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Also admitted in Massachusetts

June 16, 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. 23-16-EL – 2023 Electric Revenue Decoupling Mechanism Reconciliation Responses to PUC Data Requests – PUC Set 1**

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 First Set of Data Requests in the above-referenced docket.

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

Very truly yours,



Leticia C. Pimentel

Enclosure

cc: Docket 23-16-EL 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.



Elaina M. Weir

June 16, 2023

Date

**Docket No. 23-16-EL – Rhode Island Energy – 2023 Electric Revenue Decoupling Mechanism (RDM) Reconciliation Filing**

**Service List updated 5/22/2023**

<b>Name/Address</b>	<b>E-mail Distribution</b>	<b>Phone</b>
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<b>File an original &amp; 9 copies w/:</b> Luly E. Massaro, Commission Clerk <b>Public Utilities Commission</b> 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a> ;	401-780-2017
	<a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov</a> ;	
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The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 23-16-EL  
In Re: Electric Revenue Decoupling Mechanism Reconciliation  
Filing Year Ending March 31, 2023  
Responses to the Commission's First Set of Data Requests  
Issued on June 7, 2023

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PUC 1-1

Request:

Referencing Table 1, on page 10 of Mr. Tyler Shields testimony titled "Estimated Components of Variance" please respond to the following:

- a. How the data in the Rate Year Forecast Variance row is derived and what it represents.
- b. How the data in the Underlying Growth row is derived and what it represents.
- c. In response to PUC 1-1 in Docket No. 5258, the Company explained that the rate year forecast was used in the rate design in Docket No. 4770. Load growth from electric vehicles and electric heat pumps were not forecasted separately in that forecast. Given the Company's expectations as stated in other dockets, regarding expected increases in both, has the Company changed its methodology for the 2023 RDM Year? If not, when does the Company expect to separately forecast EVs and heat pumps?
- d. The variance in Underlying Growth for residential customers was 6.1%, while variance in Electric Vehicles for that same group was only 0.7%. What drove the 6.1% increase in Underlying Growth for residential customers if not load growth from Electric Vehicles?

Response:

- a. The Rate Year Forecast Variance row represents the variance between the weather-normalized actual values from the Rate Year Forecast (September 2018 through August 2019) and the forecast values in the rate design in Docket No. 4770 (September 2018 through August 2019). September 2018 through August 2019 represents rate year 1 of the multi-year rate plan.

The formula for calculating the Rate Year Forecast Variance is defined as follows and the variances are shown in percent values:

Rate Year Forecast Variance = (rate year weather normalized actual / rate year forecast)-1

- b. The Underlying Growth is calculated by comparing the Rate Year Forecast values (September 2018 through August 2019) to the 2023 RDM year actual values (April

PUC 1-1, Page 2

2022 through March 2023) and then adjusting for the impacts of all other listed factors including energy efficiency, solar PV, electric vehicles, weather, days billed, and rate year forecast variance.

The Underlying Growth represents the implied underlying system growth between the current 2023 RDM year and the rate year after accounting for the impacts of all other listed factors including energy efficiency, solar PV, electric vehicles, weather, days billed, and rate year forecast variance.

- c. The rate year forecast was used in the rate design in Docket No. 4770. Load growth from electric vehicles and electric heat pumps were not forecasted separately in that forecast.

The Cis currently forecasting impacts of EV's and heat pumps separately, has incorporated those forecasts into the annual forecast creation process and intends to continue to forecast EV's and heat pumps separately going forward.

- d. The Underlying Growth variance is comparing the 2023 RDM year (April 2022 through March 2023) actual values to the rate year (September 2018 through August 2019) forecast values. The Underlying Growth variance represents the cumulative change over a period of about four years from September 2018 through August 2019 to April 2022 through March 2023, not a single year over year change.

The Company has observed the following changes from the rate year (September 2018 through August 2019) to the 2023 RDM year (April 2022 through March 2023) that contributed to the underlying growth:

- The residential customer count has grown year over year since the rate year (September 2018 through August 2019) causing overall residential usage to increase for the 2023 RDM year (April 2022 through March 2023).
- The usage per residential customer has gradually grown year over year since the rate year (September 2018 through August 2019) causing overall residential usage to increase for the 2023 RDM year (April 2022 through March 2023).
- Electric heat pump load has also had some impact to the 6.1% increase in Underlying Growth for residential customers. However, the impact of electric heat pump load to the total load is approximately 0.5%.

PUC 1-2

Request:

Please provide a table containing the following information, corresponding to the 12 categories (i.e. lines) of billed distribution revenue included on page 5 of NECO-1:

- a. Total billed revenue for the period April 2022 - March 2023
- b. Forecast revenue for the period April 2022 – March 2023
- c. Please provide explain the reasons for any significant departures between billed and forecast if not already explained in the Company's testimony.

Response:

- a. Please see Attachment PUC 1-2, Page 1, Column a and Page 2.
- b. Please see Attachment PUC 1-2, Page 1, Column b and Page 3.
- c. There were three significant departures between billed revenue and forecasted revenue on Attachment PUC 1-2. As described in detail below, these differences are decreases in 1) Customer Charge Revenue; 2) Distribution Demand Charges; and 3) Lighting Equipment Revenue.
  1. Customer Charge Revenue is one of various components that make up the total Annual Target Revenue ("ATR") in the Company's Revenue Decoupling Mechanism ("RDM"). The customer charge portion of the ATR that was developed in RIPUC Docket No. 4770, was based on a forecasted numbers of customers by rate class multiplied by the approved customer charge. The forecast that was used in developing the customer charge ATR was higher than the actual customer count than the Company experienced during the RDM reconciliation period, FY2023 (April 2022 – March 2023), which resulted in an under-recovery for the customer charge ATR as shown on Attachment PUC 1-2, Page 1, Line 1. In Table A below, the two major contributors to this customer charge under recovery are Rate Class G-02 and G-32. The actual number of bills assessed a customer charge and the resulting customer charge revenue for these two rate classes are lower than the customer charge ATR due to a forecast level of customers that the Company did not bill. Please note that the Actual Billed Revenue includes the Customer Charge Deferral for the period October 2022 through March 2023.

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 23-16-EL

In Re: Electric Revenue Decoupling Mechanism Reconciliation  
Filing Year Ending March 31, 2023  
Responses to the Commission’s First Set of Data Requests  
Issued on June 7, 2023

PUC 1-2, Page 2

Table A

Rate Class	Customer Charge		
	Annual Target Revenue	Actual Billed Revenue	Variance
A-16	\$29,084,971	\$29,364,237	\$279,266
A-60	\$2,623,027	\$2,809,403	\$186,376
C-06	\$6,253,540	\$6,410,473	\$156,933
G-02	\$15,215,642	\$13,912,800	(\$1,302,842)
G-32	\$14,809,206	\$13,407,488	(\$1,401,718)
X-01	<u>\$256,954</u>	<u>\$251,736</u>	<u>(\$5,218)</u>
Total	<u>\$68,243,339</u>	<u>\$66,156,140</u>	<u>(\$2,087,199)</u>

Table B presents the number of bills forecasted in developing the rates in RIPUC Docket No. 4770 and the number of actual bills assessed a customer charge (including the amount deferred from October 2022 through March 2023) from Fiscal Year 2019 through Fiscal 2023. In each year, the table shows the Company never assessed the level of customer charges that was included in the rate design in RIPUC Docket No. 4770 that derived the customer charge ATR. When the actual customer charge revenue billed is compared against the Rate Year customer charge ATR, for this component of the ATR, the Company under-recovered customer charge ATR for Rate Classes G-02 and G-32 due to the lower quantity of bills, driven by a decrease in customer count, as compared to what was forecasted for the Rate Year in RIPUC Docket No. 4770.

Table B

	Number of Bills		Decrease Compared to Rate Year Forecast			
	G-02	G-32	Number of Bills		Percentage	
			G-02	G-32	G-02	G-32
Rate Year 1 Forecast Sep 2018 – Aug 2019	104,935	13,463				

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PUC 1-2, Page 3

Rate Year 1 Actual							
Sep 2018 – Aug 2019	100,054	12,714	(4,881)	(749)	-4.7%	-5.6%	
FY 2019							
Apr 18 – Mar 19	100,734	12,626	(4,201)	(837)	-4.0%	-6.2%	
FY 2020							
Apr 19 – Mar 20	99,242	12,527	(5,693)	(936)	-5.4%	-7.0%	
FY 2021							
Apr 20 – Mar 21	97,292	12,418	(7,643)	(1,045)	-7.3%	-7.8%	
FY 2022							
Apr 21 – Mar 22	96,514	12,348	(8,421)	(1,115)	-8.0%	-8.3%	
FY 2023							
Apr 22- Mar 23	96,679	12,198	(8,256)	(1,265)	-7.9%	-9.4%	

PUC 1-2, Page 4

2. Similar to the discussion above for customer charge revenue, the distribution demand charge ATR is taken from the rate design schedules from RIPUC Docket No. 4770 for rate classes G-02 and G-32 and is a function of the forecasted billing demand billing units and the approved distribution demand rate for that class. During the twelve month period ending March 31, 2023, for rate class G-32, the Company did not bill the same level of billing demand billing units as compared to the Rate Year forecasted billing demand billing units that was used to develop the approved distribution demand rates in RIPUC. Docket No. 4770, resulting in lower demand charge revenue for this year. The Company has experienced a declining number of customers in this rate class, which is a main driver for the lower billing demand units, contributing to the under-recovery of distribution demand charge ATR as shown on Attachment PUC 1-2, Page 1, Line 6. Please see Table C below that supports the decrease in demand billing units in the subsequent years compared to the forecasted billing demand billing units that were used to develop the distribution demand charges in RIPUC Docket No. 4770.

Table C

	Decrease Compared to Rate Year Forecast		
	Billing Demand G-32	Number of Customers G-32	Percentage G-32
Rate Year 1 Forecast	3,856,449		
Rate Year 1 Actual	3,814,835	(41,614)	-1.1%
FY 2020	3,642,524	(213,925)	-5.5%
FY 2021	3,600,574	(255,875)	-6.6%
FY 2022	3,539,750	(316,699)	-8.2%
FY 2023	3,501,890	(354,559)	-9.2%

3. The under-recovery of lighting equipment revenue of \$3,964,516 on Attachment PUC 1-2, Page 1, Line 2 was due to the processing of the sale of the Company’s street

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PUC 1-2, Page 5

lighting assets to various towns/municipalities since the revenue requirement that determined the ATR was established in the Company's last general rate case in RIPUC Docket No. 4770 and the sales' impact to street lighting revenue during the year. When the Company sells its street lighting assets, the billing is transferred to Rate S-05, Street and Area Lighting - Customer Owned Equipment, which only assesses the customer for the delivery of electricity to the customer-owned street lighting equipment. The rental, operation, and maintenance of the street lighting equipment are no longer the responsibility of the Company and are therefore not charged by the Company to the customers, resulting in a reduction in revenue. The actual billed lighting equipment revenue in this year's RDM reconciliation is consistent with the actual billed lighting equipment revenue in the twelve-month period ending March 31, 2022 in RIPUC Docket No. 5258.

The Narragansett Electric Company  
Billed Revenue and Forecast/Annual Target Revenue by Revenue Type  
For the Period April 1, 2022 through March 31, 2023

	Billed Revenue	Forecast/ Annual Target Revenue	Variance/ Contribution to Net Over Recovery
	(a)	(b)	(c)
(1) Customer Charge	\$66,156,140	\$68,243,339	(\$2,087,199)
(2) Lighting Equipment	\$3,117,944	\$7,082,460	(\$3,964,516)
(3) Second Feeder Service	\$1,978,301	\$1,244,762	\$733,539
(4) Back-Up Distribution	\$72,065	\$75,561	(\$3,496)
(5) Distribution Optional Demand	\$27,673	\$0	\$27,673
(6) Distribution Demand Charge	\$44,035,000	\$45,238,308	(\$1,203,308)
(7) Supplemental Distribution	\$153,753	\$165,981	(\$12,228)
(8) Transformer Ownership	(\$1,337,114)	(\$1,493,923)	\$156,809
(9) Distribution kWh Charge	\$180,607,112	\$179,429,318	\$1,177,794
(10) Minimum Bill Provision	\$30,550	\$30,569	(\$19)
(11) 1% High Voltage Metering Credit	(\$569,663)	(\$443,949)	(\$125,714)
(12) AMR Opt Out	<u>\$5,775</u>	<u>\$0</u>	<u>\$5,775</u>
(13) Total	\$294,277,536	\$299,572,427	(\$5,294,891)
(14) Rate Design Variance		(\$7,300)	\$7,300
(15) Adjustment to Annual Target Revenue for ADIT		(\$274,501)	\$274,501
(16) Adjusted Total	\$294,277,536	\$299,305,226	(\$5,027,690)

- (a) Page 2, Column (n)
- (b) Page 3, Column (n)
- (c) Column (a) - Column (b)

- (1) Total of line (1)(a) and (1)(b) on page 2
- (13) Sum of lines (1) - (12)
- (14) Page 3, Line (14), Column (n)
- (15) Page 3, Line (15), Column (n)
- (16) Line (13) - Line (14) + Line (15)

The Narragansett Electric Company  
Billed Revenue by Revenue Type and Month  
For the Period April 1, 2022 through March 31, 2023

	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Jan-23	Feb-23	Mar-23	Apr-23	Grand Total
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)
(1)(a) Customer Charge	\$2,323,723	\$5,631,536	\$5,251,083	\$5,461,203	\$5,481,538	\$5,525,120	\$4,587,744	\$2,396,280	\$2,217,902	\$2,326,725	\$2,282,272	\$2,276,411	\$1,252,116	\$47,013,653
(1)(b) Customer Charge deferral	\$0	\$0	\$0	\$0	\$0	\$0	\$1,259,679	\$3,197,130	\$3,203,256	\$3,209,749	\$3,216,214	\$3,220,443	\$1,836,017	\$19,142,487
(2) Lighting Equipment	\$150,111	\$316,500	\$591,131	\$353,756	\$292,294	\$227,096	\$328,324	\$65,084	\$308,191	\$335,982	\$296,459	\$80,087	(\$227,071)	\$3,117,944
(3) Second Feeder Service	\$65,843	\$150,687	\$185,697	\$164,691	\$164,691	\$164,691	\$164,691	\$136,294	\$193,088	\$164,691	\$136,294	\$193,088	\$93,855	\$1,978,301
(4) Back-Up Distribution	\$2,548	\$6,102	\$6,102	\$6,102	\$6,102	\$6,102	\$0	\$0	\$0	\$18,306	\$11,822	\$5,656	\$3,223	\$72,065
(5) Distribution Optional Demand	\$78	\$956	\$731	\$1,086	\$2,026	\$2,064	\$1,207	\$951	\$831	\$4,919	\$12,349	\$190	\$285	\$27,673
(6) Distribution Demand Charge	\$1,446,239	\$3,432,068	\$3,483,440	\$3,668,060	\$4,156,783	\$4,033,242	\$4,197,810	\$3,590,774	\$3,496,297	\$3,530,932	\$3,355,026	\$3,569,802	\$2,074,527	\$44,035,000
(7) Supplemental Distribution	\$4,041	\$10,812	\$10,367	\$9,434	\$8,756	\$16,727	\$8,120	\$0	\$7,261	\$37,879	\$19,339	\$13,102	\$7,915	\$153,753
(8) Transformer Ownership	(\$42,551)	(\$99,535)	(\$112,336)	(\$112,298)	(\$132,584)	(\$129,279)	(\$125,182)	(\$100,902)	(\$114,864)	(\$49,767)	(\$109,963)	(\$110,815)	(\$97,038)	(\$1,337,114)
(9) Distribution kWh Charge	\$5,615,377	\$12,216,421	\$13,181,910	\$17,934,729	\$21,961,379	\$19,114,928	\$12,750,302	\$12,590,406	\$13,279,850	\$16,468,223	\$14,016,102	\$13,887,037	\$7,590,448	\$180,607,112
(10) Minimum Bill Provision	\$1,199	\$2,954	\$2,094	\$1,900	\$2,409	\$2,409	\$3,056	\$2,076	\$2,871	\$2,871	\$2,362	\$2,871	\$1,478	\$30,550
(11) 1% High Voltage Metering Credit	(\$13,743)	(\$267,956)	(\$34,042)	(\$30,759)	(\$37,222)	(\$37,101)	(\$31,486)	(\$20,720)	(\$16,576)	(\$18,329)	(\$21,990)	(\$19,925)	(\$19,814)	(\$569,663)
(12) AMR Opt Out	\$0	\$455	\$468	\$481	\$494	\$533	\$507	\$494	\$481	\$559	\$494	\$520	\$289	\$5,775
(13) Total	\$9,552,865	\$21,401,000	\$22,566,645	\$27,458,385	\$31,906,666	\$28,926,532	\$23,144,772	\$21,857,867	\$22,578,588	\$26,032,740	\$23,216,780	\$23,118,467	\$12,516,230	\$294,277,536

(a) prorated for usage on and after April 1  
(m) prorated for usage prior to April 1

source: Company billing records and R.L.P.U.C. Docket No. 23-16-EL, Schedule NECO-1, Page 5

The Narragansett Electric Company  
Forecast/Annual Target Revenue by Revenue Type and Month  
For the Period April 1, 2022 through March 31, 2023

	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Jan-23	Feb-23	Mar-23	Grand Total
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(n)
(1) Customer Charge	\$5,126,721	\$5,040,900	\$5,230,728	\$6,394,899	\$6,931,234	\$6,236,629	\$5,344,179	\$5,032,335	\$5,649,314	\$6,086,859	\$5,705,369	\$5,464,171	\$68,243,339
(2) Lighting Equipment	\$532,064	\$523,157	\$542,858	\$663,678	\$719,340	\$647,253	\$554,632	\$522,268	\$586,300	\$631,709	\$592,117	\$567,085	\$7,082,460
(3) Second Feeder Service	\$93,512	\$91,946	\$95,409	\$116,643	\$126,426	\$113,756	\$97,478	\$91,790	\$103,044	\$111,025	\$104,066	\$99,667	\$1,244,762
(4) Back-Up Distribution	\$5,676	\$5,581	\$5,792	\$7,081	\$7,674	\$6,905	\$5,917	\$5,572	\$6,255	\$6,740	\$6,317	\$6,050	\$75,561
(5) Distribution Optional Demand	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
(6) Distribution Demand Charge	\$3,398,488	\$3,341,598	\$3,467,434	\$4,239,160	\$4,594,694	\$4,134,243	\$3,542,641	\$3,335,920	\$3,744,914	\$4,034,961	\$3,782,072	\$3,622,183	\$45,238,308
(7) Supplemental Distribution	\$12,469	\$12,260	\$12,722	\$15,554	\$16,858	\$15,169	\$12,998	\$12,240	\$13,740	\$14,804	\$13,877	\$13,290	\$165,981
(8) Transformer Ownership	(\$112,230)	(\$110,351)	(\$114,506)	(\$139,991)	(\$151,732)	(\$136,527)	(\$116,990)	(\$110,163)	(\$123,670)	(\$133,248)	(\$124,897)	(\$119,617)	(\$1,493,923)
(9) Distribution kWh Charge	\$13,479,470	\$13,253,824	\$13,752,932	\$16,813,838	\$18,223,999	\$16,397,705	\$14,051,223	\$13,231,305	\$14,853,503	\$16,003,921	\$15,000,885	\$14,366,713	\$179,429,318
(10) Minimum Bill Provision	\$2,296	\$2,258	\$2,343	\$2,865	\$3,105	\$2,794	\$2,394	\$2,254	\$2,531	\$2,727	\$2,556	\$2,448	\$30,569
(11) 1% High Voltage Metering Credit	(\$33,351)	(\$32,793)	(\$34,028)	(\$41,601)	(\$45,090)	(\$40,572)	(\$34,766)	(\$32,737)	(\$36,751)	(\$39,597)	(\$37,116)	(\$35,546)	(\$443,949)
(12) AMR Opt Out	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
(13) Total	\$22,505,116	\$22,128,380	\$22,961,684	\$28,072,125	\$30,426,507	\$27,377,355	\$23,459,706	\$22,090,784	\$24,799,179	\$26,719,901	\$25,045,246	\$23,986,443	\$299,572,427
(14) Rate Design Variance	(\$548)	(\$539)	(\$560)	(\$684)	(\$742)	(\$666)	(\$572)	(\$538)	(\$604)	(\$651)	(\$610)	(\$585)	(\$7,300)
(15) Adjustment to Annual Target Revenue for ADIT	(\$20,623)	(\$20,276)	(\$21,040)	(\$25,723)	(\$27,880)	(\$25,086.03)	(\$21,496.27)	(\$20,241.92)	(\$22,723.64)	(\$24,483.60)	(\$22,949.11)	(\$21,978.92)	(\$274,501)
(16) Adjusted Total/Annual Target Revenue	\$22,485,042	\$22,108,643	\$22,941,204	\$28,047,086	\$30,399,369	\$27,352,935	\$23,438,782	\$22,071,080	\$24,777,060	\$26,696,068	\$25,022,908	\$23,965,049	\$299,305,226

- (1) - (12), (14) Per R.I.P.U.C. Docket Nos. 4770/4780, Compliance Attachment 9, Schedules 4A - 4F for specific Rate Year ATR by Rate Class and Revenue Type multiplied by the applicable monthly allocation % from R.I.P.U.C. Docket No. 5258, Schedule NECO-1, Page 4, Column (b)
- (15) RIPUC Docket No. 4770, In RE: Excess Deferred Income Tax True-Up, Rebuttal Attachment 1, Pages 1 - 2 for specific Rate Year, Column (a)-(c), Line (1) multiplied by the applicable monthly allocation % from R.I.P.U.C. Docket No. 5258, Schedule NECO-1, Page 4, Column (b)
- (16) Line (13) - Line (14) + Line (15)