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Rhode Island Energy™
a PPL company

August 24, 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
Responses to PUC Data Requests – Set 2 (Complete Set)

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 PUC 2-4 and PUC 2-5.

This transmittal completes the Company's responses to the Commission's Second Set of Data Requests issued 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

PUC 2-1

Request:

Regarding the Schedule B used for allocation of credits:

a. Confirm whether a host/developer can add new accounts and remove accounts when updating a Schedule B throughout the life of the project.

b. Confirm that a Schedule B requires a percentage-based allocation of the host account's net metering credits.

c. Explain briefly if an optional Schedule B could be created and used at the hots account's decision to allocate a specific amount of credits or credit value.

d. Explain briefly if an optional Schedule B could allow a host/developer to allocate the lesser of two allocation metrics, for example the lesser of a defined percentage of the monthly output and the customer's actual monthly use.

Response:

a. The Company's interpretation of the tariff is that new accounts can be added or removed when updating a Schedule B throughout the life of the project.

b. The Company's interpretation of the tariff is that the Schedule B requires a percentage-based allocation of the host account's net metering credits.

c. The Company is open to an optional Schedule B that could be created and used at the host account's decision to allocate a specific amount of credits or credit value.

d. The Company is open to and will explore the scope required to implement such measures in the billing system, CSS, to allow a host/developer to allocate the lesser of two allocation metrics.

PUC 2-2

Request:

Please provide the actual annual AC capacity factor for any net metering facility with at least twelve months of generation data for the previous five years. Please present the annual and five-year average. Please separate the response for different generator types (e.g., solar and wind).

Response:

The table below presents the actual annual AC capacity factor for any stand-alone net metering facility with at least twelve months of generation data for the previous five years. Please refer to Attachment PUC 2-2 for the detailed facility-level analysis.

Year	Renewable Type	Average Capacity Factor	5yr Average Capacity Factor
2018	Solar	14.58%	17.31%
2019	Solar	17.22%	
2020	Solar	18.47%	
2021	Solar	17.82%	
2022	Solar	18.45%	
2019	Wind	24.68%	N/A
2020	Wind	26.39%	
2021	Wind	25.67%	
2022	Wind	27.71%	
2022	Hydro	26.49%	N/A

Prepared by or under the supervision: Erica Russell Salk

Year	Renewable Type	Nameplate kW AC	Max Annual Generation (kWh)	Actual Generation kWh	Average of Actual Capacity Factor
2019	Solar	**1620**	14,191,200	-2,941,747	20.73%
2020	Solar	**1620**	14,191,200	-3,059,243	21.56%
2021	Solar	**1620**	14,191,200	-2,833,926	19.97%
2022	Solar	**1620**	14,191,200	-2,996,214	21.11%
				-11,831,130	**20.84%**
2022	Solar	**9600**	84,096,000	-12,132,119	14.43%
				-12,132,119	**14.43%**
2019	Solar	**780**	6,832,800	-1,246,380	18.24%
2020	Solar	**780**	6,832,800	-1,273,567	18.64%
2021	Solar	**780**	6,832,800	-1,225,267	17.93%
2022	Solar	**780**	6,832,800	-1,269,886	18.59%
				-5,015,100	**18.35%**
2021	Solar	**1826**	15,995,760	-2,987,542	18.68%
2022	Solar	**1826**	15,995,760	-3,055,986	19.10%
				-6,043,528	**18.89%**
2021	Solar	**4482**	39,262,320	-4,742,298	12.08%
2022	Solar	**4482**	39,262,320	-7,405,339	18.86%
				-12,147,637	**15.47%**
2020	Solar	**8000**	70,080,000	-12,154,824	17.34%
2021	Solar	**8000**	70,080,000	-11,219,304	16.01%
2022	Solar	**8000**	70,080,000	-12,406,908	17.70%
				-35,781,036	**17.02%**
2020	Solar	**8000**	70,080,000	-11,220,966	16.01%
2021	Solar	**8000**	70,080,000	-11,010,780	15.71%
2022	Solar	**8000**	70,080,000	-11,666,934	16.65%
				-33,898,680	**16.12%**
2019	Solar	**3000**	26,280,000	-4,954,469	18.85%
2020	Solar	**3000**	26,280,000	-5,268,509	20.05%
2021	Solar	**3000**	26,280,000	-4,848,029	18.45%
				-15,071,007	**19.12%**
2022	Hydro	**1700**	14,892,000	-3,945,387	26.49%
				-3,945,387	**26.49%**
2020	Solar	**3875**	33,945,000	-5,926,539	17.46%
2021	Solar	**3875**	33,945,000	-6,688,233	19.70%
2022	Solar	**3875**	33,945,000	-7,062,298	20.81%
				-19,677,070	**19.32%**
2019	Solar	**3000**	26,280,000	-4,000,510	15.22%
2020	Solar	**3000**	26,280,000	-4,428,452	16.85%
2021	Solar	**3000**	26,280,000	-4,341,548	16.52%
2022	Solar	**3000**	26,280,000	-4,495,569	17.11%
				-17,266,079	**16.43%**
2022	Solar	**9600**	84,096,000	-11,666,436	13.87%
				-11,666,436	**13.87%**

2022	Solar	**4980**	43,624,800	-7,164,777	16.42%
				-7,164,777	**16.42%**
2021	Solar	**4999**	43,791,240	-7,659,513	17.49%
2022	Solar	**4999**	43,791,240	-7,919,810	18.09%
				-15,579,323	**17.79%**
2019	Solar	**1000**	8,760,000	-1,546,535	17.65%
2020	Solar	**1000**	8,760,000	-1,570,068	17.92%
2021	Solar	**1000**	8,760,000	-1,493,002	17.04%
2022	Solar	**1000**	8,760,000	-1,597,350	18.23%
				-6,206,955	**17.71%**
2018	Solar	**1500**	13,140,000	-1,763,664	13.42%
2019	Solar	**1500**	13,140,000	-1,894,978	14.42%
2020	Solar	**1500**	13,140,000	-2,125,076	16.17%
2021	Solar	**1500**	13,140,000	-2,184,785	16.63%
2022	Solar	**1500**	13,140,000	-2,304,702	17.54%
				-10,273,205	**15.64%**
2021	Solar	**1800**	15,768,000	-2,361,633	14.98%
				-2,361,633	**14.98%**
2021	Solar	**1660**	14,541,600	-2,760,821	18.99%
2022	Solar	**1660**	14,541,600	-3,267,388	22.47%
				-6,028,209	**20.73%**
2019	Solar	**1200**	10,512,000	-2,050,798	19.51%
2020	Solar	**1200**	10,512,000	-2,144,479	20.40%
2021	Solar	**1200**	10,512,000	-1,963,872	18.68%
2022	Solar	**1200**	10,512,000	-2,109,623	20.07%
				-8,268,772	**19.67%**
2022	Solar	**3168**	27,751,680	-5,507,798	19.85%
				-5,507,798	**19.85%**
2022	Solar	**9600**	84,096,000	-9,047,958	10.76%
				-9,047,958	**10.76%**
2021	Solar	**3750**	32,850,000	-5,529,103	16.83%
2022	Solar	**3750**	32,850,000	-6,283,334	19.13%
				-11,812,437	**17.98%**
2019	Solar	**2200**	19,272,000	-5,756,614	29.87%
2020	Solar	**2200**	19,272,000	-5,986,556	31.06%
2021	Solar	**2200**	19,272,000	-5,572,411	28.91%
2022	Solar	**2200**	19,272,000	-5,420,642	28.13%
				-22,736,223	**29.49%**
2021	Solar	**2625**	22,995,000	-3,842,957	16.71%
2022	Solar	**2625**	22,995,000	-4,222,298	18.36%
				-8,065,255	**17.54%**
2019	Solar	**2010**	17,607,600	-2,241,179	12.73%
2020	Solar	**2010**	17,607,600	-3,823,153	21.71%
2021	Solar	**2010**	17,607,600	-3,541,679	20.11%
2022	Solar	**2010**	17,607,600	-3,875,947	22.01%
				-13,481,958	**19.14%**
2021	Solar	**2640**	23,126,400	-4,279,428	18.50%

2022	Solar	**2640**	23,126,400	-4,484,387	19.39%
				-8,763,815	**18.95%**
2020	Solar	**1750**	15,330,000	-2,806,099	18.30%
2021	Solar	**1750**	15,330,000	-2,758,457	17.99%
2022	Solar	**1750**	15,330,000	-2,746,402	17.92%
				-8,310,958	**18.07%**
2020	Solar	**8000**	70,080,000	-10,652,634	15.20%
2021	Solar	**8000**	70,080,000	-10,281,510	14.67%
2022	Solar	**8000**	70,080,000	-10,397,946	14.84%
				-31,332,090	**14.90%**
2019	Solar	**4992**	43,729,920	-8,480,356	19.39%
2020	Solar	**4992**	43,729,920	-8,637,156	19.75%
2021	Solar	**4992**	43,729,920	-8,185,411	18.72%
2022	Solar	**4992**	43,729,920	-8,713,046	19.92%
				-34,015,969	**19.45%**
2020	Solar	**5000**	43,800,000	-7,510,004	17.15%
2021	Solar	**5000**	43,800,000	-8,654,126	19.76%
2022	Solar	**5000**	43,800,000	-9,098,600	20.77%
				-25,262,730	**19.23%**
2021	Solar	**4000**	35,040,000	-6,780,071	19.35%
2022	Solar	**4000**	35,040,000	-7,102,548	20.27%
				-13,882,619	**19.81%**
2019	Wind	**3000**	26,280,000	-6,946,613	26.43%
2020	Wind	**3000**	26,280,000	-7,498,674	28.53%
2021	Wind	**3000**	26,280,000	-6,980,248	26.56%
2022	Wind	**3000**	26,280,000	-7,806,849	29.71%
				-29,232,384	**27.81%**
2021	Solar	**2376**	20,813,760	-3,097,315	14.88%
2022	Solar	**2376**	20,813,760	-3,810,335	18.31%
				-6,907,650	**16.59%**
2019	Solar	**4050**	35,478,000	-4,975,833	14.03%
2020	Solar	**4050**	35,478,000	-5,146,392	14.51%
2021	Solar	**4050**	35,478,000	-5,932,574	16.72%
2022	Solar	**4050**	35,478,000	-6,269,521	17.67%
				-22,324,320	**15.73%**
2019	Solar	**2100**	18,396,000	-3,633,864	19.75%
2020	Solar	**2100**	18,396,000	-3,667,340	19.94%
2021	Solar	**2100**	18,396,000	-3,570,905	19.41%
2022	Solar	**2100**	18,396,000	-3,526,984	19.17%
				-14,399,093	**19.57%**
2019	Wind	**3000**	26,280,000	-6,506,654	24.76%
2020	Wind	**3000**	26,280,000	-6,803,253	25.89%
2021	Wind	**3000**	26,280,000	-6,644,854	25.28%
2022	Wind	**3000**	26,280,000	-7,265,484	27.65%
				-27,220,245	**25.89%**
2018	Solar	**3000**	26,280,000	-3,775,325	14.37%
2019	Solar	**3000**	26,280,000	-4,571,620	17.40%

2020	Solar	**3000**	26,280,000	-4,764,409	18.13%
2021	Solar	**3000**	26,280,000	-4,822,714	18.35%
2022	Solar	**3000**	26,280,000	-5,133,085	19.53%
				-23,067,153	**17.55%**
2021	Solar	**2000**	17,520,000	-3,405,909	19.44%
2022	Solar	**2000**	17,520,000	-3,569,642	20.37%
				-6,975,551	**19.91%**
2019	Solar	**7750**	67,890,000	-8,708,502	12.83%
2020	Solar	**7750**	67,890,000	-13,804,575	20.33%
2021	Solar	**7750**	67,890,000	-12,762,065	18.80%
2022	Solar	**7750**	67,890,000	-13,501,809	19.89%
				-48,776,951	**17.96%**
2019	Solar	**3780**	33,112,800	-6,458,850	19.51%
2020	Solar	**3780**	33,112,800	-6,494,460	19.61%
2021	Solar	**3780**	33,112,800	-6,099,462	18.42%
2022	Solar	**3780**	33,112,800	-6,411,948	19.36%
				-25,464,720	**19.23%**
2020	Solar	**1250**	10,950,000	-1,846,020	16.86%
2021	Solar	**1250**	10,950,000	-1,924,031	17.57%
2022	Solar	**1250**	10,950,000	-2,036,744	18.60%
				-5,806,795	**17.68%**
2022	Solar	**9600**	84,096,000	-10,307,444	12.26%
				-10,307,444	**12.26%**
2020	Solar	**5000**	43,800,000	-7,575,236	17.30%
2021	Solar	**5000**	43,800,000	-8,604,007	19.64%
2022	Solar	**5000**	43,800,000	-9,020,178	20.59%
				-25,199,421	**19.18%**
2018	Solar	**1104**	9,671,040	-1,544,007	15.97%
2019	Solar	**1104**	9,671,040	-1,612,453	16.67%
2020	Solar	**1104**	9,671,040	-1,652,988	17.09%
2021	Solar	**1104**	9,671,040	-1,616,903	16.72%
2022	Solar	**1104**	9,671,040	-1,719,231	17.78%
				-8,145,582	**16.85%**
2019	Solar	**8500**	74,460,000	-10,197,165	13.69%
2020	Solar	**8500**	74,460,000	-15,416,337	20.70%
2021	Solar	**8500**	74,460,000	-14,517,618	19.50%
2022	Solar	**8500**	74,460,000	-15,255,828	20.49%
				-55,386,948	**18.60%**
2019	Wind	**3000**	26,280,000	-6,007,741	22.86%
2020	Wind	**3000**	26,280,000	-6,502,968	24.74%
2021	Wind	**3000**	26,280,000	-6,611,405	25.16%
2022	Wind	**3000**	26,280,000	-6,771,986	25.77%
				-25,894,100	**24.63%**
2019	Solar	**2200**	19,272,000	-1,833,716	9.51%
2020	Solar	**2200**	19,272,000	-1,963,889	10.19%
2021	Solar	**2200**	19,272,000	-1,844,738	9.57%
2022	Solar	**2200**	19,272,000	-1,896,892	9.84%

	-7,539,235	**9.78%**
	-775,225,485	**18.76%**

PUC 2-3

Request:

For CRNM, confirm which distribution rate class and LRS rate group charges are used to define the Renewable Net Metering and Excess Renewable Net metering credits provided to satellite accounts.

Response:

In the context of CRNM, Renewable Net Metering Credits and Excess Renewable Net Metering Credits are calculated using the distribution rate class and LRS rate group charges associated with the rate class of the host. Consequently, the Renewable Net Metering Credits and Excess Renewable Net Metering Credits provided to satellite accounts are calculated on the basis of the host's rate class.

Prepared by or under the supervision: Chris Ann Rossi

PUC 2-4

Request:

Please assume the following example:

- An eligible net metering generator is sized to generate 2000 kWh per year, and does, using no station power.

- There are two satellite accounts (Satellite A and Satellite B) that are, per the project' Schedule B, 50% of credits each.

- Customer A's actual annual use is 250 kWh.
- Customer B's actual annual use is 1000kWh.

- The only charges on any customers' bills are LRS, distribution, transmission, and transition charges, and all customers are C-06 rate class. The sum of these charges all during the year are $0.20/kWh while the value of LRS is always $0.08/kWh.

- RIE's tariff changes are approved as filed

Please show the following:

a. The billing/credit position of all customers at the end of the year, but before credit reconciliation occurs.

b. The calculation for credit reconciliation, identifying which customer's rate class is used for any billing charge calculation.

c. The billing/credit position of all customers after reconciliation.

d. Identify which customers, if any, are eligible for a cash out of credit value and what the value is, if any.

PUC 2-4, page 2

Response:

a.

	Generator	A	B
Credit	$ (400.00)	$ -	$ -
Charge	$ -	$ 50.00	$ 200.00
Total	$ (400.00)	$ 50.00	$ 200.00
AFTER TRANSFER			
	Generator	**A**	**B**
Credit	$ (400.00)	$ (200.00)	$ (200.00)
Charge	$ 400.00	$ 50.00	$ 200.00
Total	$ -	$ (150.00)	$ -

b. Billing charge calculations are defined in Schedule EJRS-1 Page 2 of 3 and Page 3 of 3. The billing charges will be calculated based on the rate class of the host/developer account. This customer's annual generation to consumption ratio is 160%:

$$\frac{2000\ kWh}{(250\ kWh + 1000\ kWh)}$$

For this example, there will not be a billing charge applied to annual generation up to 1250 kWh (i.e., up to 100% of annual consumption). Billing Charge 1 will apply to annual generation in the range of 1250kWh to 1562.5 kWh (i.e., 100% to 125% of annual consumption). These 312.5 kWh were credited at 20 cents per kWh but should have been credited at 8 cents per kWh. Therefore, a 12-cent per kWh charge will be applied to these 312.5 kWh for a total Billing Charge 1 of $37.50. Billing Charge 2 will apply to generation greater than 1562.5 kWh (i.e., greater than 125% of annual consumption). These 437.5 kWh were credited at 20 cents per kWh but should not have been credited at all. Therefore, a 20-cent per kWh charge will be applied to these 437.5 kWh for a total Billing Charge 2 of $87.50.

In summary, the host/developer account was credited $400.00 during the year, but only should have been credited $275.00. The total billing charge summing Billing Charge 1 and Billing Charge 2 is $125.00

Prepared by or under the supervision: Erica Russell Salk

PUC 2-4, page 3

c.

	Generator	A	B
Credit	$ (400.00)	$ (200.00)	$ (200.00)
Charge	$ 400.00	$ 50.00	$ 200.00
Total	$ -	$ (150.00)	$ -
Reconciliation Charge	$ 125.00	$ -	$ -
New Total	$ 125.00	$ (150.00)	$ -

d. After reconciliation and billing charges, this net metering system (inclusive of the generator/host account and the two satellite accounts) has $25.00 available for a potential cash out, or 312.5 kWh of excess generation at the LRS rate of $0.08 per kWh. The Company proposes to apply the billing charge of $125.00 at the generator/host account. This would leave a total of $150.00 on A available to cash-out. Because the Company does not have visibility with respect to the financing agreement between the generator/host account and the two satellite accounts, it proposes to offer a cash-out of the $150 to A and thereafter leave it solely to the generator/host and satellites to conduct any final reconciliation within the net metering system.

PUC 2-5

Request:

Please respond to the prompts in 2-4, but assume the following difference:

- Customer A's actual use is 250 kWh.
- Customer B's actual use is 1250 kWh.

Response:

a.

	Generator	**A**	**B**
Credit	$ (400.00)	$ -	$ -
Charge	$ -	$ 50.00	$ 250.00
Total	$ (400.00)	$ 50.00	$ 250.00
AFTER TRANSFER			
	Generator	**A**	**B**
Credit	$ (400.00)	$ (200.00)	$ (200.00)
Charge	$ 400.00	$ 50.00	$ 250.00
Total	$ -	$ (150.00)	$ 50.00

b. Billing charge calculations are defined in Schedule EJRS-1 Page 2 of 3 and Page 3 of 3. The billing charges will be calculated based on the rate class of the host/developer account. This customer's annual generation to consumption ratio is 133%:

$$\frac{2000\ kWh}{(250\ kWh + 1250\ kWh)}$$

For this example, there will not be a billing charge applied to annual generation up to 1500 kWh (i.e., up to 100% of annual consumption). Billing Charge 1 will apply to annual generation in the range of 1500kWh to 1875 kWh (i.e., 100% to 125% of annual consumption). These 375kWh were credited at 20 cents per kWh but should have been credited at 8 cents per kWh. Therefore, a 12-cent per kWh charge will be applied to these 375 kWh for a total Billing Charge 1 of $45.00. Billing Charge 2 will apply to generation greater than 1875 kWh (i.e., greater than 125% of annual consumption). These 375 kWh were credited at 20 cents per kWh but should not have been credited at all. Therefore, a 20-cent per kWh charge will be applied to these 375 kWh for a total Billing Charge 2 of $25.00.

Prepared by or under the supervision: Erica Russell Salk

PUC 2-5, page 2

In summary, the host/developer account was credited $400.00 during the year, but only should have been credited $330. The total billing charge summing Billing Charge 1 and Billing Charge 2 is $70.

c.

	Generator	A	B
Credit	$ (400.00)	$ (200.00)	$ (200.00)
Charge	$ 400.00	$ 50.00	$ 250.00
Total	$ -	$ (150.00)	$ 50.00
Reconciliation Charge	$ 70.00	$ -	$ -
New Total	$ 70.00	$ (150.00)	$ 50.00

d. After reconciliation and billing charges, this net metering system (inclusive of the generator/host account and the two satellite accounts) has $30.00 available for a potential cash out, or 375 kWh of excess generation at the LRS rate of $0.08 per kWh. The Company proposes to apply the billing charge of $70.00 at the generator/host account. This would leave a total of $150.00 on A available to cash-out. Because the Company does not have visibility with respect to the financing agreement between the generator/host account and the two satellite accounts, it proposes to offer a cash-out of the $150 to A and thereafter leave it solely to the generator/host and satellites to conduct any final reconciliation within the net metering system.

PUC 2-6

Request:

Will customers opting for a cash out provision receive a 1099 Form statement from RIE in any instance?

Response:

Yes. Rhode Island Energy will only provide a 1099 Form statement to customers who participate in net metering who receive a payment in excess of $600 via the cash out provision.

Prepared by or under the supervision: Chris Ann Rossi

PUC 2-7

Request:

If the Company received approval of its proposed tariff by Octobe[r] 1, 2023,

a. when would the reconciliation and billing charges occur for net metering accounts active in CY2022?
b. When would that reconciliation have an impact on the Net Metering Charge??

Response:

a. The actual implementation of the reconciliation and billing charges for CY 2022 would also require that the Company had received approval of its proposed CY 2022 reconciliation in addition to receiving approval of its proposed tariff. Assuming the Company received approval of its proposed tariff by October 1, 2023, and that it filed its proposed CY 2022 annual reconciliation (including proposed billing charges) around October 1, 2023, and received approval of that proposal prior to December 1, 2023, the Company could implement the CY 2022 annual reconciliation as follows:

   If the Company were directed to treat the billing charges as a one-time miscellaneous debit, the Company can prepare to post a one-time miscellaneous debit on the affected accounts with 30 days' notice. This would include adding a bill message on those bills to explain the debit. A journal entry would then be needed to properly map the debits back to the appropriate accounting.

   If the Company were instructed to treat these debits (i.e., billing charges) as a new "charge type", the Company would need approximately 3 months to post the billing charges. In this manner a Journal entry would not be required.

   The soonest the impact of the CY 2022 annual reconciliation would be reflected in the Net Metering Charge is December 1, 2023 (i.e., 60 days after the filing of the proposed CY 2022 annual reconciliation).

b. Refer to (a).

Prepared by or under the supervision: Chris Ann Rossi and Stephanie A. Briggs

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PUC 2-8

Request:

Referencing Step 3 of Schedule ERJS-1, beginning with the equations on the top of page 2 of 3:

a. Confirm the first equation is equal to $\left[1 - \frac{net\ generation}{estimated\ consumption}\right] * 100$

b. Confirm the second equation is equal to $\left[1 - \frac{net\ generation}{estimated\ generation + net\ consumption}\right] * 100$

c. Please confirm which calculation RIE proposed to use, and if that is explicit in the proposed tariff.

d. Please reconcile the answer with RIE's response to Division 1-3 and MAE 1-2.

Response:

a. Yes, the first equation of Schedule EJRS-1 is equal to the equation presented in PUC 2-8 a.

b. No, the second equation of Schedule EJRS-1 is not equal to the equation presented in PUC 2-8 b. It is equivalent to either of the following modifications to the equation presented in PUC 2-8 b:

$$\left[1 - \frac{net\ generation}{estimated\ generation - net\ consumption}\right] * 100$$

$$\left[1 - \frac{net\ generation}{estimated\ generation + net\ generation}\right] * 100$$

c. The Company proposed to use the calculation with an estimated consumption as filed in response to Division 1-3 and MAE 1-2. The proposed tariff does not explicitly define which calculation method must be used but rather presents all possible methods.

Prepared by or under the supervision: Erica Russell Salk

PUC 2-8, page 2

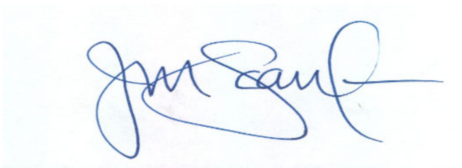
d. The response to c. is consistent with Division 1-3 and MAE 1-2 and does not need to be reconciled. What warrants clarification is the discussion at the technical session on August 16, 2023. That discussion was focused on estimated generation or production as opposed to estimated consumption. The discussion likely stemmed from the reference made in the question to PUC 1-2.[1] Consistent with the Company's response to Division 1-3 and MAE 1-2, the Company is proposing to apply the calculation using an estimated consumption. The Company currently expects, however, that it will be able to provide the reconciliation calculated using either methodology (i.e., estimated consumption or estimated generation).

[1] The question to PUC 1-2 reads: "RIE has proposed to estimate customer's production. Please explain what recourse customers have to dispute RIE's estimation."

<u>Certificate of Service</u>

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	<u>August 24, 2023</u> Date

Docket No. 23-05-EL Rhode Island Energy – Net Metering Provision, RIPUC No. 2268
Service List updated 8/23/2023

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