

July 17, 2023

VIA ELECTRONIC MAIL

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

**RE: Docket No. 22-49-EL-The Narragansett Electric Company d/b/a Rhode Island Energy
Advanced Metering Functionality Business Case
Responses to PUC Data Requests – PUC Set 10**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”), attached is the electronic version of Rhode Island Energy’s responses to the Public Utilities Commission’s Tenth Set of Data Requests in the above-referenced matter.¹

This filing includes a Motion for Protective Treatment of Confidential Information in accordance with Commission Rules of Practice and Procedure 1.3(H)(3) and R.I. Gen. Laws § 38-2-2(4) for portions of the responses to PUC 10-1 and PUC 10-3, which contain confidential and proprietary business information. For the reasons stated in the Motion for Protective Treatment, the Company seeks protection from public disclosure of portions of the responses to PUC 10-1 and PUC 10-3. Accordingly, the Company has provided the Commission with an original and two complete, unredacted copies of the Confidential responses to PUC 10-1 and PUC 10-3 in a sealed envelope marked “**Contains Privileged and Confidential Information – Do Not Release,**” and has included a redacted version of the responses to PUC 10-1 and PUC 10-3 for the public filing.

¹ Per communication from Commission counsel on October 4, 2021, the Company is submitting an electronic version of this filing followed by hard copies filed with the Clerk within 24 hours of the electronic filing.

Thank you for your time and attention to this matter. If you have any questions, please contact Jennifer Brooks Hutchinson at 401-316-7429.

Very truly yours,




Jennifer Brooks Hutchinson

Enclosures

cc: Docket No. 22-49-EL Service List
John Bell, Division
Leo Wold, Esq.

CERTIFICATE OF SERVICE

I certify that a copy of the within documents was forwarded by e-mail to the Service List in the above docket on the 14th day of July, 2023.



Adam M. Ramos, Esq.

The Narragansett Electric Company d/b/a Rhode Island Energy
Docket No. 22-49-EL Advanced Meter Functionality (AMF)
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The Narragansett Electric Company
d/b/a Rhode Island Energy
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Redacted
PUC 10-1

Request:

Referring to Attachment H, Benefit Cost Guide Memo, page 38 “AMF vs TSA Exit Cost Accounting”, the attachment describes an MDMS allocation of 56% to TSA Exit and 44% to AMF for the “MDMS implementation”. Please explain why the total capital amounts for MDMS implementation for years 1 through 4 do not align with that allocation.

Response:

Please see the Company's supplemental response to PUC 7-14, which explains that Confidential Attachment 7-14-1 incorrectly distributed all L+G and TCS contract costs across 20 years instead of the MDMS portion only, as the question requested. Please see Confidential Attachment PUC 7-14-1 Supplemental, which corrects the previous numbers. In addition, the annual AMF costs are split across 3 systems for L+G (MDMS, HeadEnd, AGA) and 6 systems (HeadEnd, MDMS, Analytics, Cybersecurity, Deployment Work Management, Middleware) for TCS. Confidential Attachment 7-14-1 Supplemental distributes the AMF costs solely to MDMS for both L+G & TCS.

The MDMS specific AMF capital in Year 4 is [REDACTED] (see Confidential Attachment PUC 7-14-1 Supplemental, Summary Tab, Cell F14), which represents [REDACTED] for L+G and [REDACTED] for TCS. The total across all years for L+G is [REDACTED] (see Confidential Attachment PUC 7-14-1 Supplemental, Summary Tab, Cell W15), which represents 44 percent of what the Company is contracted to pay for the AMF portion of the MDMS solution to L+G (see Confidential Attachment PUC 7-14-1 Supplemental, tab updated_L&G_SOW_Milestones, Cells E21, G12 and F21). Likewise, for TSA Exit, the total across all years for L&G is [REDACTED], which represents 56 percent of the contract value for the TSA Exit portion of the MDMS solution to L&G (see Confidential Attachment PUC 7-14-1 Supplemental, tab updated L&G SOW Milestones, Cells E12 and F19-20). These values align with the allocation percentages in Attachment H, Benefit Cost Guide Memo, page 38 “AMF vs TSA Exit Cost Accounting.”

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PUC 10-2

Request:

Referring to Confidential Attachment PUC 7-14-1, Summary Tab, Cell F14, please explain how the company determined that the total capital listed for year 4 related solely to AMF given the fact the company has testified it has been using an allocation based on functionalities for determining the split between AMF and TSA Exit for the MDMS implementation costs.

Response:

Please see the Company's response to PUC 10-1 and Confidential Attachment PUC 7-14-1 Supplemental, which shows the distribution of L+G and TCS contract costs across the 20 years for the MDMS portion only, as well as the MDMS specific costs for AMF capital in Year 4. As explained in the response to PUC 10-1, the L+G contract values align with the allocation percentages to determine the split between AMF and TSA Exit for the MDMS implementation costs. For TCS, the allocation between AMF and TSA Exit is based on requirements for their scope of work.

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Redacted
PUC 10-3

Request:

Referring to PUC 3-22, page 1 of 3, the column labeled "Total (\$) nominal", and the rows related to Estimated MDMS Implementation (Years 1-4), please explain those numbers are represented and presented in attachment PUC 7-14-1 'Summary' tab.

Response:

Please see the Company's response to PUC 10-1 and Confidential Attachment PUC 7-14-1-Supplemental, which distributes the AMF costs solely to MDMS for both L+G & TCS.

The values in Confidential Attachment PUC 3-22-1, page 1 of 3, "Total (\$) nominal" for the Estimated MDMS Implementation (Years 1-4) are based on the AMF BCA Model - Attachment H - FINAL (Confidential), whereas the AMF costs in Confidential Attachment PUC 7-14-1-Supplemental are based on the actual L+G or TCS contract values, not the AMF BCA Model. Any differences in the values between these two attachments is the result of one being estimates (i.e., AMF BCA Model) and the other being the actual contract values.

For example, the value of [REDACTED] in the AMF BCA Model – Attachment H- FINAL (Confidential) represents [REDACTED] for L+G (see tab 10 - RI AMF Cost Model; Cell O84) and [REDACTED] for TCS (see tab, 10 - RI AMF Cost Model; Cell O85). In Confidential Attachment PUC 7-14-1-Supplemental, the total across all 20 years for L+G is [REDACTED] (See Summary tab (updated); Cell W15), which matches the estimate in the AMF BCA Model - Attachment H - FINAL (Confidential). The total across all years for TCS is [REDACTED] (See Summary tab (updated); Cell W16), which is [REDACTED] lower than the [REDACTED] estimate in the AMF BCA Model - Attachment H - FINAL (Confidential).

PUC 10-4

Request:

Referring to Attachment Q7-14c, please explain what the numbers in columns G and H represent and how they relate to Column A. For example, does a zero represent a zero allocation to that category; does a 1 represent 100% allocation to that category; and does a decimal represent a percentage allocation to that category?

- a. If the assumptions in PUC 10-4 are correct, please refer to line 9 of the Excel spreadsheet. Column A is labeled "Assigned to AMF or TSA." Column A on Line 9 of the Excel Spreadsheet states, "TSA Exit 100%". Column G of that same line, Labeled TSA Exit, includes a 0.3 while Column H includes a 0.7. Please reconcile the columns.
- b. It appears there are several Business Requirement Descriptions that are included in the TSA Exit 100% category in Column A where there are numbers less than 1 in Column G. For each of those Business Requirement Descriptions, please explain the Categorization numbers in Column G and Column H.

Response:

Columns G and H of Attachment Q7-14c, referred to hereinafter as Attachment PUC 7-14-3, do not relate to column A because the Company did not use them to assign costs for the MDMS either to AMF or to TSA Exit. Rather, the Company used the list of MDMS functionality requirements provided as part of Confidential Attachment PUC 3-22-2 to allocate MDMS implementation costs between TSA Exit and AMF. As mentioned in the Company's response to PUC 7-14 (d), the Company used columns E & F of Confidential Attachment PUC 3-22-2 (and columns G and H of Attachment PUC 7-14-3) for reference only. Those columns represent Tata Consultancy Services' ("TCS") initial estimate of how to allocate the functionalities. The Company, however, modified the approach in column C of Confidential Attachment PUC 3-22-2 (and column E of Attachment PUC 7-14-3) to match the contractual milestones. These columns reference three categories of costs: (1) MDMS for Bill Reads, which the Company allocated all to TSA Exit, (2) MDMS for Retail Settlement, which the Company allocated all to TSA Exit, and (3) MDMS for AMF, which the Company allocated all to AMF. This approach also matches what is set forth in Attachment H, Benefit Cost Guide Memo, page 38 "AMF vs TSA Exit Cost Accounting," which shows:

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- MDMS Implementation – based on total number of PPL requirements (224 total)
 1. Base/AMR – MDMS foundational (match Rhode Island Energy daily read functionality) TSA Exit, 36% based on requirements
 2. Retail Settlement – TSA Exit, 20% based on requirements
 3. RF - 44% AMF based on requirements
- a. In Attachment PUC 7-14-3, Line 9 shows costs allocated 100% to TSA Exit because these costs relate to the MDMS for Bill Reads (as per Column E), and, as noted in Attachment H, these are MDMS foundational costs related to daily read functionality that should be allocated 100% to TSA Exit. See column B in Attachment PUC 7-14-3, which explains that these costs are related to interoperability, and this work supports multiple systems. As explained above, Columns G & H in Attachment PUC 7-14-3 do not relate to allocation determination.
- b. All costs assigned to TSA Exit (100%) in Column A of Attachment PUC 7-14-3 relate either to MDMS for Bill Reads or MDMS for Retail as per Column E. As explained above, TCS provided the categorization numbers in columns G & H in Attachment PUC 7-14-3 as initial allocation estimates, but the Company did not use them to determine allocations.