



Advancing the Clean Energy Future

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July 19, 2023

State of Rhode Island  
Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, Rhode Island 02888

Comments delivered via email to [Luly.Massaro@puc.ri.gov](mailto:Luly.Massaro@puc.ri.gov)

**PUC Docket No. 22-49-EL – in re: The Narragansett Electric Co. d/b/a Rhode Island Energy’s Advanced Metering Functionality (“AMF”) Business Case**

To Whom It May Concern:

Whereas, Acadia Center has developed expertise relating to Time-Varying Rates (TVR) and Time-of-Use (TOU) rate policy, our previous intervention and subsequent comments in this docket focus on obtaining a commitment from Rhode Island Energy (hereinafter the “Company”) and a directive from the Public Utilities Commission (hereinafter the “PUC”) for the Company to accelerate the availability of TOU/TVR. This acceleration would more quickly deliver direct economic opportunities and benefits to ratepayers, system resiliency and reliability enhancements, and emissions reduction benefits critical to meeting the state’s GHG reduction and Renewable Energy Standard mandates.

On July 13, 2023, the Narragansett Electric Company d/b/a Rhode Island Energy (hereinafter the “Company”) submitted a Statement of Alternative and Additional Positions in response to many of the issues and concerns it has heard from the Public Utilities Commission (hereinafter the “PUC”) and from the other parties to this docket. The Company states that it is willing to **accelerate the development of its TVR proposal**, and we urge the PUC to require and hold the Company accountable to such an acceleration.

The AMF Business Case indicates that the specific rate design would be developed through a separate regulatory proceeding. The Company references the regulatory approval required for the implementation of TVR, committing to the submission of a proposal for a *separate TVR docket* within one year of approval of the AMF Business Case. To avoid additional delay, Acadia Center urges the PUC to open a proceeding for TVR as soon as possible.

The Company’s proposed “implementation of some of TVR no later than one year following the completion of electric meter deployment” implies that completion of deployment is a prerequisite to TVR. This is not the case. Acadia Center urges the PUC to require, as described by the Company, “a **staggered rollout of TVR** to allow customers who have received an AMF meter to begin benefitting from TVR before all AMF meters have been installed”. Piloting the rollout of TVR as well as a campaign to inform and educate customers about TVR can all begin prior to the completion of AMF deployment. In fact, the Company should conduct **public education on the benefits of TVR** well in advance of meter deployment.

Acadia Center applauds the emphasis of outreach about TVR to low-to-moderate income customers and customers in multi-family housing. A timely and targeted rollout of TVR can ensure that the technology is bringing benefits to those that need it the most.

Thank you for the opportunity to submit these comments. Acadia Center looks forward to engaging in this process.

Sincerely,

A handwritten signature in cursive script that reads "emily koo".

Emily Koo  
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