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December 15, 2023

**VIA ELECTRONIC MAIL**

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

**RE: Docket No. 23-37-EL – The Narragansett Electric Company d/b/a  
Rhode Island Energy’s Petition for Acceleration of a System Modification  
Due to Distributed Generation Project  
Tiverton Project  
Responses to PUC Data Requests – Set 1**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”), enclosed, please find the Company’s responses to the Public Utilities Commission’s First Set of Data Requests in the above-referenced docket.

Thank you for your attention to this filing. If you have any questions, please contact me at 401-784-4263.

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrew S. Marcaccio".

Andrew S. Marcaccio

Enclosures

cc: Docket 23-37-EL Service List

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 23-37-EL  
In Re: Rhode Island Energy's Petition for Acceleration Due  
To Distributed Generation Project – Tiverton Projects  
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PUC 1-1

Request:

Please refer to page 19 of the Company's response to DIV 5-1 in Docket No. 5209 (<https://ripuc.ri.gov/sites/g/files/xkgbur841/files/eventsactions/docket/5209-Ngrid-DR-DIV-Set-5-%28PUC-2-14-22%29.pdf>).

Please also refer to RR-11 in Docket No. 5209 ([https://ripuc.ri.gov/sites/g/files/xkgbur841/files/2022-07/5209-RIE-RR\\_7-5-22.pdf](https://ripuc.ri.gov/sites/g/files/xkgbur841/files/2022-07/5209-RIE-RR_7-5-22.pdf)).

- a. Please compare the estimated costs the developer would be responsible for in those responses to the current estimates.
- b. Please update the response to RR-11 to the extent the Company has more information from the passage of time and advancement of the project.

Response:

- a. Regarding DIV 5-1 in Docket No. 5209, Section 8, page 19 and RR-11 in Docket No. 5209, page 3, the costs are aligned with current estimates.

As stated in the response, this table excludes the civil cost:

	Distribution Total (\$M)	Substation (D) Total (\$M)	Total (\$M)
CapEx	3.097	1.022	4.119
OpEx	0.000	0.002	0.002
Removal	0.000	0.000	0.000
Total	3.097	1.024	4.121

The \$3.097M distribution capex is the cable procurement and cable installation where \$1.557 is estimated for procurement and \$1.540 is estimated for installation. The developer has opted to procure the cable and this amount is no longer in the Company costs. Also see the response to PUC 1-2 for alignment with current estimates. The \$1.022 substation value matches current estimates.<sup>1</sup>

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<sup>1</sup> These estimates are current but are 2021 vintage values. They have not been adjusted for recent year inflation values.

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PUC 1-1, page 2

This table represents the line extension, for which the developer would not be responsible; however, it aligns with current estimates:

Spend	Distribution Total (\$M)
CapEx	1.907
OpEx	0.063
Removal	0.211
Total	2.181

Also see the response to PUC 1-2 for alignment.

- b. There are no formal updates to the response to RR-11 at this time. However, the Company does note that the estimates are 2021 vintage and do not include recent year inflation values.

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PUC 1-2

Request:

What was the scope of the project included in the five-year budget? Please provide a table describing

- (a) the System Modifications that are the subject of this petition,
- (b) System Modifications excluded from the cost sharing, and
- (c) any System Improvements not subject to this petition to the extent they related to the new 33F6 line. Please include costs.

Response:

The scope of the project included in the five-year budget consists of building out the new feeder position and extending the 33F6 further south beyond the DG project to serve load.

	Scope	Capital Cost (M)
<b>System Modification Subject to Petition</b>	Substation – New feeder position	\$1.022
	Line – Civil & Cable Procure - 21,000 feet of a manhole and duct system with 3 conductor 1000 kcmil rubber insulated copper cable	\$15.381
	Line – Electrical – Installation of 21,000 feet of 3 conductor 1000 kcmil rubber insulated copper cable	\$1.540
	Total	\$17.943
<b>System Modification excluded from Cost Sharing</b>	Difference between overhead and underground system on Route 177 and Brayton Road.	\$3.284
	Equipment at Interconnecting Customer’s Property	\$0.320
	Total	\$3.604
<b>System Improvement not subject to Petition</b>	22,900 feet line extension and reconductoring	\$1.907

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PUC 1-3

Request:

Please reconcile the total budget amounts included in Attachment 3c Second Supplemental – Five Year Budget with Details ([https://ripuc.ri.gov/sites/g/files/xkgbur841/files/2023-03/2253-RIE-SecondSupplBudget\\_3-21-23.pdf](https://ripuc.ri.gov/sites/g/files/xkgbur841/files/2023-03/2253-RIE-SecondSupplBudget_3-21-23.pdf)) from Docket No. 22-53-EL with the current estimated cost.

Response:

The scope of work included in the FY 2024 ISR Filing Attachment 3c Second Supplemental – Five Year Budget with Details totaling \$4,566,000 (under both Asset Condition and System Capacity & Performance spending rationales) from FY 2024 to FY 2028 is different than the work included in the estimate listed in Schedule SAB-1 totaling \$14,660,000.

The scope of work included in the petition was not budgeted for in the FY 2024 filing. The Company was in the process of completing the estimates associated with the reimbursement to the developer at the time the FY 2024 ISR Plan was filed.

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PUC 1-4

Request:

Using the illustrative dollar values included in the testimony, please show the difference in the projected ISR revenue requirement by year through FY 2029 for the project for (a) the proposed reimbursement date; and (b) the alternative reimbursement date.

Response:

Please see the below table with the illustrative ISR revenue requirements associated with the project, by year through FY 2029 for the above scenarios. Please note that the amount of investment placed in service in both scenarios is \$13,038,604, which is the estimated final cost less the depreciated value through FY 2028. Note that for purposes of this response, the revenue requirement was calculated using the FY 2024 Electric ISR revenue requirement model and rates in that model such as depreciation and return.

	FY 2025	FY 2026	FY 2027	FY 2028	FY 2029
Scenario (a) *	\$675,791	\$1,333,642	\$1,298,642	\$1,264,896	\$1,232,144
Scenario (b) **	\$ 0	\$ 0	\$ 0	\$ 0	\$675,791
Difference	\$675,791	\$1,333,642	\$1,298,642	\$1,264,896	\$556,354

\* Assumes included in ISR beginning FY 2025

\*\* Assumes included in ISR beginning FY 2029

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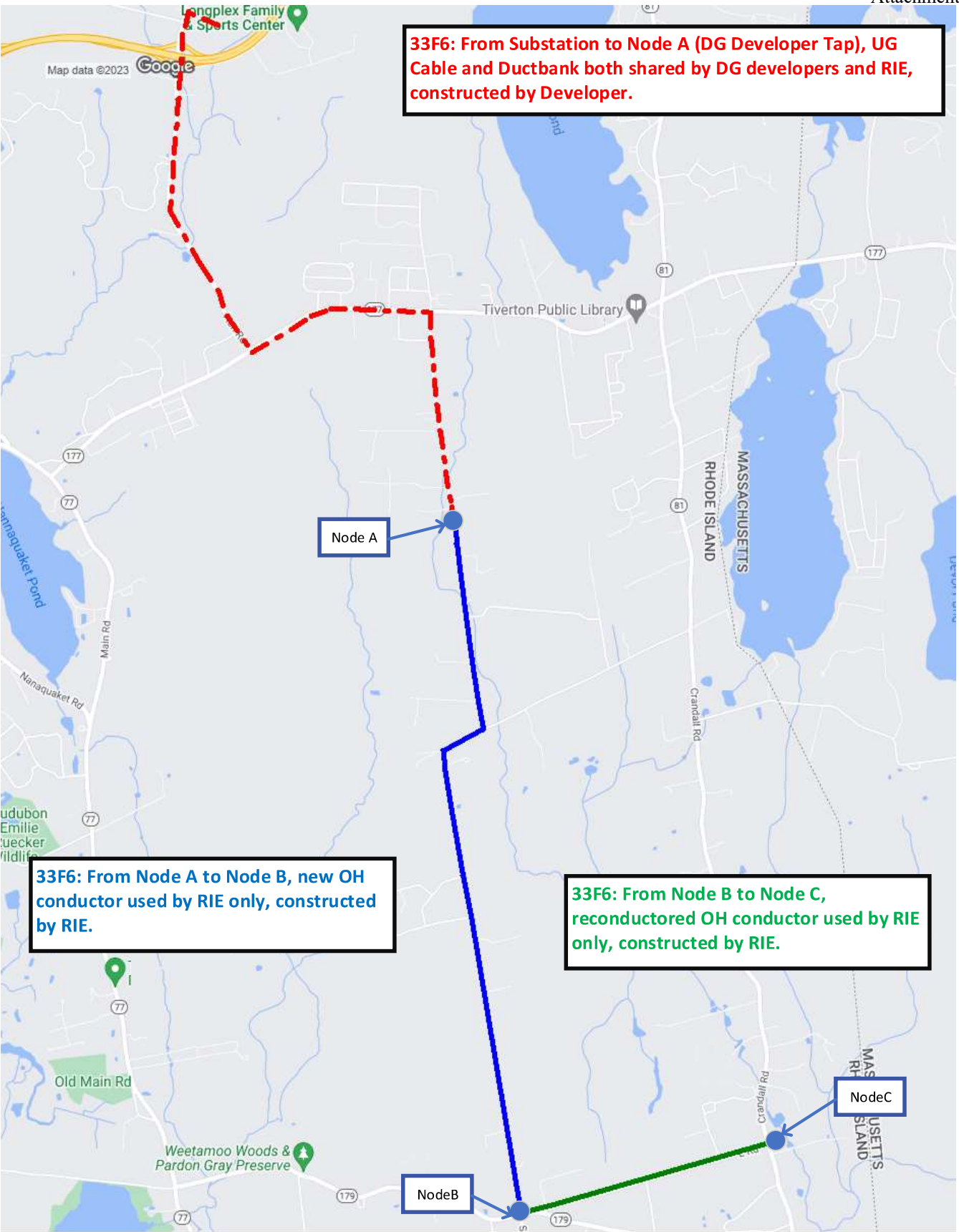
PUC 1-5

Request:

Please provide an aerial map that shows, using different colors, the components of the project by those that came out of the area study (System Improvements/accelerated system modifications), developer constructed civil work, developer System Improvement responsibility, etc.

Response:

A map is provided in Attachment PUC 1-5.



**33F6: From Substation to Node A (DG Developer Tap), UG Cable and Ductbank both shared by DG developers and RIE, constructed by Developer.**

**33F6: From Node A to Node B, new OH conductor used by RIE only, constructed by RIE.**

**33F6: From Node B to Node C, reconducted OH conductor used by RIE only, constructed by RIE.**

Node A

Node B

Node C



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PUC 1-6

Request:

Is there a difference in ratepayer impact between reimbursement alternative one and two? Please explain and show an illustration.

Response:

There is no difference in the total dollar amount related to the project that will be included in the ISR revenue requirement in reimbursement alternative one and two. In both scenarios that the Company presented, the amount included in the ISR is the total projected cost to be reimbursed to the developer less the amount of depreciation expense from the date of in-service (FY 2025) to the date the project would have been placed in service without the accelerated work (FY 2029).

However, in the Company's proposal and alternative option, there is a difference in the timing of when the Company would begin to recover the cost from ratepayers. As shown in the table in response to PUC 1-4, in alternative one, the ISR includes recovery from ratepayers beginning in FY 2025 while in alternative two, the ISR does not include recovery from ratepayers until FY 2029. For illustrative purposes of the revenue requirement in PUC 1-4, the same assumptions for inputs such as book depreciation rates, rate of return, and tax rates were used in alternative one and two. However, if an event such as new base distribution rates or tax law changes took effect between the dates of the two reimbursement date alternatives (e.g. between FY 2025 and FY 2029), then these assumptions could change the impact to ratepayers (either increases or decreases) in the FY 2029. The Company is not aware of what these changes could be at this time so is not able to quantify the impact that could have on the ratepayers.

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PUC 1-7

Request:

To be eligible for cost sharing of its self-build costs, is the developer held to any cost cap or bandwidth between the estimated cost and the final cost?

Response:

Criteria to perform self-build includes having an estimate that is either at or below the Company's estimated cost to perform the work. The customer costs are audited through a third-party to ensure they are accurate and prudent. Whether the customer is self-building or the Company is performing the work, there can be justified reasons for project costs to come in above estimate. At this time, there is no cost cap between estimated and final cost beyond the outcome of the audit and ensuring that only reasonable costs are attributable to cost sharing.

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PUC 1-8

Request:

How does the 10% cap in the ISA affect the calculation of the final accounting for the subject DG projects?

Response:

The DG projects are subject to the standard final accounting practice regarding the 10% cap. If the cost increases are identified during the project, and the DG customer is notified of such increase, then the costs will be collected from the DG customer.

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PUC 1-9

Request:

What were the Company's cost estimates for the portion of the project constructed by the developer? Must the developer's recoverable costs be at or below the Company's estimated costs? If not, why should all distribution customers pay more than what they would have if the Company had constructed the portions that were constructed by the developers?

Response:

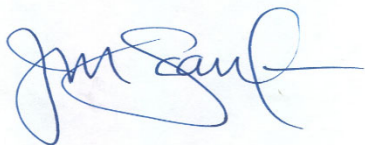
The customer constructed a civil portion and procured electrical cable for the Tiverton project, which Green estimated at \$15,381,179. The Company did not conduct a formal estimate; however, based on review of Green's estimate relative to historic values for similar work performed, it was considered to be a reasonable self-build candidate with final cost reimbursement subject to a third-party audit.

The developer's recoverable costs do not necessarily have to be at or below the Company's estimated costs. Whether the customer is self-building or the Company is performing the work, there can be justified reasons for project costs to come in above estimate. The recoverable costs are verified through a third-party audit process.

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was 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.



\_\_\_\_\_  
Joanne M. Scanlon

December 15, 2023  
Date

**Docket No. 23-37-EL Rhode Island Energy – Petition for Acceleration Due to DG Project – Tiverton Projects - Service List updated 12/14/2023**

<b>Parties' Name/Address</b>	<b>E-mail</b>	<b>Phone</b>
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