Robinson+Cole

LETICIA C. PIMENTEL

One Financial Plaza, 14th Floor Providence, RI 02903-2485 Main (401) 709-3300 Fax (401) 709-3378 lpimentel@rc.com Direct (401) 709-3337

Also admitted in Massachusetts

December 13, 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 Record Requests

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 Record Requests No. 1, 2 and 3 issued at the Public Utilities Commission's Evidentiary Hearing on December 12, 2023 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 Pimentel

Leticia C. Pimentel

cc: Docket 23-35-EE Service List

Boston | Hartford | New York | Washington, DC | Providence | Miami | Stamford | Wilmington | Philadelphia | Los Angeles | Albany | rc.com

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.

Leticia Pimentel

Leticia Pimentel

December 13, 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

Name /Address	E-mail Distribution List	Phone
The Narragansett Electric Company	amarcaccio@pplweb.com; cobrien@pplweb.com;	
d/b/a Rhode Island Energy Andrew Marcaccio, Esq. 280 Melrose St. Providence, RI 02907	jhutchinson@pplweb.com; jscanlon@pplweb.com; dmmoreira@rienergy.com; MOCrayne@rienergy.com; BSFeldman@rienergy.com; ACLi@rienergy.com; DJTukey@rienergy.com;	401-784-4263
	DJTukey(@rienergy.com; SBriggs@pplweb.com; BJPelletier@rienergy.com; JOliveira@pplweb.com; Teast@rienergy.com; Masiegal@rienergy.com;	
Leticia C. Pimentel, Esq. Steve Boyajian, Esq. Robinson & Cole LLP One Financial Plaza, 14th Floor	<u>Cagill@rienergy.com;</u> sboyajian@rc.com; LPimentel@rc.com;	
Providence, RI 02903	<u>HSeddon@rc.com;</u>	
Division of Public Utilities & Carriers Margaret L. Hogan, Esq.	Margaret.L.Hogan@dpuc.ri.gov;Christy.hetherington@dpuc.ri.gov;john.bell@dpuc.ri.gov;Joel.munoz@dpuc.ri.gov;Ellen.golde@dpuc.ri.gov;Machaela.Seaton@dpuc.ri.gov;Paul.Roberti@dpuc.ri.gov;	401-780-2120

Tim Woolf	twoolf@synapse-energy.com;	
Jennifer Kallay		_
Synapse Energy Economics	jkallay@synapse-energy.com;	
22 Pearl Street		
Cambridge, MA 02139		
RI EERMC	marisa@desautelbrowning.com;	401-477-0023
Marisa Desautel, Esq.		
Desautel Browning Law		
38 Bellevue Ave., Unit H	Adrian.Caesar@nv5.com;	
Newport, RI 02840	Craig.Johnson@nv5.com;	
	Samuel.Ross@nv5.com;	_
Office of Energy Resources (OER)	Albert.Vitali@doa.ri.gov;	401-222-8880
Albert Vitali, Esq.	Nancy.Russolino@doa.ri.gov;	-
Dept. of Administration	Christopher.Kearns@energy.ri.gov;	
Division of Legal Services	William.Owen@energy.ri.gov;	
One Capitol Hill, 4 th Floor	Steven.Chybowski@energy.ri.gov;	
Providence, RI 02908	Nathan.Cleveland@energy.ri.gov;	
Original & 9 copies file w/:	Luly.massaro@puc.ri.gov;	401-780-2107
Luly E. Massaro, Commission Clerk	John.Harrington@puc.ri.gov;	
John Harrington, Commission Counsel		_
Public Utilities Commission	Alan.nault@puc.ri.gov;	_
89 Jefferson Blvd.	Todd.bianco@puc.ri.gov;	_
Warwick, RI 02888		_
	Emma.Rodvien@puc.ri.gov;	
Interested Party		
Dept. of Human Services	Frederick.sneesby@dhs.ri.gov;	
Frederick Sneesby		
RI Infrastructure Bank	cvitale@hvlawltd.com;	_
Chris Vitale, Esq.,	SUsatine@riib.org;	-
		-
Green Energy Consumers Alliance	Larry@massenergy.org;	
Larry Chretien, Executive Director		
	1.0	
Amanda Barker	amanda@greenenergyconsumers.org;	-
Acadia Center	EKoo@acadiacenter.org;	401-276-0600 x402
Emily Koo, Director		-101-270-0000 A -1 02

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 Record Requests Issued at the Commission's Evidentiary Hearings On December 12, 13, and 14, 2023

Record Request No. 1

Request:

Referencing Table E-6 of Attachment 5 (Revised), Page 8 of 16, filed December 5, 2023, how much of the total oil benefits is avoided oil benefits and oil DRIPE?

Response:

Please see the table below for the relative magnitude of avoided direct oil benefits and oil DRIPE.

Year	Category	Direct Oil Benefits	Oil DRIPE	Total Oil Benefits
	Benefit	\$18,029,276	\$5,056	\$18,034,332
2024	Percentage of Total	99.97%	0.03%	100.00%

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 Record Requests Issued at the Commission's Evidentiary Hearings On December 12, 13, and 14, 2023

Record Request No. 2

Request:

Please recalculate the 2024 gas and electric proposed incentives incorporating the following three changes:

- 1. Weigh the other resources benefits as 0%;
- 2. Use the 2023 marginal distribution cost value;
- 3. Count only the intrastate RI benefits.

Response:

Please see Attachment Record Request 2-1 for the recalculated 2024 electric proposed incentive incorporating the stated three changes. Please see Attachment Record Request 2-2 for the recalculated 2024 gas proposed incentive incorporating the stated three changes. Please note that for this record request, the attachments are in the same format as the Performance Incentive table from E-8C and G8-C. The SQA was not included in this analysis.

Table E-8C Rhode Island Energy 2024 PIM and SQA (8000)

	Performance Incentive									
	Eligible	Benefits		Eligible Net	Design	Design Payout	Design		Service Quality	
	100% Utility	0% Resource	Eligible Costs	ts Benefits	Performance	Rate P	Performance	Payout Cap	Adjustment	
	System Benefits	Benefits			Achievement		Payout		Applied	
Residential	\$19,046	\$0	\$30,238	-\$11,191	\$2,000	25.0%	\$500	\$625	TRUE	
Income Eligible Residential	\$5,670	\$0	\$16,230	-\$10,560	\$2,000	25.0%	\$500	\$625	TRUE	
Commercial & Industrial	\$48,802	\$0	\$40,592	\$8,211	\$8,211	10.1%	\$830	\$1,037	FALSE	

Table G-8C Rhode Island Energy 2024 PIM and SQA (8000)

	Performance Incentive								
	Eligible	Benefits		Eligible Net	Design	Design Payout	Design		Service Quality
	100% Utility	0% Resource	Eligible Costs	Benefits	Performance	Rate	Performance	Payout Cap	Adjustment
	System Benefits	Benefits		Belletits	Achievement		Payout		Applied
Residential	\$10,056	\$0	\$15,209	-\$5,153	\$2,000	25.0%	\$500	\$625	TRUE
Income Eligible Residential	\$2,734	\$0	\$7,711	-\$4,978	\$2,000	25.0%	\$500	\$625	TRUE
Commercial & Industrial	\$15,838	\$0	\$8,511	\$7,327	\$7,327	11.7%	\$857	\$1,072	FALSE

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 Record Requests Issued at the Commission's Evidentiary Hearings On December 12, 13, and 14, 2023

Record Request No. 3

Request:

Please recalculate the 2024 gas and electric proposed incentives incorporating the following three changes:

- 1. Weigh the other resource benefits as 35%;
- 2. Use the electric payout incentive at 8% for Residential and C&I;
- 3. Use the gas payout incentive at 10% for C&I.

Response:

Please see Attachment Record Request 3-1 for the recalculated 2024 electric proposed incentive incorporating the stated three changes. Please see Attachment Record Request 3-2 for the recalculated 2024 gas proposed incentive incorporating the stated three changes. Please note that for this record request, the attachments are in the same format as the Performance Incentive table from E-8C and G8-C. The SQA was not included in this analysis.

Table E-8C Rhode Island Energy 2024 PIM and SQA (8000)

	Performance Incentive									
	Eligible	Benefits		Eligible Net	Design	Design Payout	Design		Service Quality	
	100% Utility	35% Resource	Eligible Costs	ts Benefits Per	Performance	Rate Performance Payout	Performance	Payout Cap	Adjustment	
	System Benefits	Benefits			Achievement		Payout		Applied	
Residential	\$28,203	\$7,258	\$30,238	\$5,223	\$5,223	8.0%	\$418	\$522	FALSE	
Income Eligible Residential	\$7,904	\$1,203	\$16,230	-\$7,123	\$2,000	25.0%	\$500	\$625	TRUE	
Commercial & Industrial	\$79,625	-\$364	\$40,592	\$38,669	\$38,669	8.0%	\$3,094	\$3,867	FALSE	

Table G-8C Rhode Island Energy 2024 PIM and SQA (8000)

	Performance Incentive								
	Eligible	Benefits		Eligible Net	Design	Design Payout	Design		Service Quality
	100% Utility	35% Resource	Eligible Costs	Benefits	Performance	Rate	Performance	Payout Cap	Adjustment
	System Benefits	Benefits		Belletits	Achievement		Payout		Applied
Residential	\$10,056	\$324	\$15,209	-\$4,829	\$2,000	25.0%	\$500	\$625	TRUE
Income Eligible Residential	\$2,734	\$84	\$7,711	-\$4,894	\$2,000	25.0%	\$500	\$625	TRUE
Commercial & Industrial	\$15,838	\$249	\$8,511	\$7,576	\$7,576	10.0%	\$758	\$947	FALSE