

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

The Rhode Island Office of Energy Resources (OER) would like to take this opportunity to make its closing comments on this proceeding, to thank the Commission and its dedicated staff as well as the parties who have contributed to a robust process and offer our appreciation for the testimony and discussions in this docket. In OER's previous filing, the need for attentive communication strategies which recognized the potential impacts functions of the proposed tariff changes might have on net metered hosts and off-takers (schools, municipalities, federal government) was of primary consideration. During the testimonies given by the parties in this docket, the need for communication and collaboration has surfaced not only as an avenue to provide clarity to invested parties but as a means to resolve issues related to the reconciliation of excess net metering credits. OER greatly appreciates the multiple meetings that the Commission and staff hosted with the parties on this docket.

The ability of the parties to discuss and amend how to reassign any excess credits discovered should *preclude* the need for the excess credit accounting scheme proposed in this tariff revision to be engaged. The proposal put forward by Rhode Island Energy (the Company) creates an obligation on their part to develop administrative procedures for the communication of excess net metering credit accruals to an account, and to process amended Schedule B submissions and requests to transfer credits to additional off-taker accounts. While the analysis to be performed annually to determine the credit accruals is inherently complex at this time –

when customers do not have meters capable of capturing load and generation data at their incident – the processes which can be developed and deployed to report and resolve those findings are not. Because host accounts now have access to expanded list of off-takers, this continued communication effort among the parties to maintain proper allocation of net metering credits can well serve as the primary means of resolving excess credits, and the reconciliation mechanism within the Company’s proposed changes should serve only as a backstop to be engaged when there is an absence of attention and effort on the part of the host accounts to make the changes necessary. Hosts accounts which have fully subscribed generation, and which now have the means to reassign any identified undersubscription of its generation should then be able to avoid any administratively burdensome accruals to their accounts.

In the event host or off-takers account do not address the accrual of excess credits to their accounts and application of the reconciliation mechanism becomes necessary, the comments OER previously submitted in this docket remain relevant. A cohesive communication plan and proper consideration of the timing of annual payouts for excess credits will be necessary for the thorough administration of the proposed changes and potential impacts on the tax filings of customers. OER thanks the Commission and the parties involved for their time in this docket.

Thank you for your consideration.

Sincerely,



Chris Kearns
Acting Commissioner