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Rhode Island Energy™
a PPL company

July 7, 2023

VIA ELECTRONIC MAIL

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

RE: Docket No. 23-05-EL – The Narragansett Electric Company d/b/a Rhode Island Energy Tariff Advice to Amend the Net Metering Provision - Proposal for Administration of Excess Net Metering Credits
<u>Responses to PUC Data Requests – Set 1</u>

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the "Company") enclosed are the Company's responses to the Public Utilities Commission's First Set of Data Requests in the above-referenced matter.

Thank you for your attention to this filing. If you have any questions, please contact me at 401-784-4263.

Sincerely,

Andrew S. Marcaccio

Enclosures

cc: Docket No. 23-05-EL Service List

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was 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.

Joanne M. Scanlon

July 7, 2023
Date

Docket No. 23-05-EL Rhode Island Energy – Net Metering Provision, RIPUC No. 2268
Service List updated 5/12/2023

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PUC 1-1

Request:

Referencing the RIE's Responses to the PUC's Seventh Set to Data Requests issued in Docket 5172 at this link: https://ripuc.ri.gov/eventsactions/docket/5127-NGrid-DR-PUC Set 7 (PUC 1-12-22).pdf

a. Please confirm that RIE's responses to all subparts of PUC 7-2 have not changed or explain what has changed.
b. Please explain the administrative ease gained by excluding facilities lesser than 25 kW from reconciliation assuming all that is required is an assumption that excess generation is at least greater than 100% of consumption.
   i. Please specifically identify the effort needed to identify this "minimum" excess credit in order to respond to Set 7 that would be incremental to RIE's proposal.
   ii. Please specifically identify the effort needed to execute Billing Charges that are avoided by adopting the proposed administrative ease.
   iii. Please provide an estimated annual cost savings gained by RIE's proposed administrative ease relative to the incremental efforts described in subparts i and ii.

Response:

a. RIE confirms that all subparts of National Grid's responses to PUC 7-2 issued in Docket 5127 remain the same.

b. At the time the Company filed the tariff advice, RIE expected reconciliation to be a labor intensive and manual process, thus reducing the amount of data by over 9000 accounts was one way to gain administrative ease; determining which accounts generated in excess of 100% consumption is only the first step of reconciliation. The Company is presently evaluating the use of the free and publicly available statistical computing program "R" to perform the reconciliation analysis. The Company anticipates that if able to successfully utilize "R" for purposes of calculating the "Volumetric Calculation" for behind-the-meter net metering installations, the efficiency gained would eliminate the 25kW threshold for the reconciliation analysis.

   i. The effort needed to identify the "minimum" excess credit in order to respond to Set 7 would be less than what the Company is proposing. Some level of data analysis is still required, but Step 4 of Schedule EJRS-1 would be eliminated, and Step 6 of Schedule EJRS-1 would be simplified to one billing charge rather than 2.

   ii. The expected time to process the qualifying subset of the approximately 9000 unique billing charges is difficult to forecast given, at this point, there would only be a manual way to issue those charges. For order of magnitude, it would likely take several months to process the additional charges. In the future the Company anticipates an automated process to create a billing charge "cons" type which would mitigate the administrative burden associated with the number of accounts.

iii. Any cost savings associated with the 25kW threshold for the reconciliation analysis would be a function of two things:

(1) The cost associated with accomplishing the "Volumetric Calculation" for all behind-the-meter net metering systems as compared to only those greater than 25 kW; and

(2) The cost associated with posting customer-specific charges for, potentially, all behind-the-metering net metering systems as compared to only those greater than 25 kW.

The Company is unable to provide an estimate for (1) and (2) at this time. It will supplement this response once the information is available.

Prepared by or under the supervision: Erica Russell Salk

PUC 1-2

Request:

RIE has proposed to estimate customer's production. Please explain what recourse customers have to dispute RIE's estimation.

Response:

A customer may dispute RIE's estimation by either calling the contact center or emailing the Customer Energy Integration shared mailbox (CAP@RIEnergy.com). Customers will be made aware of this through the billing charge communication. Rhode Island Energy will re-evaluate disputed estimates. The plan for re-evaluation would be determined on a per-customer basis, dependent on the specific concerns raised in the dispute.

Prepared by or under the supervision: Erica Russell Salk

PUC 1-3

Request:

Regarding the portions of the Joint Testimony that refers to the provisions for estimating production and consumption in R.I. Gen. Laws § 39-26.4-3(a)(2)(i)-(ii), for example the Joint Testimony in lines 1 through 7 on page 14 of 19, does RIE believe it has the ability to estimate production and consumption for administrative ease, or does RIE believe it has the ability to estimate production and consumption subject to reconciliation to actual production and consumption for administrative ease?

Response:

Based on a strict reading of R.I. Gen. Laws § 39-26.4-3(a)(2)(ii), the Company has the ability to estimate production and consumption subject to reconciliation to actual production and consumption. As noted in prior proceedings,[1] the Company has been using one meter instead of two meters or other metering solution that would be required to reconcile actual production and consumption. The Company will be able to reconcile actual production and consumption on a go-forward basis once the appropriate metering infrastructure is in place.

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[1] See Technical Session, April 12, 2022, Timothy Roughan on behalf of the Company, Page 16, Lines 17-21, "And for the ease of the program way back when it was first developed and put in place, we all talked very clearly about netting and that's how we've been doing it." and See the Company's response to PUC 1-16 in Docket No. 5127 which, in pertinent part, reads: "…As the Company explained on April 14, 2015, in a technical session (and other sessions/hearings where net metering was discussed) in RIPUC Docket No. 4549, it obtains meter readings from a single net meter for each project, then CSS uses the monthly readings to value all excess generation at the rate for a Renewable Generation Credit, and the Company manually reconciles net metering accounts for projects with a nameplate capacity greater than 25 kilowatts to determine whether there are any excess renewable credits for the year…". The pertinent part of the response may be viewed at PDF Page 174 out of 389 at: https://ripuc.ri.gov/sites/g/files/xkgbur841/files/eventsactions/docket/5127-NGrid-DR-PUC1-%28R%29-%28Revised-Complete-Set%29%28PUC-3-26-21%29V1.pdf

PUC 1-4

Request:

Please explain how, specifically, RIE would determine annual averages for the purpose of calculating Billing Charges as described in the proposed Schedule C load-sited net metering facilities.

Response:

The Company would utilize the monthly tariff rates as shown in R.I.P.U.C. Tariff No. 2095 and R.I.P.U.C. Tariff No. 2096 to calculate the annual average Renewable Net Metering Credit and Excess Renewable Net Metering Credit for purposes of calculating the Billing Charges. For an example utilizing A-16 for 2022, please refer to PUC 1-4 Attachment. The Company calculated the Renewable Net Metering Credit and the Excess Renewable Net Metering Credit for each month of 2022 based on their respective components (Last Resort Service, Distribution, Transmission, and Transition) and subsequently computed their yearly mean values.

	(a)	(b)	(c)	(d)	(e) = (a) + (b) + (c)	(f)	(g)	(h)	(i)	(j) = (g) + (h) + (i)	(k)	(l)	(m)	(n) = (e) + (f) + (j) + (m)	(o) = (e)
	Last Resort Service						Transmission				Transition				
A-16	Last Resort Service Base Charge	Last Resort Service Adjustment	Last Resort Service Admin. Cost Factor	Renewable Energy Standard Charge	Last Resort Service (Excluding RES)	Distribution	Base Transmission Charge	Transmission Adjustment	Transmission Uncollectible Factor	Transmission	Base Transition Charge	Transition Charge Adjustment	Transition	Renewable Net Metering Credit	Excess Renewable Net Metering Credit
Jan-22	$ 0.10491	$ (0.00512)	$ 0.00238	$ 0.00665	$ 0.10217	$ 0.04580	$ 0.03454	$ 0.00074	$ 0.00046	$ 0.03574	$ (0.00149)	$ 0.00004	$ (0.00145)	$ 0.18226	$ 0.10217
Feb-22	$ 0.10491	$ (0.00512)	$ 0.00238	$ 0.00665	$ 0.10217	$ 0.04580	$ 0.03454	$ 0.00074	$ 0.00046	$ 0.03574	$ (0.00149)	$ 0.00004	$ (0.00145)	$ 0.18226	$ 0.10217
Mar-22	$ 0.10491	$ (0.00512)	$ 0.00238	$ 0.00665	$ 0.10217	$ 0.04580	$ 0.03454	$ 0.00074	$ 0.00046	$ 0.03574	$ (0.00149)	$ 0.00004	$ (0.00145)	$ 0.18226	$ 0.10217
Apr-22	$ 0.07174	$ (0.00512)	$ 0.00238	$ 0.00665	$ 0.06900	$ 0.04580	$ 0.03524	$ 0.00095	$ 0.00046	$ 0.03665	$ -	$ 0.00018	$ 0.00018	$ 0.15163	$ 0.06900
May-22	$ 0.07174	$ (0.00512)	$ 0.00238	$ 0.00665	$ 0.06900	$ 0.04580	$ 0.03524	$ 0.00095	$ 0.00046	$ 0.03665	$ -	$ 0.00018	$ 0.00018	$ 0.15163	$ 0.06900
Jun-22	$ 0.07174	$ (0.00512)	$ 0.00238	$ 0.00665	$ 0.06900	$ 0.04580	$ 0.03524	$ 0.00095	$ 0.00046	$ 0.03665	$ -	$ 0.00018	$ 0.00018	$ 0.15163	$ 0.06900
Jul-22	$ 0.07174	$ (0.00512)	$ 0.00238	$ 0.00665	$ 0.06900	$ 0.04580	$ 0.03524	$ 0.00095	$ 0.00046	$ 0.03665	$ -	$ 0.00018	$ 0.00018	$ 0.15163	$ 0.06900
Aug-22	$ 0.07174	$ (0.00512)	$ 0.00238	$ 0.00665	$ 0.06900	$ 0.04580	$ 0.03524	$ 0.00095	$ 0.00046	$ 0.03665	$ -	$ 0.00018	$ 0.00018	$ 0.15163	$ 0.06900
Sep-22	$ 0.07174	$ (0.00512)	$ 0.00238	$ 0.00665	$ 0.06900	$ 0.04580	$ 0.03524	$ 0.00095	$ 0.00046	$ 0.03665	$ -	$ 0.00018	$ 0.00018	$ 0.15163	$ 0.06900
Oct-22	$ 0.17149	$ (0.00318)	$ 0.00233	$ 0.00721	$ 0.17064	$ 0.04580	$ 0.03524	$ 0.00095	$ 0.00046	$ 0.03665	$ -	$ 0.00018	$ 0.00018	$ 0.25327	$ 0.17064
Nov-22	$ 0.17149	$ (0.00318)	$ 0.00233	$ 0.00721	$ 0.17064	$ 0.04580	$ 0.03524	$ 0.00095	$ 0.00046	$ 0.03665	$ -	$ 0.00018	$ 0.00018	$ 0.25327	$ 0.17064
Dec-22	$ 0.17149	$ (0.00318)	$ 0.00233	$ 0.00721	$ 0.17064	$ 0.04580	$ 0.03524	$ 0.00095	$ 0.00046	$ 0.03665	$ -	$ 0.00018	$ 0.00018	$ 0.25327	$ 0.17064
						AVERAGE								$ 0.18470	$ 0.10270

Notes:

(a)(b)(c)(d) For January - March 2022: Docket No. 4978 (July 20, 2021), Attachment 2.
For April - September 2022: Docket No. 4978 (January 19, 2022), Attachment 1, Page 3 of 5.
For October - December 2022: Docket No. 4978 (July 21, 2022), Schedule 2.

(f) For January - December 2022: R.I.P.U.C. Tariff No. 2095 (Effective 4/1/2022; Issued 3/29/2022)

(g)(h)(i) For January - March 2022: R.I.P.U.C. Tariff No. 2095 (Effective 1/1/2022; Issued 12/23/2021)
For April - December 2022: R.I.P.U.C. Tariff No. 2095 (Effective 4/1/2022; Issued 3/29/2022)

(k)(l) For January - March 2022: R.I.P.U.C. Tariff No. 2095 (Effective 1/1/2022; Issued 12/23/2021)
For April - December 2022: R.I.P.U.C. Tariff No. 2095 (Effective 4/1/2022; Issued 3/29/2022)

PUC 1-5

Request:

Please explain how, specifically, RIE would determine annual averages for the purpose of calculating Billing charges as described in the proposed Schedule C for standalone net metering facilities, making sure to identify the applicable rate class (host/satellite) used in the full calculation facilities.

Response:

Satellite facilities receive allocated percentages of host credits per Schedule B. That is, Renewable Metering Credits and Excess Renewable Metering Credits are paid out to satellites at the host's rate schedule. Consequently, for purposes of the "Volumetric Calculation," Billing Charges would utilize the host rate schedule's Renewable Net Metering Credit and Excess Renewable Net Metering Credit. These would be calculated in the same manner as described in PUC 1-4.

PUC 1-6

Request:

Please confirm that RIE will continue to provide cash credits, or a "monetary method" of crediting all excess generation in the first instance but will apply the "volumetric method" when reconciling production and consumption in order to calculate the billing charge.

Response:

Confirmed. The Company will continue to provide cash credits, or a "monetary method" of crediting all excess generation in the first instance but will apply the "volumetric method" when reconciling production and consumption in order to calculate the billing charge. This aligns with R.I.P.U.C No. 2257 II. (5).

PUC 1-7

Request:

Please identify the statutory language, if any, that requires a zero-dollar credit for generation in excess of 125% of consumption.

Response:

The Company did not find any statutory language within the Net Metering Act, R.I. Gen. Laws Ch. 39-26.4, that expressly requires a zero-dollar credit for generation in excess of 125% of consumption.

PUC 1-8

Request:

Regarding the Joint Testimony on page 18 of 19 lines 1-4, would RIE seek recovery of costs associated with creating a new cons type (and other integration) with CSS, and if so, what costs and through which recovery mechanism?

Response:

The Company considers the development of new cons types, as referenced in the Joint Testimony on page 18 of 19 lines 1-4, to be part of the transition from National Grid to PPL[1] and, therefore, would not seek cost recovery.

If, as a result of these proceedings, the Company determines that the implementation of new systems is required and such systems would be incremental to the Company's systems under National Grid, the Company would evaluate whether cost recovery is warranted. The evaluation would be governed by the net metering statute which allows for recovery of prudent and reasonable costs. Specifically, R.I. Gen. Laws § 39-26.4-3(c) provides that "[a]ny prudent and reasonable costs incurred by the electric-distribution company pursuant to achieving compliance with subsection (a) and the annual amount of any renewable net-metering credits or excess renewable net-metering credits provided to accounts associated with eligible net-metering systems or community remote-net-metering systems, shall be aggregated by the distribution company and billed to all distribution customers on an annual basis through a uniform, per-kilowatt-hour (kWh) surcharge embedded in the distribution component of the rates reflected on customer bills."

[1] On May 25, 2022, PPL Rhode Island Holdings, LLC acquired 100 percent of the equity interest in The Narragansett Electric Company from National Grid USA.

PUC 1-9

Request:

Regarding the Joint Testimony on page 18 of 19 lines 6-8, would RIE seek recovery of costs associated with its communication strategy to explain Billing Charges, and if so, what costs and through which recovery mechanism?

Response:

At this time, the Company would not seek recovery of costs associated with its communication strategy to explain Billing Charges. This work would not be incremental to the current responsibilities the FTEs on the communication team already support.

PUC 1-10

Request:

Regarding the Joint Testimony on page 18 of 19 lines 10-13, is RIE's motive for choosing the "volumetric method" based on a policy to "help drive down the balance of credits?" If so, why?

Response:

No, RIE's motive for choosing the "volumetric method" is not based on a policy to "help drive down the balance of credits." Any method of reconciliation, volumetric or monetary, would help drive down the balance of credits. RIE recommends the volumetric method because it believes this method more closely aligns with the intent of the net metering statute; specifically, the definition of "excess renewable net-metering credit" as defined by R.I. Gen. Laws § 39-26.4-2(7).[1] In addition, the volumetric method better aligns with current tariff language R.I.P.U.C. No. 2257, Section II (5).

[1] "Excess renewable net-metering credit" means a credit that applies to an eligible net-metering system or community remote net-metering system for that portion of the production of electrical energy beyond one hundred percent (100%) and no greater than one hundred twenty-five percent (125%) of the renewable self-generator's own consumption at the eligible net-metering system site or the sum of the usage of the eligible credit recipient accounts associated with the community remote net-metering system during the applicable billing period. Such excess renewable net-metering credit shall be equal to the electric distribution company's avoided cost rate, which is hereby declared to be the electric distribution company's standard-offer service kilowatt hour (kWh) charge for the rate class and time-of-use billing period (if applicable) applicable to the customer of record for the eligible net-metering system or applicable to the customer of record for the community remote net-metering system. The commission shall have the authority to make determinations as to the applicability of this credit to specific generation facilities to the extent there is any uncertainty or disagreement.

Prepared by or under the supervision: Erica Russell Salk

PUC 1-11

Request:

RIE has proposed withholding Authority to Interconnect (ATI) until a standalone facility has shown the facility's generation to consumption ratio is no greater than 100%, the Joint Testimony at 14 of 19 describes "Requiring a generation to consumption ratio no greater than 100%."

a. Please explain whether this 100% cap is already required in Schedule B part C.

b. Please explain the effect of the proposed language in Schedule B part C that states "… but shall be as close to 100% as feasible."

c. Regarding the proposed language in Schedule B part A that begins, "Total Estimated generation to consumption ratio…" and concludes with a parenthetical statement:
   i. Please explain the effect of this proposed language, and
   ii. Please explain what party provides this data and what party, if any, validates this data and how.

Response:

a. The Company's interpretation of Schedule B, part C, is that it specifies the sum of the percentage allocation should not exceed 100% but does not identify a lower limit.

b. The effect of the allocation being as close to 100% as feasible will help ensure that credits can be utilized.

c.
   i. The effect of this proposed language is to help mitigate an abundance of excess net metering credits.
   ii. The customer is responsible for submitting the Schedule B to the Company. The Company validates this data by reviewing the information provided by the customer (details around the generation) and by reviewing bill account historic data we have in CSS (for details around the consumption).

Prepared by or under the supervision: Erica Russell Salk

PUC 1-12

Request:

Regarding the Joint Testimony on page 14 lines 10-13, the witnesses state, "Requiring the percentage allocation of credits to equal 100% will ensure that unused credits do not bank on the host account, unable to be used.":

a. Does this indicate that only host accounts have the potential to have unused credits?

b. If the answer to part a is "Yes," please provide an explanation of why, referencing specific tariff language. If the answer to part b is "No," please clarify the testimony.

Response:

a. No, satellite accounts also have the potential to have unused credits.

b. The purpose of the Q&A on page 14 of the Joint Testimony, lines 10-13, was to identify one potential solution to help mitigate excess credits on host accounts. It was not intended to be an exhaustive solution to all possible reasons host accounts or satellite accounts could accumulate excess credits. Satellite accounts also have the potential to have unused credits for various reasons such as, but not limited to, rate class discrepancies between host and satellite, the fact that allocations are made based on estimates of generation and estimates of consumption, the possibility of satellites having multiple hosts, the possibility of satellites having an independent third-party supplier, the variation of rates throughout a year, the fact that the host and satellite accounts may not be on the same billing cycle (satellite could get and pay for a bill before the credits are transferred), etc.

Prepared by or under the supervision: Erica Russell Salk

PUC 1-13

Request:

Would a facility that fails to meet the required 100% cap on generation to consumption ratio be eligible to register as a PURPA facility? If so,

a. What avoided cost would apply?

b. Can the facility become a net metering facility at a later time? Please provide any tariff language, statute, or regulation upon which the response is based.

Response:

Yes, a facility that fails to meet the required 100% cap on generation to consumption ratio is eligible to register as a PURPA facility (or, synonymously, a qualifying facility). Based on R.I.P.U.C No. 2240 III., a facility can be compensated as a qualifying facility if the facility is not eligible for net metering. A facility that fails to meet the required 100% cap on generation to consumption ratio is not eligible for net metering and, therefore, would be eligible to be compensated as a qualifying facility (pending meeting whatever other eligibility criteria might be relevant for a qualifying facility).

a. Any qualifying facility approved by FERC would need to enter into a PPA via Schedule A of R.I.P.U.C. No. 2240 of which compensation would be at the avoided cost rate reconciled to actual wholesale purchases.

b. The facility is not prohibited from becoming a net metering facility at a later time. The Company did not identify any language in R.I.P.U.C No. 2240 or R.I.P.U.C No. 2257 that would prevent the facility from becoming a net metering facility at a later time if eligibility criteria is satisfied.

Prepared by or under the supervision: Erica Russell Salk

PUC 1-14

Request:

Can a facility partially participate as a net metering facility, and partially participate as a PURPA facility? If so, please explain how. Please provide any tariff language, statute, or regulation upon which the response is based.

Response:

Per current tariff language, the Company believes that a facility cannot partially participate as a net metering facility and partially participate as a PURPA facility. Based on R.I.P.U.C No. 2240 III., a facility can be compensated as a qualifying facility if the facility is not eligible for net metering. R.I.P.U.C. No. 2240 III does not define or contemplate partial participation, therefore, the Company concludes that partial participation is not allowed.

PUC 1-15

Request:

Regarding the definition of “Eligible Net Metering System” please provide a list of circumstances in which a “projected annual consumption of energy may be used” to reasonably design and size an Eligible Net Metering Resource. Please also explain how the “projected annual consumption” is calculated.

Response:

A “projected annual consumption” of energy may be used for instances where either (i) there is no historic data, or (ii) the historic data would become obsolete. Examples of these instances include, but are not limited to, new construction (no historical data) and proposed load for significant renovation or electrification (historic data would become obsolete).

The customer calculates “projected annual consumption” and submits their calculations to the Company via a “load sheet”. The Company validates customer calculations.