PUC 3-6 is subject to the conditions explained above – including that the amounts or percentages do not provide a true and exact representation of the allocation; the amounts do not incorporate the actual spend adjustments; and the total earned performance incentive is subject to the thresholds and caps – in addition to any other conditions that may apply.

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<sup>1</sup> As explained in the Report on Investigation of Out-of-Period Invoicing Within the Rhode Island Energy Efficiency Program (the “Report”), Section IV (Quantifying Customer Impact), National Grid recalculated the performance incentives earned by Narragansett for the period 2012 through 2020, based on the work completed in the initial investigation. Therefore, for alignment with the investigation and resulting Report, National Grid is providing the requested information for the equivalent time period in response to this request.

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c. & d.

Narragansett and National Grid have a substantial amount of data and documentation for the projects and sales activity that occurred within the energy efficiency programs from 2012 through 2021. However, Narragansett and National Grid no longer have access to invoices or other source material to substantiate, “in total,” the calculation of the earned performance incentives in each program year. The requested analysis would require obtaining and reviewing every invoice (and often other source material) for every program, plus conducting the calculation of the voluminous data in InDemand, to translate those invoices to reported claimable savings. The materials would comprise hundreds of thousands of documents (or more) and millions upon millions of rows of data. Despite the substantial volume of available information that could be reviewed, the documentation does not include *all* invoices or other source material from 2012 through 2021 that could substantiate, in total, the earned performance incentives.

In the Report, National Grid provided a comprehensive transaction analysis of all available data and documentation for one program, the Residential Upstream Lighting (“RUL”) program, from 2012 through 2021. The data, derived from several different sources, included: (1) Narragansett RUL rebate activity recorded in the InDemand system, by lighting manufacturer and by year from 2012 through 2021; (2) National Grid’s RUL demand side management data, which includes payment level details by lighting manufacturer, including a National Grid payment number and rebate number; and (3) data from a third-party invoice processor, which included two distinct source files because the invoice processor transitioned its accounting systems during the relevant time period. This data encompassed approximately six million rows of data and approximately 5,700 invoices (representing a *minimum* of approximately 5,700 distinct electronic files) for the RUL program. In its response to Data Request Division 9-1 Supplemental, National Grid provided the RUL data that it analyzed.

The critical point is that, even this substantial amount of data is not sufficient to substantiate, *in total*, the calculation of the earned incentives in each program year for the RUL program. First, records of underlying sales activity (i.e., actual invoices) are not available earlier than January 1, 2016. Narragansett’s incentive payment processor during that time period was contacted for records, but informed Narragansett that the records had not been retained. Thus, it is not possible to examine underlying sales activity for the years 2012 through 2015.

Second, National Grid analyzed all available sales activity (invoices or transaction) in the RUL program from 2016 through 2021. The analysis resulted in analyzing approximately 92 percent of all RUL program sales activity during that time period. The remaining 8 percent of RUL program sales activity is not available to analyze.

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Therefore, it is impossible to substantiate, *in total*, the calculation of the earned performance incentives in each program year.

As explained in the Report, National Grid analyzed other energy efficiency programs to determine whether it could perform a transaction analysis for those programs too. In relevant summary, to explore this possibility, National Grid obtained InDemand extracts for the Large Commercial Retrofit (“LCR”) program in the Commercial and Industrial Sector. In particular, National Grid selected just one year (2016) to analyze and determine whether it would be feasible to extract data on relevant activity points and whether those data points could be objectively assessed for the presence of out-of-period invoicing conduct and, ultimately, computing the annual results for the program to isolate the impact of out-of-period invoicing on customers.

Through this additional analysis, National Grid learned that the LCR program is tremendously complex, involving vast amounts of data and embedded activity points that cannot be feasibly disaggregated or differentiated for sampling purposes. The LCR program has four unique and distinct subprograms: (1) Electric Applications; (2) Electric Work Packages; (3) Gas Custom; and (4) Gas Work Packages. Each of these subprograms has distinct characteristics in terms of data captured in InDemand, supporting documentation, and milestones to trigger accruals and payments.

Available documents in InDemand to review for the LCR program include invoices, post inspection reports, Minimum Documents Requirements (“MDRs”), and quality assurance and quality control reports, among other documentation. In total, for all four LCR subprograms, InDemand contained approximately 34,000 available documents in 2016 alone, to review to determine whether out-of-period invoicing occurred.

National Grid undertook an analysis of the supporting documentation for the four LCR subprograms for the first four months of 2016. This review included approximately 1,300 project applications, consisting of a total of 2,400 pieces of supporting documentation. The review determined that, like the RUL program, the available documentation was not complete, and key documents were missing. In addition, complete analysis of the supporting documentation for the LCR program would require obtaining information from numerous individuals from 2012 through 2021 (many of whom are no longer employed by National Grid or Narragansett, or are third parties who are not employed by National Grid or Narragansett) to identify and analyze the supporting documentation for each application and to extract key data points, followed by the need to follow-up on each embedded activity point to understand each milestone trigger to move to the next milestone, and also to understand the natural delays that occurred as a result of exceptions to the process flow, such as (but not limited to) a project failing post-inspection or needing to calibrate equipment to achieve specific measures.

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Other energy efficiency programs include the same review and documentation challenges to substantiate, in total, the calculation of the earned incentives in each program year. For these reasons, among others, National Grid selected a reasonable proxy to determine the extent of out-of-period invoicing across the energy efficiency programs. As explained in the Report, National Grid's analysis identified the RUL program as the most complete and reasonable proxy for the other energy efficiency programs because of the unique features of the program, such as the simplicity of linking program savings directly to invoiced lightbulbs, among other reasons.

|  | (a)                              | (b)   | (c)   | (d)   |
|--|----------------------------------|---|---|---|
|  | Earned Incentive in Program Year | % of Total Earned Incentive in Program Year | Does the Company possess invoices and/or other source material to substantiate <u>in total</u> the calculation of the earned incentives in column (a) for this program? (1) | Is the Company able to substantiate the earned incentives in column (a) for this program using the invoices and/or other source material from column (c)? (1) |
| <b>Program Year 2012</b>                 |                                  |   |   |   |
| ENERGY STAR® Lighting                    | \$647,693                        | 26%   |   |   |
| Large Commercial Retrofit                | \$571,756                        | 23%   |   |   |
| Large Commercial New Construction        | \$311,184                        | 13%   |   |   |
| Small Business Direct Install            | \$283,043                        | 11%   |   |   |
| EnergyWise                               | \$240,342                        | 10%   |   |   |
| Single Family Low Income Services        | \$212,353                        | 9%  |   |   |
| ENERGY STAR® Appliances                  | \$158,052                        | 6%  |   |   |
| Electric HVAC                            | \$25,713                         | 1%  |   |   |
| Residential New Construction             | \$19,274                         | 1%  |   |   |
| <b>Total</b>                             | <b>\$2,469,411</b>               | <b>100%</b>                                 |   |   |
| <b>Program Year 2013</b>                 |                                  |   |   |   |
| ENERGY STAR® Lighting                    | \$632,555                        | 21%   |   |   |
| Large Commercial Retrofit                | \$511,955                        | 17%   |   |   |
| Large Commercial New Construction        | \$438,120                        | 15%   |   |   |
| Small Business Direct Install            | \$302,979                        | 10%   |   |   |
| Single Family - Income Eligible Services | \$286,249                        | 10%   |   |   |
| EnergyWise                               | \$231,818                        | 8%  |   |   |
| Home Energy Reports                      | \$201,921                        | 7%  |   |   |
| Income Eligible Multifamily              | \$196,987                        | 7%  |   |   |
| ENERGY STAR® Products                    | \$109,064                        | 4%  |   |   |
| ENERGY STAR® HVAC                        | \$35,851                         | 1%  |   |   |
| EnergyWise Multifamily                   | \$34,986                         | 1%  |   |   |
| Residential New Construction             | \$15,196                         | 1%  |   |   |
| <b>Total</b>                             | <b>\$2,997,681</b>               | <b>100%</b>                                 |   |   |
| <b>Program Year 2014</b>                 |                                  |   |   |   |
| Large Commercial Retrofit                | \$1,501,713                      | 36%   |   |   |
| Home Energy Reports                      | \$579,373                        | 14%   |   |   |
| ENERGY STAR® Lighting                    | \$489,388                        | 12%   |   |   |
| Large Commercial New Construction        | \$441,464                        | 10%   |   |   |
| Single Family - Income Eligible Services | \$352,001                        | 8%  |   |   |
| Income Eligible Multifamily              | \$234,810                        | 6%  |   |   |
| Small Business Direct Install            | \$233,258                        | 6%  |   |   |
| EnergyWise                               | \$211,315                        | 5%  |   |   |
| ENERGY STAR® Products                    | \$84,082                         | 2%  |   |   |
| EnergyWise Multifamily                   | \$56,786                         | 1%  |   |   |
| ENERGY STAR® HVAC                        | \$26,155                         | 1%  |   |   |
| Residential New Construction             | \$12,976                         | 0%  |   |   |
| <b>Total</b>                             | <b>\$4,223,321</b>               | <b>100%</b>                                 |   |   |
| <b>Program Year 2015</b>                 |                                  |   |   |   |
| Large Commercial Retrofit                | \$1,029,481                      | 23%   |   |   |
| ENERGY STAR® Lighting                    | \$733,325                        | 16%   |   |   |
| Large Commercial New Construction        | \$723,028                        | 16%   |   |   |
| Home Energy Reports                      | \$580,159                        | 13%   |   |   |
| Single Family - Income Eligible Services | \$378,407                        | 8%  |   |   |
| EnergyWise                               | \$343,315                        | 8%  |   |   |
| Small Business Direct Install            | \$327,740                        | 7%  |   |   |
| Income Eligible Multifamily              | \$232,158                        | 5%  |   |   |
| ENERGY STAR® Products                    | \$74,654                         | 2%  |   |   |
| EnergyWise Multifamily                   | \$66,549                         | 1%  |   |   |
| ENERGY STAR® HVAC                        | \$24,273                         | 1%  |   |   |
| Residential New Construction             | \$20,270                         | 0%  |   |   |
| <b>Total</b>                             | <b>\$4,533,360</b>               | <b>100%</b>                                 |   |   |
| <b>Program Year 2016</b>                 |                                  |   |   |   |
| Large Commercial Retrofit                | \$1,256,889                      | 30%   |   |   |
| ENERGY STAR® Lighting                    | \$887,116                        | 21%   |   |   |
| Single Family - Income Eligible Services | \$464,770                        | 11%   |   |   |
| Home Energy Reports                      | \$440,759                        | 11%   |   |   |
| EnergyWise                               | \$246,080                        | 6%  |   |   |
| Income Eligible Multifamily              | \$234,443                        | 6%  |   |   |
| Small Business Direct Install            | \$227,972                        | 6%  |   |   |
| Large Commercial New Construction        | \$202,770                        | 5%  |   |   |
| Residential Consumer Products            | \$69,155                         | 2%  |   |   |
| EnergyWise Multifamily                   | \$54,828                         | 1%  |   |   |
| ENERGY STAR® HVAC                        | \$23,527                         | 1%  |   |   |
| Residential New Construction             | \$19,727                         | 0%  |   |   |
| <b>Total</b>                             | <b>\$4,128,034</b>               | <b>100%</b>                                 |   |   |
| <b>Program Year 2017</b>                 |                                  |   |   |   |
| Large Commercial Retrofit                | \$1,755,336                      | 36%   |   |   |
| ENERGY STAR® Lighting                    | \$1,019,092                      | 21%   |   |   |
| Home Energy Reports                      | \$508,968                        | 11%   |   |   |
| Single Family - Income Eligible Services | \$441,199                        | 9%  |   |   |
| Income Eligible Multifamily              | \$297,381                        | 6%  |   |   |
| Small Business Direct Install            | \$258,143                        | 5%  |   |   |
| Large Commercial New Construction        | \$252,785                        | 5%  |   |   |
| EnergyWise                               | \$96,942                         | 2%  |   |   |
| Residential Consumer Products            | \$85,152                         | 2%  |   |   |
| ENERGY STAR® HVAC                        | \$53,241                         | 1%  |   |   |
| EnergyWise Multifamily                   | \$39,868                         | 1%  |   |   |
| Residential New Construction             | \$21,740                         | 0%  |   |   |

| Total                                    | \$4,829,847        | 100%        |  |  |
|--|--------------------|-------------|--|--|
| <b>Program Year 2018</b>                 |                    |             |  |  |
| Large Commercial Retrofit                | \$1,876,979        | 38%         |  |  |
| ENERGY STAR® Lighting                    | \$1,108,087        | 22%         |  |  |
| Home Energy Reports                      | \$485,325          | 10%         |  |  |
| Single Family - Income Eligible Services | \$378,155          | 8%          |  |  |
| Large Commercial New Construction        | \$323,987          | 7%          |  |  |
| Small Business Direct Install            | \$245,032          | 5%          |  |  |
| Income Eligible Multifamily              | \$151,116          | 3%          |  |  |
| EnergyWise                               | \$118,303          | 2%          |  |  |
| Residential Consumer Products            | \$101,598          | 2%          |  |  |
| ENERGY STAR® HVAC                        | \$80,506           | 2%          |  |  |
| EnergyWise Multifamily                   | \$53,590           | 1%          |  |  |
| Residential New Construction             | \$17,724           | 0%          |  |  |
| <b>Total</b>                             | <b>\$4,940,402</b> | <b>100%</b> |  |  |
| <b>Program Year 2019</b>                 |                    |             |  |  |
| ENERGY STAR® Lighting                    | \$1,173,098        | 36%         |  |  |
| Home Energy Reports                      | \$585,140          | 18%         |  |  |
| Large Commercial Retrofit                | \$567,460          | 17%         |  |  |
| Single Family - Income Eligible Services | \$225,851          | 7%          |  |  |
| EnergyWise                               | \$222,374          | 7%          |  |  |
| Residential Consumer Products            | \$136,673          | 4%          |  |  |
| Large Commercial New Construction        | \$112,576          | 3%          |  |  |
| Small Business Direct Install            | \$102,615          | 3%          |  |  |
| ENERGY STAR® HVAC                        | \$65,188           | 2%          |  |  |
| Income Eligible Multifamily              | \$56,855           | 2%          |  |  |
| EnergyWise Multifamily                   | \$23,305           | 1%          |  |  |
| Residential New Construction             | \$19,103           | 1%          |  |  |
| <b>Total</b>                             | <b>\$3,290,237</b> | <b>100%</b> |  |  |
| <b>Program Year 2020</b>                 |                    |             |  |  |
| ENERGY STAR® Lighting                    | \$1,249,022        | 39%         |  |  |
| Home Energy Reports                      | \$848,231          | 26%         |  |  |
| Large Commercial Retrofit                | \$424,332          | 13%         |  |  |
| EnergyWise                               | \$173,729          | 5%          |  |  |
| Large Commercial New Construction        | \$147,229          | 5%          |  |  |
| Residential Consumer Products            | \$144,561          | 4%          |  |  |
| Small Business Direct Install            | \$88,714           | 3%          |  |  |
| ENERGY STAR® HVAC                        | \$83,954           | 3%          |  |  |
| EnergyWise Multifamily                   | \$58,748           | 2%          |  |  |
| Residential New Construction             | \$24,155           | 1%          |  |  |
| Single Family - Income Eligible Services | \$0                | 0%          |  |  |
| Income Eligible Multifamily              | \$0                | 0%          |  |  |
| <b>Total</b>                             | <b>\$3,242,675</b> | <b>100%</b> |  |  |

**Note:**

(1) For parts (c) and (d) of this table, please refer to the accompanying written portion of this response.

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PUC 3-7

Request:

For program years 2012 – 2021, provide a breakdown of the earned gas efficiency performance incentive by individual program, in tabular form. Omit individual programs that did not generate an earned incentive. For each individual program, express the earned incentive in dollars and as a percentage of the total earned incentive in the given program year. For each individual program, describe whether the Company retains documentation of the necessary invoices or other source material to substantiate in total the calculation of the earned incentives in each program year. Provide your responses in the same format as PUC 4-6:

|                          | (a)<br>Earned Incentive in Program Year | (b)<br>% of Total Earned Incentive in Program Year | (c)<br>Does the Company possess invoices and/or other source material to substantiate <u>in total</u> the calculation of the earned incentives in column (a) for this program? | (d)<br>Is the Company able to substantiate the earned incentives in column (a) for this program using the invoices and/or other source material from column (c)? |
|--------------------------|---|--|--|--|
| <b>Program Year 2012</b> |   |  |  |  |
| Program 1                |   |  |  |  |
| Program 2                |   |  |  |  |
| ...                      |   |  |  |  |
| <b>Program Year 2021</b> |   |  |  |  |
| Program 1                |   |  |  |  |
| Program 2                |   |  |  |  |

Response:

a. & b.

As explained in the response to Data Request PUC 3-2, The Narragansett Electric Company (“Narragansett”) and National Grid USA (“National Grid”) do not develop, nor maintain, the gas

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energy efficiency performance incentive earned by individual program. For program years 2012 to 2021, Narragansett earned its performance incentives by sector, and not by program. Accordingly, the calculation of the earned performance incentive occurred at the sector level rather than at the individual program level. The performance incentive mechanism involved a complex calculation, with several variables (e.g., target savings, actual savings, target adjustments, aggregated sector budgets, actual spending, and earning thresholds and caps) that interacted iteratively to determine the earned performance incentive by sector, in any year.

Due to the complexity of the calculation, a straightforward mathematical allocation of the earned performance incentives from the sector-level to the individual programs would not produce an accurate representation of an “earned” incentive for each individual program. Nor would it produce an accurate representation of the percentage of an “earned” incentive for each individual program compared to the sector-level earned performance incentive. For example, the earned performance incentive for a sector was impacted by the 75 percent savings threshold and 125 percent savings cap, whereas each individual program was not impacted by the threshold or cap. Because performance was evaluated by sector, individual programs may go over budget without influencing Narragansett’s incentive for the program’s sector, so long as the sector as a whole remained under-budget and achieved its benefits targets. Moreover, a sector’s savings target was adjusted by a formula if actual spend for the sector was below 95 percent of the planned budget, and achieved savings exceeded the planned target (i.e., 100 percent), which had a corresponding effect on the ability to earn additional performance incentive up to the cap. Individual programs were not subject to the same conditions, which skews the calculation.

In an effort to be responsive to this request, the table prepared by National Grid in Attachment PUC 3-7 provides a simple mathematical allocation of the earned gas performance incentive amounts based on the share of sector-level savings attributed to each program from 2012 through 2020.<sup>1</sup> The information in Attachment PUC 3-7 is subject to the conditions explained above – including that the amounts or percentages do not provide a true and exact representation of the allocation; the amounts do not incorporate the actual spend adjustments; and the total earned performance incentive is subject to the thresholds and caps – in addition to any other conditions that may apply.

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<sup>1</sup> As explained in the Report on Investigation of Out-of-Period Invoicing Within the Rhode Island Energy Efficiency Program (the “Report”), Section IV (Quantifying Customer Impact), National Grid recalculated the performance incentives earned by Narragansett for the period 2012 through 2020, based on the work completed in the initial investigation. Therefore, for alignment with the investigation and resulting Report, National Grid is providing the requested information for the equivalent time period in response to this request.



The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 22-05-EE  
In Re: Investigation of Misconduct by  
The Narragansett Electric Company Relating to  
Past Payments of Energy Efficiency Program  
Shareholder Incentives  
Responses to the Public Utilities Commission's  
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c. & d.

As explained in the response to Data Request PUC 3-6, Narragansett and National Grid have a substantial amount of data and documentation for the projects and sales activity that occurred within the energy efficiency programs from 2012 through 2021. However, Narragansett and National Grid no longer have access to invoices or other source material to substantiate, “in total,” the calculation of the earned performance incentives in each program year. The requested analysis would require obtaining and reviewing every invoice (and often other source material) for every program, plus conducting the calculation of the voluminous data in InDemand, to translate those invoices to reported claimable savings. The materials would comprise hundreds of thousands of documents (or more) and millions upon millions of rows of data. Despite the substantial volume of available information that could be reviewed, the documentation does not include *all* invoices or other source material from 2012 through 2021 that could substantiate, in total, the earned performance incentives.

In the Report, National Grid provided a comprehensive transaction analysis of all available data and documentation for one program, the Residential Upstream Lighting (“RUL”) program, from 2012 through 2021. The data, derived from several different sources, included: (1) Narragansett RUL rebate activity recorded in the InDemand system, by lighting manufacturer and by year from 2012 through 2021; (2) National Grid’s RUL demand side management data, which includes payment level details by lighting manufacturer, including a National Grid payment number and rebate number; and (3) data from a third-party invoice processor, which included two distinct source files because the invoice processor transitioned its accounting systems during the relevant time period. This data encompassed approximately six million rows of data and approximately 5,700 invoices (representing a *minimum* of approximately 5,700 distinct electronic files) for the RUL program. In its response to Data Request Division 9-1 Supplemental, National Grid provided the RUL data that it analyzed.

The critical point is that, even this substantial amount of data is not sufficient to substantiate, *in total*, the calculation of the earned incentives in each program year for the RUL program. First, records of underlying sales activity (i.e., actual invoices) are not available earlier than January 1, 2016. Narragansett’s incentive payment processor during that time period was contacted for records, but informed Narragansett that the records had not been retained. Thus, it is not possible to examine underlying sales activity for the years 2012 through 2015.

Second, National Grid analyzed all available sales activity (invoices or transaction) in the RUL program from 2016 through 2021. The analysis resulted in analyzing approximately 92 percent of all RUL program sales activity during that time period. The remaining 8 percent of RUL program sales activity is not available to analyze.

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Therefore, it is impossible to substantiate, *in total*, the calculation of the earned performance incentives in each program year.

As explained in the Report, National Grid analyzed other energy efficiency programs to determine whether it could perform a transaction analysis for those programs too. In relevant summary, to explore this possibility, National Grid obtained InDemand extracts for the Large Commercial Retrofit (“LCR”) program in the Commercial and Industrial Sector. In particular, National Grid selected just one year (2016) to analyze and determine whether it would be feasible to extract data on relevant activity points and whether those data points could be objectively assessed for the presence of out-of-period invoicing conduct and, ultimately, computing the annual results for the program to isolate the impact of out-of-period invoicing on customers.

Through this additional analysis, National Grid learned that the LCR program is tremendously complex, involving vast amounts of data and embedded activity points that cannot be feasibly disaggregated or differentiated for sampling purposes. The LCR program has four unique and distinct subprograms: (1) Electric Applications; (2) Electric Work Packages; (3) Gas Custom; and (4) Gas Work Packages. Each of these subprograms has distinct characteristics in terms of data captured in InDemand, supporting documentation, and milestones to trigger accruals and payments.

Available documents in InDemand to review for the LCR program include invoices, post inspection reports, Minimum Documents Requirements (“MDRs”), and quality assurance and quality control reports, among other documentation. In total, for all four LCR subprograms, InDemand contained approximately 34,000 available documents in 2016 alone, to review to determine whether out-of-period invoicing occurred.

National Grid undertook an analysis of the supporting documentation for the four LCR subprograms for the first four months of 2016. This review included approximately 1,300 project applications, consisting of a total of 2,400 pieces of supporting documentation. The review determined that, like the RUL program, the available documentation was not complete, and key documents were missing. In addition, complete analysis of the supporting documentation for the LCR program would require obtaining information from numerous individuals from 2012 through 2021 (many of whom are no longer employed by National Grid or Narragansett, or are third parties who are not employed by National Grid or Narragansett) to identify and analyze the supporting documentation for each application and to extract key data points, followed by the need to follow-up on each embedded activity point to understand each milestone trigger to move to the next milestone, and also to understand the natural delays that occurred as a result of exceptions to the process flow, such as (but not limited to) a project failing post-inspection or needing to calibrate equipment to achieve specific measures.

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Other energy efficiency programs include the same review and documentation challenges to substantiate, in total, the calculation of the earned incentives in each program year. For these reasons, among others, National Grid selected a reasonable proxy to determine the extent of out-of-period invoicing across the energy efficiency programs. As explained in the Report, National Grid's analysis identified the RUL program as the most complete and reasonable proxy for the other energy efficiency programs because of the unique features of the program, such as the simplicity of linking program savings directly to invoiced lightbulbs, among other reasons.

|  | (a)                              | (b)   | (c)   | (d)   |
|--|----------------------------------|---|---|---|
|  | Earned Incentive in Program Year | % of Total Earned Incentive in Program Year | Does the Company possess invoices and/or other source material to substantiate <u>in total</u> the calculation of the earned incentives in column (a) for this program? (1) | Is the Company able to substantiate the earned incentives in column (a) for this program using the invoices and/or other source material from column (c)? (1) |
| <b>Program Year 2012</b>                 |                                  |   |   |   |
| Large Commercial Retrofit                | \$212,971                        | 36%   |   |   |
| Energy Star® HVAC                        | \$144,003                        | 25%   |   |   |
| EnergyWise                               | \$100,848                        | 17%   |   |   |
| Large Commercial New Construction        | \$61,710                         | 11%   |   |   |
| Single Family Low Income Services        | \$55,680                         | 10%   |   |   |
| Small Business Direct Install            | \$10,824                         | 2%  |   |   |
| <b>Total</b>                             | <b>\$586,036</b>                 | <b>100%</b>                                 |   |   |
| <b>Program Year 2013</b>                 |                                  |   |   |   |
| EnergyWise                               | \$206,243                        | 21%   |   |   |
| Large Commercial Retrofit                | \$185,922                        | 19%   |   |   |
| Income Eligible Multifamily              | \$185,834                        | 19%   |   |   |
| Energy Star® HVAC                        | \$156,791                        | 16%   |   |   |
| Single Family - Income Eligible Services | \$59,586                         | 6%  |   |   |
| Home Energy Reports                      | \$54,998                         | 6%  |   |   |
| Large Commercial New Construction        | \$53,183                         | 5%  |   |   |
| EnergyWise Multifamily                   | \$28,498                         | 3%  |   |   |
| Residential New Construction             | \$20,607                         | 2%  |   |   |
| Commercial & Industrial Multifamily      | \$9,183                          | 1%  |   |   |
| Small Business Direct Install            | \$7,383                          | 1%  |   |   |
| <b>Total</b>                             | <b>\$968,229</b>                 | <b>100%</b>                                 |   |   |
| <b>Program Year 2014</b>                 |                                  |   |   |   |
| Large Commercial Retrofit                | \$313,372                        | 23%   |   |   |
| EnergyWise                               | \$227,164                        | 17%   |   |   |
| Income Eligible Multifamily              | \$208,424                        | 15%   |   |   |
| Home Energy Reports                      | \$185,750                        | 14%   |   |   |
| Large Commercial New Construction        | \$125,794                        | 9%  |   |   |
| Energy Star® HVAC                        | \$111,271                        | 8%  |   |   |
| Single Family - Income Eligible Services | \$77,809                         | 6%  |   |   |
| EnergyWise Multifamily                   | \$54,611                         | 4%  |   |   |
| Residential New Construction             | \$23,312                         | 2%  |   |   |
| Small Business Direct Install            | \$19,782                         | 1%  |   |   |
| Commercial & Industrial Multifamily      | \$14,820                         | 1%  |   |   |
| <b>Total</b>                             | <b>\$1,362,108</b>               | <b>100%</b>                                 |   |   |
| <b>Program Year 2015</b>                 |                                  |   |   |   |
| Large Commercial Retrofit                | \$300,807                        | 22%   |   |   |
| EnergyWise                               | \$224,953                        | 16%   |   |   |
| Home Energy Reports                      | \$221,612                        | 16%   |   |   |
| Income Eligible Multifamily              | \$206,375                        | 15%   |   |   |
| Single Family - Income Eligible Services | \$107,691                        | 8%  |   |   |
| Energy Star® HVAC                        | \$102,795                        | 7%  |   |   |
| Large Commercial New Construction        | \$80,317                         | 6%  |   |   |
| EnergyWise Multifamily                   | \$61,491                         | 4%  |   |   |
| Residential New Construction             | \$42,186                         | 3%  |   |   |
| Commercial & Industrial Multifamily      | \$28,370                         | 2%  |   |   |
| Small Business Direct Install            | \$10,482                         | 1%  |   |   |
| <b>Total</b>                             | <b>\$1,387,079</b>               | <b>100%</b>                                 |   |   |
| <b>Program Year 2016</b>                 |                                  |   |   |   |
| Large Commercial Retrofit                | \$324,739                        | 22%   |   |   |
| Home Energy Reports                      | \$284,096                        | 19%   |   |   |
| EnergyWise                               | \$257,593                        | 17%   |   |   |
| Income Eligible Multifamily              | \$160,197                        | 11%   |   |   |
| Single Family - Income Eligible Services | \$154,495                        | 10%   |   |   |
| Large Commercial New Construction        | \$118,389                        | 8%  |   |   |
| Energy Star® HVAC                        | \$67,571                         | 5%  |   |   |
| EnergyWise Multifamily                   | \$50,306                         | 3%  |   |   |
| Residential New Construction             | \$40,948                         | 3%  |   |   |
| Commercial & Industrial Multifamily      | \$27,853                         | 2%  |   |   |
| Small Business Direct Install            | \$10,682                         | 1%  |   |   |
| <b>Total</b>                             | <b>\$1,496,869</b>               | <b>100%</b>                                 |   |   |
| <b>Program Year 2017</b>                 |                                  |   |   |   |
| Home Energy Reports                      | \$426,857                        | 26%   |   |   |
| Large Commercial Retrofit                | \$411,500                        | 25%   |   |   |
| Income Eligible Multifamily              | \$192,035                        | 12%   |   |   |
| Single Family - Income Eligible Services | \$159,739                        | 10%   |   |   |
| Energy Star® HVAC                        | \$122,896                        | 8%  |   |   |
| EnergyWise                               | \$116,039                        | 7%  |   |   |
| Large Commercial New Construction        | \$73,661                         | 5%  |   |   |
| EnergyWise Multifamily                   | \$54,423                         | 3%  |   |   |
| Residential New Construction             | \$48,265                         | 3%  |   |   |
| Commercial & Industrial Multifamily      | \$19,356                         | 1%  |   |   |
| Small Business Direct Install            | \$8,759                          | 1%  |   |   |
| <b>Total</b>                             | <b>\$1,633,531</b>               | <b>100%</b>                                 |   |   |
| <b>Program Year 2018</b>                 |                                  |   |   |   |
| Home Energy Reports                      | \$497,734                        | 32%   |   |   |
| Income Eligible Multifamily              | \$255,980                        | 17%   |   |   |
| Large Commercial Retrofit                | \$255,787                        | 17%   |   |   |
| Single Family - Income Eligible Services | \$142,893                        | 9%  |   |   |
| Energy Star® HVAC                        | \$108,707                        | 7%  |   |   |

|  |                    |             |  |  |
|--|--------------------|-------------|--|--|
| EnergyWise                               | \$98,670           | 6%          |  |  |
| Large Commercial New Construction        | \$79,695           | 5%          |  |  |
| EnergyWise Multifamily                   | \$42,104           | 3%          |  |  |
| Residential New Construction             | \$33,858           | 2%          |  |  |
| Commercial & Industrial Multifamily      | \$21,332           | 1%          |  |  |
| Small Business Direct Install            | \$4,495            | 0%          |  |  |
| <b>Total</b>                             | <b>\$1,541,255</b> | <b>100%</b> |  |  |
| <b>Program Year 2019</b>                 |                    |             |  |  |
| Home Energy Reports                      | \$393,596          | 25%         |  |  |
| Income Eligible Multifamily              | \$364,718          | 23%         |  |  |
| Large Commercial Retrofit                | \$293,718          | 19%         |  |  |
| Energy Star® HVAC                        | \$124,014          | 8%          |  |  |
| EnergyWise                               | \$117,706          | 7%          |  |  |
| Single Family - Income Eligible Services | \$110,901          | 7%          |  |  |
| Large Commercial New Construction        | \$85,786           | 5%          |  |  |
| EnergyWise Multifamily                   | \$52,025           | 3%          |  |  |
| Commercial & Industrial Multifamily      | \$19,929           | 1%          |  |  |
| Residential New Construction             | \$12,394           | 1%          |  |  |
| Small Business Direct Install            | \$5,333            | 0%          |  |  |
| <b>Total</b>                             | <b>\$1,580,119</b> | <b>100%</b> |  |  |
| <b>Program Year 2020</b>                 |                    |             |  |  |
| Home Energy Reports                      | \$225,417          | 65%         |  |  |
| Energy Star® HVAC                        | \$52,386           | 15%         |  |  |
| EnergyWise                               | \$51,595           | 15%         |  |  |
| EnergyWise Multifamily                   | \$11,611           | 3%          |  |  |
| Residential New Construction             | \$6,723            | 2%          |  |  |
| Large Commercial New Construction        | \$0                | 0%          |  |  |
| Large Commercial Retrofit                | \$0                | 0%          |  |  |
| Small Business Direct Install            | \$0                | 0%          |  |  |
| Commercial & Industrial Multifamily      | \$0                | 0%          |  |  |
| Single Family - Income Eligible Services | \$0                | 0%          |  |  |
| Income Eligible Multifamily              | \$0                | 0%          |  |  |
| <b>Total</b>                             | <b>\$347,732</b>   | <b>100%</b> |  |  |

**Note:**

(1) For parts (c) and (d) of this table, please refer to the accompanying written portion of this response.