

Celia B. O'Brien
Associate General Counsel
PPL Services Corporation
COBrien@pplweb.com

280 Melrose Street
Providence, RI 02907
Phone 401-578-2700



December 28, 2023

VIA ELECTRONIC DELIVERY

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

**RE: Docket No. 23-05-EL – The Narragansett Electric Company d/b/a Rhode Island Energy
Tariff Advice to Amend the Net Metering Provision
Second Supplemental Response to Record Request No. 2**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”), attached is the Company’s second supplemental response to Record Request No. 2 issued at the Evidentiary Hearing on October 5, 2023, in the above-referenced docket.

Thank you for your attention to this filing. If you have any questions regarding this filing, please contact Andrew Marcaccio at 401-784-4263 or me at 401-578-2700.

Very truly yours,

A handwritten signature in blue ink that reads "Celia B. O'Brien".

Celia B. O'Brien

Attachment

cc: Docket No. 23-05-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

December 28, 2023

Date

**Docket No. 23-05-EL Rhode Island Energy – Net Metering Provision, RIPUC No. 2268
Service List updated 11/16/2023**

Parties' Name/Address	E-mail	Phone
The Narragansett Electric Company d/b/a Rhode Island Energy Andrew Marcaccio, Esq. Celia B. O'Brien, Esq. 280 Melrose Street Providence, RI 02907	AMarcaccio@pplweb.com ;	401-784-7263
	COBrien@pplweb.com ;	
	JScanlon@pplweb.com ;	
	SBriggs@pplweb.com ;	
	BLJohnson@pplweb.com ;	
	NSucci@rienergy.com ;	
Jack Habib, Esq. Keegan Werlin LLP 99 High Street, 29th Floor Boston, MA 02110	jhabib@keeganwerlin.com	617- 951-1400
Division of Public Utilities 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 ;	
	Paul.Roberti@dpuc.ri.gov ;	
	Machaela.Seaton@dpuc.ri.gov ;	
Ellen.golde@dpuc.ri.gov ;		
Gregory Booth	gboothpe@gmail.com ;	
Mike Brennan	mikebrennan099@gmail.com ;	
Office of Energy Resources (OER) Chris Kearns	Albert.Vitali@doa.ri.gov ;	
	nancy.russolino@doa.ri.gov ;	

	Christopher.Kearns@energy.ri.gov ; Shauna.Beland@energy.ri.gov ; Steven.Chybowski@energy.ri.gov ; Nathan.Cleveland@energy.ri.gov ; William.Owen@energy.ri.gov ; Karen.Bradbury@energy.ri.gov ; jkennerly@seadvantage.com ; cbrown@seadvantage.com ;	
MassAmerica Energy d/b Gridwealth Seth H. Handy, Esq. HANDY LAW, LLC 42 Weybosset Street Providence, RI 02903	seth@handylawllc.com ; quincy@gridwealth.com ;	401-626-4839
Revity Energy LLC Nicholas L. Nybo, Esq. Revity Energy LLC & Affiliates 117 Metro Center Blvd., Suite 1007 Warwick, RI 02886	nick@revityenergy.com ;	508-269-6433
File an original & 9 copies w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov ; John.harrington@puc.ri.gov ; Alan.nault@puc.ri.gov ; Emma.Rodvien@puc.ri.gov ; Todd.bianco@puc.ri.gov ;	401-780-2107
Matt Sullivan, Green Development	ms@green-ri.com ;	
Christian F. Capizzo, Esq.	cfc@psh.com ;	
Frank Epps, EDP	Frank@edp-energy.com ;	
Peter Baptista	peter@capcomgrp.com ;	
Nick Hemond	nhemond@capcomgrp.com ;	
Mackenna Phelps	MPhelps@nautilussolar.com ;	

Record Request No. 2 – Second Supplemental

Request:

Please update the Company's Response to PUC 7-1 in Docket No. 5127.

Response:

The Company's response to PUC 7-1 in Docket No. 5127 is attached as Attachment RR-2.

The Company is presently undertaking the volumetric method analysis that will form the basis of the updated response to PUC 7-1 for Calendar Year 2021 and Calendar Year 2022 and will provide it once it is available. The Company anticipates that the update to PUC 7-1 will be completed by November 17, 2023.

Supplemental Response:

Please see Attachment RR-2 Supplemental for the current estimate of the volumetric method analysis for Calendar Year 2021 and Calendar Year 2022. The Company has not performed a monetary method analysis for Calendar Year 2021 or Calendar Year 2022.

The Company will make every effort to provide Host Customers subject to the program with adequate time in 2024 to work with the Company to ensure that the Company has accurately reconciled its net metering costs attributable to a Host Customer's account and is charging/crediting the Host Customer's account accordingly. Further, the Company will commit to hearing and potentially re-evaluating any customer disputes related to a billing charge or estimate.

Second Supplemental Response:

Please see Attachment RR-2 Second Supplemental, which is identical to Attachment RR-2 Supplemental except for the following:

1. The Company has added a Notes section to the attachment that provides an explanation or formula for each row as applicable.
2. The Company now includes the results of the CY 2019 and CY 2020 Volumetric Method analyses originally presented in the Company's response to PUC 7-1 in Docket No. 5127.
 - Please note that, for CY 2019 and CY 2020, the Company does not have readily available the number of systems evaluated, the excess generation broken out

Record Request No. 2 – Second Supplemental, Page 2

between Tier 1 (100% - 125% of annual consumption) and Tier 2 (>125% of annual consumption), or the billing charges by tier.

3. The Company now includes, for each calendar year, a row that shows the number of systems with a billing charge.
4. The Company now includes, for each calendar year, a row that shows total excess dollar credits.
 - Please note that, for CY 2021 and CY 2022, the Company has not calculated "Total Excess Credits (\$)." The Company would further note that the Billing Charge amounts presented are the most appropriate representations of the dollar value of actual "excess" generation.
5. The Company now includes a second page that provides a comparison, broken out by system size, of the following for the period CY 2019 through CY 2022:
 - a. The number of net metering systems with a billing charge.
 - b. Total excess generation in kWh.
 - c. The calculated billing charges.
 - d. The "minimum" billing charges, which represent the value of the billing charges if all excess generation is valued at the Company's avoided cost rate.

For CY 2021 and CY 2022, the Company utilized billing system data for each net metering system to calculate excess generation. As compared to prior iterations of the Volumetric Method analysis, the Company also calculated billing charges for each system based on that system's Weighted Average Renewable Net Metering Credit and Weighted Average Excess Renewable Net Metering Credit for the annual period. Furthermore, the Volumetric Method analysis was calculated using estimated annual consumption based on available historical consumption data prior to the installation of the net metering system (although the result based on estimated annual generation is included for systems for which historical consumption data was unavailable).

As shown on page 2 of Attachment RR-2 Second Supplemental, the Company would note that the Volumetric Method analyses indicate a clear upward trend in the following variables over the period CY 2019 through CY 2022:

1. The number of net metering systems with a billing charge.
2. Total excess generation in kWh.
3. The calculated billing charges.
4. The "minimum" billing charges, which represent the value of the billing charges if all excess generation is valued at the Company's avoided cost rate.

	(a)		(b)		(c)		(d)		(e) = (a) + (b) + (c) + (d)	(f) = (a) + (b)		(g) = (c) + (d)	
	CY 2022 Volumetric Method				Greater than 25 kW		Less than 25 kW			Greater than 25 kW	Less than 25 kW		
	BTM	Community	BTM	Community	BTM	Community	BTM	Community		Total			
(1) Systems Evaluated	150	92	9,516	157	9,915					242	9,673		
(2) Systems with a Billing Charge	24	40	2,000	36	2,100					64	2,036		
(3) Tier 1 Excess Generation (kWh)	365,996	16,145,339	2,431,817	1,024,905	19,968,057					16,511,334	3,456,722		
(4) Tier 2 Excess Generation (kWh)	252,105	32,533,833	939,045	4,843,417	38,568,401					32,785,939	5,782,463		
(5) Total Excess Generation (kWh)	618,101	48,679,172	3,370,862	5,868,322	58,536,458					49,297,273	9,239,185		
(6) Total Excess Credits (\$)													
(7) Tier 1 Billing Charge	\$ 18,644	\$ 1,525,420	\$ 239,877	\$ 97,128	\$ 1,881,069					\$ 1,544,064	\$ 337,005		
(8) Tier 2 Billing Charge	\$ 33,764	\$ 6,170,256	\$ 182,972	\$ 919,311	\$ 7,306,302					\$ 6,204,019	\$ 1,102,283		
(9) Total Billing Charge	\$ 52,408	\$ 7,695,675	\$ 422,850	\$ 1,016,438	\$ 9,187,371					\$ 7,748,083	\$ 1,439,288		
(10) Tier 1 Billing Charge (All Excess Generation)	\$ 32,214	\$ 4,614,492	\$ 332,330	\$ 554,485	\$ 5,533,521					\$ 4,646,706	\$ 886,815		

= (3) + (4)

= (7) + (8)

	CY 2021 Volumetric Method		Greater than 25 kW		Less than 25 kW		Total	Greater than 25 kW	Less than 25 kW
	BTM	Community	BTM	Community	Greater than 25 kW	Less than 25 kW			
	(11) Systems Evaluated	150	77	9,516	144	9,887			227
(12) Systems with a Billing Charge	15	22	1,040	26	1,103		37	1,066	
(13) Tier 1 Excess Generation (kWh)	321,954	17,239,605	1,115,624	26,516	18,703,698		17,561,558	1,142,140	
(14) Tier 2 Excess Generation (kWh)	102,901	13,184,790	339,616	63,214	13,690,520		13,287,691	402,829	
(15) Total Excess Generation (kWh)	424,854	30,424,394	1,455,240	89,730	32,394,218		30,849,249	1,544,969	
(16) Total Excess Credits (\$)									
(17) Tier 1 Billing Charge	\$ 16,044	\$ 595,340	\$ 205,155	\$ 2,236	\$ 818,775		\$ 611,384	\$ 207,391	
(18) Tier 2 Billing Charge	\$ 10,237	\$ 522,248	\$ 82,937	\$ 6,892	\$ 622,314		\$ 532,484	\$ 89,829	
(19) Total Billing Charge	\$ 26,281	\$ 1,117,588	\$ 288,092	\$ 9,129	\$ 1,441,089		\$ 1,143,868	\$ 297,220	
(20) Tier 1 Billing Charge (All Excess Generation)	\$ 20,919	\$ 878,727	\$ 262,299	\$ 5,958	\$ 1,167,902		\$ 899,645	\$ 268,257	

= (13) + (14)

= (17) + (18)

	CY 2020 Volumetric Method*		Greater than 25 kW		Less than 25 kW		Total	Greater than 25 kW	Less than 25 kW
	BTM	Community	BTM	Community	Greater than 25 kW	Less than 25 kW			
	(21) Systems Evaluated								
(22) Systems with a Billing Charge	26	12	831		869		38	831	
(23) Tier 1 Excess Generation (kWh)									
(24) Tier 2 Excess Generation (kWh)									
(25) Total Excess Generation (kWh)	588,561	10,185,472	1,122,218		11,896,251		10,774,033	1,122,218	
(26) Total Excess Credits (\$)	\$ 31,470	\$ 839,385	\$ 91,429		\$ 962,284		\$ 870,855	\$ 91,429	
(27) Tier 1 Billing Charge									
(28) Tier 2 Billing Charge									
(29) Total Billing Charge	\$ 51,732	\$ 918,506	\$ 125,545		\$ 1,095,782		\$ 970,238	\$ 125,545	
(30) Tier 1 Billing Charge (All Excess Generation)	\$ 31,470		\$ 91,429		\$ 122,899		\$ 31,470	\$ 91,429	

= (23) + (24)

= (27) + (28)

	CY 2019 Volumetric Method**		Greater than 25 kW		Less than 25 kW		Total	Greater than 25 kW	Less than 25 kW
	BTM	Community	BTM	Community	Greater than 25 kW	Less than 25 kW			
	(31) Systems Evaluated								
(32) Systems with a Billing Charge	13	5	620		638		18	620	
(33) Tier 1 Excess Generation (kWh)									
(34) Tier 2 Excess Generation (kWh)									
(35) Total Excess Generation (kWh)	249,153	2,639,962	818,461		3,707,576		2,889,115	818,461	
(36) Total Excess Credits (\$)	\$ 19,711	\$ 609,536	\$ 85,684		\$ 714,931		\$ 629,247	\$ 85,684	
(37) Tier 1 Billing Charge									
(38) Tier 2 Billing Charge									
(39) Total Billing Charge	\$ 18,319	\$ 202,289	\$ 87,724		\$ 308,333		\$ 220,608	\$ 87,724	
(40) Tier 1 Billing Charge (All Excess Generation)	\$ 11,962		\$ 65,175		\$ 77,137		\$ 11,962	\$ 65,175	

= (33) + (34)

= (37) + (38)

Notes:

- (1);(11);(21);(31) For CY 2021 and CY 2022, represents the number of net metering systems evaluated. "BTM" systems are "behind-the-meter" systems with consumption and generation netted behind the same meter. "Community" systems represent net metering facilities where credits associated with generation are allocated to other accounts. The Company does not have readily available equivalent figures for CY 2019 and CY 2020.
- (2);(12);(22);(32) Number of net metering systems for which the analysis calculates a non-zero billing charge.
- (3);(13);(23);(33) For CY 2021 and CY 2022, Tier 1 Excess Generation (kWh) represents, across all systems, the kilowatt-hours generated in excess of 100% of annual consumption but less than 125% of annual consumption for each system. Tier 1 Excess Generation is calculated separately for each individual system. The Company does not have readily available equivalent figures for CY 2019 and CY 2020.
- (4);(14);(24);(34) For CY 2021 and CY 2022, Tier 2 Excess Generation (kWh) represents, across all systems, the kilowatt-hours generated in excess of 125% of annual consumption for each system. Tier 2 Excess Generation is calculated separately for each individual system. The Company does not have readily available equivalent figures for CY 2019 and CY 2020.
- (6);(16);(26);(36) For CY 2019 and CY 2020, Total Excess Credits (\$) are those presented in Tables 1 and 3 of the Company's response to PUC 7-1, page 2, RIPUC Docket No. 5127. The Company has not calculated equivalent figures for 2021 and 2022. The Company would further note that the Billing Charge amounts are better representations of the dollar value of actual "excess" generation.
- (7);(17);(27);(37) For CY 2021 and CY 2022, Tier 1 Billing Charge represents, across all systems, the calculated billing charge associated with Tier 1 Excess Generation. For each system, the Tier 1 Billing Charge is equal to the system's Tier 1 Excess Generation (kWh) multiplied by the difference between the system's Weighted Average Renewable Net Metering Credit and Weighted Average Excess Renewable Net Metering Credit. The Company does not have readily available equivalent figures for CY 2019 and CY 2020.
- (8);(18);(28);(38) For CY 2021 and CY 2022, Tier 2 Billing Charge represents, across all systems, the calculated billing charge associated with Tier 2 Excess Generation. For each system, the Tier 2 Billing Charge is equal to the system's Tier 2 Excess Generation (kWh) multiplied by the difference between the system's Weighted Average Renewable Net Metering Credit. The Company does not have readily available equivalent figures for CY 2019 and CY 2020.
- (10);(20);(30);(40) For CY 2021 and CY 2022, Tier 1 Billing Charge (All Excess Generation) represents, across all systems, the calculated billing charge if all Excess Generation (Tier 1 and Tier 2) kWh for a system are assessed a billing charge at the system's Tier 1 Billing Charge rate. For each system, the Tier 1 Billing Charge rate is equal to the difference between the system's Weighted Average Renewable Net Metering Credit and Weighted Average Excess Renewable Net Metering Credit. For CY 2019 and CY 2020, this amount is equal to the "Minimum Charge for BTM Projects (\$)" from Tables 1 and 3, respectively, of the Company's response to PUC 7-1, Page 2, RIPUC Docket No. 5127.

* Source: Table 3 of PUC 7-1, page 2, RIPUC Docket No. 5127.

** Source: Table 1 of PUC 7-1, page 2, RIPUC Docket No. 5127.

VOLUMETRIC METHOD ANALYSIS RESULTS		CY 2019	CY 2020	CY 2021	CY 2022	
(1)	Number of Net Metering Systems with a Billing Charge (System Size: Greater than 25 kW)	18	38	37	64	Page 1 of 2, Column (f), Lines (32), (22), (12), and (2)
(2)	Number of Net Metering Systems with a Billing Charge (System Size: Less than 25 kW)	620	831	1,066	2,036	Page 1 of 2, Column (g), Lines (32), (22), (12), and (2)
(3)	Number of Net Metering Systems with a Billing Charge (Total)	638	869	1,103	2,100	=(1) + (2)
(4)	Excess Generation (kWh) (System Size: Greater than 25 kW)	2,889,115	10,774,033	30,849,249	49,297,273	Page 1 of 2, Column (f), Lines (35), (25), (15), and (5)
(5)	Excess Generation (kWh) (System Size: Less than 25 kW)	818,461	1,122,218	1,544,969	9,239,185	Page 1 of 2, Column (g), Lines (35), (25), (15), and (5)
(6)	Excess Generation (kWh) (Total)	3,707,576	11,896,251	32,394,218	58,536,458	=(4) + (5)
(7)	Billing Charge (\$) (System Size: Greater than 25 kW)	\$ 220,608	\$ 970,238	\$ 1,143,868	\$ 7,748,083	Page 1 of 2, Column (f), Lines (39), (29), (19), and (9)
(8)	Billing Charge (\$) (System Size: Less than 25 kW)	\$ 87,724	\$ 125,545	\$ 297,220	\$ 1,439,288	Page 1 of 2, Column (g), Lines (39), (29), (19), and (9)
(9)	Billing Charge (\$) (Total)	\$ 308,333	\$ 1,095,782	\$ 1,441,089	\$ 9,187,371	=(7) + (8)
(10)	"Minimum" Billing Charge (\$) (System Size: Greater than 25 kW)	\$ 11,962	\$ 31,470	\$ 899,645	\$ 4,646,706	Page 1 of 2, Column (f), Lines (40), (30), (20), and (10)
(11)	"Minimum" Billing Charge (\$) (System Size: Less than 25 kW)	\$ 65,175	\$ 91,429	\$ 268,257	\$ 886,815	Page 1 of 2, Column (g), Lines (40), (30), (20), and (10)
(12)	"Minimum" Billing Charge (\$) (Total)	\$ 77,137	\$ 122,899	\$ 1,167,902	\$ 5,533,521	=(10) + (11)