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August 7, 2023

**VIA HAND DELIVERY & ELECTRONIC MAIL**

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

**RE: Docket No. 23-24-REG – RE Growth Factor Filing (Program Year 2023)  
Responses to PUC Data Requests – PUC Set 1**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”), I have enclosed the Company’s responses to the Public Utilities Commission’s First Set of Data Requests in the above-referenced docket.

Thank you for your attention to this matter. If you have any questions, please contact me at (401) 709-3337.

Very truly yours,



Leticia C. Pimentel

Enclosure

cc: Docket 23-24-REG Service List

Certificate of Service

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

Heidi J. Seddon

August 7, 2023

Date

**Docket 23-24-REG The Narragansett Electric Co. d/b/a Rhode Island Energy  
RE Growth Factor Filing (Program Year 2023)  
Service List updated 07/10/2023**

<b>Parties' Name/Address</b>	<b>E-mail</b>	<b>Phone</b>
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PUC 1-1

Request:

On page 7 of the Company's prefiled testimony, the witnesses state that "[t]he Company is proposing to true-up certain administrative labor costs and marketing and metering expenses incurred during the 2022 Program Year in next year's Renewable Energy Growth ("ReGrowth) Cost recovery filing instead of the instant proceeding." As the reason, the Company witnesses cite a "reporting gap that presently exists that prevents the Company from presenting an accurate record of actual costs incurred during the 2022 Program Year at this time." Please provide further detailed explanation of the reason for the "reporting gap."

Response:

Prior to the 2022 Program Year, administrative labor costs and marketing and metering expense for the ReGrowth Program were recorded by responsible internal parties to particular accounting work orders. These accounting work orders were then available via queries of the Company's records for purposes of identifying applicable expenses for inclusion in the Company's ReGrowth Cost Recovery filing. However, since the transition from National Grid, ReGrowth Program administrative labor costs and marketing and metering expenses have not been recorded at the same level of granularity. Hence, at the time of filing, the amounts for the actual administrative labor costs and marketing and metering expenses for this period need additional review and analysis to ensure that the ReGrowth cost recovery only includes costs related to the Program.

The Company is presently taking steps to: (1) put together a complete and accurate record of the actual administrative labor costs and marketing and metering expenses for the 2022 Program Year; and (2) ensure that these costs are recorded at the necessary level of detail for the 2023 Program Year and all future program years.

It is the Company's intention that it only recover from customers those eligible actual costs based on a complete and accurate record. Consequently, it proposes to modify its original proposal to true-up certain administrative labor costs and marketing and metering expenses incurred during the 2022 Program Year in next year's Renewable Energy Growth Cost recovery filing instead of the instant proceeding as follows:

1. The Company will file in R.I.P.U.C. Docket No. 23-24-REG by January 31, 2024, a letter that will include an analysis of the complete and accurate records of the actual administrative labor costs and marketing and metering expenses for the 2022 Program Year.

PUC 1-1, Page 2

2. For purposes of the reconciliation of the particular 2022 Program Year costs in next year's Renewable Energy Growth Cost Recovery filing, the Company will present the full administrative labor costs and marketing and metering expenses but will cap its recovery of these expenses at its original estimate in R.I.P.U.C. Docket No. 22-04-REG. Consequently, only a downward or no reconciliation will be possible. The Company will include twelve-months interest at the customer deposit rate for the period October 2023 through September 2024 if a downward reconciliation results.

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 23-24-REG  
In Re: 2023 Renewable Energy Growth Program Factor Filing  
Responses to the Commission's First Set of Data Requests  
Issued on July 17, 2023

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PUC 1-2

Request:

Please provide a new Schedule which uses Schedule NECO-2 from Docket No. 22-04-REG and adds a column for actuals.

Response:

Please refer to Attachment PUC 1-2.

