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December 8, 2023

VIA ELECTRONIC MAIL AND HAND DELIVERY

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

**Re: Docket No. 23-35-EE – 2024-2026 Three Year Energy Efficiency Plan and
2024 Annual Energy Efficiency Plan
Responses to PUC Data Requests – Set 8**

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 Eighth Set of Data Requests issued by the Public Utilities Commission 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 23-35-EE 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

December 8, 2023

Date

**Docket No. 23-35-EE – Rhode Island Energy’s EE Plan 2024-2026 Three-Year Plan and 2024 Annual EEP
Service list updated 10/4/2023**

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The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 23-35-EE
In Re: 2024-2026 Three-Year Energy Efficiency Plan and
2024 Annual Energy Efficiency Plan
Responses to the Commission's Eighth Set of Data Requests
Issued on December 6, 2023

PUC 8-1

Request:

In response to part b of PUC 3-24, the Company writes “the forecasted capital expenditures are larger than the historical spend generally because of the completion of the Company’s area studies along with the inclusion of grid modernization investments in the ISR.”

- a. Please clarify the dollar amount of “grid modernization investments” that was included in the calculation of the 2024 Marginal Distribution Cost value and explain where the Company sourced the estimate. (If the estimate is contained in another document or a filing in another docket, please provide copies of those documents and/or links to the filings.)
- b. In your response, reference exactly where the dollar amount of “grid modernization investments” is embedded in the Marginal Distribution Cost model provided in Attachment 1-65.
- c. Also, please explain how much of the increase in the MDC from 2023 to 2024 was driven by the completion of area studies versus the inclusion of grid modernization investments in the ISR.

Response:

- a. The Company wishes to clarify the response to part b of PUC 3-24. The statement that “the forecasted capital expenditures are larger than the historical spend” refers to the overall forecast of capital expenditures, not specifically the forecast incremental investments caused by load growth.

The forecast capital expenditures associated with grid modernization investments are included in the overall forecast but are not included in the System Capacity and Performance category that is used to calculate the percentage of total distribution capital investments related to increasing load (as described in part a of the response to PUC 3-24).¹

When that percentage is applied in the calculation of the MDC value, it effectively removes grid modernization investments from the calculation of the MDC. It also effectively removes investments associated with Customer Request/Public

¹ From the [Electric Infrastructure, Safety, and Reliability Plan FY 2024 Proposal](#), section 2, page 55 [“CY23” and “CY24” columns, “System Capacity & Performance” and “Grand Total” columns, $(26586+25098)/(147365+180405) = 15.8\%$

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PUC 8-1, Page 2

Requirement, Damage/Failure, Asset Condition, and Non-Infrastructure, the other categories of spending rationale used in the ISR plan.

- b. The Company wishes to correct the response to part b of PUC 3-24. In Attachment 1-65, the dollar amount of “grid modernization investments” is not embedded in the amounts shown in the row titled “Forecast Incremental Investments into Distribution Systems” on page 4 of 7.
- c. None of the increases in the MDC from 2023 to 2024 was driven by the inclusion of grid modernization investments in the ISR.

The increase in the MDC from 2023 to 2024 was driven by the completion of area studies that increased the forecast capital expenditures, as well as the introduction of new reliability programs into the ISR Plan. It was also affected by a decrease in the total incremental growth in peak demand from 2023 to 2024 which is used in the denominator of the incremental \$/kW calculation. In the 2024 MDC calculation, this is shown on page 6 of Attachment PUC 1-65 to be 195 MW. In the 2023 MDC calculation, the value used in the calculation was 249 MW.

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PUC 8-2

Request:

In response to part b of PUC 3-24, the Company writes “[t]otal Incremental Investments Caused by Load Growth are distribution capital investments from annual FERC Form 1 (for historic investments) and an internal Company distribution capital investment forecast (for future investments). The future investments are sourced from a recent Company’s capital plan.” Please provide copies of the “internal Company distribution capital investment forecast” and the referenced “recent Company’s capital plan.” Please also provide references to the portions of the documents where the estimate referenced in your response to 8-1 was sourced.

Response:

The sentence “[t]he future investments are sourced from a recent Company’s capital plan” was mistakenly included in the response due to an editing error. “The “internal Company distribution capital investment forecast” and the “recent Company[’s] capital plan” are the same thing.

Attachment PUC 8-2 provides the internal Company distribution capital forecast. The “Total” row, highlighted, is the information that served as an input to the calculation of the MDC.

NECO-D						
	FY22	FY23	FY24	FY25	FY26	FY27
Capex	108.1	146.1	175.0	196.2	168.1	151.4
COR	7.8	16.0	16.0	17.0	17.0	17.0
Total	116	162	191	213	185	168

Source *FY22 Actuals *BP20 Capex S *BP20 Capex S *BP20 Capex S *BP20 Capex S *BP20 Capex Submission Base Case