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November 21, 2023

VIA ELECTRONIC MAIL AND HAND DELIVERY

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

Dear Ms. Massaro:

**Re: Docket No. 23-29-EL – 2024 Renewable Energy Standard Procurement Plan
Response to Division Data Requests – Set 2**

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 response to the Second Set of Data Requests issued by the Division of Public Utilities and Carriers in the above-referenced docket.

Please contact me if you have any questions. Thank you for your attention to this matter.

Very truly yours,



Leticia C. Pimentel

cc: Docket 23-29-EL 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

November 21, 2023

Date

**Docket No. 23-29-EL – Narragansett Electric Co. d/b/a Rhode Island Energy
– 2024 Renewable Energy Standard Procurement Plan
Service List updated 11/20/2023**

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Division 2-1

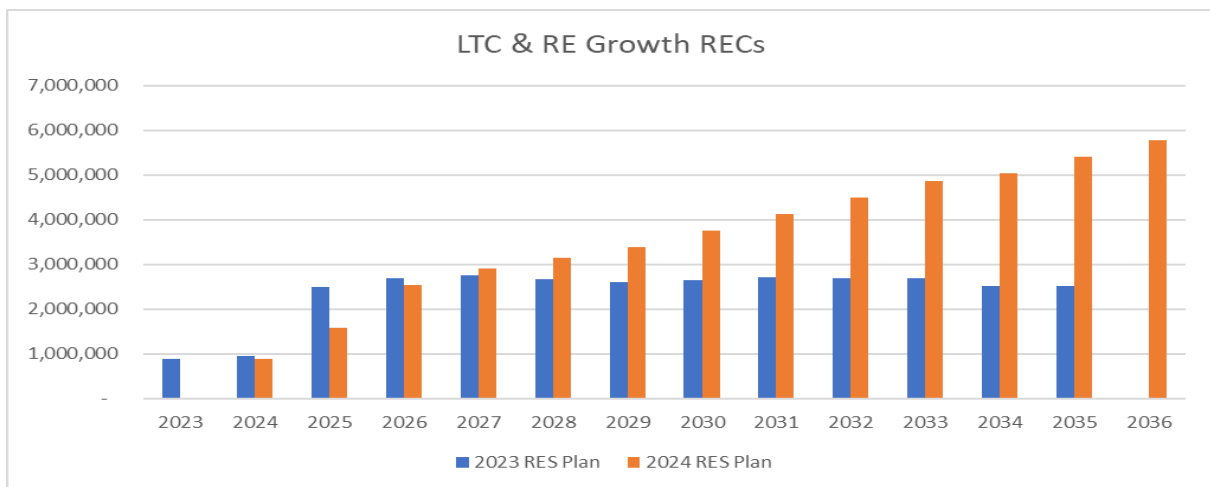
Request:

Please refer to the chart on page 4 titled LRS New RES Requirements and Forecast of New RECs Supplied Under Long-Term Renewable Contracts and the RE Growth Program.

- a. Please provide a chart comparing the LTC & RE Growth RECs data in the chart in the 2023 RES Plan to the data in the chart in the 2024 RES Plan.
- b. Please describe the reason for any differences between the two trends shown in (a).
- c. Please provide a chart comparing the LRS RES New REC data in the chart in the 2023 RES Plan to the data in the chart in the 2024 RES Plan.
- d. Please describe the reason for any differences between the two trends shown in (c).
- e. Please explain the extent to which forecasted increases in load due to electrification are responsible for the observed increases over time.
- f. Please explain the extent to which forecasted future municipal aggregation activity is reflected in this trend.

Response:

- a. This chart compares the LTC & RE Growth RECs data in the 2023 RES Plan and the 2024 RES Plan.

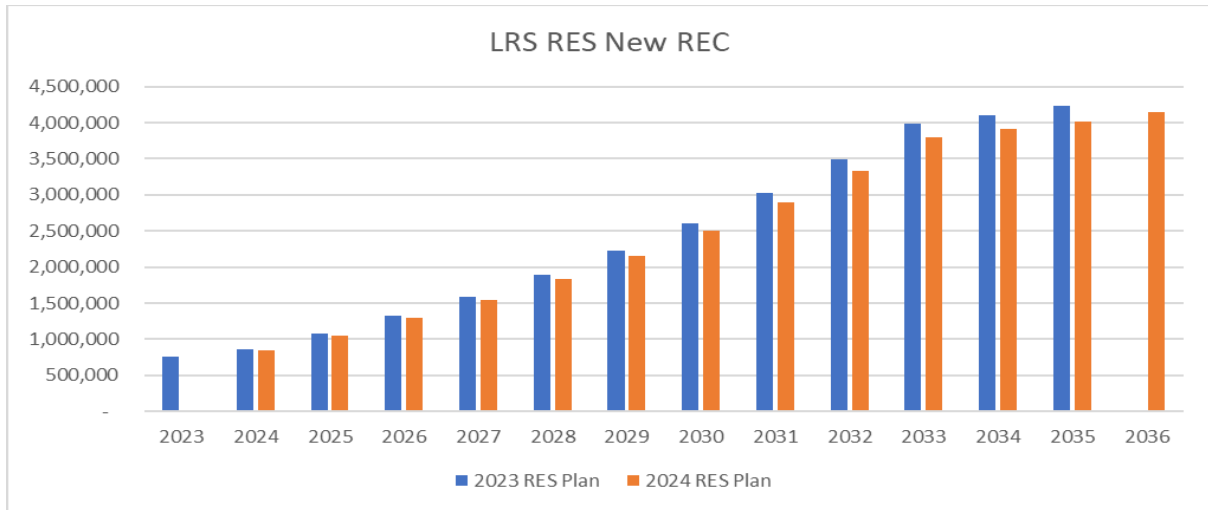


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- b. The projection of New RECs from the Long-Term Renewable Contracts and the RE Growth Program consist of two estimates. The Company first estimates future generation from operational facilities by utilizing the most recent 12 months of historical generation. The estimates used in the 2023 RES Plan and 2024 RES Plan may differ if the historical generation of the most recent 12 months is not the same.

The Company also estimates future generation for facilities that are not operational. This includes facilities that are contracted but not yet operational, and it also includes facilities that the Company expects to enroll in the future. The 2024 RES Plan included a later commercial operation date than the 2023 RES Plan for the Revolution Wind facility. It also included the expansion of the RE Growth Program as described in “An Act Relating to Public Utilities and Carriers – Net Metering” (2023-S 0684A, 2023-H 5853A). Both differences have an impact on the projection of New RECs from the Long-Term Renewable Contracts and the RE Growth Program in the 2023 RES Plan and the 2024 RES Plan.

- c. This chart compares the LRS New RECs data in the 2023 RES Plan and the 2024 RES Plan.



- d. The LRS RES New REC is the quantity of New RECs that the Company estimates it will need to comply with the RES. It is the Last Resort Service (“LRS”) load forecast for each year multiplied by the Percentage from New Renewable Energy Resources for each compliance year. The percentages used in the 2023 RES Plan and the 2024 RES Plan are identical, and therefore the differences in the graph are due to differences in the LRS load

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forecasts used in each plan. The 2023 RES Plan used a load forecast developed in September 2021. The 2024 RES Plan used a load forecast developed in March 2023.

The monthly LRS load forecast relies on the monthly electric deliveries forecast. The Company first develops the monthly electric deliveries forecast and derives the expected annual growth rate for each month. The Company then applies the expected annual growth rate to the current year's LRS monthly load to estimate next year's LRS load forecast for the corresponding month.

The two forecasts used in the 2023 RES Plan and the 2024 RES Plan relied on different electric deliveries forecasts that derive the expected annual growth rate for each month. Also, the current year's LRS monthly load used to estimate the next year's load forecast will be different in the two forecasts. This results in different LRS load forecasts and therefore different LRS RES New REC in the graphs of the RES plans.

- e. Electrification, specifically the impact associated with growth in adoption of electric vehicles and the impact of growth in electric heat pump installations, contributes a 0.7% increase in the load forecast in 2023. The load impact grows to approximately 10% increase in load in 2033 as installation and adoption of those technologies continue.
- f. For the 2024 RES Plan, the Company adjusted the LRS load forecast through 2036 for the migration of the municipal aggregation customers that began in May 2023. The Company did not make additional adjustments for any potential municipal aggregation activity. The Company will adjust LRS load forecasts in subsequent RES plans when approved Community Electricity Aggregation Plans select nonregulated power producers and have expected switch dates.