

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

IN RE: 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

Docket No. 23-05-EL

RHODE ISLAND OFFICE OF ENERGY RESOURCES (OER) IN RESPONSE TO 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

OER appreciates the opportunity to offer its position in this matter following the technical session hosted by the PUC on August 16, 2023. Understanding the nature of the changes resulting from the proposed amendments to the Net Metering provision – whether those changes require new code elements (or Cons types per page 18 of 19 in the Rhode Island Energy’s Joint Testimony) in National Grid’s billing system or can be done as a one-off – as well as the timing of when potential cash-outs are available will be impactful to the company’s communication plan.

In effecting these amendments, off-takers and consumers will be the parties most impacted by these changes, but they are the parties for whom mechanisms supporting communicating are the most limited. OER and other stakeholders in the solar industry in Rhode Island have capacity to reach host accounts and developers, but the capacity to reach the full body of off-takers and consumers is not feasible. RIE is likely the sole entity which can identify and communicate directly with affected accounts, making the need for a clear, coherent and comprehensive communication strategy essential. RIE should utilize its billing data as well as its documentation of off-takers as listed on the schedule B of VNM projects to generate contact lists for those parties. RIE should also work with host accounts and developers along with stakeholders like OER to help raise awareness and highlight the potential impacts of these changes as widely as possible to limit confusion on the part of off-takers.

OER recommends RIE develops a detailed communication strategy for both developers and off-takers as well as a timeline for its implementation. Additionally, RIE should hold a DG Seminar that goes into detail about these changes. It should be recorded and posted on the RIE website.

Secondly, it is apparent cash-payments above the tax liability threshold of \$600 in particular require the company to have a communication strategy that covers the full span of time for when accounts may be impacted by this change. For instance, if RIE must generate a new Cons type, pushing reconciliation back the 3 months indicated, cash-out payments for CY 2022 may not be generated until January or February 2024, and accounts would not receive the 1099 for those payments until January 2025, potentially around the time of submission of CY 2023 cash-out payments. Alternatively, if CY 2022 payments are sent in early 2024, but CY 2023 payments end up being sent in late 2024 (assuming an Oct 1 filing for the CY2023 reconciliation), there is the potential for accounts to receive multiple payments in the same calendar year, potentially increasing the number of accounts subject to tax liability.

OER recommends that RIE publish a clear process document with expected timing for changes and a tax guidance document, and communicate that information regularly with accounts.

Lastly, OER notes RIE's process for fielding disputing estimated production charges. RIE's response to PUC 1-2 indicates customers "will be made aware of this", but OER finds that language to be vague. Providing a clear, easily understood process laid out in easy to find guidance will provide customers with a level of transparency and assurance that they would be able to resolve such an issue if it arose. This will benefit customers as well as reduce the number of contacts the CEI mailbox receives, as well as complaints to other agencies such as OER and the Attorney General's office.

OER recommends RIE commit to or be ordered to prepare robust guidance on disputing estimated production charges including examples of how a customer may be able to determine if their estimate is inaccurate.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Chris Kearns".

Christopher Kearns
Acting Commissioner