

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 Request – PUC 7**

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 supplemental response to PUC 7-14 from the Public Utilities Commission’s Seventh 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 the Confidential Attachment PUC 7-14-1 Supplemental, which contains confidential and proprietary business information. For the reasons stated in the Motion for Protective Treatment, the Company seeks protection from public disclosure of the entirety of Confidential Attachment PUC 7-14-1 Supplemental. The Company also has provided the Commission Confidential Attachment PUC 7-14-1 Supplemental by way of a secure, confidential link and has included a slip sheet in place of this Confidential Attachment 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.

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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,



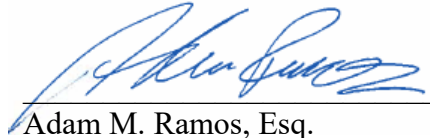
Jennifer Brooks Hutchinson

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 17th 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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PUC 7-14 Supplemental

Data Requests Regarding Supplemental Testimony

MDMS Allocation

Request:

Referring to the Supplemental Testimony at pages 27 and 28 and Confidential Attachment 3-22-2, relating to the MDMS cost allocation between TSA Exit and AMF, the testimony indicates that the allocation was based on the total number of functionality requirements assigned to the TSA Exit and AMF.

- a. Please provide the total estimated cost for implementing the MDMS, breaking it down between TSA Exit and AMF, including a breakdown between capital and O&M.
- b. Please provide two schedules: (1) one schedule which reflects each year of spend for each category of cost assigned to TSA Exit and AMF (separating O&M and capital), and (2) another schedule which reflects the annual revenue requirement for the AMF costs for which the Company is seeking rate recovery, (separating the portion of the revenue requirement for O&M from the portion of the revenue requirement associated with the capital expenditures).
- c. Please confirm or provide a schedule showing the entire list of functionalities used in the calculation of the allocation relating to TSA Exit and AMF (if this is already provided in the Confidential Attachment 3-22-2, please indicate).
- d. Tab 1 of Confidential Attachment 3-22-2 appears to indicate 224 functionalities, with 99 functionalities relating to AMF. However, columns E and F of Tab 2 do not appear to sum to those totals. Please clarify.
- e. For each of the functionalities assigned to AMF, please provide an explanation of why each functionality applied only to AMF or was shared with TSA Exit.
- f. Where a functionality was shared between AMF and TSA Exit, please explain the basis for allocating between the two for such functionality.
- g. Please explain whether and how AMF functionalities needed for the gas distribution business were addressed in the calculation of the allocation.

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Original Response:

- a. Please see Confidential Excel Attachment PUC 7-14-1. Costs of implementing are Years 1-4.
- b. (1) Please see Confidential Excel Attachment PUC 7-14-1. This attachment shows each year of spend based on contractual values.

(2) Please see Excel Attachment PUC 7-14-2 for the annual revenue requirement for the MDMS AMF Costs for which the Company is seeking rate recovery. The revenue requirement was calculated using the same model and assumptions as Schedule SAB/BLJ-1; however, the spend amounts used to determine the revenue requirement are derived from the portion of the MDMS AMF contract values that are presented on Confidential Excel Attachment PUC 7-14-1. Note that the spend on Confidential Excel Attachment PUC 7-14-1 is based on calendar year and the revenue requirement on Excel Attachment PUC 7-14-2 is shown by Recovery Year (October to September).
- c. A complete list of MDMS functionality requirements used in the calculation of allocating MDMS implementation costs between TSA Exit and AMF was provided as part of Confidential Attachment 3-22-2.
- d. The summary chart located at Tab 1 of Confidential Attachment PUC 3-22-2 determined that there were the 99 functionality requirements relating to AMF by summing up the number of entries for "MDMS for AMF" in Column C. Columns E & F, in contrast, were used for reference, but the sum total functionalities for AMF was based on review of the requirements and Column C.

Upon further review of the 99 AMF functionality requirements, two (REQ-04020 & REQ-04094) are related to gas readings and should have been assigned to TSA Exit as part of the "MDMS for Bill Readings" functionality. This would result in a total percentage of 43%, not 44%, for "MDMS for AMF" to be used for the estimated MDMS Implementation. As a result, in the cost model the estimated MDMS Implementation costs would be approximately \$70,000 less (\$3.01 million vs \$3.08 million).

- e. Please see Excel Attachment PUC 7-14-3 for a functionality requirement -by- functionality requirement explanation as to why the individual functionality requirement applies to AMF. As stated in the response to subpart (d), above, there are a total of 97 requirements that are assigned to AMF.

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Two (2) of the 97 functionality requirements (REQ-06027 & REQ-08019) indicate a split between TSA Exit and AMF in columns G and H, but have been assigned 100 percent to AMF for the following reasons. REQ-06027 is related to providing a count of the number of open orders which includes remote connect and remote disconnect orders. This functionality requirement is enabled by the AMF meter's remote disconnect ability, the AMF meter notifications, and internal Company processes. REQ-08019 deals with ensuring the MDMS system is aware when a customer has been shut off for non-payment and an unrelated power outage event is occurring at the same location. This functionality requirement is enabled by the AMF meter notifications as well as internal Company processes. Upon review of these details, and for simplicity, these two (2) functionality requirements are assigned 100 percent to AMF as indicated in column A.

The remaining 95 MDMS functionality requirements are assigned to AMF, as indicated in column A, and a requirement-by-requirement explanation is provided, in column B, that illustrates each of these are functionality requirements are brought about as a result of AMF.

- f. Each functionality requirement, was reviewed by our System Integrator and internal Subject Matter Experts, and assigned to one of three functionality categories: 1. MDMS for Bill Reads, 2. MDMS for Retail Settlement, and 3. MDMS for AMF. The first two categories— MDMS for Bill Reads and MDMS for Retail Settlement—were fully assigned to TSA Exit costs. Only MDMS for AMF functionalities were fully assigned to AMF.

As noted in the Company's response to PUC 7-14(d), upon inspection of these 99 functionalities, a total of 2 functionality requirements (REQ-04020 & REQ-04094) are related to gas and should have been assigned to the MDMS for Bill Reads functionality instead of MDMS for AMF.

Excel Attachment PUC 7-14-3 provides a functionality requirement-by-functionality requirement summary explanation as to why the individual functionality requirement was considered to apply towards either AMF and/or TSA Exit.

- g. Gas is not considered as part of the Rhode Island Energy AMF cost model and the Company's AMF filing is for electric only. A subsequent filing may occur when the Company is requesting approval to implement Gas AMF.

Nonetheless, of the 224 MDMS functionalities a total of 10 mention gas (REQ-04020, REQ-04002, REQ-04072, REQ-04090, REQ-04094, REQ-04095, REQ-04150, REQ-06068, REQ-06078, and REQ-06080). As part of the calculation and process explained

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in the Company's response to PUC 7-14(f), eight of these were allocated to TSA Exit because they were assigned to the functionality category MDMS for Bill Reads. As noted in the Company's response to PUC 7-14(d), the other two functionalities (REQ-04020 & REQ-04094) should have been assigned to the MDMS for Bill Reads functionality instead of 3 MDMS for AMF.

Supplemental Response:

(a) and (b)

Please see Confidential Attachment PUC 7-14-1-Supplemental. The original Attachment PUC 7-14-1 incorrectly distributed the entire L+G and TCS contract costs across the 20 years instead of the MDMS portion only, as the question requested. Confidential Attachment PUC 7-14-1-Supplemental reflects the total estimated cost of the MDMS portion only, breaking it down between TSA Exit and AMF, and including a breakdown between capital and O&M.

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Attachment PUC 7-14-1 Supplemental

Please see the Excel version of Confidential Attachment PUC 7-14-1 Supplemental.