

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

The Narragansett Electric Co. d/b/a Rhode Island Energy's
Advanced Metering Functionality ("AMF") Business Case

Docket 22-49-EL

**CONSERVATION LAW FOUNDATION'S
STATEMENT OF ISSUES FOR OPEN MEETING**

At the conclusion of public hearings in Docket No. 22-49-EL, the parties were invited to submit statements of issues that they believe the Public Utilities Commission (the "Commission") needs to address at an Open Meeting when making a decision in this matter. The Conservation Law Foundation ("CLF") respectfully requests that the Commission address the following issues.

We ask that in the event that the Commission approves Rhode Island Energy's (the "Company") Business Case in this docket, it also explicitly render a decision on which if any additions or alterations to the Company's proposal are incorporated into the approval. This is particularly relevant considering the Company's filing of a Statement of Alternative or Additional Positions on July 13, 2023. The Company indicates that this document "reflect[s] the Company's review, evaluation, and consideration of many of the issues and concerns it has heard, both directly and indirectly, from the Commission and from the other parties to this docket," and that it "is not opposed to the adoption of these positions as part of any order in this docket, *if the Commission elects to adopt them.*" Statement of Alternative or Additional Positions at 1 (emphasis added). However, this document does not alter the proposal before the

Commission, and the Company would not be bound by the modifications to its proposal contained in the document unless the Commission explicitly elects to adopt them. *See id.* (“The Company’s submission of this Statement does not reflect that the Company is abandoning any aspect of its request.”).

Of particular interest to CLF are the terms concerning accelerated rollout of time varying rates (“TVR”), including:

- a. Within one year of approval of the AMF Business Case, the Company would submit a proposal to the Commission for TVR in a separate docket that addresses the availability of basic time-of-use (“TOU”) rates, critical peak pricing (“CPP”), peak time rebate (“PTR”) and/or variable peak pricing (“VPP”) rates, including identification of modifications to the Company’s billing systems (and any associated costs that may need to be recovered to implement those modifications) that may be necessary to permit the implementation of TOU, CPP, PTR, and VPP rates.
- b. The submission described in subparagraph 2(a) would:
 - i. propose implementation of some form of TVR no later than one year following the completion of electric meter deployment, subject to regulatory approval;
 - ii. include a campaign to inform and educate customers about TVR, to begin prior to the completion of AMF deployment, emphasizing outreach to 5 low-to-moderate income customers and customers in multi-family housing, and
 - iii. consider 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.

Id. at 4--5. CLF asks that the Commission make any approval contingent on a rollout of TVR at least as rapid as described in the Company's Statement of Alternative or Additional Positions. The implementation of TVR can help to reduce state greenhouse gas emissions, and therefore help the state comply with the Act on Climate, under which it must achieve net-zero emissions by 2050. The Act on Climate states that it is within the "powers, duties, and obligations" of agencies including the Commission to address "climate change mitigation, adaptation, and resilience in so far as climate change affects its mission, duties, responsibilities, projects, or programs." R.I. Gen. Laws § 42-6.2-8.

For the foregoing reasons, CLF respectfully requests that in the event that the Commission approves the Company's Business Case in this docket, the Commission explicitly render a decision on which if any additions or alterations to the Company's proposal are incorporated into the approval.

Respectfully submitted,

CONSERVATION LAW FOUNDATION

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CERTIFICATE OF SERVICE

I certify that the original and four copies of this Statement of Issues were filed with the Public Utilities Commission. In addition, a PDF version of this Statement of Issues was served electronically on the service list of this Docket, as that list was provided by the PUC on August 1, 2023. I certify that all of the foregoing was done on August 24, 2023.

/s/ James Crowley