

The Narragansett Electric Company
d/b/a Rhode Island Energy

**Proposed FY2025 Gas
Infrastructure, Safety, and
Reliability Plan**

Book 1 of 2

December 21, 2023

Docket No. 23-49-NG

Submitted to:
Rhode Island Public Utilities Commission

Submitted by:



Rhode Island Energy™
a PPL company

December 21, 2023

VIA HAND DELIVERY AND ELECTRONIC MAIL

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

**RE: Docket No. 23-49-NG – The Narragansett Electric Company d/b/a
Rhode Island Energy’s Proposed FY 2025 Gas Infrastructure, Safety, and
Reliability Plan**

Dear Ms. Massaro:

In compliance with R.I. Gen. Laws § 39-1-27.7.1, I have enclosed 10 copies of Rhode Island Energy’s¹ proposed fiscal year (“FY”) 2025 Gas Infrastructure, Safety and Reliability (“ISR”) Plan (the “Gas ISR Plan” or “Plan”). The Gas ISR Plan is designed to enhance the safety and reliability of Rhode Island Energy’s natural gas distribution system.

On October 27, 2023, Rhode Island Energy submitted an earlier version of the proposed Plan to the Division of Public Utilities and Carriers (“Division”) for review as required by law. The Company consulted with the Division on a proposed plan to be filed with the Rhode Island Public Utilities Commission (“PUC”). Throughout these consultations the Division undertook a comprehensive review of the initial plan, which included issuing numerous informal and formal discovery requests to the Company, review of responses to those requests, discussions with Company representatives and outside consultant review. The Company is awaiting confirmation from the Division as to its general concurrence on the budget for the Plan.

The Gas ISR Plan is designed to maintain and upgrade the Company’s gas delivery system through proactively replacing leak-prone pipe; upgrading the gas delivery system’s custody transfer stations, pressure regulating facilities, and peak shaving plants; responding to emergency leak situations; and addressing infrastructure conflicts that arise out of state, municipal, and third-party construction projects. The Plan is intended to attain these safety and reliability goals through a cost-effective, coordinated work plan. The level of work that the Plan provides will sustain and enhance the safety and reliability of the Rhode Island gas distribution infrastructure, promote efficiency in the management and operation of the gas distribution system and directly benefit Rhode Island gas customers. The Plan also helps reduce the annual methane emissions released by the gas distribution system, primarily through the replacement and abandonment of leak-prone pipe with its Proactive Main Replacement programs, consistent with the 2021 Act on Climate.

¹ The Narragansett Electric Company d/b/a Rhode Island Energy (referred to herein as “Rhode Island Energy” or the “Company”).

The Plan and accompanying testimony of Company witnesses Nathan A. Kocon, Philip J. LaFond and Laeyeng H. Hunt explain certain changes to the categories and budget framework that have been employed in prior years' Gas ISR plans. These proposed changes to categorization and budgeting have been formulated by the Company consistent with the proposal the Company presented at the technical session conducted by the PUC in Docket No. 23-39-NG on November 29, 2023. The Plan also includes a description of the categories of work Rhode Island Energy proposes to perform in FY2025, the proposed targeted spending levels for each work category and the resulting plant additions. As explained in the Plan and accompanying testimony of Messrs. Kocon and LaFond and Mrs. Hunt, the Company is proposing spending of \$185.41 million for capital investment through the Plan and PHMSA Contingency Plan spending of up to \$10.79 million to account for the potential enactment of regulations during FY2025 that would significantly alter the Company's leak detection and repair obligations under federal regulations.²

In accordance with R.I. Gen. Laws § 39-1-27.7.1(c)(2), the enclosed Plan also addresses the revenue requirement, rate design, and bill impacts. The Company's FY2025 Gas ISR Plan revenue requirement is \$74,096,163 (which is an incremental \$6,875,828 over the amount in FY2024). The Company has included the joint pre-filed direct testimony of Stephanie A. Briggs, Jeffrey D. Oliveira, and Natalie Hawk that describes the calculation of the Company's revenue requirements for FY2025. Please note that, in this case, the calculation also includes an adjustment for the tax hold harmless impact on ISR rate base.

For the average residential heating customer using 845 therms annually, the proposed FY2025 ISR factors for the period of April 1, 2024 through March 31, 2025 will result in an annual bill increase of \$48.28 or 2.9 percent, as reflected in the proposed Gas ISR Plan at Section 4, Attachment 2. The Company has included the pre-filed direct testimony of Tyler G. Shields to describe the customer bill impacts of the proposed rate changes.

For the PUC's convenience, the Company has also included copies of its responses to Division Data Requests Set 1. In connection with the Data Requests, this filing contains a Motion for Protective Treatment of Confidential Information in accordance with 810-RICR-00-00-1-1.3(H)(3) (Rule 1.3(H)) of the PUC's Rules of Practice and Procedure and R.I. Gen. Laws § 38-2-2(4)(B) and (4)(F). Rhode Island Energy seeks protection from public disclosure of certain confidential and privileged information in its responses to data requests Division 1-12, Division 1-17 and Division 1-30 and Attachments DIV 1-2-2 through 1-2-5, Attachment DIV 1-5-2, Attachment DIV 1-16, and Attachment DIV 1-17. In compliance with Rule 1.3(H), the Company has provided the PUC with, unredacted copies of the confidential responses and attachments in an envelope marked, "**HIGHLY CONFIDENTIAL INFORMATION - DO NOT RELEASE!**"

² The proposed ISR Plan capital investments, and the forecasts of future years' capital investments contained within the ISR Plan, do not represent the total amount of capital investment anticipated by the Company in this and future years. In this ISR Plan the proposed capital investments and forecasts of future capital investments only include those amounts that the Company has proposed, or, with respect to future years, plans to propose, to recover through the ISR mechanism.

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The Gas ISR Plan presents an opportunity to facilitate and encourage investment in Rhode Island Energy's gas utility infrastructure and enhance Rhode Island Energy's ability to provide safe, reliable and efficient gas service to customers.

Thank you for your attention to this matter. If you have any questions, please contact me at 401-316-7429.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Jennifer Brooks Hutchinson", with a long horizontal line extending to the right.

Jennifer Brooks Hutchinson

Enclosure

cc: Docket No. 23-49-NG Service List
Leo Wold, Esq.
Al Mancini, Division (w/confidential versions)
John Bell, Division (w/confidential versions)
Jeremy Walker, Division Consultant (w/confidential versions)

STATE OF RHODE ISLAND
RHODE ISLAND PUBLIC UTILITIES COMMISSION

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)	Docket No. 23-49-NG
FY2025 Gas Infrastructure, Safety and)	
Reliability Plan)	
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**MOTION OF THE NARRAGANSETT ELECTRIC
COMPANY D/B/A RHODE ISLAND ENERGY FOR PROTECTIVE
TREATMENT OF CONFIDENTIAL INFORMATION**

Rhode Island Energy¹ respectfully requests that the Rhode Island Public Utilities Commission (“PUC”) grant protection from public disclosure certain confidential, competitively sensitive, and proprietary information submitted in this proceeding, as well as certain critical energy infrastructure information as permitted by 810-RICR-00-00-1.3(H) (Rule 1.3(H)) of the PUC’s Rules of Practice and Procedure and R.I. Gen. Laws § 38-2-2(4)(B) and (4)(F). The Company also respectfully requests that, pending entry of that finding, the PUC preliminarily grant the Company’s request for confidential treatment pursuant to Rule 1.3(H)(2).

I. BACKGROUND

On December 21, 2023, the Company submitted its FY 2025 Gas Infrastructure, Safety and Reliability Plan (the “Plan” or “Gas ISR Plan”) filing in the above-captioned docket. The Gas ISR Plan filing includes the Company’s responses to fifty-six data requests propounded by the Division of Public Utilities and Carriers (the “Division”) in connection with its pre-filing review of the Plan. The Company’s responses to data requests Division 1-12, Division 1-17 and

¹ The Narragansett Electric Company d/b/a Rhode Island Energy (Rhode Island Energy or the Company).

Division 1-30 (“Confidential Responses”) and Attachments DIV 1-2-2 through 1-2-5, Attachment DIV 1-5-2, Attachment DIV 1-16, and Attachment DIV 1-17 (the “Confidential Attachments”) contain information that is not subject to disclosure under Rhode Island’s Access to Public Records Act. Specifically, the Confidential Attachments and the Company’s responses to data requests Division 1-12 and Division 1-30 contain critical energy infrastructure information (“CEII”) the disclosure of which could present a threat to public safety. The CEII contained in the Company’s Confidential Attachments and data request responses includes plans, descriptions, design standards and schematic drawings of natural gas transmission and distribution infrastructure. Additionally, the Company’s responses to data requests Division 1-12, Division 1-17, and Division 1-30 contain certain confidential and commercially sensitive cost estimates for future work. Disclosing these cost estimates may reduce the Company’s ability to secure competitive pricing for the work in the future.

Therefore, the Company requests that, pursuant to Rule 1.3(H), the PUC afford confidential treatment to the CEII and confidential commercial information contained in the Confidential Responses and Confidential Attachments.

II. LEGAL STANDARD

Rule 1.3(H) provides that access to public records shall be granted in accordance with the Access to Public Records Act (APRA), R.I. Gen. Laws § 38-2-1, *et seq.* Under the APRA, all documents and materials submitted in connection with the transaction of official business by an agency is deemed to be a “public record,” unless the information contained in such documents and materials falls within one of the exceptions specifically identified in R.I. Gen. Laws § 38-2-2(4). To the extent that information provided to the PUC falls within one of the designated exceptions to the public records law, the PUC has the authority under the terms of

APRA to deem such information as confidential and to protect that information from public disclosure.

In that regard, R.I. Gen. Laws § 38-2-2(4)(B) and (4)(F) provide that the following types of records shall not be deemed public:

(B) Trade secrets and commercial or financial information obtained from a person, firm, or corporation which is of a privileged or confidential nature...

(F) Scientific and technological secrets and the security plans of military and law enforcement agencies, the disclosure of which would endanger the public welfare and security.

With respect to the commercial information exception to the definition of “public record,” the Rhode Island Supreme Court has held that this confidential information exemption applies where the disclosure of information would be likely either (1) to impair the government’s ability to obtain necessary information in the future; or (2) to cause substantial harm to the competitive position of the person from whom the information was obtained. *Providence Journal v. Convention Ctr. Auth.*, 774 A.2d 40 (R.I. 2001). The first prong of the test is satisfied when information is provided to the governmental agency and that information is of a kind that would customarily not be released to the public by the person from whom it was obtained. *Providence Journal*, 774 A.2d at 47.

With respect to other exceptions to the definition of public record, the Rhode Island Supreme Court has held that the agencies making determinations as to the disclosure of information under APRA may apply the balancing test established by the Court in *Providence Journal v. Kane*, 577 A.2d 661 (R.I. 1990). Under this balancing test, the PUC may protect information from public disclosure if the benefit of such protection outweighs the public interest inherent in disclosure of information pending before regulatory agencies.

III. BASIS FOR CONFIDENTIALITY

The commercial information contained in the Company's Confidential Responses is privileged information and is the type of information that Rhode Island Energy would not ordinarily make public. The Confidential Responses includes estimate costs for certain work and disclosing such information could impair Rhode Island Energy's ability to negotiate advantageous pricing or other terms in the future, thereby causing substantial harm to the detriment of the Company and its customers. Additionally, disclosing these cost estimates may reduce the Company's ability to secure competitive pricing for the work in the future during an RFP process. For example, the disclosure of estimated costs to potential RFP bidders could be detrimental to the bidding process and to Rhode Island customers as it may effectually eliminate bids that are below the Company's estimated price. At a minimum, public disclosure would give potential bidders an advantage that is harmful and inconsistent to the RFP and bidding process. Accordingly, Rhode Island Energy respectfully requests that the PUC provide confidential treatment to the information.

With respect to the CEII contained in the Company's Confidential Attachments and its responses to data requests Division 1-12 and Division 1-30, CEII is defined by the Federal Energy Regulatory Commission ("FERC") as: [S]pecific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that:

1. Relates details about the production, generation, transmission, or distribution of energy;
2. Could be useful to a person planning an attack on critical infrastructure;
3. Is exempt from mandatory disclosure under the [Federal] Freedom of Information Act, 5 U.S.C. § 552; and
4. Does not simply give the general location of the critical information.

18 CFR § 388.113(c)(2). In turn, "critical infrastructure" is defined as:

[E]xisting and proposed systems and assets, whether physical or virtual, the incapacity or destruction of which would negatively affect security, economic security, public health or safety, or any combination of those matters.

18 CFR § 388.113(c)(4). The design specifications and schematic drawings, maps and related information contained in the Company's Confidential Attachments and data request responses fall squarely within FERC's definition of CEII. Public dissemination of this information could pose a grave threat to public health and safety as it could be used to identify vulnerabilities in, and plan attacks against, natural gas transmission and distribution infrastructure. Under the Rhode Island Supreme Court's balancing test set forth in *Providence Journal v. Kane*, the public interest in access to this information is far outweighed by the threat to the public's health and safety that could result from public dissemination of these technical details concerning natural gas infrastructure.

IV. CONCLUSION

For the foregoing reasons, Rhode Island Energy respectfully requests that the PUC grant its Motion for Protective Treatment of the Company's Confidential Responses and Confidential Attachments. In accordance with Rule 1.3(H) the Company has submitted redacted versions of the Confidential Responses and Confidential Attachments for the public file in this matter and unredacted confidential versions subject to this motion for protective treatment.

Respectfully submitted,

**THE NARRAGANSETT ELECTRIC
COMPANY d/b/a RHODE ISLAND ENERGY**

By its attorney,



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Dated: December 21, 2023

DIRECT JOINT TESTIMONY

OF

NATHAN KOCON

PHILIP LAFOND

AND

LAEYENG HUNT

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1 **I. Introduction and Qualifications**

2 **Nathan Kocon**

3 **Q. Mr. Kocon, please state your name and business address.**

4 A. My name is Nathan Kocon. My business address is 477 Dexter Street, Providence, RI
5 02907.

6

7 **Q. Mr. Kocon, by whom are you employed and in what capacity?**

8 A. I am employed by The Narragansett Electric Company d/b/a Rhode Island Energy
9 (“Rhode Island Energy” or the “Company”) as the Principal Regulatory Analyst, within
10 the Resource and Investment Planning group, for the Rhode Island Gas Division. I
11 support Rhode Island for all gas system issues, with a focus on those related to the capital
12 investment strategies for Rhode Island Energy. In my role, I work closely with the
13 Rhode Island Jurisdictional President, the Vice President - Gas, and jurisdiction staff on
14 all local gas issues related to the natural gas distribution system in the Rhode Island
15 service territory. In this role, I am responsible for issues related to the natural gas
16 distribution system, developing strategies to support Company objectives regarding
17 investment in the natural gas distribution system, and supporting Rhode Island Energy’s
18 gas capital investments during state regulatory proceedings.

19

1 **Q. Mr. Kocon, please describe your educational background and professional**
2 **experience.**

3 A. In 2005, I graduated from Northeastern University with a Bachelor of Science in Business
4 Administration with a dual concentration in Finance and Marketing. I joined National Grid
5 USA (“National Grid”) in 2013 as a Lead Analyst in the Process and Performance group
6 within the Customer Organization. During my tenure at National Grid, I completed
7 National Grid’s Performance Excellence Practitioner, Senior Practitioner, and Coach
8 Practitioner Trainings and led several process and performance improvement initiatives.
9 From February 2019 until May 2022, I was a Principal Regulatory Analyst, within the
10 Resource and Investment Planning group at National Grid. Prior to joining National Grid,
11 from 2010 to 2013, I worked for Ernst & Young in the Financial Investigations and Dispute
12 Services – Government Contract Services group. I am also a Certified Fraud Examiner. On
13 May 25, 2022, PPL Rhode Island Holdings, LLC, a wholly owned indirect subsidiary of
14 PPL Corporation, acquired 100% of the outstanding shares of common stock of the
15 Company from National Grid (the “Acquisition”), at which time I assumed my current
16 position with Rhode Island Energy.

17
18 **Q. Mr. Kocon, have you previously testified before the Rhode Island Public Utilities**
19 **Commission (“PUC”)?**

20 A. Yes, in 2021, 2022, and 2023, I testified before the PUC and filed pre-filed direct
21 testimony in support of the Company’s Fiscal Year (“FY”) 2022, FY2023, and FY2024

1 Gas Infrastructure, Safety, and Reliability (“ISR”) Plans in Docket Nos. 5099, 5210, and
2 22-54-NG.

3

4 **Philip LaFond**

5 **Q. Mr. LaFond, please state your name and business address.**

6 A. My name is Philip LaFond. My business address is 477 Dexter Street, Providence, RI
7 02907.

8

9 **Q. Mr. LaFond, by whom are you employed and in what capacity?**

10 A. I am employed by Rhode Island Energy as the Manager of Resource and Investment
11 Planning for the Rhode Island Gas Division. My group creates the gas business
12 investment plan and creates work plans to align human and material resources to the
13 Company’s strategic and mandated capital plans. The group manages the work during
14 the investment plan year, directing executing groups on prioritization and work volumes.
15 In my role, I work closely with the Rhode Island Jurisdictional President, the Vice
16 President - Gas, and jurisdiction staff on all local gas issues related to the natural gas
17 distribution system in the Rhode Island service territory.

18

19 **Q. Mr. LaFond, please describe your educational background and professional
20 experience.**

21 A. In 1998, I graduated from the Massachusetts Institute of Technology with a Bachelor of
22 Science in Nuclear Engineering. I have been the manager of Resource Planning for the

1 Company's gas division since 2019 and added the Investment Planning team to my area
2 of responsibility following the Acquisition. I was hired by National Grid in 2016 in the
3 role of Lead Program Manager for the Leak Prone Pipe replacement and rehabilitation
4 programs in the Massachusetts jurisdiction. Prior to joining National Grid, I was a
5 Program Manager, Operations Manager, and Lead Engineer for Yankee Scientific, Inc. in
6 Medfield, Massachusetts.

7
8 **Q. Mr. LaFond, have you previously testified before the PUC?**

9 A. Yes, in 2022 and 2023, I testified before the PUC in support of the Company's FY2023
10 and FY2024 Gas ISR Plans in Docket Nos. 5210, and 22-54-NG.

11
12 **Laeyeng Hunt**

13 **Q. Mrs. Hunt, please state your name and business address.**

14 A. My name is Laeyeng Hunt. My business address is 477 Dexter St, Providence, RI 02907.

15
16 **Q. Mrs. Hunt, by whom are you employed and in what capacity?**

17 A. I am employed by Rhode Island Energy as the Director of Engineering and Asset
18 Management. In my role, I oversee asset management, engineering and design and
19 provide input to capital investment strategies for Rhode Island.

20

1 **Q. Mrs. Hunt, please describe your educational background and professional**
2 **experience.**

3 A. In 1994, I graduated from Tufts University with a Bachelor of Science in Civil Engineering
4 and earned a Master of Science in Environmental Engineering from Tufts University in
5 1995. In 2004, I joined National Grid as a Lead Engineer in the Operations Engineering
6 group. I remained with National Grid through the date of the Acquisition and, during that
7 time, held a variety of positions in Integrity Engineering, Public Works Engineering,
8 Resource Planning, and Resource Coordination and Scheduling. In addition, from 1995 to
9 2004, I worked for engineering consultant firms that provide services for the Massachusetts
10 Water Resource Authority and Boston Water & Sewer Commission. Upon the closing of
11 the Acquisition, I assumed my current position with Rhode Island Energy.

12

13 **Q. Mrs. Hunt, have you previously testified before the PUC?**

14 A. Yes, in 2023, I testified before the PUC in support of the Company's FY2024 Gas ISR
15 Plan in Docket No. 22-54-NG.

16

17 **II. Purpose of Testimony**

18 **Q. What is the purpose of your joint testimony?**

19 A. The purpose of our testimony is to adopt and describe the Company's proposed FY2025
20 Gas Infrastructure, Safety, and Reliability Plan ("Gas ISR Plan" or "Plan").¹ The

¹ The Company is required by statute to annually file an infrastructure, safety, and reliability spending plan with the

1 Company’s Gas ISR Plan, details the work the Company expects to complete under the
2 Plan, the anticipated capital investments associated with that work, and the resulting plant
3 additions. In addition, our testimony describes the Company’s proposed Gas ISR
4 budgetary framework developed in connection with Docket No. 23-39-NG, titled
5 “The Narragansett Electric Co. d/b/a Rhode Island Energy (RI Energy) - Gas
6 Infrastructure, Safety & Reliability (ISR) Plan Budgeting and Planning Processes”.

7 Company witnesses participated in a Technical Record Session on November 29, 2023 to
8 explain and receive feedback on an initial budgetary framework that the Company
9 prepared for that session. The Company has incorporated that feedback into an updated
10 proposed budgetary framework which is explained in detail throughout this testimony.
11 The Company has also structured the FY2025 Gas ISR Plan in alignment with the new
12 Level 1 category groups, which will be explained in this testimony.

13

14 The testimony of Company witnesses Stephanie A. Briggs, Jeffrey D. Oliveira, and
15 Natalie Hawk presents the revenue requirement associated with the Company’s Plan, and
16 the testimony of Company witness Tyler G. Shields provides (1) an explanation of how
17 the Company calculated the rate design for the ISR mechanism; (2) the calculation of the
18 ISR factors; and (3) the customer bill impacts of the proposed ISR factors.

PUC for review and approval. *See* R.I. Gen. Laws § 39-1-27.7.1(d).

1 **III. Overview**

2 **Q. What is the Gas ISR Plan designed to accomplish?**

3 A. Overall, the Gas ISR Plan will allow the Company to meet state and federal safety and
4 reliability requirements and maintain and upgrade its gas distribution system to a safe and
5 reliable condition. The Plan has been developed to improve the safety and reliability of
6 the Company's gas system for the immediate and continuing benefit of Rhode Island's
7 natural gas customers.

8

9 The Gas ISR Plan is designed to establish a spending plan, together with a reconcilable
10 allowance for the anticipated capital additions being placed in service for the fiscal year
11 and other spending needed to maintain and upgrade the Company's gas distribution
12 system,² such as proactively replacing leak-prone pipe; upgrading the gas delivery
13 system's custody transfer stations; pressure regulating facilities; and peak shaving plants;
14 responding to emergency leak situations; and addressing infrastructure conflicts that arise
15 out of state, municipal, and third-party construction projects. The Company intends to
16 attain these safety and reliability goals through a cost-effective, coordinated work plan.

17 The level of work that the Plan provides will sustain and enhance the safety and
18 reliability of the Rhode Island gas pipeline infrastructure, promote efficiency in the
19 management and operation of the gas distribution system and directly benefit Rhode

² See R.I. Gen. Laws § 39-1-27.7.1(c)(2). In accordance with the PUC's Order in Docket No. 5099 (FY 2022 Gas ISR), effective April 1, 2021, the Company aligned the calculation of the Gas ISR revenue requirement with the Electric ISR and implemented a plant-in-service methodology to calculate the Gas ISR revenue requirement.

1 Island gas customers. The Plan also helps reduce the annual methane emissions released
2 by the gas distribution system, primarily through the replacement and abandonment of
3 leak-prone pipe with its Proactive Main Replacement programs. Where possible, the
4 Company seeks to employ cost effective scalable solutions, such as portable LNG
5 equipment, to adapt the gas distribution system to any changes to the delivery of energy
6 that might arise because of the mandates of the Act on Climate while fulfilling the duty to
7 safely and reliably deliver natural gas to customers.

8
9 **Q. Please explain the review of the Gas ISR Plan that has occurred to date?**

10 A. The Company developed the Gas ISR Plan and submitted it to the Rhode Island Division
11 of Public Utilities and Carriers (“Division”) for review on October 27, 2023 in
12 accordance with R.I. Gen. Laws § 39-1-27.7.1 (the “Revenue Decoupling Law”).³ On
13 November 6 and 8, 2023 the Company met with the Division regarding the Plan and
14 subsequently responded to more than fifty formal data requests from the Division
15 regarding various components of the Plan.⁴ The Company and the Division continued to
16 consult regarding the proposed Plan on several occasions, and as a result of the

³ Pursuant to R.I. Gen. Laws § 39-1-27.7.1(d), the Company must consult with the Division on a proposed plan, and the Division must cooperate in good faith with the Company to reach an agreement on the proposed plan within sixty (60) days. If the Company and the Division cannot agree on a plan, the Company shall file a proposed plan with the PUC for review, and if the PUC finds that the investments and spending are reasonably needed to maintain safe and reliable distribution service over the short and long term, the PUC must approve the plan within ninety (90) days.

⁴ As of the date of filing of this ISR Plan, the Company is preparing its responses to the Division’s second set of data requests.

1 consultations the Company has made adjustments to its initial proposal to align with the
2 feedback it has received. The Company anticipates that the Division will continue to
3 review the Plan and its costs after filing, consistent with prior Gas ISR Plan filings. The
4 Company now submits the Plan to the PUC for review and approval in accordance with
5 the Revenue Decoupling Law.⁵

6
7 **Q. Are you sponsoring any attachments to your testimony?**

8 A. Yes. The proposed Gas ISR Plan is attached as Attachment 1 to our joint testimony. The
9 Plan is organized as follows:

10 Section 1 – Introduction and Summary

11 Section 2 – Gas Capital Investment Plan (including major categories of work)

12 Section 3 – Revenue Requirement Calculation

13 Section 4 – Rate Design and Bill Impacts

14 Schedule 1 – 2022 System Integrity Report

15
16 Our testimony focuses on Sections 1 and 2 of the Plan. As noted above, Ms. Briggs, Mr.
17 Oliveira, and Ms. Hawk are sponsoring the revenue requirement calculation included in
18 Section 3 of the Plan; and Mr. Shields is sponsoring the rate design and bill impacts
19 included in Section 4 of the Plan.

20

⁵ See R.I. Gen. Laws § 39-1-27.7.1(d); Note 3, *supra*.

1 **Q. What types of infrastructure, safety, and reliability work does the Gas ISR Plan**
2 **include?**

3 A. The Gas ISR Plan seeks not only to maintain the Company’s distribution system, but also
4 to proactively upgrade the system’s condition to address problems before they arise. A
5 safe and reliable gas delivery system in Rhode Island is essential to the health, safety, and
6 well-being of its citizens, and for maintaining a healthy economy and continuing to
7 attract new residents and businesses to Rhode Island. In 2008, the PUC embarked on a
8 course to address Rhode Island’s aging gas infrastructure with the establishment of the
9 Accelerated Replacement Plan. The Company filed its first Gas ISR Plan on
10 December 20, 2010 for FY2012. In addition to the type of infrastructure, safety, and
11 reliability work performed under the Accelerated Replacement Plan, the Gas ISR Plan
12 contains spending related to safety and reliability for public works, mandated programs,
13 and reliability programs, including Southern RI Gas Expansion. Included in the Plan is a
14 description of the Company’s proposed budget for capital investments for the FY2025
15 Gas ISR Plan, the capital additions projected to be placed in service during FY2025, and
16 a five-year capital plan forecast that covers the period of April 1, 2024 through March 31,
17 2029 (also referred to as FY2025 through FY2029).

18
19 This year’s Plan also includes a section describing the history and effectiveness of the
20 Gas ISR Plan, along with a section regarding the Act on Climate and the historical and
21 forecasted methane emissions reductions from the abandonment of leak prone pipe. The

1 Plan also includes a copy of the most recent System Integrity Report, as ordered by the
2 PUC in Docket No. 4781.

3 **IV. Proposed Gas ISR Budgetary Framework**

4 **Q. Please briefly describe the Company's proposed Gas ISR Budgetary Framework.**

5 A. The Company proposes grouping budget categories differently than it has in recent ISR
6 proposals. The most apparent change is a realignment of categories that were previously
7 used for the formulation of Gas ISR plans. In the FY2025 Gas ISR Plan, the categories
8 that were previously presented to the Commission are grouped into four separate Level 1
9 categories: Main Replacement & Rehabilitation, Mandated & Non-Main Reactive,
10 Reliability & Pressure Regulation, and Large Multi-Year Reliability Projects.

11

12 **Q. Why are the budget categories grouped in this manner?**

13 A. With this proposal, budget categories are grouped according to the similarity of work
14 type and/or resource needs for the purposes of managing sub-budgets within the overall
15 ISR portfolio. The goal of this realignment is to allow the Company the necessary
16 flexibility to manage its work plan throughout the ISR year while providing for budget
17 thresholds applicable to certain Level 1 categories.

18

19 The first Level 1 category, Main Replacement & Rehabilitation, is comprised of all safety
20 and reliability main installation, abandonment, replacement, and/or rehabilitation work.

21 This work is all conducted by the same Company Construction Oversight department

1 using the same Company and Contractor resource pools, same materials, and same
2 construction techniques.

3
4 The Mandated & Non-Main Reactive category includes projects that are generally shorter
5 cycle projects, ranging from less than one hour to a few days, undertaken by Company
6 operations departments, including Field Operations, Customer Meter Services,
7 Instrumentation and Regulation, and others. All work in this category is required to be
8 performed by Federal or State regulations and/or in reaction to field conditions. This
9 work is time bound and cannot be significantly delayed or deferred.

10
11 Reliability & Pressure Regulation projects all relate in some way to supporting the
12 Company's ability to reliably maintain system pressure under foreseeable circumstances
13 and conditions. Projects in this category include Liquefied Natural Gas ("LNG"),
14 Regulator and Take Station upgrades and replacements, including heaters, and
15 sectionalizing valve replacements.

16
17 Large Multi-Year Reliability Projects include projects with expected lifetime expenditure
18 of greater than \$10 million and time horizons greater than two fiscal years. These
19 projects are separate from the Reliability & Pressure Regulation category due to the
20

1 potential variability in spend timing, allowing for budgets in the former category to be
2 insulated from under- or over-spend on large project work that often entails cost
3 variability.

4
5 **Q. Please explain how the Company intends to prioritize work within the new Main**
6 **Replacement & Rehabilitation Level 1 Group.**

7 A. The Company will prioritize categories within the new Level 1 Main Replacement &
8 Rehabilitation grouping from projects driven by reactive forces, such as third-party
9 construction and paving and material condition discovery, to long term planning and
10 reliability projects, through to Proactive Main Replacement leak prone pipe replacements.

11 The proposed category prioritization order is:

- 12 • Latent Damages
- 13 • Reactive Main Replacement
- 14 • City/State Construction and Public Works
- 15 • Gas System Reliability
- 16 • Large Diameter Pipe Rehabilitation
- 17 • Low Pressure System Elimination
- 18 • Pipeline Integrity
- 19 • Replace Pipe on Bridges
- 20 • Proactive Main Replacement – Leak Prone Pipe
- 21 • Planned Service Replacements

1 Within the Proactive Main Replacement category, the Company will prioritize projects
2 with high risk scores. In light of the Pipeline and Hazardous Materials Safety
3 Administration’s (“PHMSA”) Notice of Proposed Rulemaking regarding Gas Pipeline
4 Leak Detection and Repair, and considering the mandates of the Act on Climate, the
5 Company will also secondarily prioritize pipe segments with a greater than average
6 number of open leaks per mile.

7
8 **Q. Does each Level 1 Group have a maximum allowable budget?**

9 A. No. Only certain Level 1 groups would have a maximum allowable budget. The
10 Company has provided a proposed budget for each category in the ISR proposal. Based
11 upon its planning process, the Company plans to spend each budget as proposed.
12 However due to the numerous unknown variables inherent in gas construction, such as
13 ongoing supply chain and labor uncertainties, weather, permit restrictions, inflation, field
14 conditions, and others, the Company intends to manage each top level group, excluding
15 Mandated & Non-Main Reactive and Large Multi-Year Reliability Projects, as a
16 grouping of fungible or exchangeable categories from a budget perspective. The total
17 budget for each Level 1 group is the sum of all individual category budgets within each
18 Level 1 group. Because of the reactive nature of the work in the Mandated & Non-Main
19 Reactive group, the Company intends to spend what is necessary to meet its mandates.

20

1 **Q. Does the Company propose any overspending tolerance before potential revenue**
2 **requirement adjustments would apply? If so, please explain.**

3 A. The Company proposes overspending allowances to account for the risks and
4 uncertainties inherent in gas construction. The Company proposes an overspending
5 tolerance for the Main Replacement & Rehabilitation and Reliability & Pressure
6 Regulation groups of 2.5 percent. This overspend allowance is in recognition that the
7 Company may face a late fiscal year need to perform work within these groups that is in
8 reaction to an unplanned external event, discovery of untenable field condition or similar
9 circumstances.

10

11 **Q. The Company is proposing a 2.5 percent overspending tolerance for certain Level 1**
12 **Groups. If the Company exceeds the proposed spending tolerance, how would a**
13 **potential downward revenue requirement adjustment be applied?**

14 A. The Company proposes that overspend up to the tolerance level be permitted. The
15 Company is proposing that, if the Company exceeds the 2.5 percent spending threshold in
16 the Main Replacement & Rehabilitation and/or Reliability & Pressure Regulation Level 1
17 categories, then the Company will make a one-time reduction to the revenue requirement
18 in that year that is equal to one year of revenue requirement dollars associated with the
19 total amount of overspend in excess of the approved budget. In subsequent years, the
20 Company would recover the normal amount on the overspend amount with no adjustment
21 to the revenue requirement. As an example, if the Company overspent on the Main

1 Replacement & Rehabilitation group by 2.4 percent, no downward revenue requirement
2 adjustment would be applied. However, if the Company overspent the Main
3 Replacement & Rehabilitation group by 2.6 percent, the potential downward revenue
4 requirement adjustment would be the revenue requirement attributable to hypothetical
5 capital additions placed in service equal to the dollar amount of the 2.6 percent of
6 overspend. The Company proposes this approach to allow for overspend when necessary
7 to meet mandates or complete work as needed while still providing a strong incentive to
8 avoid utilizing the allowed 2.5 percent as an approved alternative budget or approved
9 enhanced spending amount.

10
11 **Q. Has the Company calculated the revenue requirement attributable to \$1.0 million of**
12 **FY2025 capital additions placed in-service as requested by the Commission at the**
13 **November 29, 2023 technical session in Docket No. 23-39-NG?**

14 A. Yes. The revenue requirement associated with the Company's FY2025 \$163.812 million
15 of proposed capital additions to be placed in-service is calculated to be \$74,020,078. The
16 revenue requirement associated with FY2025 capital additions placed in-service of
17 \$162.812 million (or \$1 million less than plan) is calculated to be \$74,096,162, for a
18 difference of **\$76,085**.

19

1 **Q. What is the estimated cost of curb-to-curb, final restoration paving the Company**
2 **expects to complete in support of this plan?**

3 A. The Company estimates curb-to-curb, final restoration paving costs to complete projects
4 associated with this FY2025 Gas ISR Plan to be approximately \$12 million. This cost
5 has risen steadily over the last several years in response to the passage of the Rhode
6 Island Utility Fair Share Roadway Repair Act in 2019. Many municipalities in the state
7 have adopted the provisions of this statute, and in issuing work permits, have required
8 curb-to-curb restoration for gas projects.

9
10 **Q. What is the revenue requirement value associated with treating curb-to-curb paving**
11 **costs as an operating expense instead of a capital cost?**

12 A. The Company has calculated a total FY2025 revenue requirement of \$85,183,144 if the
13 final restoration paving costs of \$12 million were treated as O&M versus capital in the
14 revenue requirement as shown in Section 3, Attachment 3. This results in an annual bill
15 increase to a residential heating customer using 845 therms annually of \$80.49 or 4.8%
16 (Section 4, Attachment 3) compared to the annual bill increase to a residential heating
17 using 845 therms annually of \$48.28 or 2.9 percent (Section 4, Attachment 2) if the final
18 restoration costs had been treated as capital in the revenue requirement.

19
20 The Company believes that treating paving costs, which are integral to the completion of
21 most gas capital projects, as operating expenses will be overly burdensome to

1 customers and runs counter to Federal Energy Regulatory Commission guidance on cost
2 capitalization for gas construction projects.

3
4 **Q. Please explain the Company's rationale for including the cost of site improvements**
5 **and equipment purchases for the Company's proposed seasonal LNG facility at Old**
6 **Mill Lane in the FY2025 Gas ISR Plan given that the Company has not received a**
7 **license from the Energy Facility Siting Board ("EFSB") for continuing portable**
8 **LNG operations at Old Mill Lane.**

9 A. The Company expects a decision with respect to its application for a license to continue
10 portable LNG operations at Old Mill Lane near in time to the PUC's ruling on this ISR
11 proposal. If the Company's application to the EFSB is approved, the Company would
12 need approval in this ISR docket to move forward with the Old Mill Lane site upgrades
13 and portable LNG equipment purchase. With the newly proposed Gas ISR budgetary
14 framework, as described in this testimony, the FY2025 budget for Old Mill Lane site
15 work and equipment purchases could only be spent for these purposes. Therefore, if the
16 EFSB does not grant the license requested by the Company, the budgeted funds would
17 not be expended. Additionally, because the proposed Old Mill Lane site improvements
18 and equipment purchases will not be placed in-service until FY2026, the project would
19 not have a customer rate impact in FY2025.

20

1 **Q. Please explain the inclusion of a separate category related to potential changes to**
2 **PHMSA regulations regarding leak detection and repair.**

3 A. The Company has been actively engaged in industry discussions and formal workshops
4 conducted by the American Gas Association, Northeast Gas Association, and other trade
5 organizations relating to PHMSA’s Notice of Proposed Rulemaking regarding Gas
6 Pipeline Leak Detection and Repair. Based upon information exchanged in these
7 discussions and workshops, the Company is anticipating that new PHMSA regulations
8 regarding leak detection and repair will take effect during the FY2025 plan year. These
9 regulations will substantially affect the way the Company must respond to and remediate
10 leaks on its pipelines, with the biggest effects arising due to the required acceleration of
11 remediation of Grade 3 leaks for environmental reasons. Due to uncertainties regarding
12 the timing and precise substance of the proposed regulations, the Company has separated
13 its anticipated budget requirement for additional leak repairs as well as supplemental
14 main replacement work into a separate category.

15
16 **Q. Please explain how the Company proposes to address the spending budget and**
17 **revenue requirement associated with potential changes to PHMSA’s leak detection**
18 **and repair regulations?**

19 A. The Company proposes that the Commission consider and conditionally approve the
20 Company’s proposed spending budget attributable to the potential change in PHMSA’s
21 leak detection and repair regulations. This would provide the Company with the needed
22 flexibility to address these regulations through its workplan should amended regulations

1 take effect, as expected, during FY2025. With respect to the revenue requirement
2 attributable to any resulting capital additions placed in service, the Company has not
3 included that revenue requirement in the rates proposed for effect through this Plan.
4 Rather, the Company proposes to seek recovery for capital additions attributable to any
5 amendment to PHMSA's leak detection and repair regulations through the reconciliation
6 process at the end of FY2025.

7
8 **V. Conclusion**

9 **Q. Does the Gas ISR Plan fulfill the Company's statutory obligation to plan for the safe**
10 **and reliable delivery of gas through the Company's distribution system in Rhode**
11 **Island?**

12 A. Yes. The Gas ISR Plan will permit the capital investment in Rhode Island that is
13 necessary to meet the needs of the Company's customers, together with a spending and
14 work plan to maintain the overall safety and reliability of the Company's Rhode Island
15 gas distribution system.

16
17 **Q. Does this conclude your testimony?**

18 A. Yes.

The Narragansett Electric Company
d/b/a Rhode Island Energy

**Proposed FY2025 Gas
Infrastructure, Safety, and
Reliability Plan**

Book 1 of 2

December 21, 2023

Docket No. 23-49-NG

Submitted to:
Rhode Island Public Utilities Commission

Submitted by:



Rhode Island Energy™
a PPL company

Section 1

Introduction and Summary

Proposed FY2025 Gas Infrastructure,
Safety, and Reliability (“ISR”) Plan

12-Month Gas ISR Plan
April 2024 – March 2025

Introduction and Summary
FY2025 Gas ISR Plan

In consultation with the Rhode Island Division of Public Utilities and Carriers (“Division”), Rhode Island Energy¹ has developed the following proposed fiscal year (“FY”) 2025 Gas Infrastructure, Safety and Reliability (“ISR”) plan (“Gas ISR Plan” or “Plan” or) in compliance with R.I. Gen. Laws § 39-1-27.7.1 (“Revenue Decoupling Law”), which provides for the filing of “[a]n annual gas infrastructure, safety and reliability spending plan for each fiscal year and an annual rate reconciliation mechanism that includes a reconcilable allowance for the anticipated capital investments and other spending pursuant to the annual pre-approved budget.”²

¹ The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”).

² R.I. Gen. Laws § 39-1-27.7.1(c)(2).

The proposed Gas ISR Plan addresses capital spending on gas infrastructure and other costs related to maintaining the safety and reliability of the Company’s gas distribution system. Through the Plan, the Company will maintain and upgrade its gas delivery system by proactively replacing leak-prone pipe; upgrading the gas delivery system’s custody transfer stations, pressure regulating facilities, and peak shaving plants; responding to emergency leak situations; and addressing infrastructure conflicts that arise out of state, municipal, and third-party construction projects. The Company intends to attain these safety and reliability goals through a cost-effective, coordinated work plan. The level of work that the Plan provides will sustain and enhance the safety and reliability of the Rhode Island gas distribution infrastructure, promote efficiency in the management and operation of the gas distribution system and directly benefit Rhode Island gas customers. The Plan also helps reduce the annual methane emissions released by the gas distribution system, primarily through the replacement and abandonment of leak-prone pipe with its Proactive Main Replacement programs. Where possible, the Company seeks to employ cost effective scalable solutions, such as portable LNG equipment, to adapt the gas distribution system to any changes to the delivery of energy that might arise because of the mandates of the Act on Climate while fulfilling the duty to safely and reliably deliver natural gas to all existing customers.

Included in this proposal is a plan (referred to herein as the “PHMSA Rules Contingency Plan”) to address Pipeline and Hazardous Material Safety Administration (“PHMSA”) Notice of Proposed Rulemaking (“NPRM”) Concerning Gas Pipeline Leak Detection and Repair

(“LDAR”) should currently pending proposed rules take effect in FY2025 as the Company expects that they will. The Company proposes to seek approval for spending associated with additional capital work resulting from PHMSA’s proposed LDAR rules in FY2025, but use of the funds would remain contingent on the timing of the passing and extent of these rules. The proposed regulatory amendments are driven by Congressional mandates to reduce methane emissions and limit the impacts of climate change. It should be noted that any potential changes and associated impacts cannot be fully evaluated until a final rule is issued. The Company has reviewed the draft rule, in close collaboration with industry peers and trade associations, to begin assessing the potential business and operational impacts. In its current form, the proposed LDAR rules would require gas operators to implement Advanced Leak Detection Programs and deploy new technology, make significant changes to leakage survey processes and leak classification criteria, increase the frequency at which leakage surveys need to be conducted, and shorten leak repair schedules. A significant change within the proposed rule includes a requirement to remediate all Grade 3 leaks, whether through individual repairs or replacement of leaking assets, within a two to five year timeframe after issuance of a final rule based on a prescribed set of repair schedule criteria. This Introduction and Summary presents (1) a history of the Gas ISR program in Rhode Island and a statement regarding how the ISR program has contributed to safety and reliability; (2) an overview of the proposed FY2025 Plan for the statutory categories of costs and the capital additions projected to be placed in-service in FY2025; (3) the resulting FY2025 revenue requirement associated with the proposed Plan; and

(4) the rate design based upon that revenue requirement and estimated typical bill impacts resulting from the rate design.

The Gas ISR Plan describes the Company’s safety and reliability activities and the multi-year plan upon which the FY2025 Plan is based. The Plan also addresses capital investment in utility infrastructure for FY2025. The Plan itemizes the recommended work activities by general category and provides budgets for capital investment. The Company now submits the Plan to the Rhode Island Public Utilities Commission (“PUC”) for review and approval.³

The Company will continue to file quarterly reports with the Division and the PUC concerning the progress of its Gas ISR programs. In addition, when the Company makes its reconciliation and rate adjustment filing described below, the Company will file an annual report on the prior fiscal year’s activities and the resulting capital additions placed in-service. In implementing an ISR plan in any fiscal year, the circumstances encountered during the year may require reasonable deviations from the original ISR plan. In such cases, the Company will include in its quarterly reports an explanation of any significant deviations.

The level of capital spending provided in the FY2025 Plan (excluding incremental PHMSA funding) to maintain the safety and reliability of the Company’s gas delivery infrastructure is \$185.41 million, which would contribute to capital additions placed in-service of \$164.81 million.

³ In accordance with R.I. Gen. Laws § 39-1-27.7.1(d), the Company and the Division must work together over the course of 60 days in an attempt to reach an agreement on a proposed Plan, which must then be submitted to the Public Utilities Commission (“PUC”) for review and approval within 90 days.

Also, the Company is seeking authorization of \$10.8 million for the PHMSA Rules Contingency Plan to accelerate efforts to repair or replace leak prone pipe to comply with pending PHMSA rulemaking regarding Gas Pipeline LDAR. However, because potential changes to PHMSA's LDAR rules have not yet become final, the Company has not included the PHMSA Rules Contingency Plan costs in the ratemaking calculation for FY2025 and proposes to recover any in-service costs incurred for this program through the FY2025 reconciliation process. For reference purposes, the PHMSA Rules Contingency Plan funding would result in total proposed spending for FY2025 of \$196.20 million and capital additions placed in-service of \$172.25 million.

A description of the Company's proposed capital investment plan and capital additions projected to be placed in-service for the FY2025 Plan period is included in Section 2. The revenue requirement description and calculations are contained in Section 3. A description of the rate design and bill impacts are provided in Section 4.

History of the ISR Plan

The Rhode Island natural gas distribution system is one of the oldest in the United States and includes a large proportion of leak-prone and deteriorating infrastructure installed, in some instances, more than 100 years ago. The Company, which owns and operates the gas distribution system, has an obligation to provide safe and reliable service to customers in compliance with applicable state and federal pipeline safety statutes and regulations. However, the challenge of

meeting this obligation is amplified on the portions of the distribution system containing leak-prone pipe, consisting of unprotected steel, cast iron, wrought iron, and vintage Aldyl-A and Polybutylene plastic pipe.

In accordance with the Revenue Decoupling Law, the Company filed its first Gas ISR Plan on December 20, 2010 for FY2012. The ISR program replaced the Accelerated Replacement Program (“ARP”), which began as part of the Company’s 2008 rate case in Docket No. 3943. The ARP targeted the replacement of cast iron and non-cathodically protected steel mains and non-cathodically protected steel inside services. The ISR program expanded on the ARP through inclusion of other capital programs related to safety and reliability for public works, mandated programs, and reliability. Starting with the FY2021 Reconciliation, in accordance with the PUC’s Order in Docket 5099 (FY2022 Gas ISR), effective as of April 1, 2021, the Company aligned “the calculation of its Gas ISR revenue requirement with the Electric ISR⁴” and implemented the capital additions placed in-service methodology; the in-service methodology was used to calculate the FY2025 Plan revenue requirement. From FY2012 to through FY2023, the Company has invested a total of \$1.3 billion through the Gas ISR program. This includes a total of \$779 million that targeted the replacement or rehabilitation of leak-prone pipe through the Company’s Proactive Main Replacement and Public Works programs. When the ISR program was first implemented, approximately forty eight percent (48%) of the Company’s gas distribution system in Rhode Island was comprised of leak-prone pipe. As of

⁴ Report and Order 24042, RIPUC Docket No. 5099, dated May 6, 2021.

December 31, 2022, that percentage has been reduced and approximately twenty seven percent (27%) of the Company’s gas distribution system in Rhode Island is comprised of leak-prone pipe. The table below provides the annual amount of leak prone pipe abandonment, and associated estimate of leaks eliminated, for each fiscal year from 2012 through 2023.

Description	FY 12	FY 13	FY 14	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21	FY 22	FY 23	Total
Total ISR Abandonment Miles	46	47	53	55	59	63	62	60	62	30	68	66	671
Gas Leaks Eliminated	191	186	140	121	150	103	178	160	160	79	190	215	1,873

To monitor its system performance, the Company prepares an annual System Integrity Report. A copy of the most recent System Integrity Report (2022) is provided as Schedule 1 at the end of the Plan. The System Integrity Report provides historical data on leak receipts, leak repairs, open leaks, and inventory of mains and services. Additional data is provided around material type for each of the listed categories. The Company considers leak receipts to be an important system performance indicator regarding the effectiveness of its leak-prone pipe abandonment program. Since 2010, the Company has seen an overall downward trend in leak receipts, which indicates that the ISR and ARP programs have contributed to this result. The System Integrity Report shows that there was a slight increase in leak receipts from 2017 to 2019, but the volume decreased in 2020 and 2021. Notably, variability in year-to-year annual leaks per mile will occur. Contributing factors include weather, public awareness, and overall system deterioration rates. In FY2021, the Company noticed the increase in cast iron leak activity and increased the target abandonment percentage of cast iron main in the FY2022 workplan to

seventy percent (70%). The Company's original FY2024 workplan targeted approximately seventy five percent (75%) cast iron mains, but the actual percentage will likely be closer to ninety percent (90%) in order to conform the Company's workplan to the Commission's directive in Report and Order 24802 in Docket No. 22-54-NG regarding the Company's FY2024 Gas ISR Plan.⁵ The Company's FY2025 workplan will also target approximately ninety percent (90%) cast iron mains. This increased percentage of cast iron is prudent as in calendar year (CY) 2022, the leak rate on cast iron mains was 5.75 times that of the leak rate on unprotected steel mains.

Act on Climate

The Company has an obligation to provide safe and reliable gas service to customers today and into the future. In addition, the 2021 Act on Climate established economy-wide mandatory reduction targets for greenhouse gas emissions. The Gas ISR Plan contributes to achieving both of those objectives. Since the inception of the ISR program, a major component of the Company's annual workplan has and will continue to include the replacement and abandonment of leak prone pipe, which contributes to the safe and reliable operation of the gas distribution system. An additional benefit of leak prone pipe replacement is that it helps to reduce the emissions from the gas distribution system. Through the Proactive Main Replacement Program, the Company measures methane emissions reductions on a calendar year basis. From 2012

⁵ Report and Order No. 24802, RIPUC Docket No, 22-54-NG dated Aug. 22, 2023.

through 2022 the Company has reduced emissions from its gas distribution system by 106,967 thousand cubic feet (“MCF”). In FY2025 the Company plans to reduce emissions by an estimated 15,461 MCF through the abandonment of 61.2 miles of leak prone pipe. In the FY2025 Plan, the Company will also reduce emissions from the Cumberland Portable LNG operations by completing the installation of a Boil-off Gas Recovery Manifold.

Section 2: Gas Capital Investment Plan

The Company’s proposed gas capital investment plan set forth in Section 2 summarizes the Company’s planned capital investments and capital additions projected to be placed in-service for the Top Level (or Level 1) category groups, listed directly below, and their subsidiary Level 2 categories, which are in explained in detail further below:

- A. Main Replacement & Rehabilitation
- B. Mandated & Non-Main Reactive
- C. Reliability & Pressure Regulation
- D. Large Multi-Year Reliability Projects
- E. PHMSA Contingency – Gas Pipeline Leak Detection and Repair (LDAR)
 - Please note, the Company has not included any forecasted capital additions that will be placed in-service during FY2025 related to the PHMSA Contingency into the proposed rates. If and when the pending PHMSA LDAR rules are implemented during FY2025, and the Company proceeds with the proposed work associated with

the PHMSA LDAR rules, the Company proposes that the spending and resulting capital additions be included in the Company's FY2025 reconciliation and reviewed during the FY2025 reconciliation process.

The Company has included its capital budget, relevant projects that would be part of the Gas ISR Plan, an explanation of the need for and benefit of performing such work to provide safe and reliable service to its customers, and the resulting capital additions that would be added to the revenue requirement over the FY2025 Plan. The Company has also included its five-year ISR capital plan forecast that covers the period of April 1, 2024 through March 31, 2029 (also referred to as FY2025 and FY2026 through FY2029). Finally, the Company has provided the most recent five-year history of ISR capital spend for reference.

The Company's FY2025 Plan includes the elimination of a total of approximately 61.2 miles of leak-prone pipe (approximately 32.8 miles of proactive main replacement including Atwells Avenue, 13.0 miles of public works replacement, 5.5 miles of reactionary main replacement, 3.0 miles from reliability work, 6.3 miles from Low Pressure System Elimination, and 0.6 mile of reinforcement work). For FY2025, the workplan for the Proactive Main Replacement program will target abandonment of approximately ninety percent (90%) cast iron main.

Section 3: Revenue Requirement

The Company has provided a calculation of the revenue requirements for the capital investment in the proposed FY2025 Plan. Section 3 of the Plan contains a description of the revenue requirement model and an illustrative calculation for the FY2025 Plan. This calculation will form the basis for the Plan rate adjustment, which would become effective on April 1, 2024 upon the PUC's approval. As provided in Section 3 of the Plan, in accordance with the Company's gas tariff, RIPUC NG-GAS No. 101, Section 3, Schedule A, Item No. 3.3, the Company will reconcile this rate adjustment as part of its annual Distribution Adjustment Charge filing. The pre-tax rate of return on rate base is the rate of return approved by the PUC in the Amended Settlement Agreement in the Company's most recent general rate case, Docket No. 4770. In the future, the pre-tax rate of return would change to reflect changes to the rate of return approved by the PUC in future rate case proceedings. Any change in the rate of return would be applicable on a prospective basis, effective at the time of the change.

Section 4: Rate Design

For purposes of rate design, the revenue requirement associated with total net capital investment is allocated to rate classes based upon the most recent rate base allocator approved in the Amended Settlement Agreement in Docket No. 4770. For each rate class, the allocated revenue requirement is divided by the plan year (12-month period) forecasted therm deliveries to arrive at a per-therm factor unique to each rate class.

The proposed rate design and associated estimated typical bill impacts are provided in Section 4.

The estimated bill impact of the Gas ISR Plan for the average Residential Heating customer, using 845 therms annually, would be an annual increase of \$48.28, or 2.9 percent, from current bills.

Section 2

Gas Capital Investment Plan

Proposed FY2025 Gas Infrastructure,
Safety, and Reliability (“ISR”) Plan

April 2024 – March 2025

**Gas Capital Investment Plan
FY2025 Gas ISR Plan
12-Month Plan**

Background

The Company developed its proposed capital investment plan to meet its obligation to provide safe, reliable, and efficient gas distribution service for customers at reasonable costs.⁶

The Gas ISR Plan includes capital investment spending needed to meet state and federal regulatory requirements applicable to the Company’s gas system and to maintain its distribution infrastructure in a safe and reliable condition. To address the replacement of leak-prone pipe, the Plan includes infrastructure, safety, and reliability work for cast-iron and non-cathodically protected steel mains. The Plan also contains capital spending related to safety and reliability for public works projects, mandated programs, and gas reliability.

Consistent with the goals of the Revenue Decoupling Law, to continue providing safe and reliable gas delivery service to Rhode Island customers, it is critical that the Company remain vigilant with respect to investing in its infrastructure and have appropriate and timely cost recovery. To that end, the Company’s proposed Plan identifies the capital spending investments that it expects to complete during the FY2025 Plan along with capital assets that are forecasted to be placed in service during the 12-month period of the Plan. At the end of this section, Table 1A contains a description of the proposed budget for the FY2025 Plan, and the resulting forecasted

⁶ The Company delivers natural gas to approximately 275,000 Rhode Island residential and commercial and industrial customers in 32 cities and towns in Rhode Island. To provide this service, the Company owns and maintains approximately 3,220 miles of gas mains and approximately 194,800 gas services.

Capital Additions placed In-Service. Table 1A lists the ISR categories within the Top Level (or Level 1) groups, which is a result of the newly proposed budgetary framework discussed with the Commission at the technical session held on November 29, 2023 in Docket No. 23-39-NG. For historical reference, the Company has also included Table 1B, which presents the ISR categories in the former Non-Discretionary and Discretionary categories which were utilized in prior years; both tables have the same budget and in-service totals. Table 2 contains a proposed five-year ISR spending forecast that will cover the period of April 1, 2024 through March 31, 2029. Table 3 contains actual spending based on the prior five-year period, FY2019 through FY2023. For the FY2025 Plan, the Company proposes to make a total of \$185.41 million of ISR investments,⁷ which includes \$117.72 million for Main Replacement & Rehabilitation, \$18.82 million for Mandated & Non-Main Reactive, \$32.46 million for Reliability & Pressure Regulation, and \$16.40 million for Large Multi-Year Reliability Projects. The total of \$185.41 million includes \$7.53 million related to Cost of Removal. The capital additions projected to be placed in-service for the FY2025 Plan are \$164.81 million, which is included in the FY2025 Gas ISR recovery mechanism. As mentioned above, the Company has also included a second scenario that includes the PHMSA Rules Contingency Plan funding of \$10.80 million; including those incremental funds, the FY2025 proposed budget totals \$196.20 million and during the FY2025

⁷ Over the course of the FY2025 Plan, the Company plans to spend \$222.97 million of total capital investment (excluding the PHMSA Rules Contingency Plan funding) or \$233.74 million, including the PHMSA Rules Contingency Plan funding of \$10.79 million. Of the FY2025 Plan total, \$37.56 million (excluding the PHMSA Rules Contingency Plan funding) is associated with projected growth, other non-ISR spending, and capital projects not currently included in the ISR, which are not included for recovery in the FY2025 Plan.

Reconciliation would theoretically result in capital additions placed in-service of \$172.25 million. The Company is proposing to exclude the PHMSA Rules Contingency Plan funding from the initial FY2025 revenue requirement, and instead would seek recovery of the resulting capital additions placed in-service during the FY2025 reconciliation if new PHMSA LDAR rules become final and take effect during FY2025.

Description of Programs and Projects

As set forth in Table 1A at the end of this section, the Company proposes the following levels of spending for each category of programs or projects contained in the \$185.41 million that the Company proposes for its FY2025 Plan budget:

A. Main Replacement & Rehabilitation

Investment Categories & Groups	FY 2025 Budget (\$000)
A. Main Replacement & Rehabilitation	
<i>Damage / Failure (Reactive)</i>	\$ 25
<i>Reactive Main Replacement - Leak Prone Pipe & Maintenance</i>	\$ 7,838
<i>CSC/Public Works - Non-Reimbursable</i>	\$ 22,519
<i>CSC/Public Works - Reimbursable</i>	\$ 1,700
<i>CSC/Public Works - Reimbursements</i>	\$ (850)
<i>Gas System Reliability</i>	\$ 4,580
<i>Proactive Main Rehabilitation - Large Diameter (CI Lining & CISBOT)</i>	\$ 750
<i>Proactive Low Pressure System Elimination</i>	\$ 6,552
<i>Pipeline Integrity</i>	\$ 10,020
<i>Replace Pipe on Bridges</i>	\$ 1,420
<i>Proactive Main Replacement - Leak Prone Pipe</i>	\$ 62,169
<i>Atwells Avenue</i>	\$ 750
<i>Proactive Service Replacement</i>	\$ 250
<i>Main Replacement & Rehabilitation Total</i>	\$ 117,723

A1. Damage/Failure (Reactive)

The Company proposes to include funding for safety and reliability projects associated with remediation of damage or failure occurrences. Damage or failure projects are initiated in response to events outside the Company’s control that require immediate action. The Company proposes a FY2025 budget of \$0.025 million for such work, which would contribute to capital additions placed in-service of \$0.024 million.

A2. Reactive Main Replacement – Leak Prone Pipe & Maintenance

The Maintenance component of this category consists of emergency main replacements or modifications because of leaks or other unplanned events where main conditions typically

dictate immediate replacement and/or because gas facilities are subject to water intrusion or exposure and require a timely remedy. The reactive main and service replacement work at Oxbow Farms in Middletown, which was included in the FY2023 plan, continues to be on hold until a long-term solution is agreed to with the owner of the property.

The Reactive – Leak Prone Pipe component of this category is for leak prone pipe replacement that occurs on a reactionary basis. Projects in this category will be leak prone pipe replacement jobs that were not part of the FY2025 Proactive Main Replacement workplan list. Funding has been allocated to this category for the purpose of replacing gas mains for which the material condition has demonstrated that immediate replacement is necessary. In prior ISR Plan years, this work was typically in the Proactive Main Replacement category, but should be identified separately as reactive work for visibility going forward. Examples of why a main replacement would be initiated under this category would be the discovery of material conditions through the course of other excavation work, such as a leak repair, or third-party damages which indicate immediate main replacement is necessary. This category of work currently includes \$5.09 million for the Cumberland Hill Road Area project in Woonsocket, which is comprised of 3-miles of installation (1 additional mile is being installed in FY2024, for a total of 4-miles) resulting in 4-miles of abandonment (the majority of which is 12-inch 60# bare steel) on Cumberland Hill Road, Park Place, and the Hamlett Avenue Bridge. A joint weld on this segment of main cracked, causing a

significant gas leak in February 2022. Since that time, the Company performed due diligence including the digging of test holes and X-ray analysis to investigate the condition of the pipe and joints/welds on nearby segments of the same main and it was determined that the Company needed to pursue a reactionary main replacement. Contracts have been awarded for all three components of the project. Ferreira Construction has begun work in the Park Place area and is forecasted to begin installation of the 12-inch main on Cumberland Hill Road in FY2024 with work continuing into FY2025. AGI Construction will be performing the work on Hamlet Avenue Bridge and that work will be completed by the end of FY2025.

In total this category has a total budgeted spent of \$7.84 million for FY2025 which will contribute to forecasted capital additions placed in-service totaling \$7.04 million in FY2025. This program is forecasted to install 4.0 miles of new gas main and abandon 5.5 miles of leak prone pipe in FY2025.

Additionally, the Company has forecasted \$6.6 million of incremental funding for Mandated Reactive Main Replacement – Leak Prone Pipe (PHMSA) for the PHMSA Rules Contingency Plan, but this funding is not included in the revenue requirement for the FY2025 Plan.

A3. Public Works

The purpose of the Public Works program is to address existing gas infrastructure conflicts, as appropriate, and to improve the safety and reliability of the Company’s natural gas distribution system in conjunction with municipal construction, water and sewer projects, and other third-party excavation projects, which provide significant incremental benefits to customers and communities. Municipal, water and sewer, and other third-party work affords the Company an opportunity to replace additional leak-prone pipe and reduce paving costs by coordinating the Company’s gas main replacement work with planned third-party construction projects. This also benefits customers and communities by improving service delivery and minimizing construction impacts and inconvenience. The Company has an ongoing plan to replace targeted gas mains with a risk-based approach. Coordinating the Company’s Integrity programs with planned municipal and water and sewer projects has yielded increased system reliability and integrity, and optimized capital spending. Although one of the primary purposes of Public Works spending is to address direct conflicts between planned third-party projects and existing gas infrastructure, Public Works spending provides the additional opportunity to coordinate other system improvement work, such as the replacement of leak-prone pipe, system reliability upgrades, elimination of redundant main, and regulator station upgrades.

The Company will manage multiple projects to address the dynamic nature of the Public Works process through effective liaison activity. Although municipal schedules and plans change largely due to funding, other factors also contribute to the scheduling of these projects (e.g., political demand and maintenance). Changes in municipal projects can and do create additional work in developing and coordinating the Company's planning and budgeting processes. Using the Company's five-year work planning process, the Company can provide some flexibility in scheduling, coordinating, and engineering projects in concert with municipal public works initiatives. The Plan incorporates \$23.37 million in net spending under the Public Works category, which includes \$24.22 million in capital spend and \$0.85 million in forecasted reimbursements from third parties. Overall, the Public Works budget provides for the installation of 13.0 miles of gas main and the abandonment of 13.0 miles of leak-prone gas main, consisting of cast iron and unprotected steel main. The forecasted capital additions placed in-service for this category during the term of the Plan total \$22.16 million.

A4. Gas System Reliability

The Gas System Reliability program identifies projects that support system reliability through standardization and simplification of system operations (e.g., system up-ratings and de-ratings and regulator elimination), integration of systems (e.g., tie-ins), and new supply sources (e.g., take stations). The FY2025 budget includes continued funding for ongoing

multi-year projects designed to eliminate single-feed systems (and low-pressure segments where applicable) in Woonsocket, Lincoln, Providence, West Warwick, East Providence, and North Providence. This program is forecasted to install 3.9 miles of new gas main and abandon of 3.0 miles of leak prone pipe in FY2025. For the FY2025 Plan, the Company proposes to spend a total of \$4.58 million for this program, which would contribute to capital additions placed in-service of \$4.56 million.

A5. Proactive Main Rehabilitation - Large Diameter (CI Lining & CISBOT)

The Company’s distribution system includes approximately 35 miles of large diameter (greater than or equal to 16-inches) leak-prone gas mains. The Proactive Large Diameter Program consists of rehabilitating large diameter leak-prone pipe through the implementation of a sealing and lining program. Lining and sealing are cost-effective alternatives for remediating large diameter leak-prone pipe. Additional benefits of this program include minimization of impacts to customers and communities, a shortened construction period and use of existing space in areas with significant underground utility congestion. For the FY2025 Plan, the Company proposes to spend a total of \$0.75 million on this overall category, which would contribute to capital additions placed in-service of \$0.68 million in FY2025. The Company will complete service transfers, engineering, and materials procurement in the Cast-Iron Lining (“CI Lining”) program for the Petteys Avenue project in Providence, but the actual main rehabilitation (lining of pipe) will not occur until FY2026.

Additionally, because the Company advanced Cast-Iron Sealing Robot (“CISBOT”) jobs into FY2024, the Company does not plan to execute field work on any CISBOT jobs in FY2025.

A6. Proactive Low Pressure System Elimination

The purpose of this program is to systematically replace low pressure (“LP”) gas systems with high pressure (“HP”) gas systems to enhance gas system safety. The Company implemented this program in response to recommendations from Federal and State government agencies following the Columbia Gas incident in Massachusetts in 2018.

Proactive LP System Elimination will systematically retire entire LP systems by transferring customers to HP systems through the installation of new distribution mains, services (or service transfers), and service regulators. The new HP services will be installed to current standards with excess flow valves and service regulators at each customer premise providing enhanced over pressure protection. In the FY2025 Plan, the Company will work on low pressure elimination projects in Middletown, Providence, Woonsocket, North Providence, and Providence which will install 6.5 miles of new gas main and contribute to the abandonment of approximately 6.3 miles of leak prone pipe. The notable projects for FY2025 are the completion of Tuckerman Avenue in Middletown, Wolcott Avenue in Middletown, Charles Street in Providence, Privilege Street in Woonsocket, Social Street in Woonsocket, Tiffany Street in North Providence, East Street in Woonsocket, and Mitris Boulevard in Woonsocket. For the FY2025 Plan, the Company proposes to spend \$6.55

million for this program, which would contribute to capital additions placed in-service of \$6.01 million.

A7. Pipeline Integrity

During FY2025 the Company will continue work on the Pipeline Integrity – Wampanoag Trail Pipeline Replacement project, which began planning in FY2023 and continued with preconstruction activities in FY2024. This multi-year project, to replace approximately two miles of main in East Providence that runs from the Providence River Crossing to the Wampanoag Trail Take Station, is expected to start the construction phase in FY2025 and be completed in FY2026. This scope of work does not include any pipe that runs under the Providence River or into the Wampanoag Trail Gate Station. As background, this section of 12- to 16-inch coated steel piping is some of the oldest main operating at 200 psig (installed before 1971) on the Rhode Island gas system and is a critical piece of infrastructure for the Rhode Island gas supply. After several leaks on this main, the Company performed due diligence and determined that replacement of this gas main was necessary. Several suspect location excavations were performed during the Fall of 2020 on the 200 PSIG East Providence main due to the criticality of the system, its age, and its suspected condition. An integrity assessment of the main revealed wall loss in several locations. Based upon the the deteriorated asset condition (wall loss) at the test excavation locations, the actual leak activity on the main, and the principal that the remaining steel pipe installed in the same year is likely

in the same condition (as the excavated locations and/or locations that leaked) the Company determined that additional leak activity in the near future would be likely and it was time to replace the main. For the FY2025 Plan, the Company proposes to spend \$10.02 million for this project, but the project would not contribute to any capital additions placed in-service until FY2026. The Company anticipates that permits and easements will be executed by March 2024 and that construction bids will be received in March or April 2024. The materials ordering is in progress and should be completed by March or April 2024. Construction is forecasted to start in May 2024 and continue until the winter. The Company estimates that approximately eighty percent (80%), or 1.6 miles, of the main will be installed by November 2024 (FY2025). The project will then resume the main installation in the spring of 2025 (FY2026), then gas-in the new main and complete the final restoration activities. Between FY2023 and FY2027, the total estimated cost for this project is approximately \$20.20 million.

A8. Replace Pipe on Bridges

For the FY2025 Plan, the Company will spend \$1.42 million on the Replace Pipe on Bridges program including planned activities at the following locations: Mineral Spring Avenue in North Providence (construction), Goat Island bridge in Newport (design and materials), Manton Avenue Tar Bridge in Providence (construction), and Glenbridge Avenue bridge in Providence (design and materials). As mentioned in the Reactive Main Replacement – Leak Prone Pipe & Maintenance category, above, work on Hamlet Avenue Bridge in Woonsocket

will be performed as part of the Cumberland Hill Road area project scope and will be reported under that Reactive Main Replacement category. Spending in the Replace Pipe on Bridge category will contribute to capital additions placed in-service of \$1.27 million during FY2025.

A9. Proactive Main Replacement – Leak Prone Pipe

The value of and need for targeted spending on the replacement of leak-prone gas main is well-documented and has been acknowledged by the PUC and Division. For the FY2025 Plan, the Company forecasts spending \$62.17 million on its Proactive Main Replacement – Leak Prone Pipe program, which will install 31.1 miles of new gas main and result in the abandonment of approximately 32.5 miles of leak-prone gas main and associated service relays, inserts, or tie-ins. The leak prone gas main segments that the Company will target will be amongst those with the highest priority ratings on the gas distribution system. These projects tend to be focused in more urban areas where project coordination and final abandonment is more complex than more rural settings, due to factors such as street closures and the higher volume of meter counts, so there may be some variability on the actual number of miles abandoned inside FY2025.

A10. Atwells Avenue - Proactive Main Replacement – Leak Prone Pipe

The Company began work on Segment 3 of the Atwells Avenue project in FY2024, but additional work will be required in FY2025 as the main installation began later in the

construction season. This segment of the project has a high concentration of services and customer meters, which is also contributing factor in the timing of when the project will be completed. The Company has budgeted \$0.75 million in the FY2025 Plan to complete the mains and services work and complete final restoration. The Company will abandon approximately 0.3 mile of leak prone pipe associated with Segment 3 of this project.

A11. Proactive Service Replacement

For the FY2025 Plan, the Company has budgeted for replacement of 38 services through the Proactive Service Replacement Program. The Company will also continue to review the remaining population of potential leak prone services on non-leak prone pipe and pursue proactive service replacements of confirmed leak prone services. The average cost per service was assumed to be \$6,579 in FY2025 to account for inflationary factors.

Across all Main Replacement & Rehabilitation categories for FY2025, the Company plans to spend \$117.72 million, which will contribute to capital additions placed in-service of \$103.38 million during FY2025. The primary driver of the variance between the FY2025 spending and forecasted capital additions placed in-service is the Wampanoag Trail Pipeline Replacement project, which will have construction spending in FY2025, but is only forecasted to go in-service in FY2026.

In summary, the Company’s overall FY2025 Plan includes the elimination of a total of approximately 61.2 miles of leak-prone pipe (approximately 32.8 miles of proactive main replacement including Atwells Avenue, 13.0 miles of public works replacement, 5.5 miles of reactionary main replacement, 3.0 miles from reliability work, 6.3 miles from Low Pressure System Elimination, and 0.6 mile of reinforcement work). The table below provides a summary of the planned main installation and leak prone pipe abandonment by category.

Investment Categories & Groups	FY2025 Main Installation	FY2025 Leak Prone Pipe Abandonment
A. Main Replacement & Rehabilitation		
<i>Reactive Main Replacement - Leak Prone Pipe & Maintenance</i>	4.0	5.5
<i>CSC/Public Works - Non-Reimbursable</i>	12.0	12.0
<i>CSC/Public Works - Reimbursable</i>	1.0	1.0
<i>Gas System Reliability</i>	3.9	3.0
<i>Proactive Low Pressure System Elimination</i>	6.5	6.3
<i>Pipeline Integrity</i>	1.6	-
<i>Proactive Main Replacement - Leak Prone Pipe</i>	31.1	32.5
<i>Atwells Avenue</i>	-	0.3
<i>Gas System Reinforcement (non-ISR)</i>	Not included	0.6
Main Installation and Leak Prone Pipe Abandonment Total	60.1	61.2
E. PHMSA - Gas Pipeline Leak Detection and Repair (LDAR)		
<i>Not included in rates until FY2025 Reconciliation</i>		
Main Replacement (Mandated) - Leak Prone Pipe (PHMSA)	4.1	2.5
Main Installation and Leak Prone Pipe Abandonment Total (With PHMSA LDAR)	64.2	63.7

*Note: Abandonment totals are approximate and may vary inside FY2025 based upon the timing of field work.

B. Mandated & Non-Main Reactive

Investment Categories & Groups	FY 2025 Budget (\$000)
B. Mandated & Non-Main Reactive	
<i>Reactive Leaks (CI Joint Encapsulation/Service Replacement)</i>	\$ 8,000
<i>Purchase Meters (Replacement)</i>	\$ 5,646
<i>Corrosion</i>	\$ 1,918
<i>Reactive Service Replacements - Non-Leaks/Other</i>	\$ 1,748
<i>I&R - Reactive</i>	\$ 1,472
<i>Access Protection Remediation</i>	\$ 40
<i>Mandated Total</i>	\$ 18,824

B1. Reactive Leaks (CI Joint Encapsulation/Service Replacement)

This category provides funding for the leak sealing of cast iron bell joints that are discovered during proactive leak surveys, public odor calls, or other activities. In addition, it provides funding for remediating leaking gas services through insertion, replacement, and/or abandonment of the services. For the FY2025 Plan, the Company proposes to spend \$8.00 million for this work. The forecasted capital additions placed in-service for this category for the FY2025 Plan total \$8.43 million.

In addition to the \$8.00 million budget for Reactive Leaks, the Company has also forecasted \$4.00 million of incremental funding for Reactive Leaks (PHMSA) for the PHMSA Rules Contingency Plan, but this funding is not included in the revenue requirement for the FY2025 Plan.

B2. Purchase Meters (Replacement)

Capital costs for the Purchase Meter Replacement program are required for the procurement of replacement meters. In FY2025 the Company will require approximately 20,500 meters (18,640 mandated and 1,860 miscellaneous). The 20,500 meters represents approximately 7.47 percent of the existing meter population in Rhode Island. The Company is planning to purchase 34,055 meters in FY2025. This purchasing volume reflects the Company's efforts to compensate for ongoing meter supply chain issues by increasing baseline inventory. It also incorporates meter orders that were initially expected in FY2024 and are now expected to be delivered and paid for during FY2025. In FY2025, the Company forecasts that it will spend \$6.65 million on the Purchase Meter Replacement program, however, based on recent supply chain challenges and feedback from the Division, the Company is only proposing a budget of \$5.65 million; this is \$1.00 million less than the forecasted costs to purchase 34,055 meters. The forecasted capital additions placed in-service for this category in FY2025, based on spending of \$5.65 million total approximately \$5.42 million.

B3. Corrosion

The Rhode Island Corrosion Control Program has two components: Underground and Atmospheric Corrosion Protection. The underground corrosion controls consist of pipe coatings and cathodic protection. Cathodic protection is accomplished by establishing proper coatings on the steel pipe segments and the installation of rectifiers, anodes, insulators, and

test stations for the steel pipes. In addition, the underground corrosion program includes control lines at existing regulator stations. The atmospheric corrosion controls require periodic inspections of exposed gas pipes and coatings (where presented) and repairs of deficiencies found. Under the corrosion control program, Rhode Island Energy installs, inspects, tests, maintains, repairs, and upgrades the underground and atmospheric corrosion control components to be compliant with Federal and State mandates. For the FY2025 Plan, the Company proposes to spend \$1.92 million on this program. The forecasted capital additions placed in-service for this category for the FY2025 Plan total approximately \$2.57 million; the primary driver of the variance between FY2025 spending and in-service is the in-service timing of work that will begin in FY2024 but will only be placed in-service in FY2025.

B4. Reactive Service Replacements – Non-Leaks/Other

This program contains the capital costs for service relocations, service abandonments, and the installation of curb valves. For the FY2025 Plan, the Company plans to spend \$1.75 million in connection with this program including funding to meet existing final restoration paving requirements. The forecasted capital additions placed in-service for this category in the FY2025 Plan total \$2.72 million; the primary driver of the variance between FY2025 spending and in-service is the in-service timing of work that will begin in FY2024 but will only be placed in-service in FY2025.

B5. I&R - Reactive

The I&R Reactive program is established to address capital project requirements over and above the Pressure Regulation capital budget. Projects range from instrumentation replacement due to failure; replacement of obsolete/unreliable equipment, such as regulators, pilots, boilers, heat exchangers, odorant equipment, and station valves; and replacement of building roofs or doors due to deterioration. In the FY2025 Plan, the Company plans to spend \$1.47 million for this program, which would contribute to forecasted capital additions placed in-service of \$1.33 million.

B6. Access Protection Remediation

The Access Protection Remediation program is designed to reduce the risk of public injury by restricting and/or deterring public access to the Company's elevated gas facilities. The FY2025 budget of \$0.04 million is to address one known location and funding for general minor capital improvements that may arise with access protection remediation panels or any reactionary work that may be identified by the Gas Corrosion Team. As the Company is coming to the end of the defined locations to remediate, the Company will explore the incorporation of access protection remediation panels into the future design of bridge crossings instead of charging such work to this separate program.

C. Reliability & Pressure Regulation

Investment Categories & Groups	FY 2025 Budget (\$000)
C. Reliability & Pressure Regulation	
<i>LNG</i>	\$ 11,187
<i>Transmission Station Integrity</i>	\$ 5,891
<i>Pressure Regulating Facilities</i>	\$ 5,888
<i>Distribution Station Over Pressure Protection</i>	\$ 1,785
<i>Tiverton GS - Heaters Replacement and Ownership Transfer</i>	\$ 10
<i>Take Station Refurbishment</i>	\$ 1,221
<i>Heater Installation Program</i>	\$ 400
<i>System Automation</i>	\$ 665
<i>Tools & Equipment</i>	\$ 1,211
<i>Valve Installation/Replacement - Primary Valve Program & Aquidneck Island Low Pressure Valves</i>	\$ 142
<i>Southern RI Gas Expansion Project - Regulator Station Investment</i>	\$ 4,060
<i>Reliability & Pressure Regulation Total</i>	\$ 32,460

The Reliability & Pressure Regulation group of categories and projects consists of Reliability and Pressure Regulation projects with a total forecasted budget less than \$10.00 million.

Based on the newly proposed Gas ISR budgetary framework, any Large Multi-Year Reliability and Pressure Regulation Projects with a forecasted project spend of \$10.00 million or more, spanning multiple years, will be tracked individually under the “Large Multi-Year Reliability Projects” category of projects. Currently, the LNG category is the only reliability category with projects forecasted to spend \$10.00 million or more over the lifecycle of a project, but in the future, other Reliability and Pressure Regulation projects may be proposed that will exceed the \$10.00 million threshold and will be reported under the Large Multi-Year Reliability Projects grouping.

C1. LNG

The Liquefied Natural Gas (“LNG”) program is established to address specific and blanket capital project requirements to support the Company’s LNG operations. There are several ongoing and upcoming site modernization and improvement projects at the Exeter and Cumberland site, which will be described below. Any totals FY2025 totals listed, by site, in this section exclude spending that is being reported under the Large Multi-Year Reliability Projects grouping.

The Company has budgeted \$0.72 million for the LNG – Blanket workorder to be utilized across all LNG sites.

With respect to specific LNG projects, in the FY2025 Plan, the Company will complete the installation of two new boil-off compressors at its Exeter LNG facility to replace two compressors that were originally commissioned in the early 1970’s. This work was originally anticipated to be completed in FY2024, but portions of the project were deferred into FY2025 due to longer than expected lead time on certain project materials. The FY2025 spend associated with this work is approximately \$1.00 million, which will result in capital additions placed in-service of approximately \$7.44 million during FY2025. During normal operation of an LNG storage tank, LNG will boil and generate a nominal amount of boil-off gas (“BOG”) inside the tank. BOG compressors take the generated BOG in the LNG tank

and inject it into the gas distribution system, instead of venting into the atmosphere, thus avoiding gas emissions, which is in alignment with the Act on Climate goals. Additional work at the Exeter site will include spending of approximately \$0.40 million to complete the upgrade of the Emergency Generator, which is being done, in part, to support the new boil-off compressors. The Company will also spend approximately \$2.80 million to complete the installation of a new Switchback Staircase Tower to access the top of the Exeter LNG Tank. The existing setup is a single-file staircase that winds along the side of the tank. The Switchback Staircase Tower will provide increased safety when ascending and descending the Exeter LNG Tank. The Staircase Tower will allow for easier first responder access and the use of a stretcher if needed. Maintenance activities will also be safer with the installation of a davit arm jib crane to lift and lower heavy, or awkward items. The current spiral staircase does not meet OSHA standards and presents a safety risk to the Company's employees and contractors. The Company will spend an additional \$0.51 million at the Exeter site to support Critical Spares, LNG Tank Upgrade activities, finish the LNG Septic Upgrade, complete the HMI Hardware & Software Upgrade, and develop the Automated Emergency Shut-Down ("AESD") system which will be completed during the Truck Station Upgrade.

For the Cumberland LNG facility, during FY2025, the Company will spend \$3.90 million for the final payment (remaining 75%) and delivery of four Supplemental Portable Storage

“queen” pump trailers for the site; the initial 25% down payment was included in the FY2024 approved budget. The supplemental storage will essentially double the site’s storage capacity and increase the site’s run time (at maximum output) from approximately five hours to ten hours. This enhances the reliable operation of this site, especially during inclement weather when it may not be prudent to have LNG tanker trucks traveling on the roadways. The FY2024 budget included funding to begin the addition of a Boil-off Gas Recovery Manifold, and in FY2025 the Company will spend approximately \$0.18 million to complete the project. This project supports the Act on Climate’s goals by capturing boil-off gas and sending it into the gas distribution system rather than releasing it into the atmosphere. The Company will also spend \$0.08 million to complete the Portable Vaporizer Tap project, which was also started with the FY2024 approved budget; this project will provide a backup for the plant’s fixed vaporizers. Work for the Cumberland LNG site also includes the installation of a new water main, which was partially deferred from FY2024 and will cost approximately \$0.70 million in FY2025. Finally, the company has budgeted \$0.14 million for the purchase of critical spares for the Cumberland LNG site.

The FY2025 Plan also includes \$0.77 million to complete the decommissioning of the LNG site on the Newport Navy Yard.

In total, for all LNG related projects (excluding those contained in the Large Multi-Year Reliability Projects category), the Company proposes to spend \$11.19 million, which will contribute to capital additions placed in-service of \$14.75 million in FY2025. The Exeter Boiloff Compressors going into service in FY2025 is the primary driver of the variance between the FY2025 spending and in-service totals.

C2. Transmission Station Integrity

This program is a continuation of a rate base funded program that began several years ago and primarily consisted of in-depth compliance records and documentation reviews of pressure regulating facilities. The primary purpose of the Transmission Station Integrity program is to meet United States Department of Transportation PHSMA code requirements, pursuant to 49 CFR § 192.624, which require operators of steel gas transmission pipeline segments to reconfirm the maximum allowable operating pressure (“MAOP”) of segments with pressure test documentation and material property records by 2035. Fifty percent (50%) of transmission pressure segments require MAOP reconfirmation by 2028. Where the records that substantiate the MAOP are not traceable, verifiable, and complete (“TVC”), the equipment will be re-tested, non-destructively examined, or replaced to ensure the pipelines, including those associated with transmission stations, are safe, reliable, and fit for service. The ongoing scope of this multi-year program consists of retesting and, where necessary, replacing equipment that will not meet the PHSMA documentation requirements; the work is

prioritized by a standard risk-based evaluation. Following the completion of the Allens Avenue Station Rebuild, 12 of the 24 Transmission Stations on the Company's system are now in scope for re-testing and/or replacement of equipment.

The FY2025 budget proposal includes Transmission Station Integrity work for the Scott Road Take Station which includes a full replacement of the station and heating system, \$5.54 million is budgeted for FY2025, contributing to forecasted capital additions placed in-service of approximately \$7.74 million in FY2025. The FY2025 budget proposal also includes \$0.30 million for the purchase of longer lead time materials and preconstruction activities for Transmission Station Integrity work for the replacement and ownership transfer of the Wampanoag Trail Gate Station (this is separate from the heaters transaction). The station replacement is necessary to address both integrity verification concerns regarding the asset records as well as the station's age when considered in relation to its criticality to the system.

The Wampanoag Trail Gate Station is the only gate station upstream of the East Shore 99 PSIG system in Barrington, the East Providence 25 PSIG system, and the Providence 200 PSIG system. It is also a major contributor to the Rhode Island 99 PSIG system which is the major feeder line between several city gate stations and downstream pressure systems throughout the territory. In total, this accounts for gas for approximately 65,000 customers during peak flow. The age of the station at 36 years old as well as piping at the facility,

without traceable, verifiable, and complete records, that is believed to be from 1953 do not by themselves necessitate replacement. The Company's decision to replace the station was driven by the station's failure history, not having ownership of three layers of overpressure protection, and not having pressure control, combined with the age, lack of records, and the number of customers that are reliant on the station. The replacement will reconfirm MAOP and create new material verification records of the existing piping as required by PHMSA. Also, the replacement will ensure the 200 PSIG system is fed by a gate station that has three layers of overpressure protection owned and operated by Rhode Island Energy and isolation valves indicating a clear line of demarcation. The ownership transfer allows Rhode Island Energy to ensure maintenance of this equipment as well as the ability to provide pressure control to its major distribution systems in this region. Currently this is only 1 of 3 gate stations where the pipeline supplier provides pressure control, and will be 1 of 2 following the replacement and asset transfer of the Tiverton gate station. In total, for the FY2025 Plan, the Company proposes to spend \$5.89 million in this overall category, which would contribute to forecasted capital additions placed in-service of \$7.78 million. The forecasted capital additions being placed in-service are notably higher than the budgeted spending in this category due to the Scott Road project being placed into service in FY2025.

C3. Pressure Regulating Facilities

The Company's pressure regulating facilities have been designed to reliably control gas distribution system pressures and maintain continuity of supply during normal and critical gas demand periods. Each regulator station has specific requirements for flows and pressures based on the anticipated needs of the station. A facility includes both pressure-regulating piping and equipment and control lines, but it may also include a heater or a scrubber. The Company has instituted a program that provides for condition-based assessments of all regulator stations. Accepted engineering guidelines provide for design, planning, and operation of these gas distribution facilities. Applicable state and federal codes are followed to help ensure safe and continuous supply of natural gas to the Company's customers and the communities it serves. This program includes work to enhance regulator station reliability that is prioritized through condition-based assessments, considering, among other things, station accessibility, pipe condition (i.e. corrosion), water intrusion, redundancy, station isolation, and common mode failure. In total, for the FY2025 Plan the Company proposes to spend \$5.89 million which would contribute to capital additions placed in-service of \$6.56 million. This spending is related to construction at five to seven stations, engineering for five future stations, and the installation of second bypass valve at two to three stations (to prevent a failure of a single bypass valve resulting in over pressurization).

C4. Distribution Station Over Pressure Protection

This program is in place to address risks for over pressurization incidents at pressure regulating facilities throughout the system. Actions planned for this program include work to relocate and provide additional protections for regulator sensing and control lines to protect from third-party damage. The preferred overpressure protection is a control line header which is an extension of the main that runs along the wall of a pressure regulating vault. Control lines sense pressure off of the header that is less likely to be damaged by excavation compared to control lines connected to mains running in or near the street. Other forms of overpressure protection include the installation of additional control equipment such as override pilots in the vaults or relief valves to ensure safe and reliable regulator station operation in the event of control line damage. To ensure that potential abnormal operating conditions at regulator stations do not result in over pressurization scenarios, in FY2025, the Company plans to install four outlet control line headers in FY2025 (two in Cranston, one in North Providence and, one in Pawtucket) and begin preparation for two additional locations to be determined that will be completed in FY2026. The Company proposes to spend \$1.79 million for this program in FY2025, which would contribute to capital additions placed in-service of \$1.99 million during the FY2025 Plan.

C5. Tiverton Gate Station – Heaters Replacement and Ownership Transfer

The FY2025 Plan includes \$0.01 million for the Tiverton Gate Station project for final closeout costs. This will contribute to capital additions placed in-service of approximately \$0.01 million in FY2025. The asset transfer of the Tiverton Gate Station and resulting capital additions being placed in-service are forecasted to occur during FY2024.

C6. Take Station Refurbishment

The Take Station Refurbishment program will address required modifications to the Company's custody transfer stations. The FY2025 Plan includes a blanket work order totaling \$0.19 million for miscellaneous work at take stations across the gas system, such as odorization and generator upgrades. The primary project in this category for the FY2025 Plan is the Smithfield Gate Station (Putnam Pike), for which the Company forecasts spending of \$1.03 million. During FY2025, the Company will complete the final stages of eliminating the direct 1,000 psig to 35 psig pressure cut at the station by installing a 99 psig to 35 psig distribution vault outside. The Company will then prepare for future inside work (regulator runs and three layers of over pressure protection) at the gate station. Overall for the FY2025 Plan, the Company plans to spend \$1.22 million, which would contribute to capital additions placed in-service of \$0.996 million, for its Take Station Refurbishment Program.

C7. Heater Installation Program

The Heater Installation Program provides for the installation and replacement of gas system heaters, which are operated to ensure proper conditioning and control of gas temperatures at key Company facilities. The FY2025 Plan proposal includes \$0.20 million of funding in this category for miscellaneous fuel train upgrades, heat exchanger replacement, engineering and design costs, burner management/safety system upgrades and other similar work. The FY2025 Plan proposal also includes funding of \$0.18 million for Diamond Hill for the completion of engineering and the purchase of longer lead time materials in preparation for installation of a hydronic boiler system. The FY2025 Plan proposal also includes \$0.01 million for closeout costs for the Dey Street project (one water bath heater installation), which was placed in service during FY2024. Finally, the FY2025 Plan proposal also includes funding of \$0.10 million for closeout costs for the Smithfield Gate Station, which is a project for the installation of a hydronic boiler system, heat exchanger piping and piping to the take station which is forecasted to be placed in-service in FY2024.

Overall for the FY2025 Plan, the Company is proposing spending of \$0.40 million, which would contribute to forecasted capital additions placed in-service of \$0.23 million, for its Heater Installation Program. Most of the engineering and construction resources that are typically used for heater installations will be dedicated to the Scott Road Gate Station (under Transmission Station Integrity) where the heating system is within the scope of the complete

station replacement and therefore not a separate part of this Heater Installation Program budget. Additionally, the budget for the Tiverton Gate Station – Heater Replacement and Ownership Transfer is being tracked as a standalone category and is described in more detail, above.

C8. System Automation

The primary purpose of the System Automation program is to meet the United States Department of Transportation code requirements under 49 C.F.R. Part 192, Docket ID PHMSA 2007-27954, which were issued on December 3, 2009. These code provisions contain the following pipeline safety requirements: (a) control room management/human factors, (b) modernization of the Company’s system data and telemetry recording, and (c) increasing the level of system automation and control. The overall System Automation program will increase the safety, reliability, and efficiency of the gas system and, by extension, the level of service the Company provides to its customers.

The Company’s ability to provide safe and reliable service is governed to a large extent by the Company’s ability to maintain adequate pressure in its gas mains. To accomplish this task, the Company has 190 gas pressure regulator stations disbursed throughout its Rhode Island gas service territory. Although a portion of these regulator stations have full system telemetry (all stations in the Rhode Island Northern Region now have telemetry) and control

capability, additional stations require the installation of new telemetry equipment, and the FY2025 Plan will be a continuation of the process to adequately equip more stations. There are five stations in the system that still require the installation of telemetry. One of the stations at 200 Cannon Street in Cranston will be abandoned in three to five years so telemetry will not be installed. Telemetry will be installed at the remaining four stations over the next one to two fiscal years using internal operations personnel. In addition to monitoring and controlling its regulator stations, the Company must also monitor system end points to ensure that adequate system pressures are being maintained in remote areas under a variety of operating conditions. The Company's work in the FY2025 Plan will provide either AC or DC solar powered traffic boxes with telemetry, and/or remote control at approximately nine locations. For the FY2025 Plan, the Company is proposing spending of \$0.67 million, which would contribute to forecasted capital additions placed in-service of \$0.69 million, for its System Automation program.

C9. Tools & Equipment

This category includes tools and equipment required to support the performance of work contained in the Gas ISR Plan and to provide for the safety and reliability of the gas distribution system. The Company proposes to spend \$1.21 million during FY2025 on capital tools and equipment that will enhance the safety and efficiency of capital projects, which includes the replacement of one screener (\$0.15 million) which is used to produce

backfill material for construction activities. This would contribute to capital additions placed in-service totaling \$1.16 million for FY2025.

In addition to the \$1.21 million of spending in the FY2025 Plan, the Company has also included the PHMSA Rules Contingency Plan to address pending PHMSA rulemaking related to LDAR. Should new PHMSA LDAR rules become final during FY2025, the Company is requesting authorization for an incremental \$0.20 million for additional Tools & Equipment to support the additional work that would be performed in the Reactive Leaks and Main Replacement categories.

C10. Valve Installation/Replacement – Primary Valve Program & Aquidneck Island

Low Pressure Valves

Valves are used to sectionalize portions of the gas network to support both planned and unplanned field activities. Replacement of inoperable valves is necessary to ensure the Company's continued ability to effectively isolate portions of the distribution system. New valve installations are also occasionally needed to provide the capability to reduce the size of an isolation area where existing valves would result in broader shutdown than desired. For the FY2025 Plan, the Company has budgeted \$0.14 million for valve work, with approximately \$0.13 million for reactionary valve work and \$0.01 million for closeout

activities of the sectionalizing valve work in Newport. The Company forecasts capital additions placed in-service of \$0.15 million in FY2025.

C11. Southern RI Gas Expansion Project – Regulator Station Investment

The FY2025 Plan budget includes \$0.01 million for closeout costs related to ongoing upgrades at the Cowesett Regulator Station. The FY2025 Plan budget also includes \$4.00 million for the ongoing work at the Cranston Regulator Station (Latent Knight). In FY2025, at Latent Knight, the take station gas piping will be taken out of service and removed, part of the building will be removed, and a building extension and, new regulator runs with three layers of protection will be installed. The regulators and main will be sized appropriately for system needs. The project is forecasted to be placed in-service during FY2025 which will result in capital additions of approximately \$6.60 million. The FY2025 Plan budget also includes \$0.05 million to complete design work for a new regulator station near the existing Cowesett regulator station. In total, for the FY2025 Plan, the Company estimates that it will spend \$4.06 million for the Southern RI Gas Expansion project, which would contribute to capital additions being placed in-service totaling \$6.61 million.

D. Large Multi-Year Reliability Projects

Investment Categories & Groups	FY 2025 Budget (\$000)
D. Large Multi-Year Reliability Projects	
<i>LNG - Exeter Truck Station Upgrade</i>	\$ 500
<i>LNG - Exeter Control Room Upgrade</i>	\$ 1,600
<i>LNG - Old Mill Lane Portable Equipment</i>	\$ 8,300
<i>LNG - Old Mill Lane Site Upgrades</i>	\$ 6,000
<i>Large Multi-Year Reliability Projects Total</i>	\$ 16,400

The Reliability projects in this category have a total forecasted project budget of \$10.0 million or more and will incur spending in multiple fiscal years.

D1. LNG – Exeter Truck Station Upgrade

In FY2025, the Company will spend \$0.50 million on design work for the ongoing LNG Truck Station and AESD System Upgrade projects. Development of this projects was included in the FY2024 budget. Modernizing the LNG Truck Station will add multiple layers of safety, provide improvements to the LNG delivery process, and will include an AESD system; the total cost of the Truck Station Upgrade project is forecasted to be \$12.65 million. In summary, approximately \$0.15 million will be spent in FY2024 to commence engineering and design, \$0.50 million will be spend in FY2025 (as stated above) to complete the design work. The construction phase is scheduled to start in FY2026 and will cost approximately \$12.00 million and the asset is forecasted to be placed in-service in FY2026.

D2. LNG – Exeter Control Room Upgrade

In FY2025, the Company will also spend \$1.60 million to continue the design and permitting work for the site’s new Control Room. Development of this project was included in the FY2024 budget. The New Control Room Building Project will provide modern, safe, and sufficient workspaces for workers to operate the plant and train. The current control room has operators adjacent to the electrical room that does not provide adequate protection during an arc flash event. There is no space in the existing control room to move the electrical room or the operator’s workstation. The new control room will feature modern and best practices for control room design and layout and can be constructed without affecting operations. In terms of the project spending lifecycle, approximately \$0.50 million will be spent in FY2024 to complete engineering and design, then \$1.60 million will be spent in FY2025 to begin construction, and another \$8.00 million will be spent in FY2026 to complete the construction phase and place the asset in-service. The forecasted total cost of the Exeter Control Room Upgrade project is \$10.10 million.

D3. LNG – Old Mill Lane Portable Equipment

During FY2025, the Company forecasts spending \$8.30 million for the final payment (remaining 75 percent) and delivery of Portable LNG equipment; the initial 25 percent down payment was included in the FY2024 approved budget. This is very similar to the equipment purchase/transition which has been ongoing at Cumberland, whereby the Company has

purchased and will operate its own equipment rather than renewing a rental agreement for portable equipment and its operation. This will result in a change in the cost recovery mechanism for LNG operations at Old Mill Lane as current rental costs are recovered through the Gas Cost Recovery factor and the cost of the equipment purchase will be recovered through the Gas ISR.

The Company's application for a license to operate portable LNG equipment Old Mill Lane remains pending before the Energy Facility Siting Board in Docket No. SB-2021-04. The EFSB is scheduling hearings on the Company's application for February 2024 and the Company anticipates a decision on its application soon thereafter. If the EFSB grants the Company's pending application, the Company will place an order with the manufacturer of the portable LNG equipment immediately afterwards to secure pricing and scheduling. Depending upon the outcome and the timing of any decision, the initial down payment, which would consist of the 25 percent down payment (\$2.80 million), as was approved in the FY2024 budget, would be made in FY2024 or FY2025. If the Company's application is granted, the Company would take delivery of the portable LNG equipment towards the end of FY2025, and another \$8.30 million would be spent for the final payment. Then an additional \$0.83 million is budgeted for FY2026 when the equipment will go in-service. In total, the equipment is forecasted to cost approximately \$11.70 million. With the newly proposed Gas ISR budgetary framework, the FY2025 money that would be budgeted for this

project could only be spent on this project and would not be redeployed elsewhere if the LNG equipment purchase does not occur. Additionally, because this project will not be placed in-service until FY2026, the project would not have a customer rate impact in FY2025.

D4. LNG – Old Mill Lane Site Upgrades

As part of its application to the EFSB regarding portable LNG operations at the Old Mill Lane site, the Company has proposed certain site upgrades including the moving of pipeline connection points farther from the road to mitigate the visual and noise impacts of the operation for abutters and to improve site efficiency and safety. The proposed site improvements will provide a more efficient layout for operating, provide better access for first responders, and will allow for the removal of any piece of equipment without having to break down and move multiple other pieces of equipment. Pending EFSB approval, the Company will spend \$6.00 million for site upgrades in FY2025 and another \$9.00 million in FY2026 when it would be placed in-service, for a total of \$15.0 million to complete the project site work. Once again, with the newly proposed Gas ISR budgetary framework, the FY2025 money that would be budgeted for this project could only be spent on this project. Additionally, because this project will not be placed in-service until FY2026, the project would not have a customer rate impact in FY2025.

E. PHMSA – Gas Pipeline Leak Detection and Repair (“LDAR”)

Investment Categories & Groups	FY 2025 Budget (\$000)
E. PHMSA - Gas Pipeline Leak Detection and Repair (LDAR)	
<i>Reactive Leaks (CI Joint Encapsulation/Service Replacement) (PHMSA)</i>	\$ 4,000
<i>Main Replacement (Mandated) - Leak Prone Pipe (PHMSA)</i>	\$ 6,589
<i>Tools & Equipment (PHMSA)</i>	\$ 200
PHMSA LDAR Total	\$ 10,789

In May 2023, PHMSA issued a notice of proposed rulemaking pertaining to the detection, monitoring, and repair of leaks on gas infrastructure. The proposed rules are aimed at reducing methane emissions in gas transmission and distribution systems. The proposed rules would require local distribution companies to weigh environmental impacts of emissions equally with safety risk when evaluating leak prone pipe and leak inventories.

PHMSA has received and is reviewing public comments, including from gas industry representatives such as the American Gas Association and the Northeast Gas Association. It is expected that some version of these new rules will take effect within the coming ISR year. Since the actual extent and requirements of these new rules is unknown, the Company seeks the Commission’s approval of the PHMSA Rules Contingency Plan as part of the FY2025 Plan budget to enable compliance with these new rules. However, the Company has excluded these costs from the ratemaking calculation for FY2025 and proposes that it be authorized to recover any in-service costs incurred for this program in FY2025 through the

reconciliation process if and when the proposed rules necessitate work during FY2025.

PHMSA's draft rules propose a one-year implementation timeline from the issuance date of a final rule which means the Company must begin working on implementation efforts within the FY2025 ISR period to ensure compliance with the timelines prescribed by PHMSA.

The proposed LDAR rules have several key components that would impact ISR spending:

- New timelines for the repair of Grade 3 leaks, which previously were only monitored and repaired through main replacement.
- Previously discovered Grade 3 leaks will need to be repaired within three years of the enactment of the rules.
- New Grade 3 leaks will need to be repaired within two years of discovery.
- Grade 3 leaks can be remediated through a main replacement project. Grade 3 leaks associated with a main replacement project must be eliminated within five years of discovery or rule enactment.
- New definitions for classifying leaks will result in significantly more leaks will be identified as Grade 2 where previously they would have been Grade 3.
- New rules regarding leak detection, and the equipment needed to address the new rules, may lead to the necessity for additional Capital Tools & Equipment purchases.

- Increased monitoring frequency would potentially lead to observations that would cause a leak to be upgraded thereby requiring earlier remediation, and leaks will no longer be downgraded.

The Company expects that some version of these new rules is likely to take effect, though it does not know with specificity what these rules will ultimately require. If the anticipated rules take effect during FY2025, the Company proposes additional spending in three categories to address the resulting requirements:

E1. PHMSA – Reactive Leaks (CI Joint Encapsulation/Service Replacement)

In FY2025, the Company proposes approval of an incremental \$4.00 million to augment the Reactive Leaks category, with the purpose of targeting Grade 3 leak repairs on segments of main with lower-than-average leak concentrations (number of leaks), which are unlikely to be replaced through a main replacement project within the next five years.

E2. PHMSA – Main Replacement (Mandated) - Leak Prone Pipe

The Company proposes approval of an incremental \$6.59 million to augment the proposed main replacement – leak prone pipe budgets. This mandated spending would specifically target leak prone pipe segments with greater than average open leak inventories.

E3. PHMSA – Tools & Equipment

The Company proposes approval of an incremental \$0.20 million to purchase additional leak detection tools and equipment, as necessary, to comply with the new rules.

The Company has prorated the expected FY2025 spending in these categories due to the partial-year effect these new rules are anticipated to have on the FY2025 Work Plan.

In Re: Proposed FY2025 Gas Infrastructure, Safety, and Reliability Plan
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Table 1A
Narragansett Gas - FY 2025 - Proposal to PUC
(\$000)

Investment Categories & Groups	FY 2025 Budget (\$000)	Projected Capital Additions Placed In-Service for FY 2025
A. Main Replacement & Rehabilitation		
<i>Damage / Failure (Reactive)</i>	\$ 25	\$ 24
<i>Reactive Main Replacement - Leak Prone Pipe & Maintenance</i>	\$ 7,838	\$ 7,040
<i>CSC/Public Works - Non-Reimbursable</i>	\$ 22,519	\$ 21,205
<i>CSC/Public Works - Reimbursable</i>	\$ 1,700	\$ 1,774
<i>CSC/Public Works - Reimbursements</i>	\$ (850)	\$ (816)
<i>Gas System Reliability</i>	\$ 4,580	\$ 4,556
<i>Proactive Main Rehabilitation - Large Diameter (CI Lining & CISBOT)</i>	\$ 750	\$ 684
<i>Proactive Low Pressure System Elimination</i>	\$ 6,552	\$ 6,012
<i>Pipeline Integrity</i>	\$ 10,020	\$ -
<i>Replace Pipe on Bridges</i>	\$ 1,420	\$ 1,265
<i>Proactive Main Replacement - Leak Prone Pipe</i>	\$ 62,169	\$ 59,577
<i>Atwells Avenue</i>	\$ 750	\$ 1,869
<i>Proactive Service Replacement</i>	\$ 250	\$ 186
Main Replacement & Rehabilitation Total	\$ 117,723	\$ 103,376
B. Mandated & Non-Main Reactive		
<i>Reactive Leaks (CI Joint Encapsulation/Service Replacement)</i>	\$ 8,000	\$ 8,431
<i>Purchase Meters (Replacement)</i>	\$ 5,646	\$ 5,420
<i>Corrosion</i>	\$ 1,918	\$ 2,569
<i>Reactive Service Replacements - Non-Leaks/Other</i>	\$ 1,748	\$ 2,723
<i>I&R - Reactive</i>	\$ 1,472	\$ 1,327
<i>Access Protection Remediation</i>	\$ 40	\$ 43
Mandated Total	\$ 18,824	\$ 20,513
C. Reliability & Pressure Regulation		
<i>LNG</i>	\$ 11,187	\$ 14,754
<i>Transmission Station Integrity</i>	\$ 5,891	\$ 7,780
<i>Pressure Regulating Facilities</i>	\$ 5,888	\$ 6,560
<i>Distribution Station Over Pressure Protection</i>	\$ 1,785	\$ 1,985
<i>Tiverton GS - Heaters Replacement and Ownership Transfer</i>	\$ 10	\$ 9
<i>Take Station Refurbishment</i>	\$ 1,221	\$ 996
<i>Heater Installation Program</i>	\$ 400	\$ 229
<i>System Automation</i>	\$ 665	\$ 688
<i>Tools & Equipment</i>	\$ 1,211	\$ 1,163
<i>Valve Installation/Replacement - Primary Valve Program & Aquidneck Island Low Pressure Valves</i>	\$ 142	\$ 145
<i>Southern RI Gas Expansion Project - Regulator Station Investment</i>	\$ 4,060	\$ 6,613
Reliability & Pressure Regulation Total	\$ 32,460	\$ 40,923
D. Large Multi-Year Reliability Projects		
<i>LNG - Exeter Truck Station Upgrade</i>	\$ 500	\$ -
<i>LNG - Exeter Control Room Upgrade</i>	\$ 1,600	\$ -
<i>LNG - Old Mill Lane Portable Equipment</i>	\$ 8,300	\$ -
<i>LNG - Old Mill Lane Site Upgrades</i>	\$ 6,000	\$ -
Large Multi-Year Reliability Projects Total	\$ 16,400	\$ -
CAPITAL ISR TOTAL	\$ 185,407	\$ 164,812
E. PHMSA - Gas Pipeline Leak Detection and Repair (LDAR)		
	<i>Not included in rates until FY2025 Reconciliation</i>	
<i>Reactive Leaks (CI Joint Encapsulation/Service Replacement) (PHMSA)</i>	\$ 4,000	\$ 3,456
<i>Main Replacement (Mandated) - Leak Prone Pipe (PHMSA)</i>	\$ 6,589	\$ 3,795
<i>Tools & Equipment (PHMSA)</i>	\$ 200	\$ 192
PHMSA LDAR Total	\$ 10,789	\$ 7,443
CAPITAL ISR TOTAL (With PHMSA LDAR)	\$ 196,196	\$ 172,255
Notable Capital Projects Not Currently Included in the ISR		
<i>LNG - Cumberland Tank Replacement</i>	\$ 375	\$ -

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 23-49-NG

In Re: Proposed FY2025 Gas Infrastructure, Safety, and Reliability Plan
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Table 1B
Narragansett Gas - FY 2025 - Proposal to PUC
(\$000)

Investment Categories & Groups	FY 2025 Budget	Projected Capital Additions Placed In-Service for FY 2025
NON-DISCRETIONARY		
Public Works		
<i>CSC/Public Works - Non-Reimbursable</i>	\$ 22,519	\$ 21,205
<i>CSC/Public Works - Reimbursable</i>	\$ 1,700	\$ 1,774
<i>CSC/Public Works - Reimbursements</i>	\$ (850)	\$ (816)
Public Works Total	\$ 23,369	\$ 22,163
Mandated Programs		
<i>Corrosion</i>	\$ 1,918	\$ 2,569
<i>Purchase Meters (Replacement)</i>	\$ 5,646	\$ 5,420
<i>Reactive Leaks (CI Joint Encapsulation/Service Replacement)</i>	\$ 8,000	\$ 8,431
<i>Service Replacements (Reactive) - Non-Leaks/Other</i>	\$ 1,748	\$ 2,723
<i>Main Replacement (Reactive) - Leak Prone Pipe & Maintenance</i>	\$ 7,838	\$ 7,040
<i>Low Pressure System Elimination (Proactive)</i>	\$ 6,552	\$ 6,012
<i>Transmission Station Integrity</i>	\$ 5,891	\$ 7,780
<i>Pipeline Integrity</i>	\$ 10,020	\$ -
Mandated Total	\$ 47,613	\$ 39,976
Damage / Failure (Reactive)		
Damage / Failure (Reactive)	\$ 25	\$ 24
NON-DISCRETIONARY TOTAL	\$ 71,007	\$ 62,163
DISCRETIONARY		
Proactive Main Replacement		
<i>Main Replacement (Proactive) - Leak Prone Pipe</i>	\$ 62,169	\$ 59,577
<i>Main Replacement (Proactive) - Large Diameter LPCI Program</i>	\$ 750	\$ 684
<i>Atwells Avenue</i>	\$ 750	\$ 1,869
Proactive Main Replacement Total	\$ 63,669	\$ 62,130
Proactive Service Replacement		
Proactive Service Replacement Total	\$ 250	\$ 186
Reliability		
<i>System Automation</i>	\$ 665	\$ 688
<i>Heater Installation Program</i>	\$ 400	\$ 229
<i>Wampanoag Trail & Tiverton GS - Heaters Replacement and Ownership Transfer</i>	\$ 10	\$ 9
<i>Take Station Refurbishment</i>	\$ 1,221	\$ 996
<i>Pressure Regulating Facilities</i>	\$ 5,888	\$ 6,560
<i>Valve Installation/Replacement - Primary Valve Program & Aquidneck Island Low Pressure Valves</i>	\$ 142	\$ 145
<i>Gas System Reliability</i>	\$ 4,580	\$ 4,556
<i>I&R - Reactive</i>	\$ 1,472	\$ 1,327
<i>Distribution Station Over Pressure Protection</i>	\$ 1,785	\$ 1,985
<i>LNG</i>	\$ 21,587	\$ 14,754
<i>Old Mill Lane Site Upgrade</i>	\$ 6,000	\$ -
<i>Replace Pipe on Bridges</i>	\$ 1,420	\$ 1,265
<i>Access Protection Remediation</i>	\$ 40	\$ 43
<i>Tools & Equipment</i>	\$ 1,211	\$ 1,163
Reliability Total	\$ 46,421	\$ 33,719
SUBTOTAL DISCRETIONARY (Without Gas Expansion)	\$ 110,340	\$ 96,035
Southern RI Gas Expansion Project		
<i>Regulator Station Investment</i>	\$ 4,060	\$ 6,613
Southern RI Gas Expansion Project Total	\$ 4,060	\$ 6,613
DISCRETIONARY TOTAL (With Gas Expansion)	\$ 114,400	\$ 102,648
CAPITAL ISR TOTAL (With Gas Expansion)	\$ 185,407	\$ 164,812
PHMSA - Gas Pipeline Leak Detection and Repair (LDAR)		
<i>Reactive Leaks (CI Joint Encapsulation/Service Replacement) (PHMSA)</i>	\$ 4,000	\$ 3,456
<i>Main Replacement (Mandated) - Leak Prone Pipe (PHMSA)</i>	\$ 6,589	\$ 3,795
<i>Tools & Equipment (PHMSA)</i>	\$ 200	\$ 192
PHMSA LDAR Total	\$ 10,789	\$ 7,443
CAPITAL ISR TOTAL (With Gas Expansion & PHMSA LDAR)	\$ 196,196	\$ 172,255
Notable Capital Projects Not Currently Included in the ISR		
<i>LNG - Cumberland Tank Replacement</i>	\$ 375	\$ -

Table 2
Narragansett Gas - 5-Year Forecast - FY2025 - FY2029
(\$000)

Investment Categories & Groups	FY 2025 Budget	FY 2026 Budget	FY 2027 Budget	FY 2028 Budget	FY 2029 Budget
A. Main Replacement & Rehabilitation					
<i>Damage / Failure (Reactive)</i>	\$ 25	\$ 30	\$ 35	\$ 40	\$ 45
<i>Reactive Main Replacement - Leak Prone Pipe & Maintenance</i>	\$ 7,838	\$ 4,958	\$ 6,250	\$ 6,250	\$ 6,250
<i>CSC/Public Works - Non-Reimbursable</i>	\$ 22,519	\$ 22,841	\$ 29,560	\$ 28,886	\$ 30,988
<i>CSC/Public Works - Reimbursable</i>	\$ 1,700	\$ 2,228	\$ 2,297	\$ 2,365	\$ 2,439
<i>CSC/Public Works - Reimbursements</i>	\$ (850)	\$ (747)	\$ (1,148)	\$ (1,183)	\$ (1,220)
<i>Gas System Reliability</i>	\$ 4,580	\$ 4,000	\$ 5,010	\$ 5,500	\$ 6,500
<i>Proactive Main Rehabilitation - Large Diameter (CI Lining & CISBOT)</i>	\$ 750	\$ 1,000	\$ 6,839	\$ 5,750	\$ 6,750
<i>Proactive Low Pressure System Elimination</i>	\$ 6,552	\$ 5,810	\$ 20,000	\$ 20,000	\$ 20,000
<i>Pipeline Integrity</i>	\$ 10,020	\$ 10,020	\$ 1,250	\$ 10	\$ -
<i>Replace Pipe on Bridges</i>	\$ 1,420	\$ 3,000	\$ 1,481	\$ 1,510	\$ 1,661
<i>Proactive Main Replacement - Leak Prone Pipe</i>	\$ 62,169	\$ 63,162	\$ 78,359	\$ 78,891	\$ 84,518
<i>Atwells Avenue</i>	\$ 750	\$ -	\$ -	\$ -	\$ -
<i>Proactive Service Replacement</i>	\$ 250	\$ 541	\$ 2,000	\$ 2,000	\$ 2,000
Main Replacement & Rehabilitation Total	\$ 117,723	\$ 116,843	\$ 151,932	\$ 150,020	\$ 159,932
B. Mandated & Non-Main Reactive					
<i>Reactive Leaks (CI Joint Encapsulation/Service Replacement)</i>	\$ 8,000	\$ 8,320	\$ 8,653	\$ 8,999	\$ 9,359
<i>Purchase Meters (Replacement)</i>	\$ 5,646	\$ 5,469	\$ 5,569	\$ 5,681	\$ 6,043
<i>Corrosion</i>	\$ 1,918	\$ 2,290	\$ 2,519	\$ 2,771	\$ 3,048
<i>Reactive Service Replacements - Non-Leaks/Other</i>	\$ 1,748	\$ 1,766	\$ 1,801	\$ 1,837	\$ 1,850
<i>I&R - Reactive</i>	\$ 1,472	\$ 1,430	\$ 1,459	\$ 1,488	\$ 1,563
<i>Access Protection Remediation</i>	\$ 40	\$ 25	\$ 25	\$ 25	\$ 25
Mandated Total	\$ 18,824	\$ 19,300	\$ 20,026	\$ 20,800	\$ 21,888
C. Reliability & Pressure Regulation					
<i>LNG</i>	\$ 11,187	\$ 2,100	\$ 7,782	\$ 4,259	\$ 6,150
<i>Transmission Station Integrity</i>	\$ 5,891	\$ 7,837	\$ 6,259	\$ 458	\$ 5,234
<i>Pressure Regulating Facilities</i>	\$ 5,888	\$ 6,695	\$ 7,296	\$ 7,103	\$ 7,316
<i>Distribution Station Over Pressure Protection</i>	\$ 1,785	\$ 3,025	\$ 3,184	\$ 297	\$ 306
<i>Tiverton GS - Heaters Replacement and Ownership Transfer</i>	\$ 10	\$ -	\$ -	\$ -	\$ -
<i>Take Station Refurbishment</i>	\$ 1,221	\$ 3,124	\$ 1,681	\$ 4,735	\$ 237
<i>Heater Installation Program</i>	\$ 400	\$ 3,806	\$ 912	\$ 2,951	\$ 300
<i>System Automation</i>	\$ 665	\$ 685	\$ 517	\$ 350	\$ 361
<i>Tools & Equipment</i>	\$ 1,211	\$ 1,112	\$ 1,164	\$ 1,216	\$ 1,223
<i>Valve Installation/Replacement - Primary Valve Program & Aquidneck Island Low Pressure Valves</i>	\$ 142	\$ 145	\$ 148	\$ 152	\$ 157
<i>Southern RI Gas Expansion Project - Regulator Station Investment</i>	\$ 4,060	\$ 498	\$ 1,273	\$ 50	\$ -
Reliability & Pressure Regulation Total	\$ 32,460	\$ 29,027	\$ 30,216	\$ 21,570	\$ 21,283
D. Large Multi-Year Reliability Projects					
<i>LNG - Exeter Truck Station Upgrade</i>	\$ 500	\$ 12,000	\$ -	\$ -	\$ -
<i>LNG - Exeter Control Room Upgrade</i>	\$ 1,600	\$ 8,000	\$ -	\$ -	\$ -
<i>LNG - Old Mill Lane Portable Equipment</i>	\$ 8,300	\$ 833	\$ -	\$ -	\$ -
<i>LNG - Old Mill Lane Site Upgrades</i>	\$ 6,000	\$ 9,000	\$ -	\$ -	\$ -
<i>LNG - Cumberland Tank Replacement</i>	\$ -	\$ -	\$ 2,500	\$ 22,500	\$ 22,500
Large Multi-Year Reliability Projects Total	\$ 16,400	\$ 29,833	\$ 2,500	\$ 22,500	\$ 22,500
CAPITAL ISR TOTAL	\$ 185,407	\$ 195,003	\$ 204,675	\$ 214,890	\$ 225,602
E. PHMSA - Gas Pipeline Leak Detection and Repair (LDAR)					
<i>Reactive Leaks (CI Joint Encapsulation/Service Replacement) (PHMSA)</i>	\$ 4,000	\$ 11,000	\$ 11,550	\$ 12,128	\$ 12,734
<i>Main Replacement (Mandated) - Leak Prone Pipe (PHMSA)</i>	\$ 6,589	\$ 4,000	\$ 4,200	\$ 4,410	\$ 4,631
<i>Tools & Equipment (PHMSA)</i>	\$ 200	\$ -	\$ -	\$ -	\$ -
PHMSA LDAR Total	\$ 10,789	\$ 15,000	\$ 15,750	\$ 16,538	\$ 17,364
CAPITAL ISR TOTAL (With PHMSA LDAR)	\$ 196,196	\$ 210,003	\$ 220,425	\$ 231,427	\$ 242,967
Notable Capital Projects Not Currently Included in the ISR					
<i>LNG - Cumberland Tank Replacement</i>	\$ 375	\$ 2,500	Costs transfer to be an ISR project in FY27		

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 23-49-NG

In Re: Proposed FY2025 Gas Infrastructure, Safety, and Reliability Plan
12-Month Filing: Period April 2024 – March 2025
Section 2: Gas Capital Investment Plan
Page 46 of 46

Table 3
RI Energy - Gas ISR - Historical Spend
(\$000)

Categories	FY2019	FY2020	FY2021	FY2022	FY2023
	Actual	Actual	Actual	Actual	Actual
NON-DISCRETIONARY					
Public Works	\$ 13,575	\$ 16,523	\$ 12,997	\$ 22,257	\$ 13,410
Mandated Programs	\$ 18,868	\$ 19,043	\$ 17,518	\$ 18,160	\$ 17,927
Damage / Failure (Reactive)	\$ -	\$ -	\$ -	\$ -	\$ -
Special Projects	\$ 8,486	\$ -	\$ -	\$ -	\$ -
NON-DISCRETIONARY TOTAL	\$ 40,928	\$ 35,566	\$ 30,516	\$ 40,417	\$ 31,337
DISCRETIONARY					
Proactive Main Replacement	\$ 52,548	\$ 58,032	\$ 60,896	\$ 72,261	\$ 84,673
Proactive Main Replacement - Large Diameter LPCI	\$ -	\$ 1,115	\$ 1,419	\$ 3,265	\$ 4,803
Atwells Avenue	\$ 81	\$ 906	\$ 5,612	\$ 1,240	\$ 2,754
Service Replacement - Proactive	\$ -	\$ -	\$ 240	\$ 396	\$ 158
Reliability	\$ 10,290	\$ 15,933	\$ 24,836	\$ 28,886	\$ 43,302
SUBTOTAL DISCRETIONARY (Without Gas Expansion)	\$ 62,918	\$ 75,986	\$ 93,003	\$ 106,048	\$ 135,691
Southern RI Gas Expansion Project	\$ 2,390	\$ 42,729	\$ 41,755	\$ 14,952	\$ 4,058
DISCRETIONARY TOTAL (With Gas Expansion)	\$ 65,308	\$ 118,715	\$ 134,758	\$ 121,000	\$ 139,749
CAPITAL ISR TOTAL (Base Capital - Without Gas Expansion)	\$ 103,846	\$ 111,552	\$ 123,519	\$ 146,464	\$ 167,028
CAPITAL ISR TOTAL (With Gas Expansion)	\$ 106,236	\$ 154,281	\$ 165,274	\$ 161,416	\$ 171,086
O&M Total	\$ 179	\$ -	\$ -	\$ -	\$ -
GAS ISR GRAND TOTAL	\$ 106,415	\$ 154,281	\$ 165,274	\$ 161,416	\$ 171,086

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 23-49-NG
In Re: Proposed FY2025 Gas Infrastructure, Safety, and Reliability Plan
12-Month Filing: Period April 2024 – March 2025
Section 2: Gas Capital Investment Plan
2022 System Integrity Report
Schedule 1

Schedule 1

2022 System Integrity Report



2022 System Integrity Report

Gas Distribution System Analysis (presenting data collected through December 31st, 2022)

June 5th, 2023

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Gas Distribution Asset Management



Name	Title	Phone
Laeyeng Hunt	Director	1-(508)-962-0043
Barry Foster	Manager	1-(401)-465-8841
Corey Hogg	Engineer	1-(774)-766-0561

Note: All data collected for years prior to calendar year 2022 was compiled by National Grid. At this time, Rhode Island Energy will rely on the existing historical data and follow a similar process for collecting and reporting to allow for the continued display of the 10 year trend of the datasets included in this report. Starting with this report and going forward, Rhode Island Energy plans to both report new datasets as well as modify some of the metrics which National Grid has traditionally reported. However, with this being the first year Rhode Island Energy has been responsible for the creation of the System Integrity Report, it will take some time before a historical dataset can be collected and trends can be properly displayed. Until that time, both versions will be included in tandem.

01

Overall System Assessment Summary





Distribution Integrity Assessment Summary

Percent Change from 2021 to 2022	
Leak Receipts (Excluding Damages)	-12.42%
Workable Leak Backlog	-57.97%
LPP Main Inventory	-6.82%
LPP Service Inventory	-2.83%
Main Leak Rate (Excluding Damages)	-16.67%
Cast Iron Main Break Rate	114.19%
Steel Main Corrosion Leak Rate	-41.23%
Service Leak Rate	-37.21%

02

Leak Receipts, Repairs, and Backlog by HDD Trend (Mains and Services)

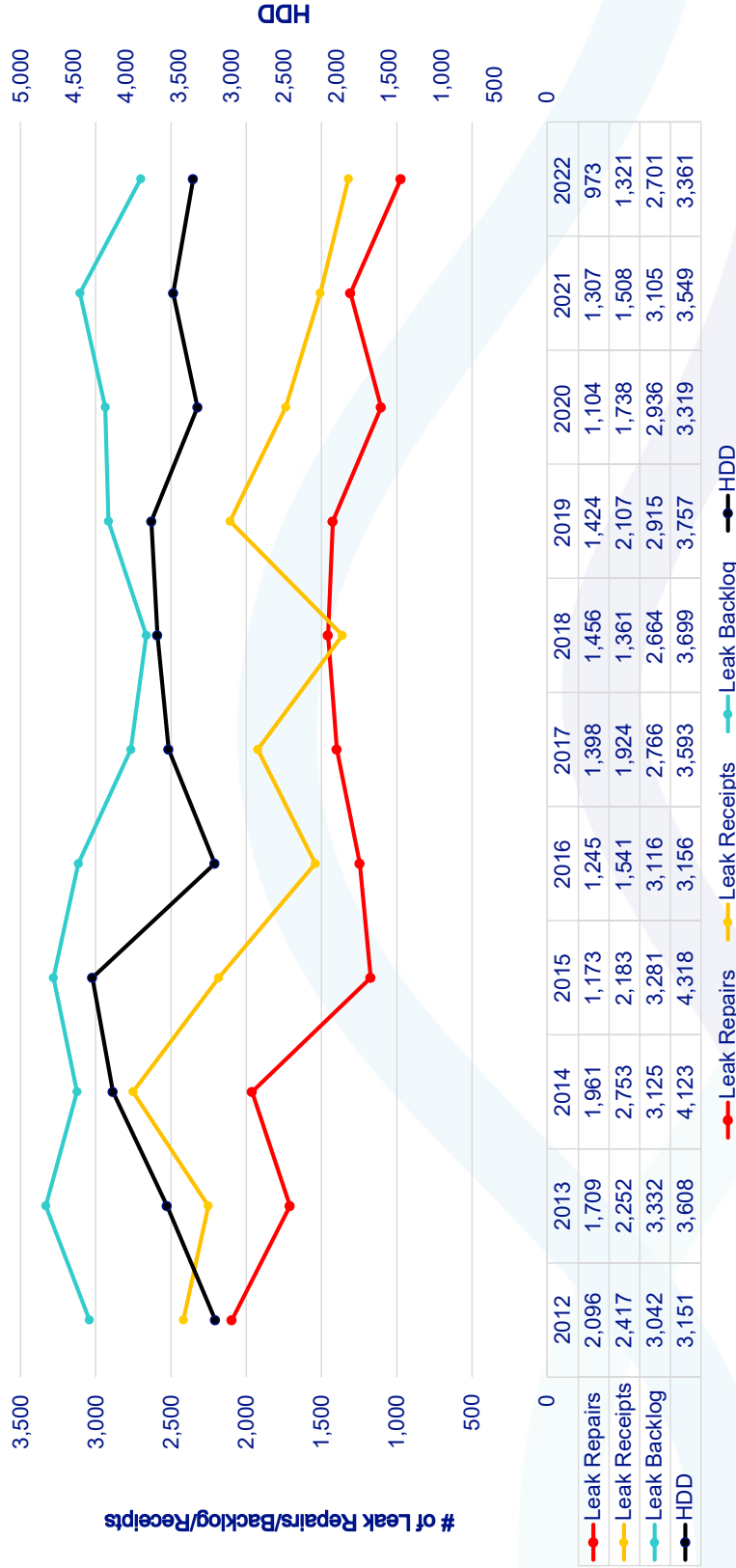


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Leak Receipts, Repairs, and Backlog (Mains and Services, Excluding Damages) by HDD Trend



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03

PHMSA Reported Incidents



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7

PHMSA Reported Incidents (2022)



Total
1

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8

04

Open Leaks



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9

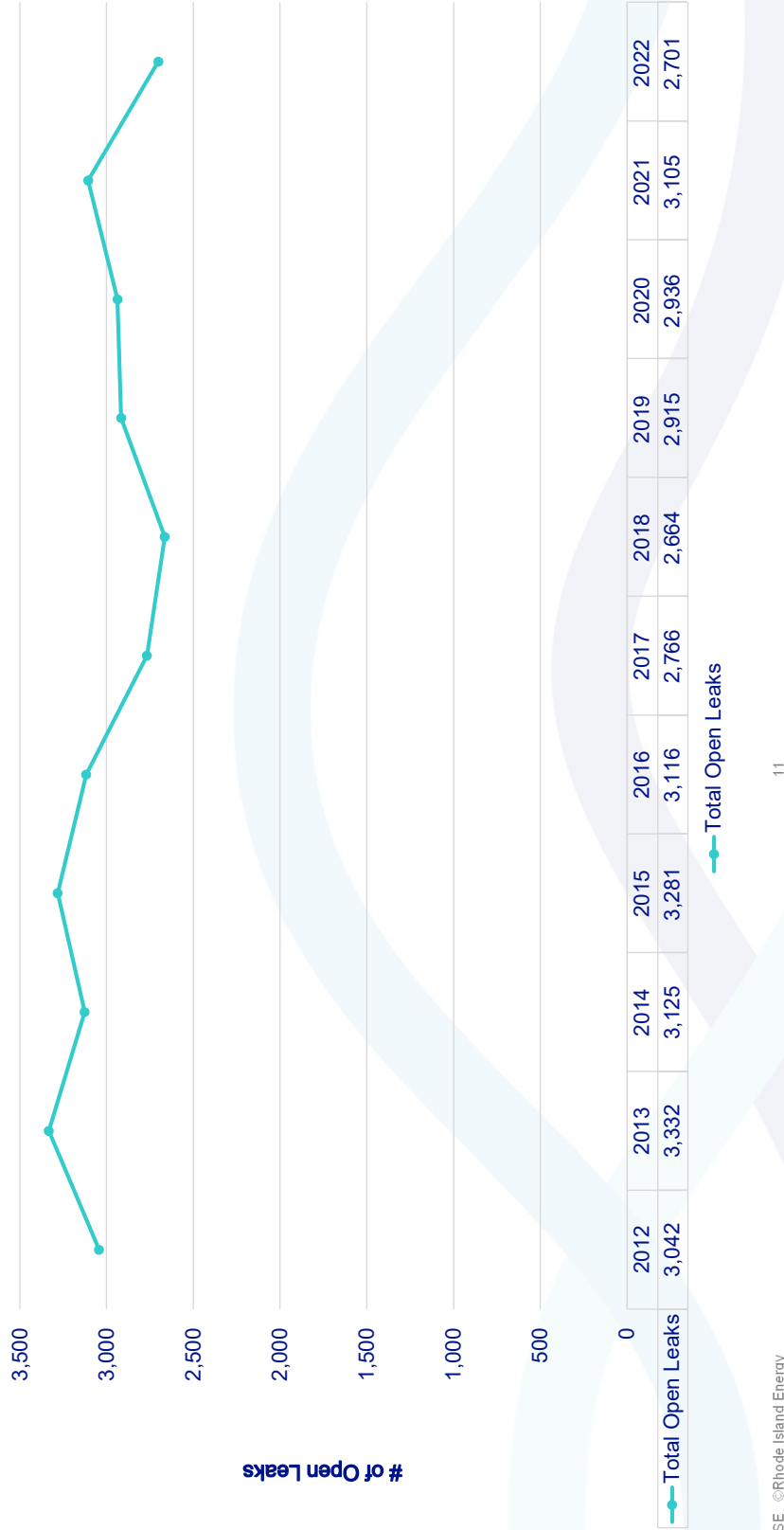
Open Leak Backlog Summary



Open Leak Backlog as of 12/31/2022	
Total Open Leaks	2,701
Workable Open Leak Backlog (Type 1, Type 2A, and Type 2 Open Leaks)	97
Type 3 Open Leak Backlog	2,604



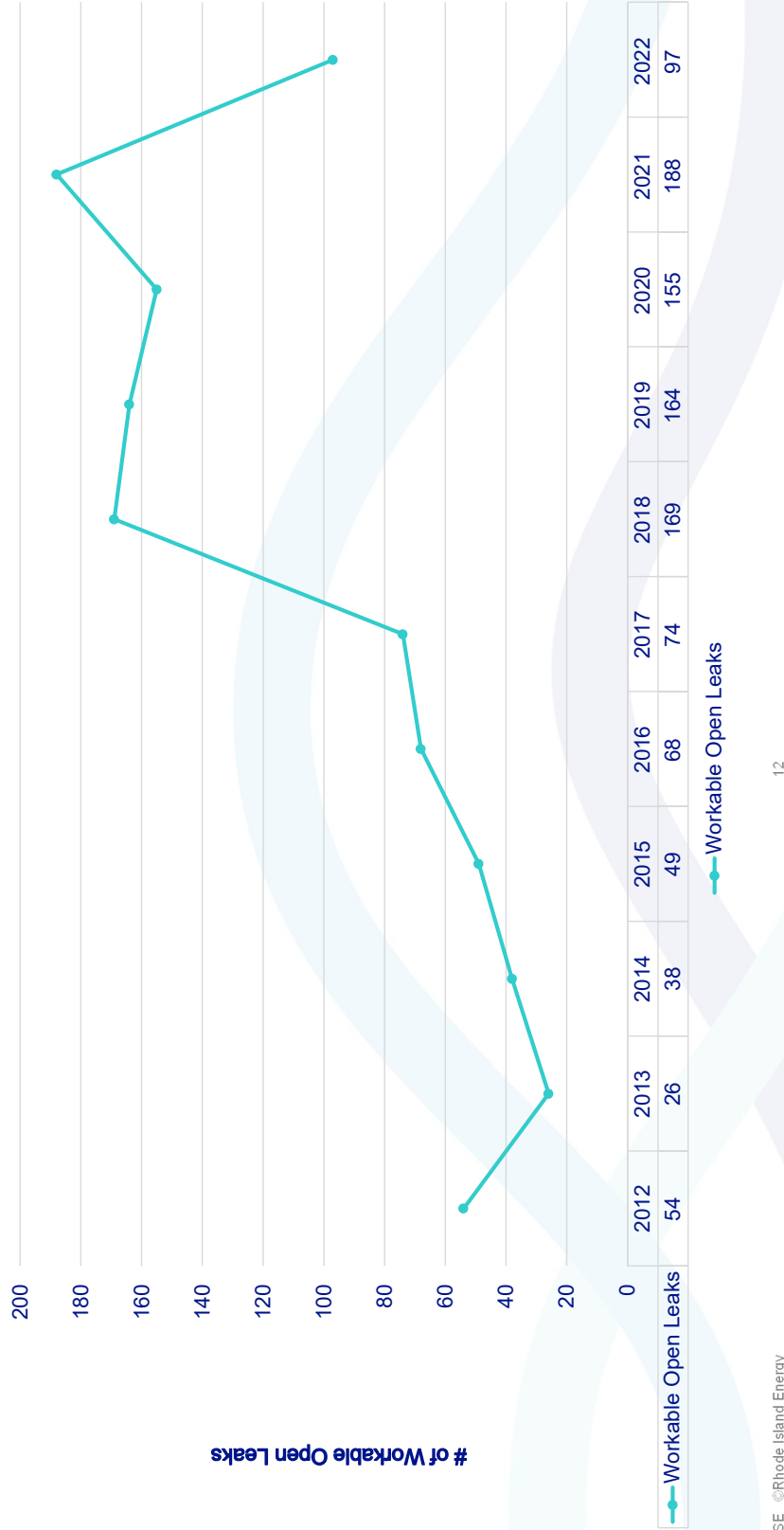
Total Open Leaks as of Year's End



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Workable Open Leak Backlog (Type 1, Type 2A, and Type 2 Open Leaks) as of Year's End

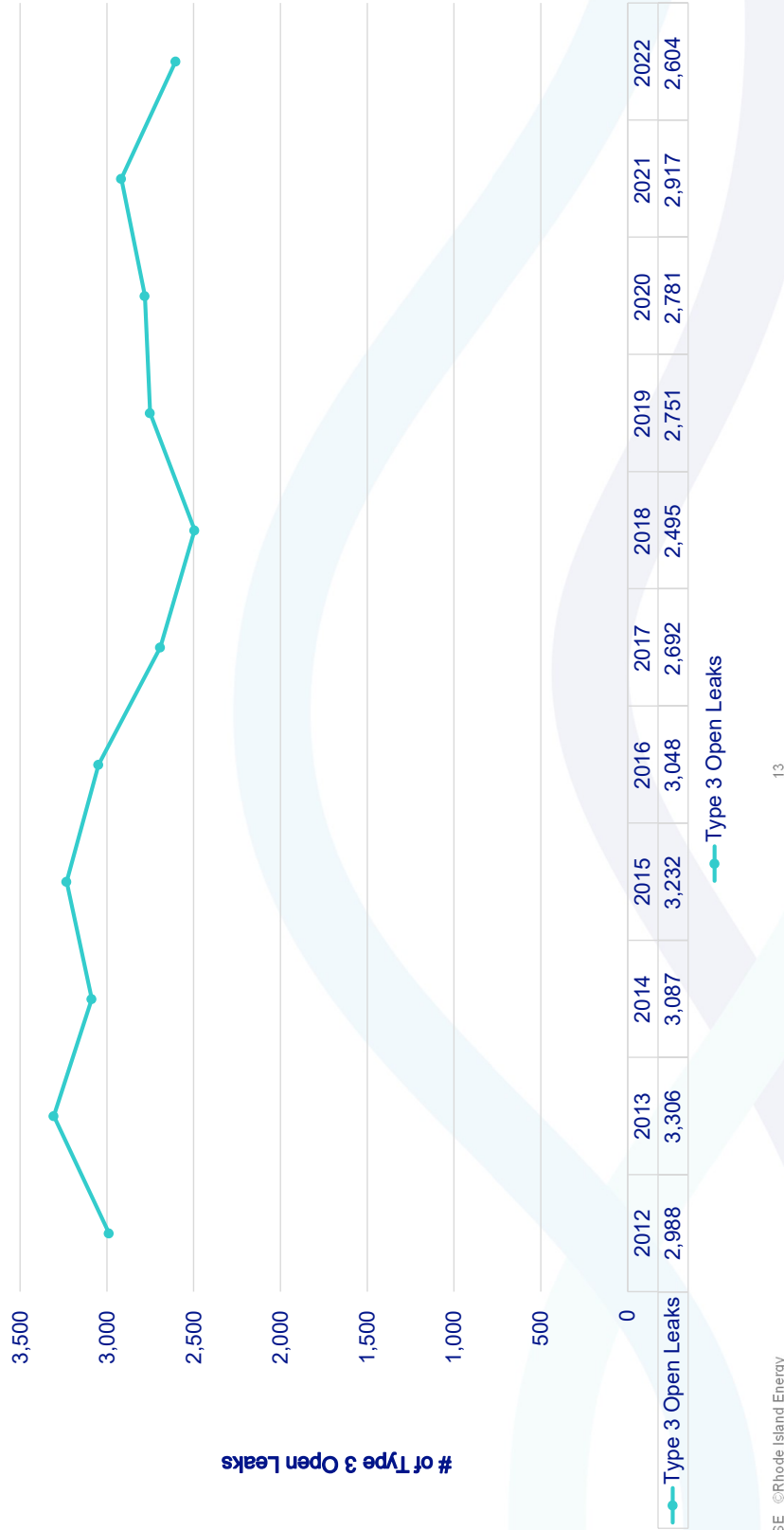


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Type 3 Open Leak Backlog as of Year's End



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13

05

Leak Receipts



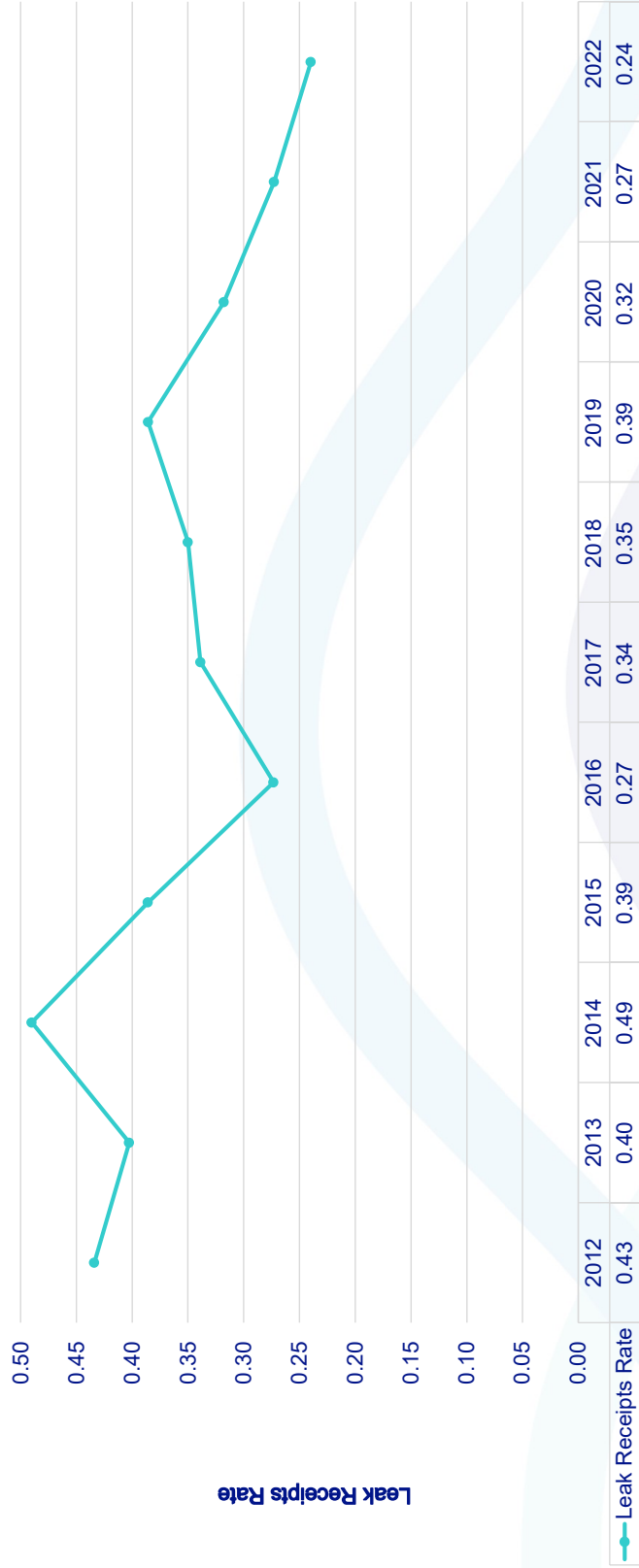
Leak Receipts Summary



Leak Receipts (Excluding Damages)	1,321
Total Main Inventory (Miles)	3,221.70
Total Service Inventory (# of Services)	194,862
Average Service Length (feet)	62.05
Total Service Inventory (Miles)	2,290.00
Leak Receipts (Excluding Damages) per Mile of Pipe (Total)	0.24



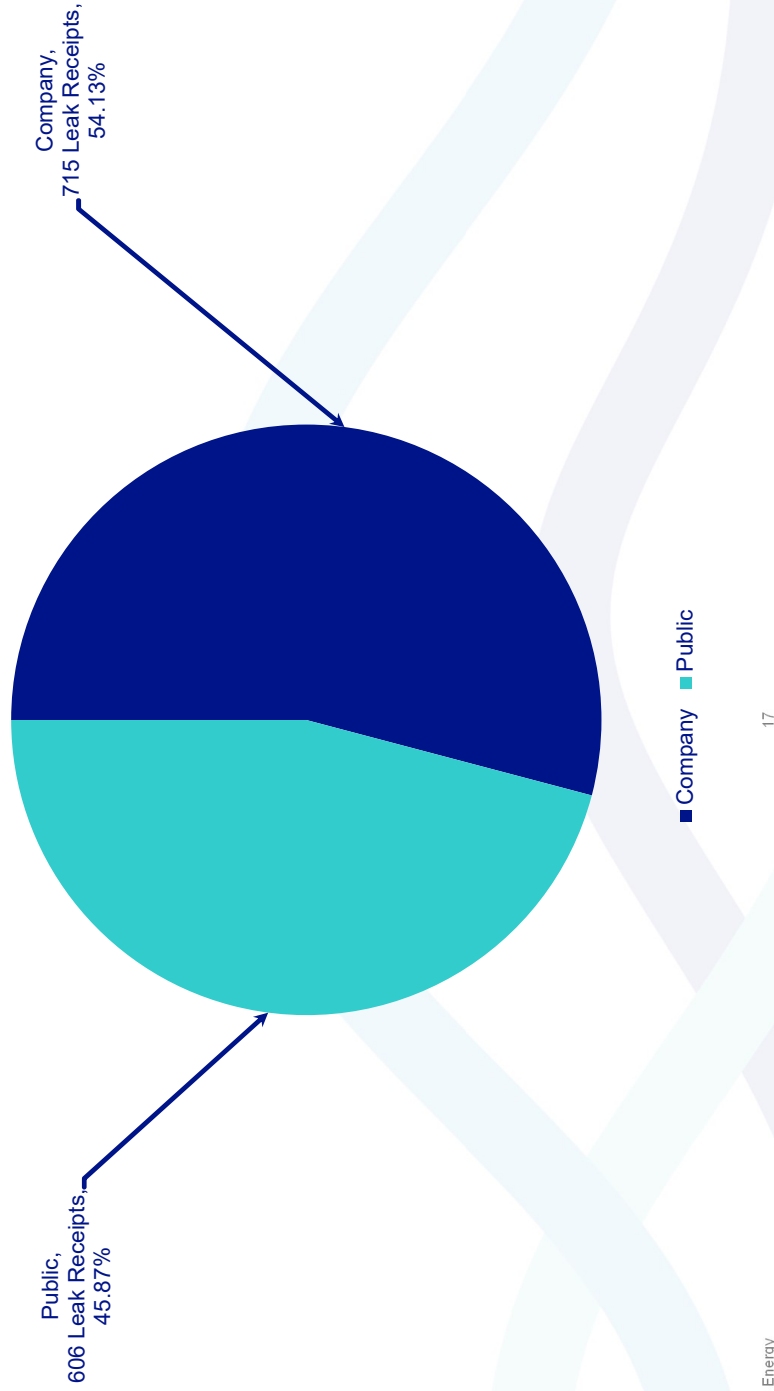
Leak Receipts (Excluding Damages) per Mile of Pipe (Main and Service)



-Leak Receipts Rate: Total # of Leak Receipts (Excluding Damages) / (Total Miles of Main + (Total # of Services x Average Service Length))
-For 2022: Total Miles of Main = 3,221.70 miles, Total # of Services = 194,862, Average Service Length = 62.05 feet



Leak Receipts by Discovery Source (Excluding Damages) – 2022 Split

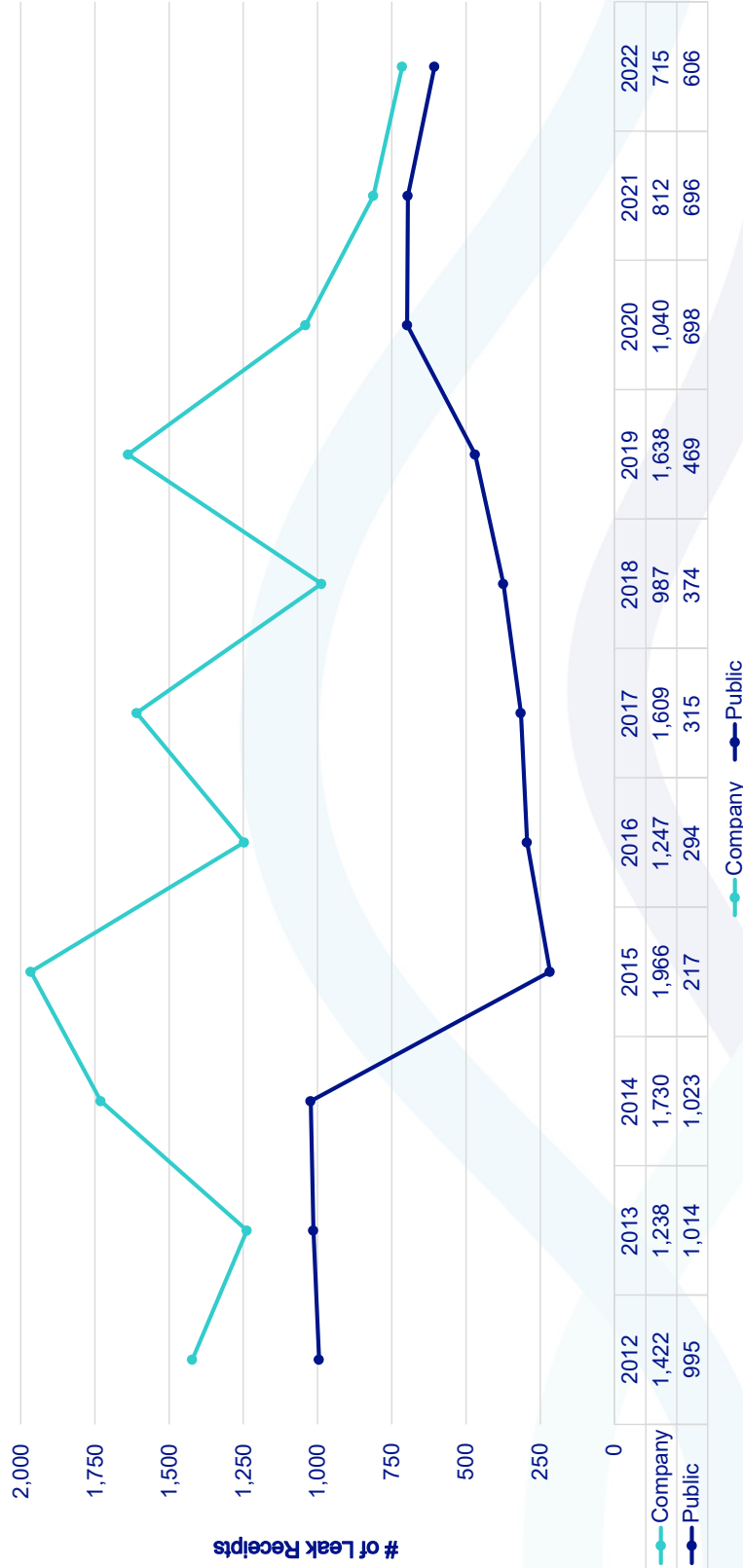


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Leak Receipts by Discovery Source (Excluding Damages)

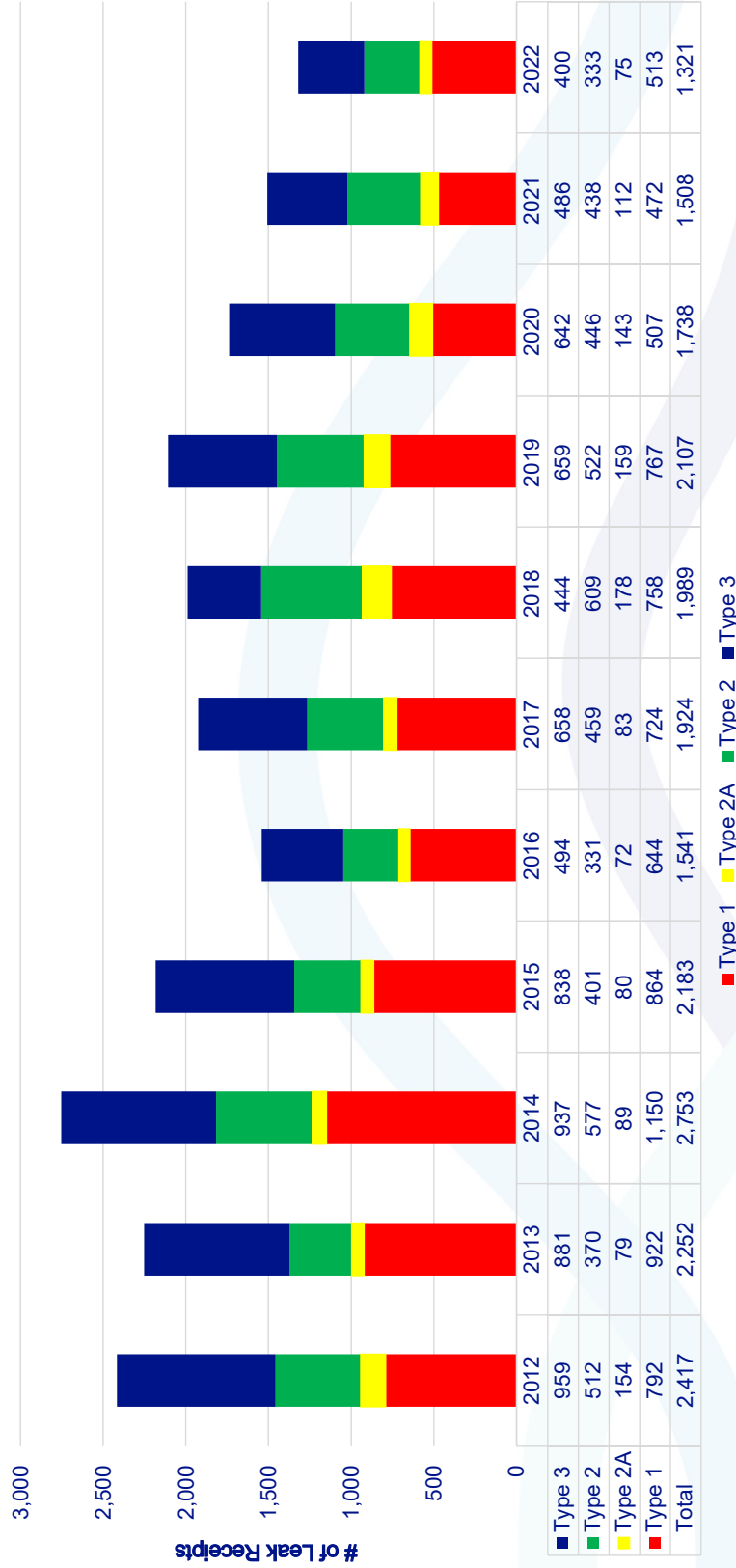


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Leak Receipts by Type (Excluding Damages)





06

Total Leak Repairs



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20



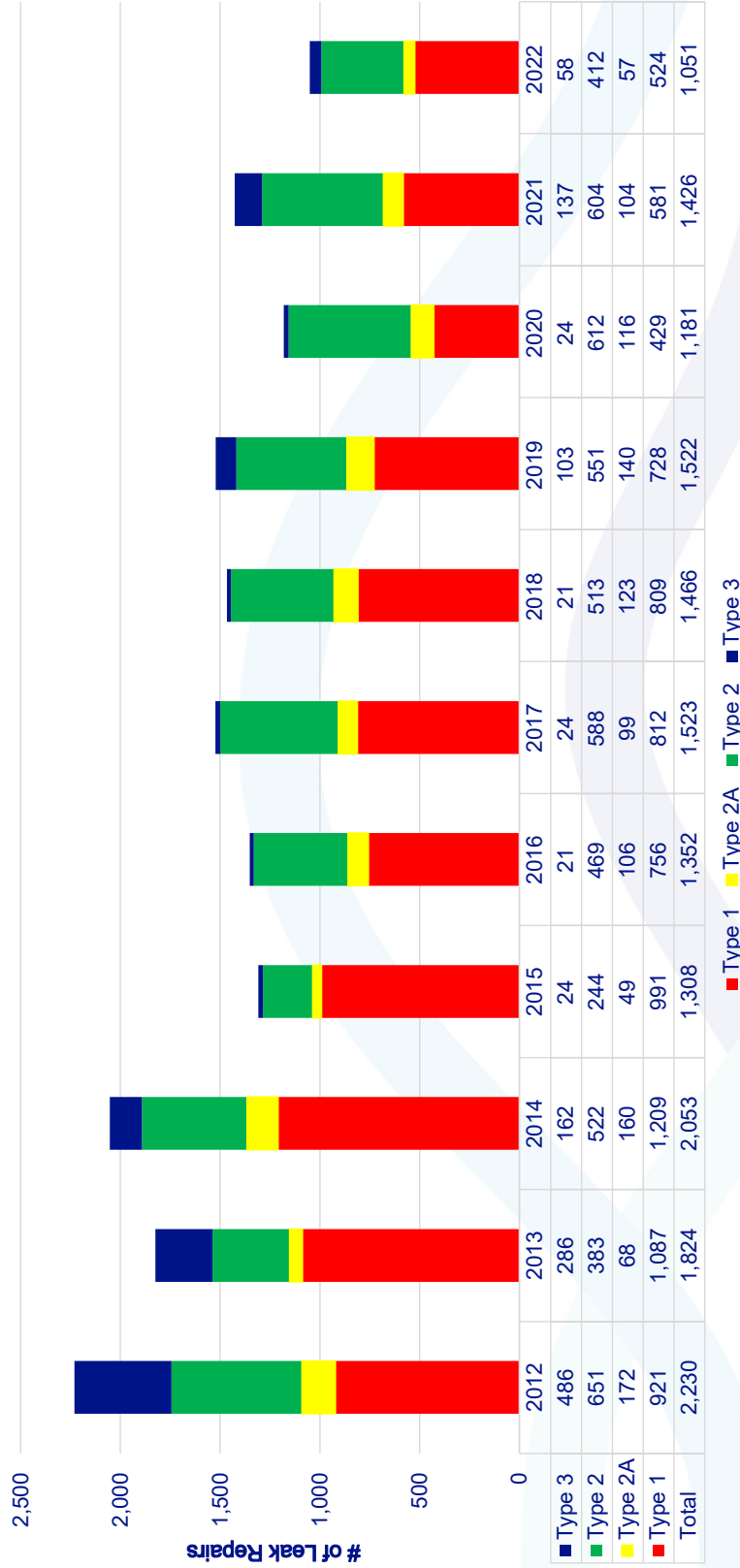
Total Leak Repairs (Including Damages, Main and Service)



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Total Leak Repairs by Leak Type (Including Damages, Main and Service)



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07

Main Inventory





Total LPP Main Inventory

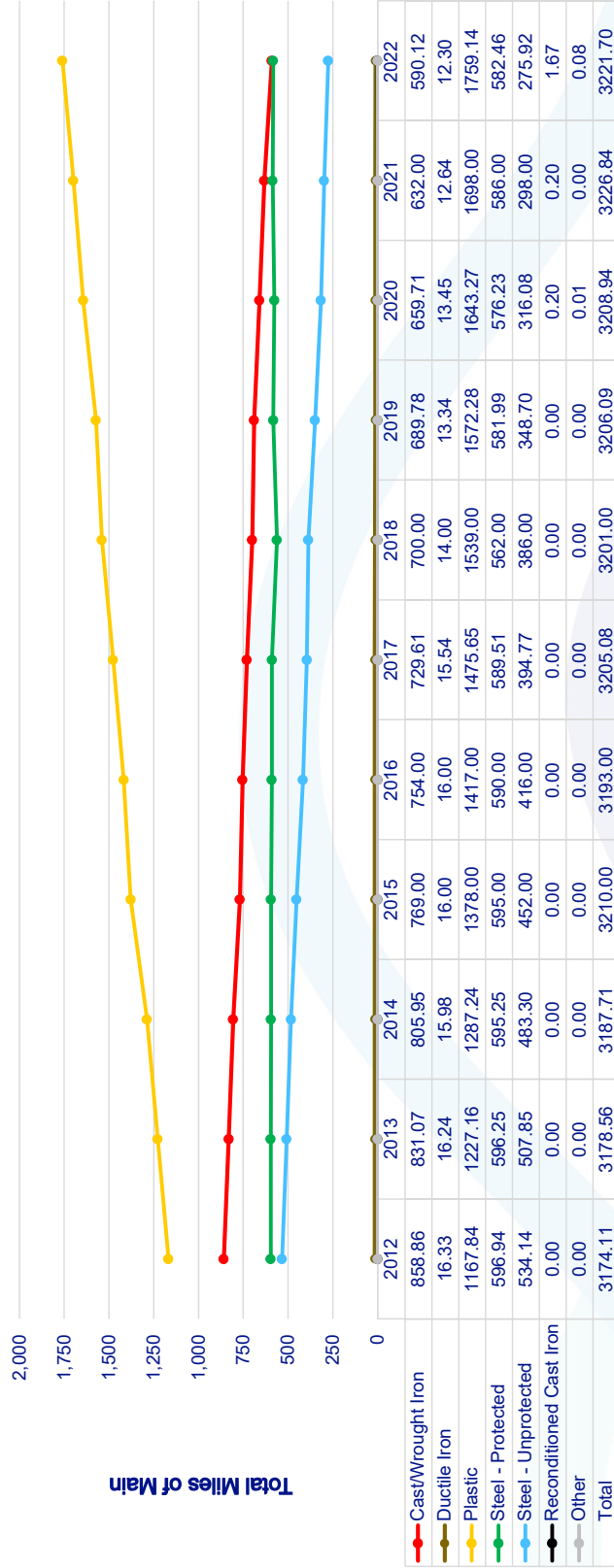


	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
Miles of LPP	1,409.33	1,355.16	1,305.22	1,237.00	1,186.00	1,139.92	1,100.00	1,051.82	989.25	942.64	878.37
YoY reduction (miles)	62.21	54.17	49.93	68.22	51.00	46.08	39.92	48.18	62.57	46.61	64.27

-LPP main inventory consists of all cast iron, wrought iron, ductile iron, bare steel, unprotected coated steel, and unknown material mains. -Although not considered LPP, the total main inventory also includes 324.22 miles of protected pre-DOT coated steel (installed prior to 08/01/1971 or marked with an unknown installation date), 23.11 miles of polybutylene, and 173.12 miles of plastic (which was installed prior to 01/01/1985 or marked with an unknown installation date) which contains a significant but unknown amount of Aldyl-A plastic.



Main Inventory by Type (Categories to match DOT Report)



-The material breakdown displayed on this slide matches the categories which are reported on the annual DOT report. Rhode Island Energy plans to provide a more detailed view of the materials in the system, but since 2022 was the first year compiling more detailed data, it will take some time to compile a dataset which will allow a trend to be displayed.



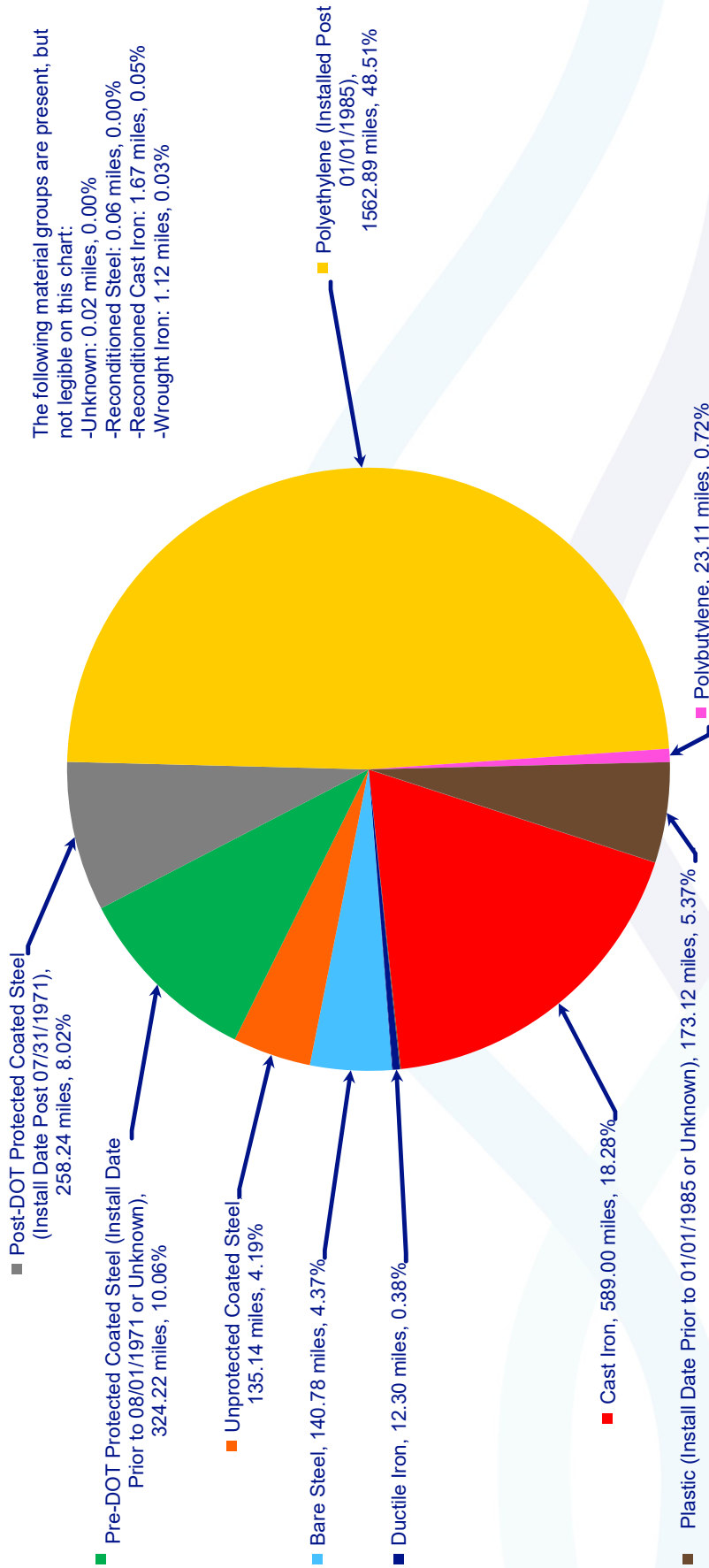
Total Main Inventory

Material	Mileage	% of Total Inventory	Material	Mileage	% of Total Inventory
Cast Iron*	589.00	18.28%	Post-DOT Protected Coated Steel (Install Date post 07/31/1971)	258.24	8.02%
Ductile Iron	12.30	0.38%	Polyethylene (Installed Post 01/01/1985)	1,562.89	48.51%
Wrought Iron	1.12	0.03%	Plastic (Install Date Prior to 01/01/1985 or Unknown)**	173.12	5.37%
Bare Steel	140.78	4.37%	Polybutylene	23.11	0.72%
Unprotected Coated Steel	135.14	4.21%	Pre-DOT Protected Coated Steel (installed prior to 08/01/1971 or marked with an unknown installation date)	324.22	10.06%
Unknown	.02	0.00%	Reconditioned Cast Iron	1.67	0.05%
Total LPP	878.37	27.27%	Reconditioned Steel	0.06	0.00%

NOTE: Material Types highlighted in red make up the company's LPP inventory
*Cast iron main inventory includes 35.41 miles which has a diameter greater than 12"
**Contains a significant, but unknown amount, of Aldyl-A plastic



Total Main Inventory



The following material groups are present, but not legible on this chart:
-Unknown: 0.02 miles, 0.00%
-Reconditioned Steel: 0.06 miles, 0.00%
-Reconditioned Cast Iron: 1.67 miles, 0.05%
-Wrought Iron: 1.12 miles, 0.03%

Rhode Island Energy Total Main Inventory vs. 2022 PHMSA Average (Categories to match DOT Report)



DOT Material Category	% of Total Main Inventory, Rhode Island Energy	% of Total Main Inventory, 2022 PHMSA Average*
Unprotected Bare Steel	4.37%	2.12%
Unprotected Coated Steel	4.19%	1.13%
Cathodically Protected Bare Steel	0.00%	0.72%
Cathodically Protected Coated Steel	18.08%	33.74%
Plastic	54.60%	60.88%
Cast Iron	18.32%	1.29%
Ductile Iron	0.38%	0.03%
Copper	0.00%	0.00%
Other	0.00%	0.07%
Reconditioned Cast Iron	0.05%	0.00%
Total Main Inventory (Miles)	Rhode Island Energy 3,221.70	2022 PHMSA Average* 6,900.97

*2022 PHMSA Average is based on 178 companies' main inventory (excluding Rhode Island Energy) which have 1,000+ miles of main in their system.



Main Inventory by Municipality

City/Town	Total Main Inventory (Miles)	LPP Main Inventory (Miles)	LPP Main Inventory as a percentage of Total LPP Inventory	City/Town	Total Main Inventory (Miles)	LPP Main Inventory (Miles)	LPP Main Inventory as a percentage of Total LPP Inventory
Burrillville	8.62	0.00	0.00%	Pawtucket	201.94	141.27	16.08%
Central Falls	31.45	20.09	2.29%	Portsmouth	54.10	0.05	0.01%
Coventry	88.47	10.15	1.16%	Providence	411.47	211.57	24.09%
Cranston	298.00	107.74	12.27%	Scituate	3.81	0.00	0.00%
Cumberland	127.40	26.39	3.00%	Smithfield	68.10	6.72	0.77%
East Greenwich	61.59	5.67	0.65%	South Kingstown	67.06	8.70	0.99%
East Providence	174.35	44.68	5.09%	Tiverton	17.27	0.00	0.00%
Exeter	9.79	0.31	0.04%	Unknown	21.02	11.40	1.30%
Hopkinton	1.63	0.02	0.00%	Warren	31.49	2.00	0.23%
Johnston	106.92	31.50	3.59%	Warwick	382.00	68.02	7.74%
Lincoln	110.26	14.68	1.67%	West Greenwich	4.11	0.00	0.00%
Middletown	60.66	4.31	0.49%	West Warwick	74.05	17.73	2.02%
Narragansett	70.56	0.52	0.06%	Westerly	90.25	8.13	0.93%
Newport	98.36	17.36	1.98%	Woonsocket	111.85	48.43	5.51%
North Kingstown	149.37	6.48	0.74%	Total	3,221.70	878.43	-



Growth Main Installed



08

Leak Repairs - Mains





Total Main Leak Repairs (Including Damages)

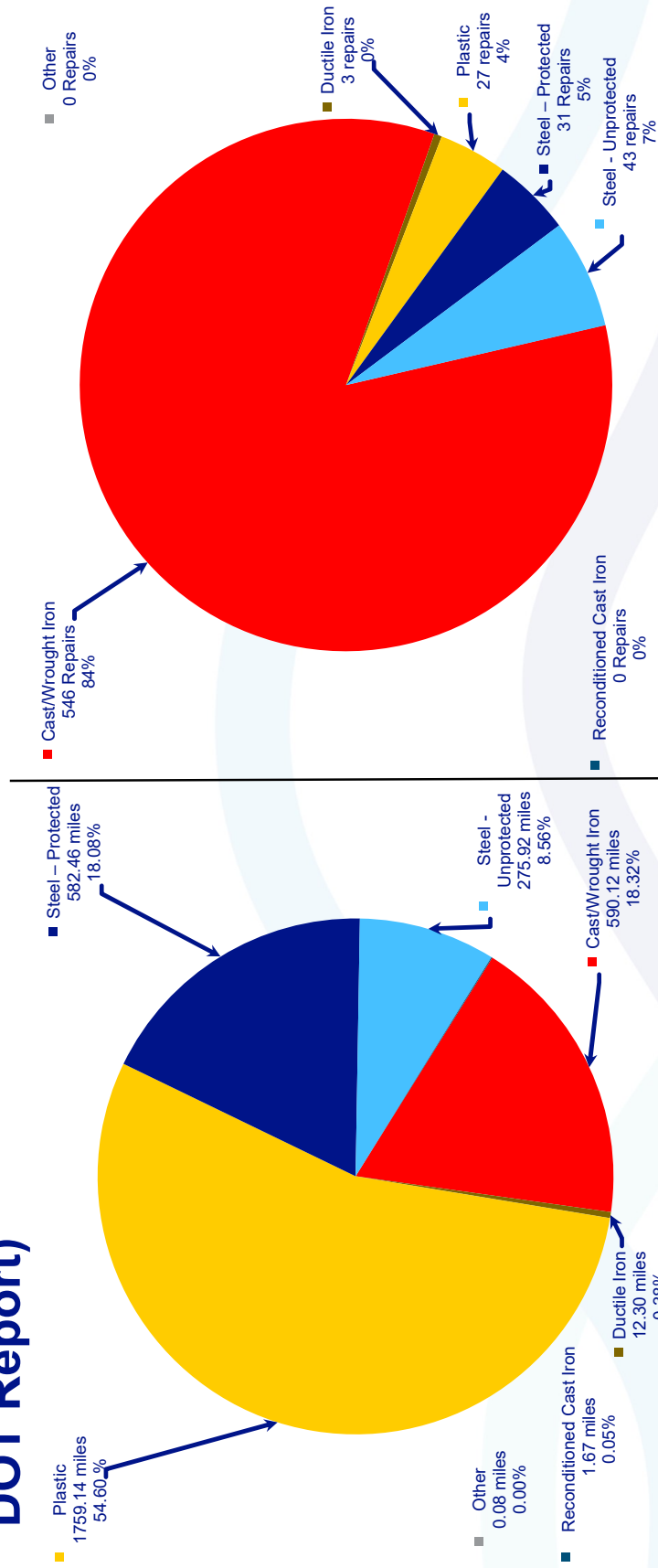


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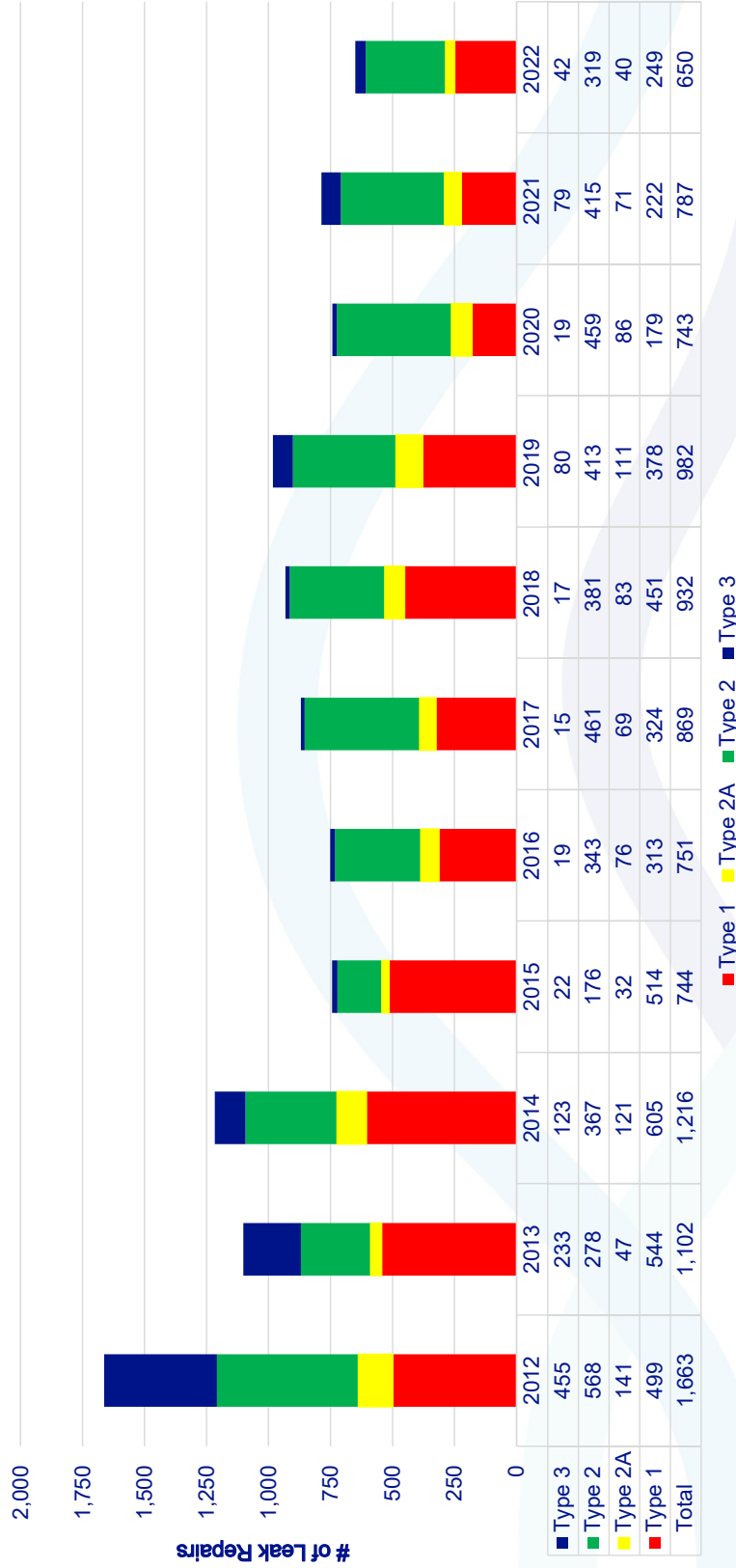
Main Inventory Compared to Main Leak Repairs by Material (Excluding Damages) (Categories to Match DOT Report)



-Data assumes all leaks on coated steel (regardless of cathodic protection status) fall within the "Steel - Protected" category

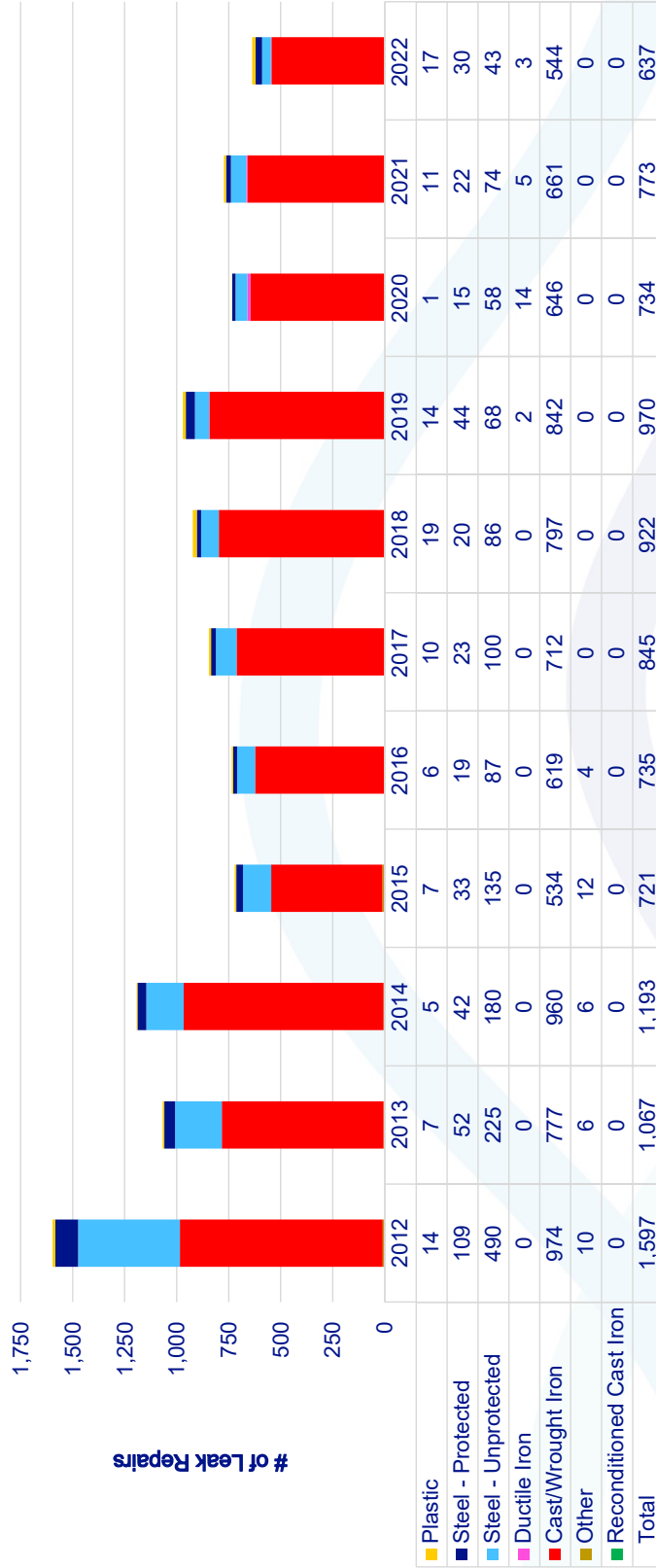


Main Leaks Repaired by Type (Including Damages)





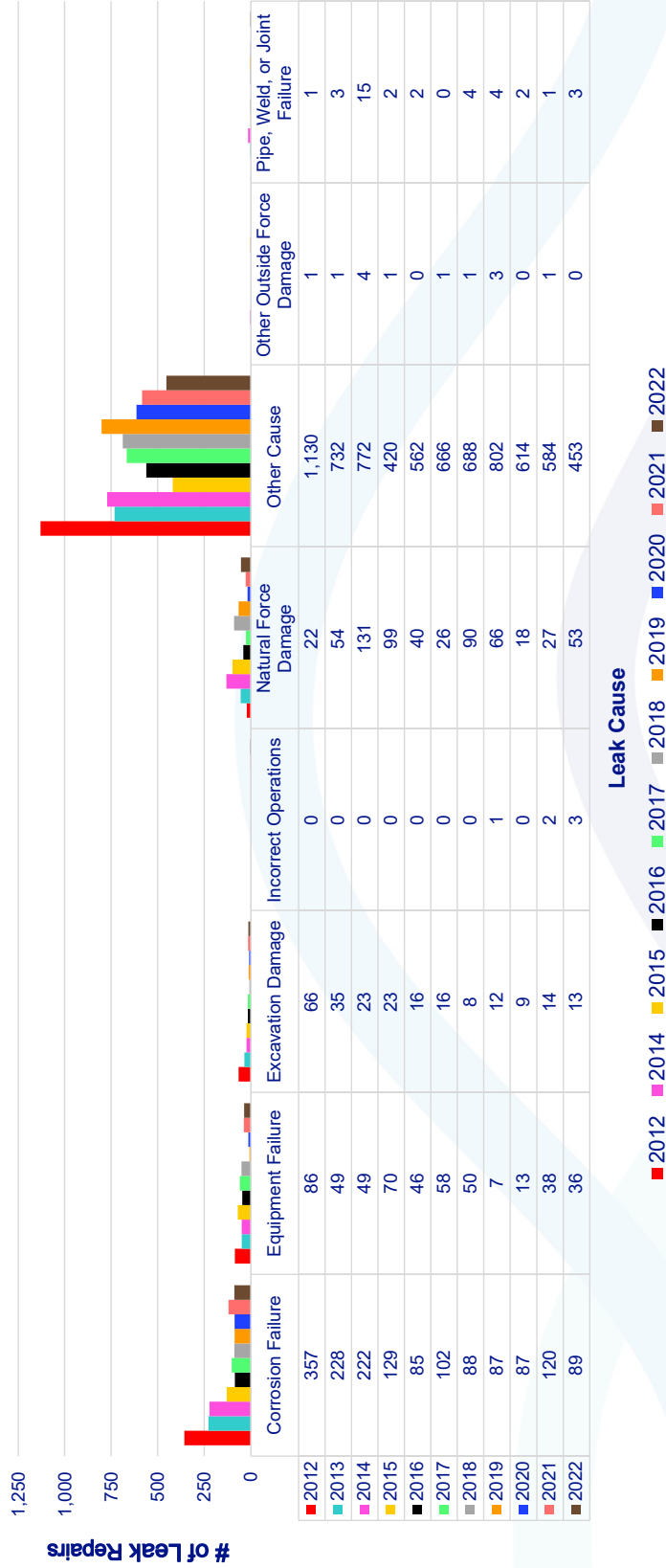
Main Leaks Repaired by Material (Excluding Damages) (Categories to Match DOT Report)



-Data assumes all leaks on coated steel (regardless of cathodic protection status) fall within the "Steel - Protected" category



Main Leaks Repaired by Leak Cause (Categories to Match DOT Report)



*Other cause leaks are cast iron joint leaks



Overall Main Leak Rate (Including Damages)

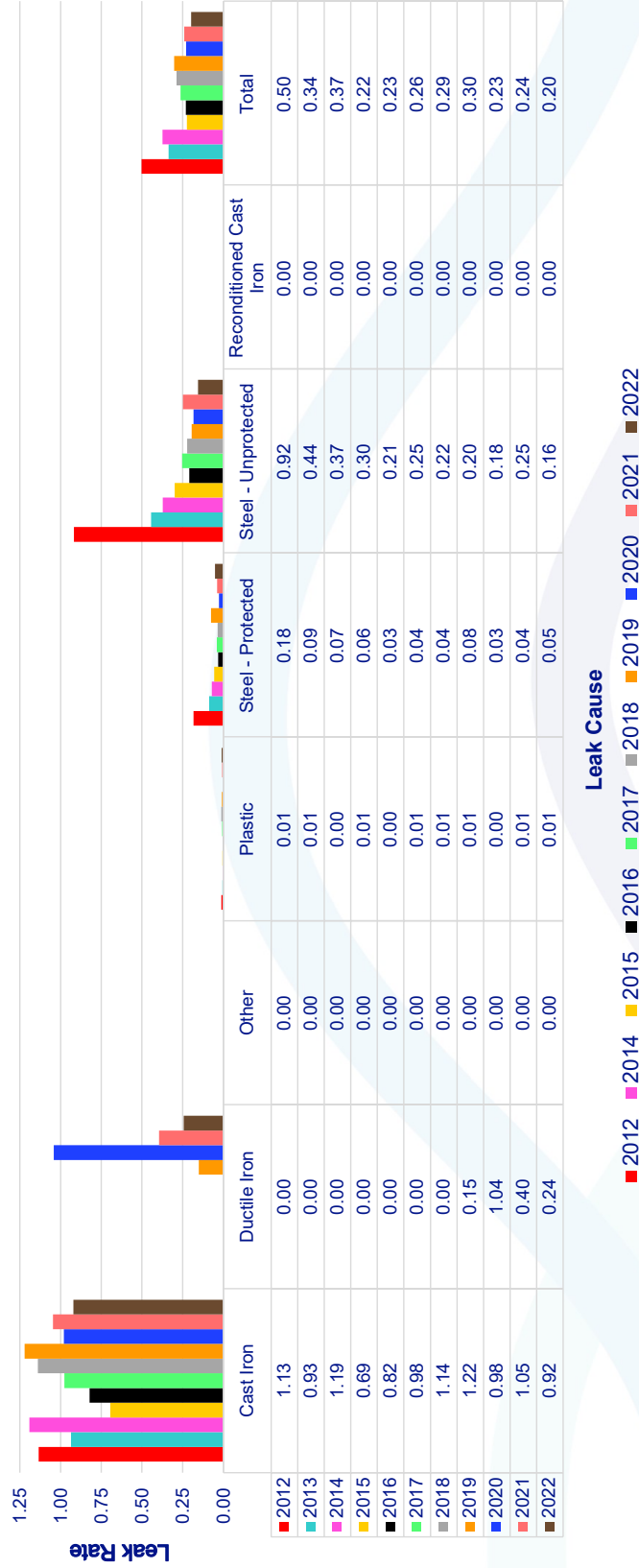


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Main Leak Rate by Material (Excluding Damages) (Categories to Match DOT Report)



*Data assumes all leaks on coated steel (regardless of cathodic protection status) fall within the "Steel – Protected" category

Main Leak Repair Data (More Detailed Material Breakdown)



2022		
Material	Main Leaks Repaired by Material (Excluding Damages)	Main Leak Rate by Material (Excluding Damages)
Cast Iron	542	0.92
Reconditioned Cast Iron	0	0.00
Ductile Iron	3	0.24
Wrought Iron	2	1.79
Bare Steel	43	0.31
Unprotected Coated Steel	13	0.10
Protected Coated Steel	17	0.05
Plastic	27	0.01
Total	650	0.20

-National Grid did not track whether leaks were occurring on protected vs. unprotected coated steel. Cast Iron and Wrought Iron were also considered a singular category (as is done for DOT reporting). Rhode Island Energy plans to track these material types separately, but it will take time to build out a dataset suitable for the plotting of trends.



2022 Main Leak Repairs – Material / Cause Matrix

Material / Cause	Leak Repairs - 2022	Material / Cause	Leak Repairs - 2022	Material / Cause	Leak Repairs - 2022	Material / Cause	Leak Repairs - 2022
Bare Steel - Excavation Damage	0	Ductile Iron - Other Outside Force Damage	0	Plastic (Other) - Excavation Damage	0	Reconditioned Cast Iron - Other Outside Force Damage	0
Bare Steel - Incorrect Operations	0	Ductile Iron - Pipe, Weld, or Joint Failure	0	Plastic (Other) - Incorrect Operations	0	Reconditioned Cast Iron - Pipe, Weld, or Joint Failure	0
Bare Steel - Natural Force Damage	0	Other - Corrosion Failure	0	Plastic (Other) - Natural Force Damage	0	Unprotected Coated Steel - Corrosion Failure	11
Bare Steel - Other Cause	0	Other - Equipment Failure	0	Plastic (Other) - Other Cause	0	Unprotected Coated Steel - Equipment Failure	3
Bare Steel - Other Outside Force Damage	0	Other - Excavation Damage	0	Plastic (Other) - Other Outside Force Damage	0	Unprotected Coated Steel - Excavation Damage	0
Bare Steel - Pipe, Weld, or Joint Failure	1	Other - Incorrect Operations	0	Plastic (Other) - Pipe, Weld, or Joint Failure	1	Unprotected Coated Steel - Incorrect Operations	0
Cast Iron - Corrosion Failure	30	Other - Natural Force Damage	0	Protected Coated Steel - Corrosion Failure	8	Unprotected Coated Steel - Natural Force Damage	0
Cast Iron - Equipment Failure	12	Other - Other Cause	0	Protected Coated Steel - Equipment Failure	7	Unprotected Coated Steel - Other Cause	0
Cast Iron - Excavation Damage	2	Other - Other Outside Force Damage	0	Protected Coated Steel - Excavation Damage	1	Unprotected Coated Steel - Other Outside Force Damage	0
Cast Iron - Incorrect Operations	0	Other - Pipe, Weld, or Joint Failure	0	Protected Coated Steel - Incorrect Operations	1	Unprotected Coated Steel - Pipe, Weld, or Joint Failure	0
Cast Iron - Natural Force Damage	52	Plastic (PE) - Corrosion Failure	3	Protected Coated Steel - Natural Force Damage	0	Wrought Iron - Corrosion Failure	0
Cast Iron - Other Cause	448	Plastic (PE) - Equipment Failure	8	Protected Coated Steel - Other Cause	0	Wrought Iron - Equipment Failure	0
Cast Iron - Other Outside Force Damage	0	Plastic (PE) - Excavation Damage	10	Protected Coated Steel - Other Outside Force Damage	0	Wrought Iron - Excavation Damage	0
Cast Iron - Pipe, Weld, or Joint Failure	0	Plastic (PE) - Incorrect Operations	2	Protected Coated Steel - Pipe, Weld, or Joint Failure	0	Wrought Iron - Incorrect Operations	0
Ductile Iron - Corrosion Failure	0	Plastic (PE) - Natural Force Damage	1	Reconditioned Cast Iron - Corrosion Failure	0	Wrought Iron - Natural Force Damage	0
Ductile Iron - Equipment Failure	0	Plastic (PE) - Other Cause	0	Reconditioned Cast Iron - Equipment Failure	0	Wrought Iron - Other Cause	2
Ductile Iron - Excavation Damage	0	Plastic (PE) - Other Outside Force Damage	0	Reconditioned Cast Iron - Excavation Damage	0	Wrought Iron - Other Outside Force Damage	0
Ductile Iron - Incorrect Operations	0	Plastic (PE) - Pipe, Weld, or Joint Failure	1	Reconditioned Cast Iron - Incorrect Operations	0	Wrought Iron - Pipe, Weld, or Joint Failure	0

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09

Cast Iron Mains

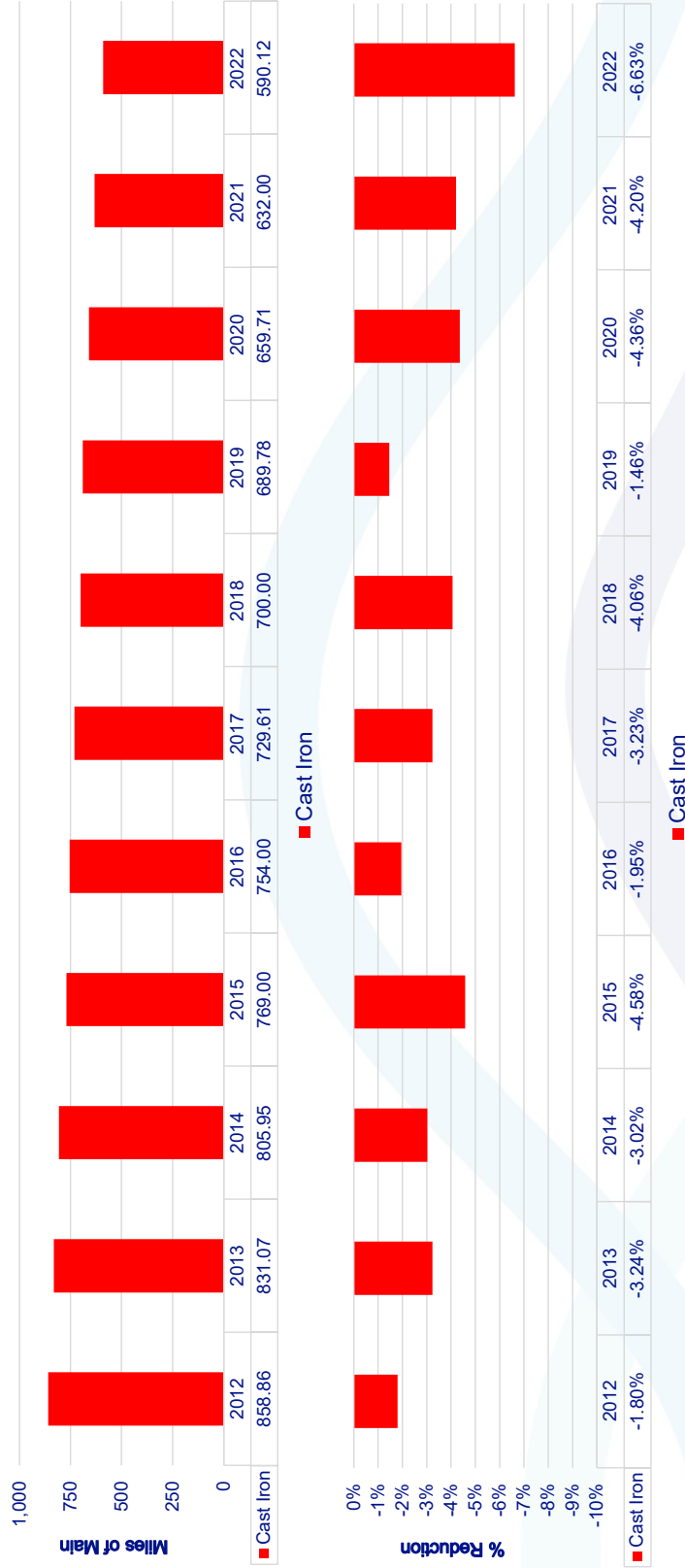


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Cast Iron Main Inventory Compared to Yearly Cast Iron Reduction Percentage



“Cast Iron” for this section of the report refers to a combination of cast and wrought iron (as they are combined on the annual DOT report). Rhode Island Energy has 1.12 miles of wrought iron in its main inventory.

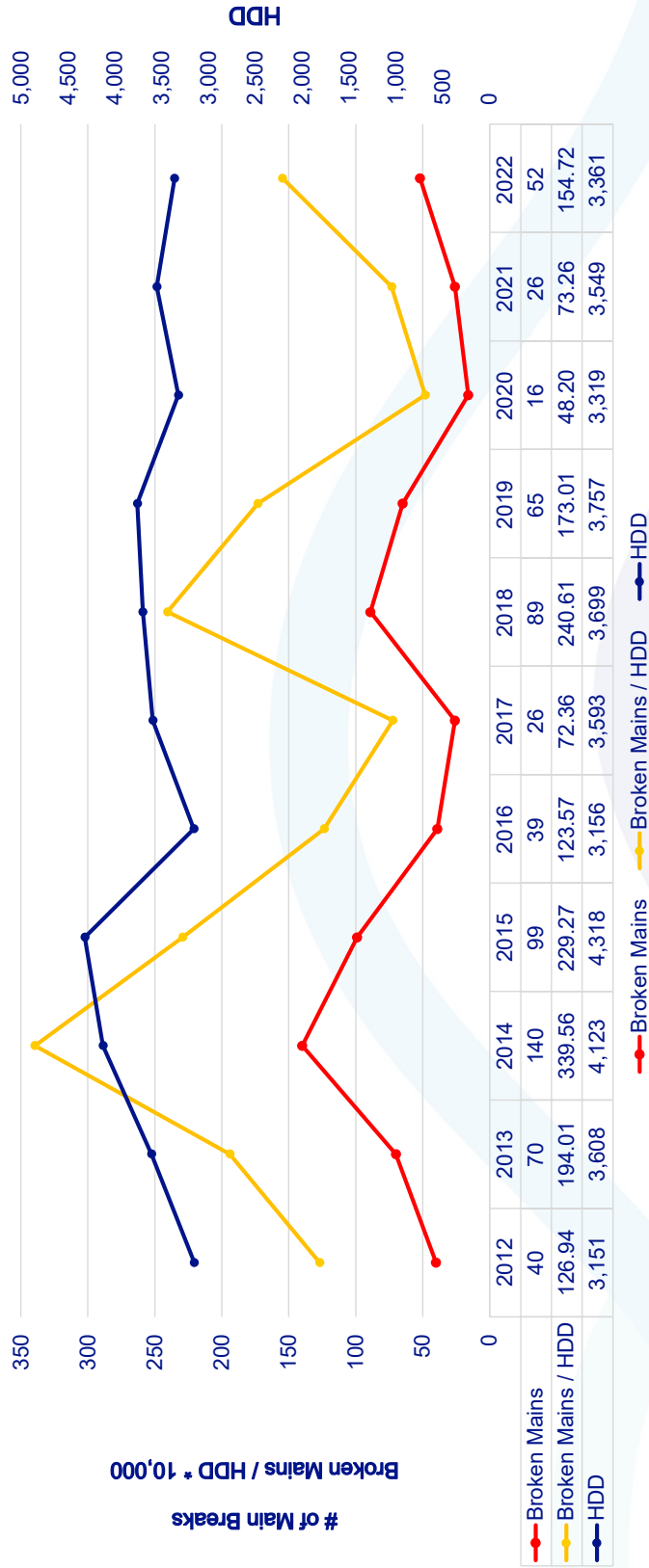


Cast Iron Main Breaks



-"Cast Iron" for this section of the report refers to a combination of cast and wrought iron (as they are combined on the annual DOT report). Rhode Island Energy has 1.12 miles of wrought iron in its main inventory.

Cast Iron Main Breaks Compared to HDD



-Broken Mains / HDD is multiplied by 10,000.
-"Cast Iron" for this section of the report refers to a combination of cast and wrought iron (as they are combined on the annual DOT report). Rhode Island Energy has 1.12 miles of wrought iron in its main inventory.



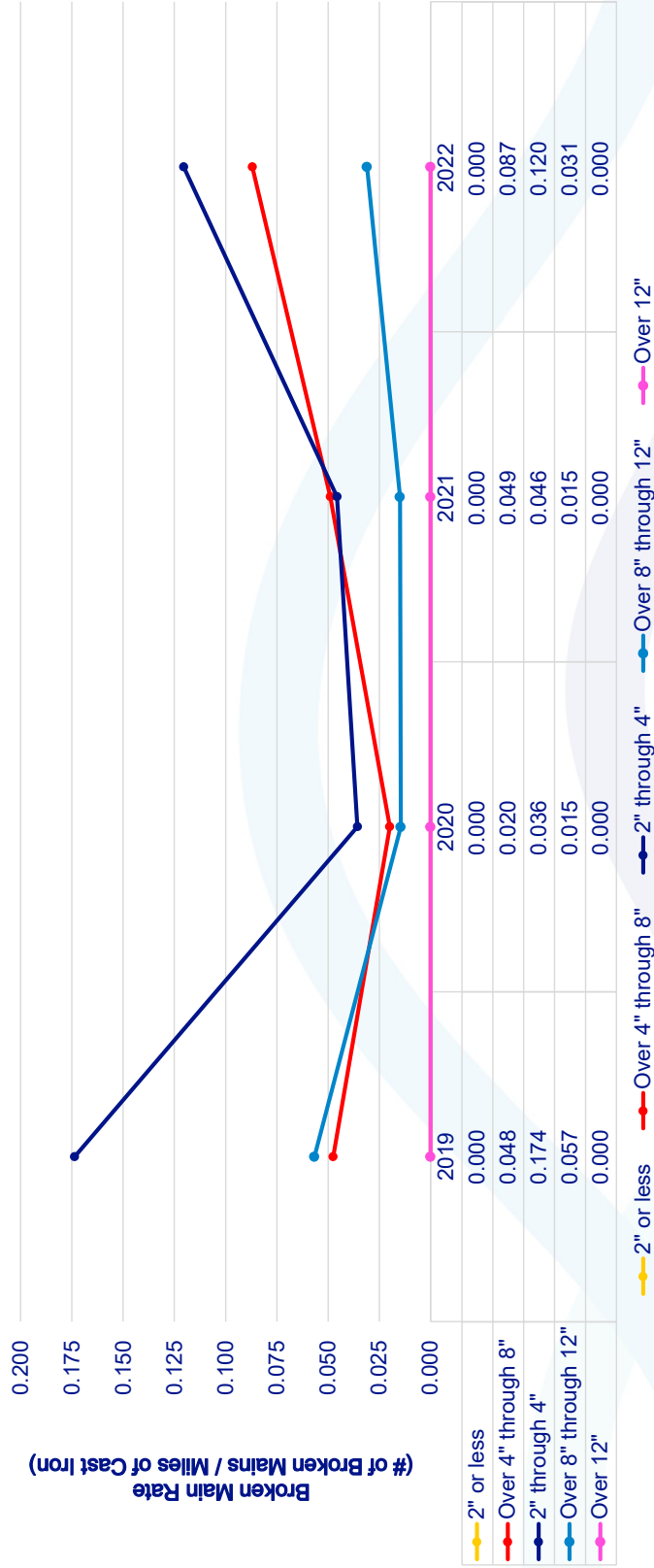
Cast Iron Main Break Rate



-“Cast Iron” for this section of the report refers to a combination of cast and wrought iron (as they are combined on the annual DOT report). Rhode Island Energy has 1.12 miles of wrought iron in its main inventory.



Cast Iron Main Break Rate by Diameter



-“Cast Iron” for this section of the report refers to a combination of cast and wrought iron (as they are combined on the annual DOT report). Rhode Island Energy has 1.12 miles of wrought iron in its main inventory.

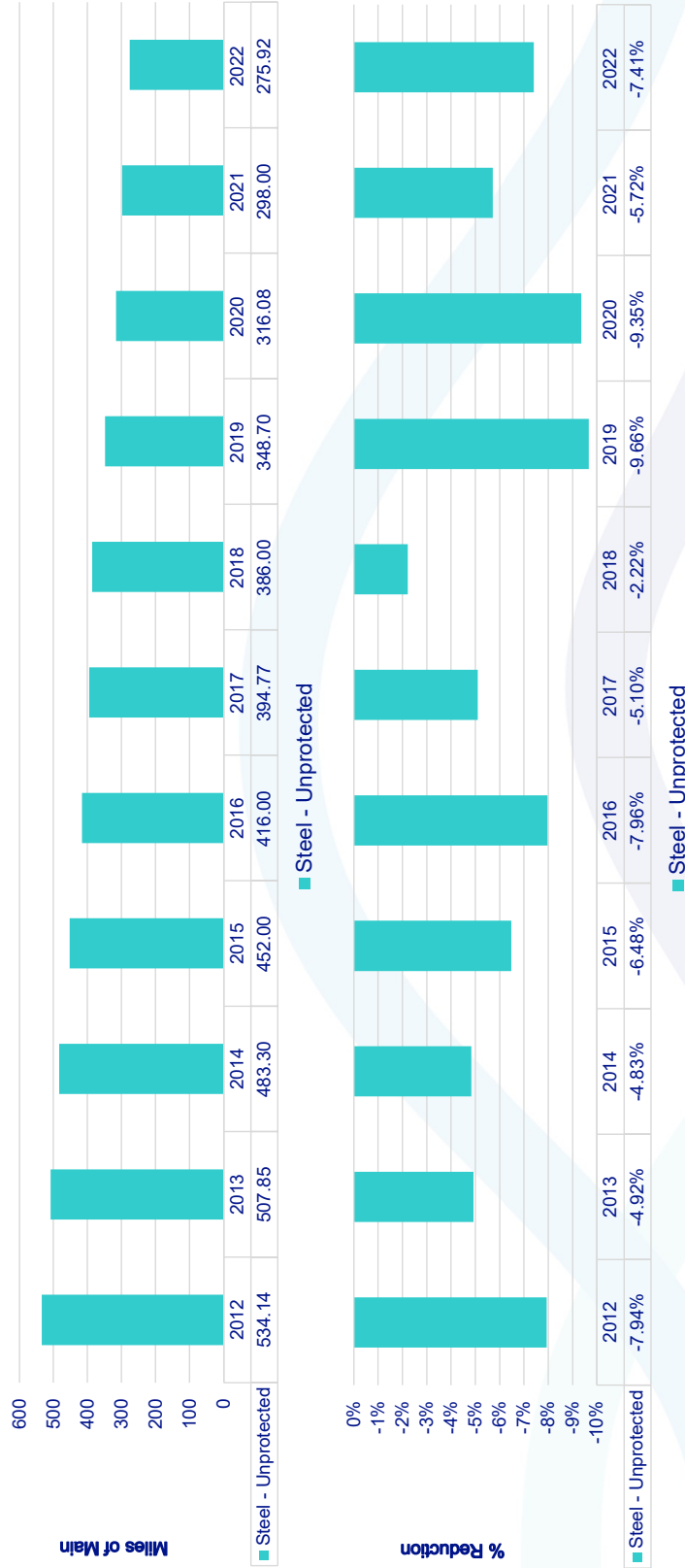
10

Steel Mains





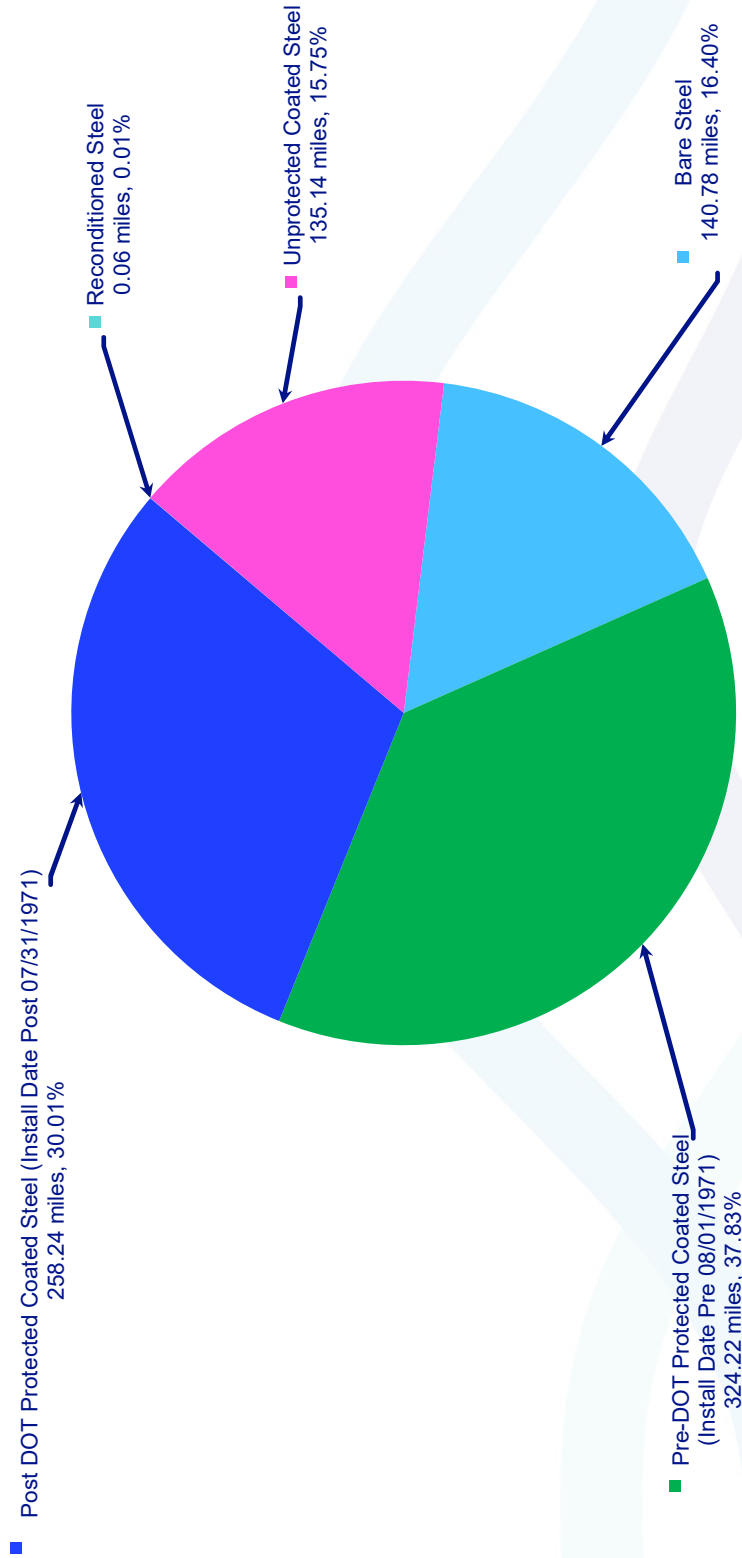
Unprotected Steel Main Inventory Compared to Yearly Unprotected Steel Reduction Percentage



-“Unprotected Steel” for this section of the report refers to a combination of bare steel and coated steel which is not categorized as cathodically protected (as they are combined on the annual DOT report). Rhode Island Energy has 140.78 miles of bare steel and 135.14 miles of unprotected coated steel in its main inventory.



Total Steel Main Inventory



Steel Main Leak Repair Data



2022		
Material	Main Leaks Repaired by Material (Excluding Damages)	Main Leak Rate by Material (Excluding Damages)
Bare Steel	43	0.31
Unprotected Coated Steel	13	0.10
Protected Coated Steel	17	0.05

-National Grid historically considered all leaks which occurred on coated steel to be "Steel – Protected" leaks. Given there is a significant portion of the coated steel inventory that is not cathodically protected and for purposes of the DOT report is considered to be "Steel – Unprotected", this method of data collection does not allow for an accurate representation of the leak rate on the different subcategories of steel mains within the Rhode Island gas distribution system. Rhode Island Energy plans to track the inventories of bare steel, unprotected coated steel, and protected coated steel as well as classify leak repair data more specifically so that an accurate dataset can be built out and the trend can be examined for each type of steel main.

11

Service Inventory





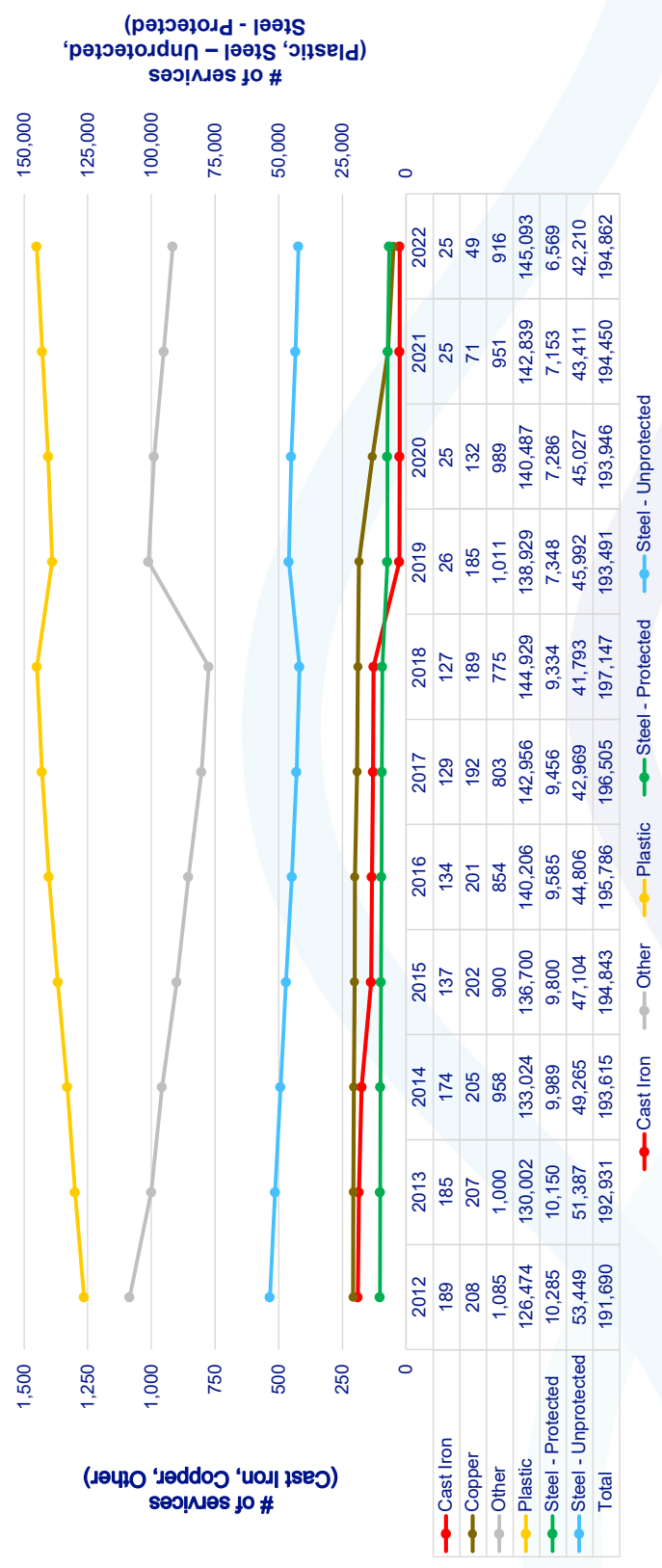
Total LPP Service Inventory



-LPP service inventory consists of all cast iron, copper, bare steel, unprotected coated steel, and unknown material services.



Service Inventory by Type (Categories to match DOT Report)



-The material breakdown displayed on this slide matches the categories which are reported on the annual DOT report. Rhode Island Energy plans to provide a more detailed view of the materials in the system, but since 2022 was the first year compiling more detailed data, it will take some time to compile a dataset which will allow a trend to be displayed.

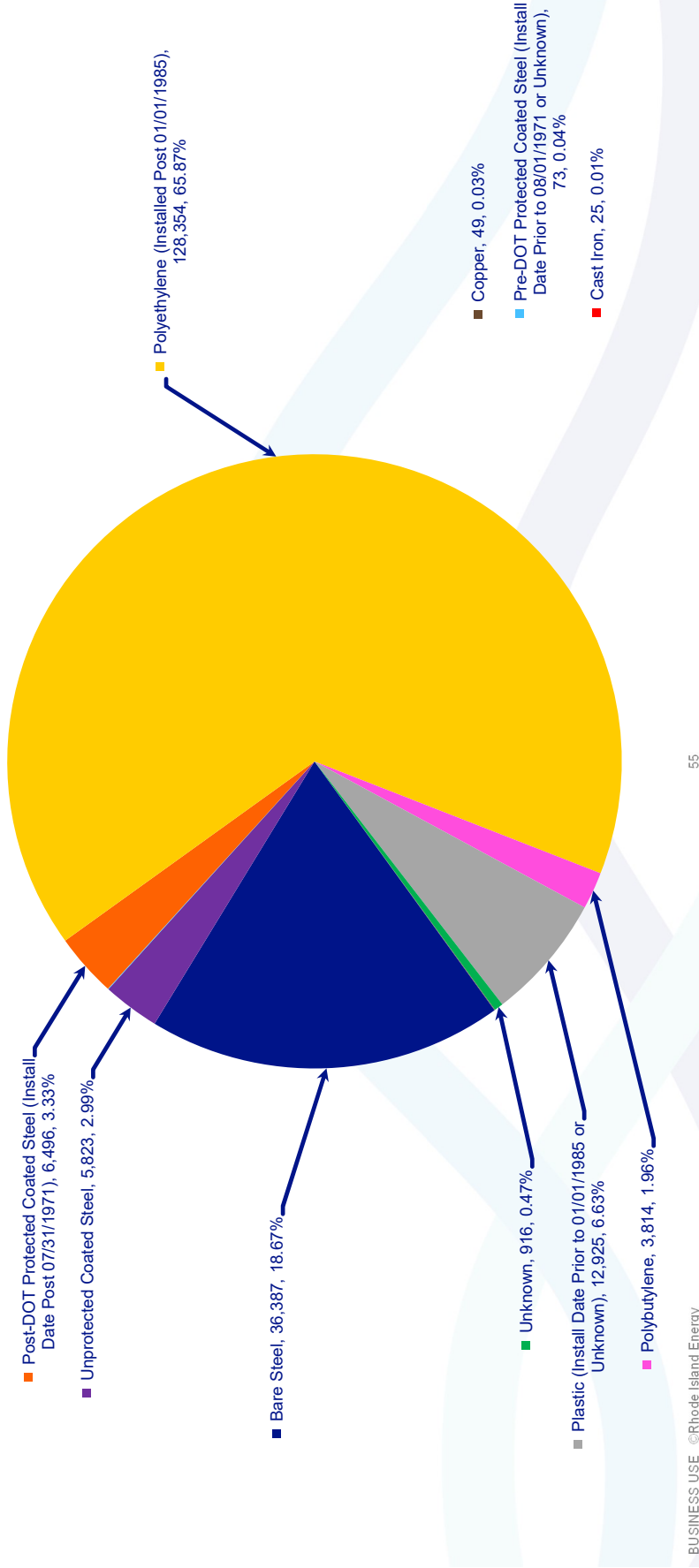


Total Service Inventory

Material	# of Services	% of Total Inventory	Material	Mileage	% of Total Inventory
Cast Iron	25	0.01%	Pre-DOT Protected Coated Steel (Install Date Prior to 08/01/1971 or Unknown)	73	0.04%
Copper	49	0.03%	Post-DOT Protected Coated Steel (Install Date Post 07/31/1971)	6,496	3.33%
Bare Steel	36,387	18.67%	Polyethylene (Installed Post 01/01/1985)	128,354	65.87%
Unprotected Coated Steel	5,823	2.99%	Polybutylene	3,814	1.96%
Unknown	916	0.47%	Plastic (Install Date Prior to 01/01/1985 or Unknown)	12,925	6.63%



Total Service Inventory



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Rhode Island Energy Total Service Inventory vs. 2022 PHMSA Average (Categories to match DOT Report)

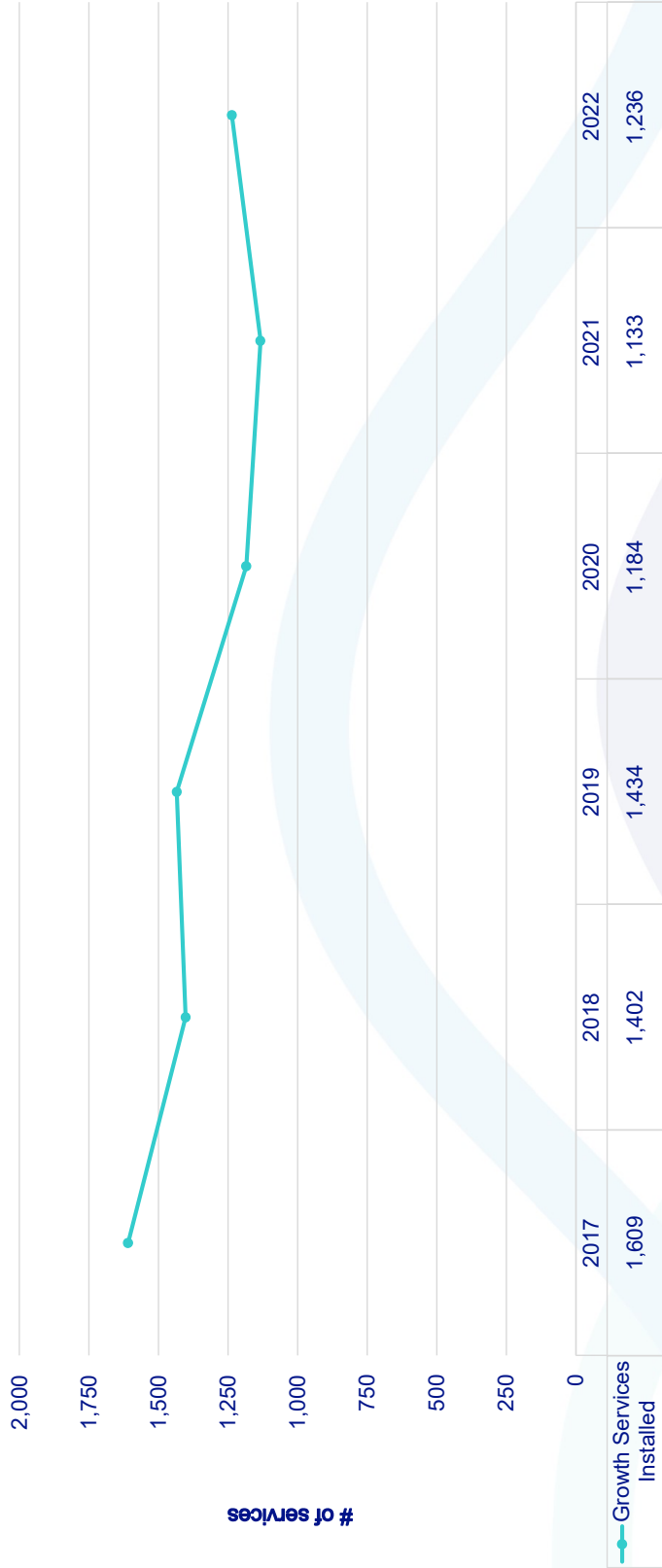


DOT Material Category	% of Total Service Inventory, Rhode Island Energy	% of Total Service Inventory, 2022 PHMSA Average*
Unprotected Bare Steel	18.67%	1.37%
Unprotected Coated Steel	2.99%	1.79%
Cathodically Protected Bare Steel	0.00%	0.60%
Cathodically Protected Coated Steel	3.37%	16.03%
Plastic	74.46%	76.21%
Cast Iron	0.01%	0.01%
Ductile Iron	0.00%	0.00%
Copper	0.03%	0.85%
Other	0.47%	3.14%
Reconditioned Cast Iron	0.00%	0.00%
Rhode Island Energy		2022 PHMSA Average*
Total Service Inventory (# of services)	194,862	377,913

*2022 PHMSA Average is based on 178 companies' main inventory (excluding Rhode Island Energy) which have 1,000+ miles of main in their system.



Growth Services Installed



-Growth service totals include both random growth services and growth services which were installed as a part of growth main projects.

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Leak Repairs - Services

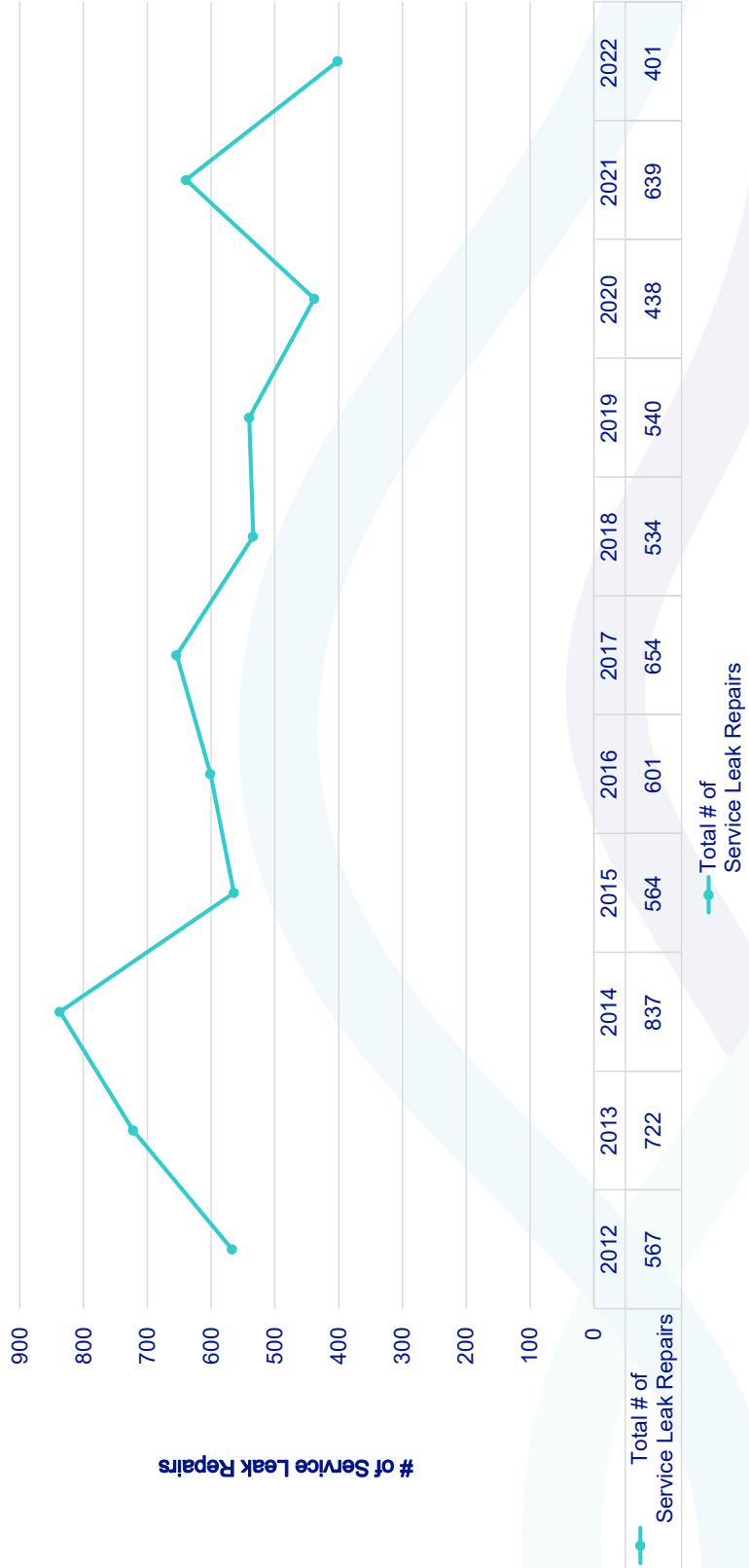


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Total Service Leak Repairs (Including Damages)

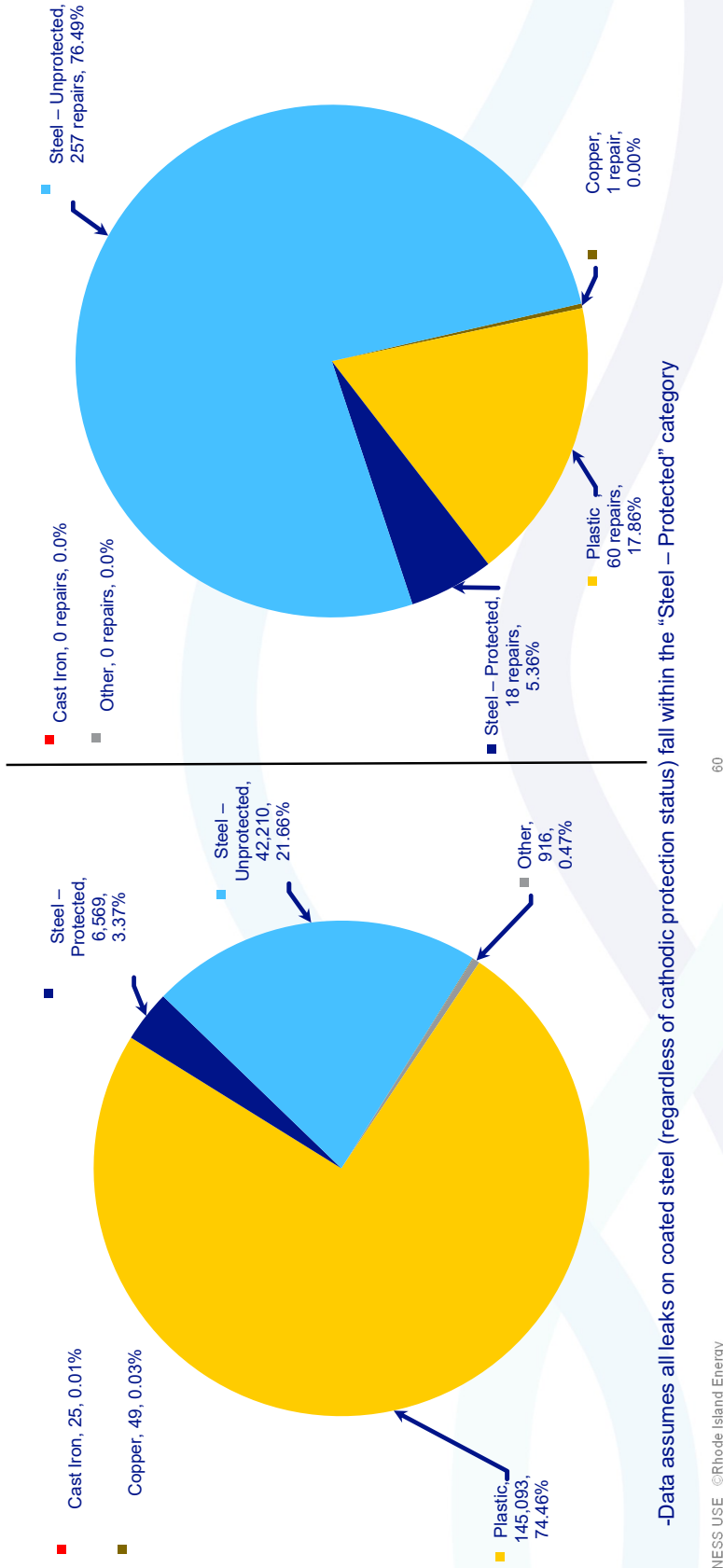


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Service Inventory Compared to Service Leak Repairs by Material (Excluding Damages) (Categories to Match DOT Report)

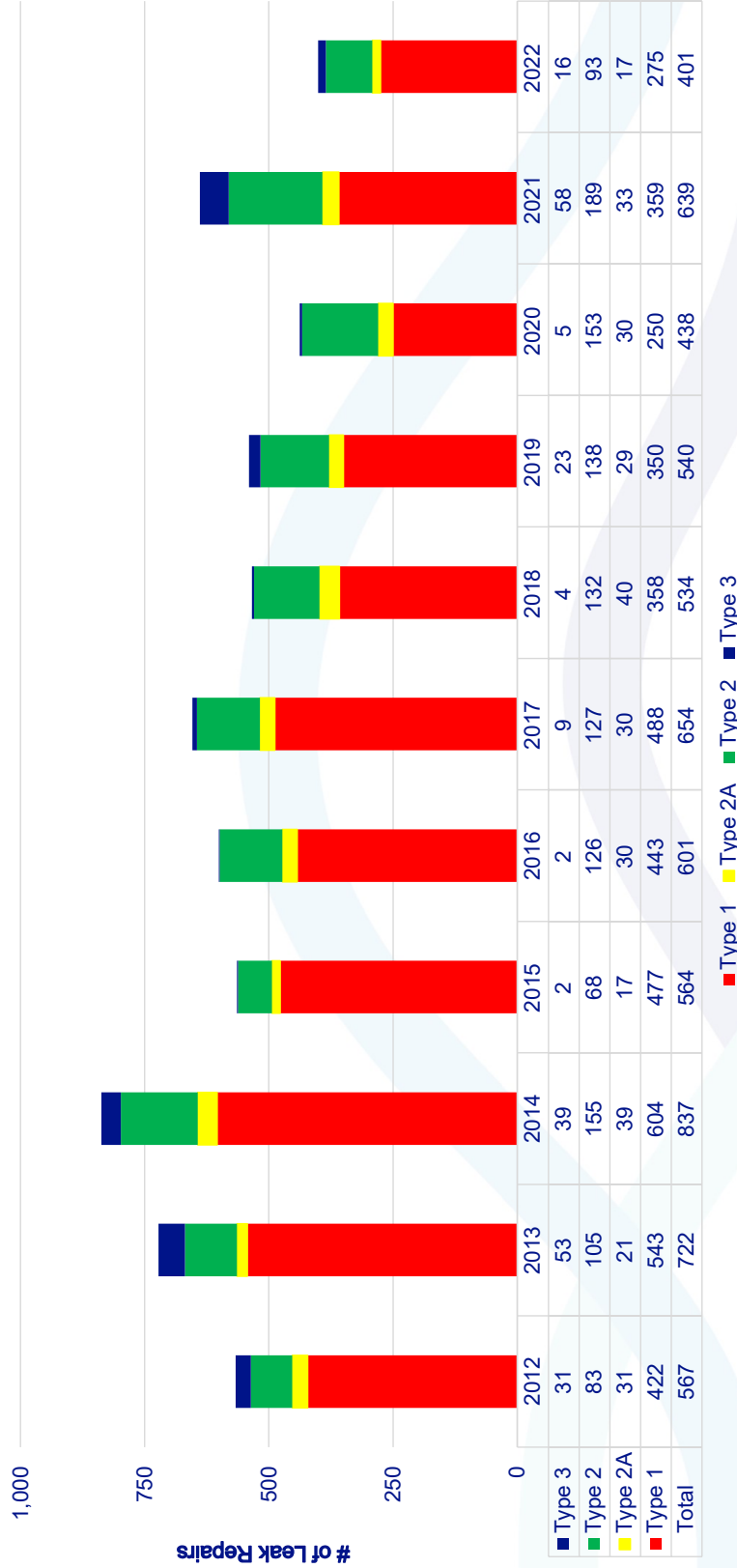


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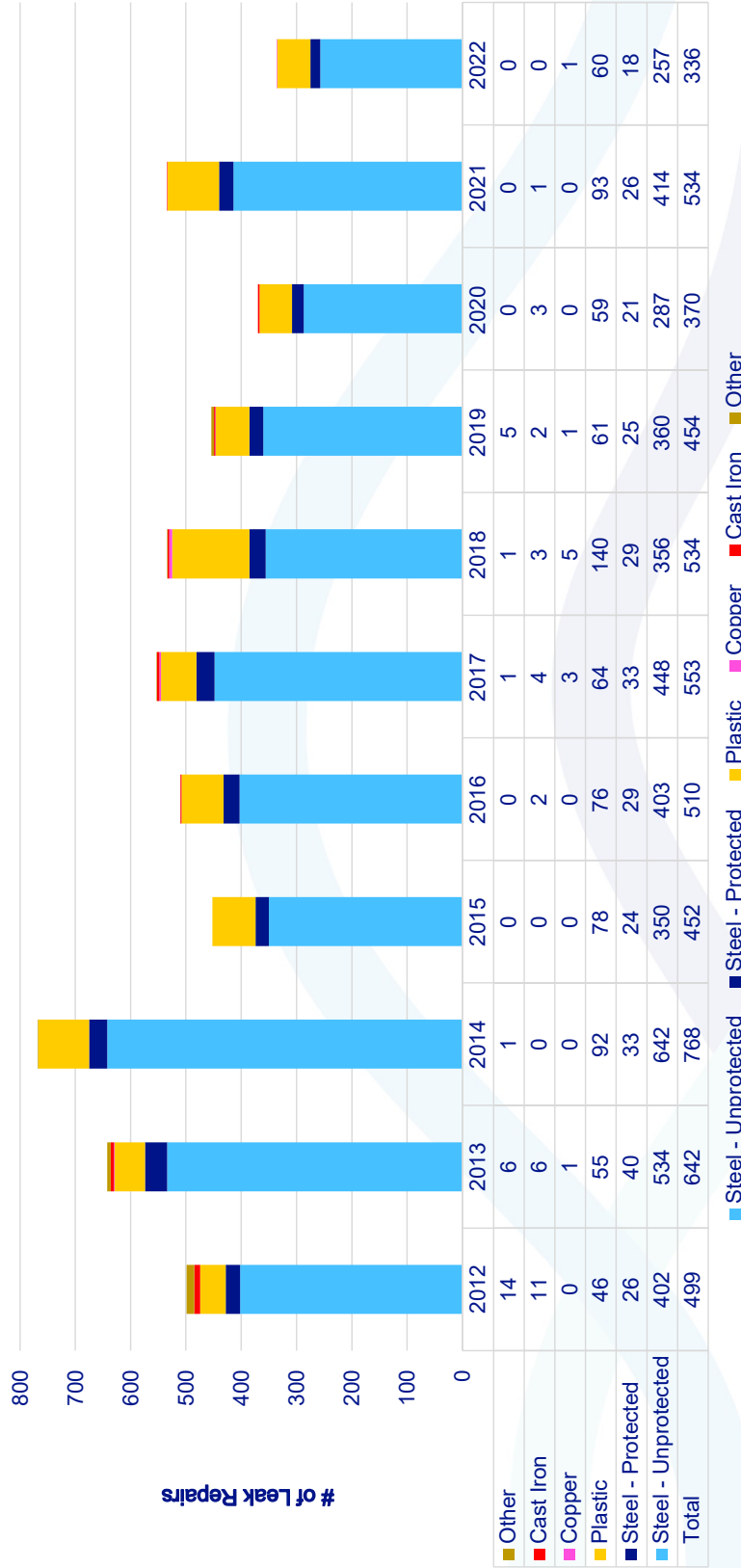


Service Leaks Repaired by Type (Including Damages)





Service Leaks Repaired by Material (Excluding Damages) (Categories to Match DOT Report)

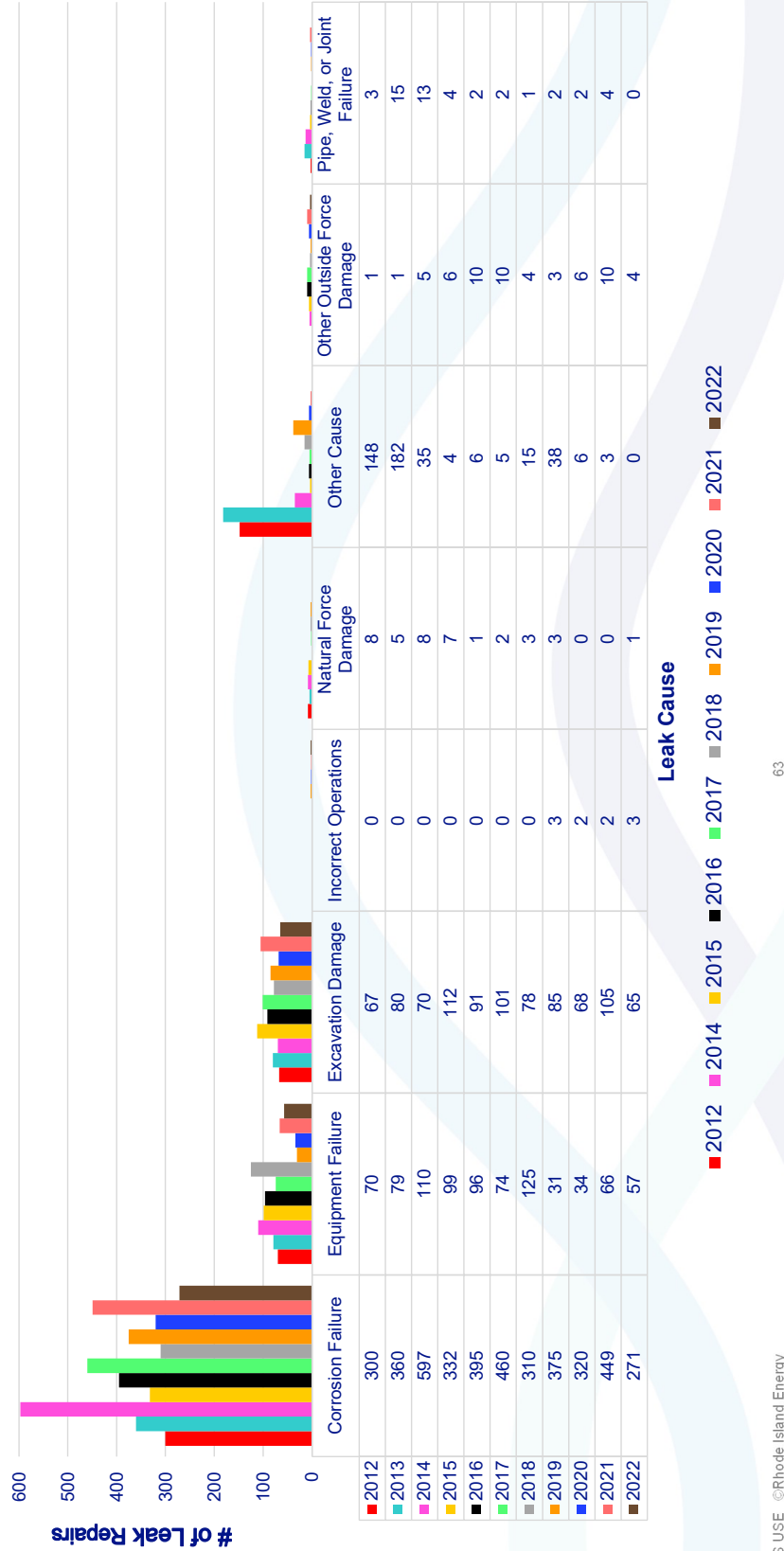


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Service Leaks Repaired by Leak Cause





Overall Service Leak Rate (Including Damages)

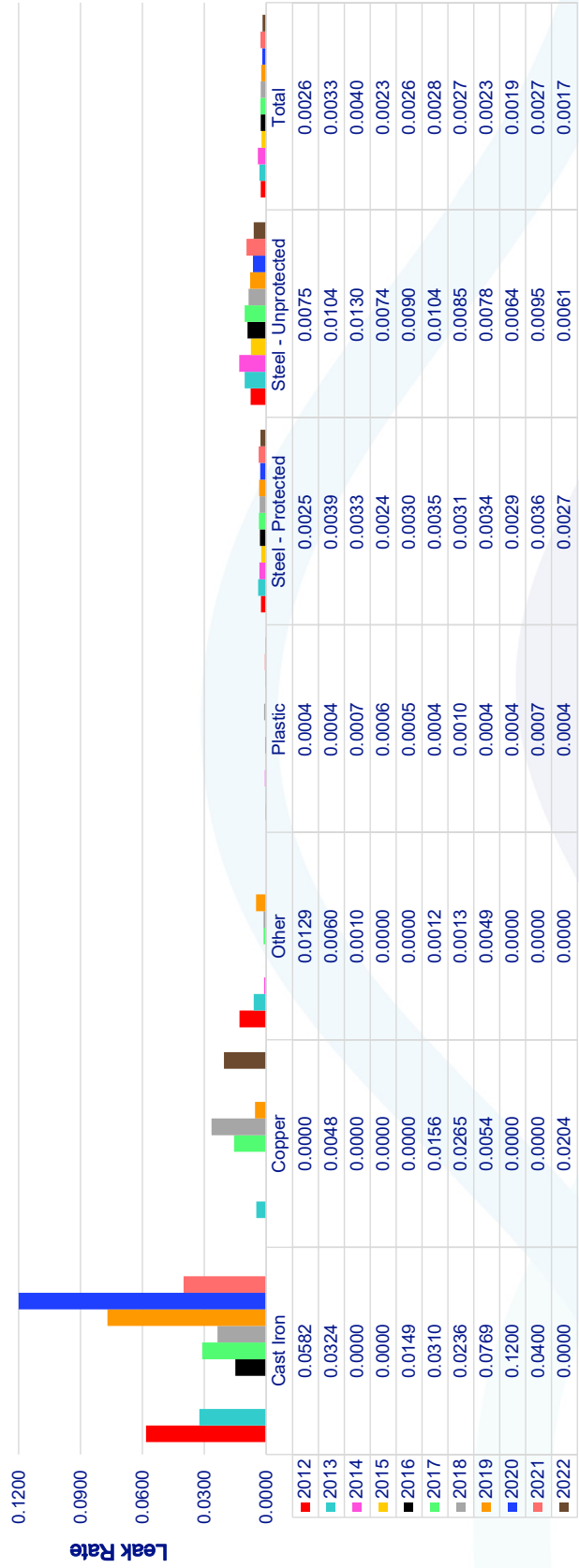


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Service Leak Rate by Material (Excluding Damages) (Categories to Match DOT Report)



Leak Cause
■ 2012 ■ 2014 ■ 2015 ■ 2016 ■ 2017 ■ 2018 ■ 2019 ■ 2020 ■ 2021 ■ 2022

*Data assumes all leaks on coated steel (regardless of cathodic protection status) fall within the "Steel – Protected" category

Service Leak Repair Data (More Detailed Material Breakdown)



2022		
Material	Service Leaks Repaired by Material (Excluding Damages)	Service Leak Rate by Material (Excluding Damages) (# of leak repairs / # of services)
Cast Iron	0	0.0000
Copper	1	0.0204
Bare Steel	257	0.0071
Unprotected Coated Steel	10	0.0017
Protected Coated Steel	8	0.0012
Plastic	60	0.0004
Total	336	0.0017

-National Grid did not track whether leaks were occurring on protected vs. unprotected coated steel. Rhode Island Energy plans to track these material types separately, but it will take time to build out a dataset suitable for the plotting of trends.



2022 Service Leak Repairs – Material / Cause Matrix

Material / Cause	Leak Repairs - 2022	Material / Cause	Leak Repairs - 2022	Material / Cause	Leak Repairs - 2022	Material / Cause	Leak Repairs - 2022
Cast Iron - Excavation Damage	0	Other - Excavation Damage	0	Plastic (Other) - Excavation Damage	2	Unprotected Coated Steel - Excavation Damage	0
Cast Iron - Incorrect Operations	0	Other - Incorrect Operations	0	Plastic (Other) - Incorrect Operations	0	Unprotected Coated Steel - Incorrect Operations	0
Cast Iron - Natural Force Damage	0	Other - Natural Force Damage	0	Plastic (Other) - Natural Force Damage	1	Unprotected Coated Steel - Natural Force Damage	0
Cast Iron - Other Cause	0	Other - Other Cause	0	Plastic (Other) - Other Cause	0	Unprotected Coated Steel - Other Cause	0
Cast Iron - Other Outside Force Damage	0	Other - Other Outside Force Damage	0	Plastic (Other) - Other Outside Force Damage	0	Unprotected Coated Steel - Other Outside Force Damage	0
Cast Iron - Pipe, Weld, or Joint Failure	0	Other - Pipe, Weld, or Joint Failure	0	Plastic (Other) - Pipe, Weld, or Joint Failure	0	Unprotected Coated Steel - Pipe, Weld, or Joint Failure	0
Copper - Corrosion Failure	0	Plastic (PE) - Corrosion Failure	14	Bare Steel - Corrosion Failure	243	Protected Coated Steel - Corrosion Failure	4
Copper - Equipment Failure	1	Plastic (PE) - Equipment Failure	34	Bare Steel - Equipment Failure	14	Protected Coated Steel - Equipment Failure	4
Copper - Excavation Damage	0	Plastic (PE) - Excavation Damage	55	Bare Steel - Excavation Damage	8	Protected Coated Steel - Excavation Damage	0
Copper - Incorrect Operations	0	Plastic (PE) - Incorrect Operations	3	Bare Steel - Incorrect Operations	0	Protected Coated Steel - Incorrect Operations	0
Copper - Natural Force Damage	0	Plastic (PE) - Natural Force Damage	0	Bare Steel - Natural Force Damage	0	Protected Coated Steel - Natural Force Damage	0
Copper - Other Cause	0	Plastic (PE) - Other Cause	0	Bare Steel - Other Cause	0	Protected Coated Steel - Other Cause	0
Copper - Other Outside Force Damage	0	Plastic (PE) - Other Outside Force Damage	4	Bare Steel - Other Outside Force Damage	0	Protected Coated Steel - Other Outside Force Damage	0
Copper - Pipe, Weld, or Joint Failure	0	Plastic (PE) - Pipe, Weld, or Joint Failure	0	Bare Steel - Pipe, Weld, or Joint Failure	0	Protected Coated Steel - Pipe, Weld, or Joint Failure	0

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Customer and Meter Data

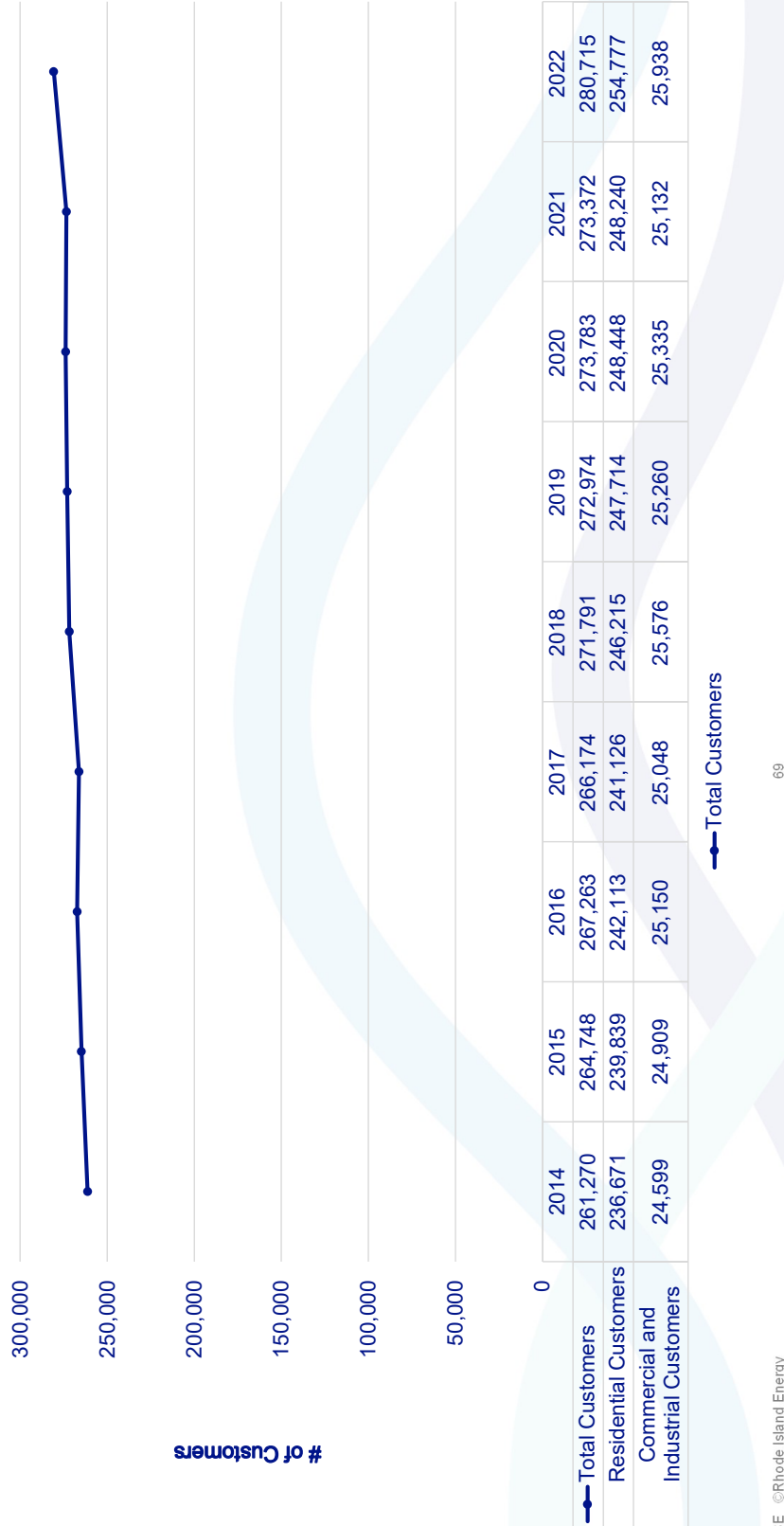


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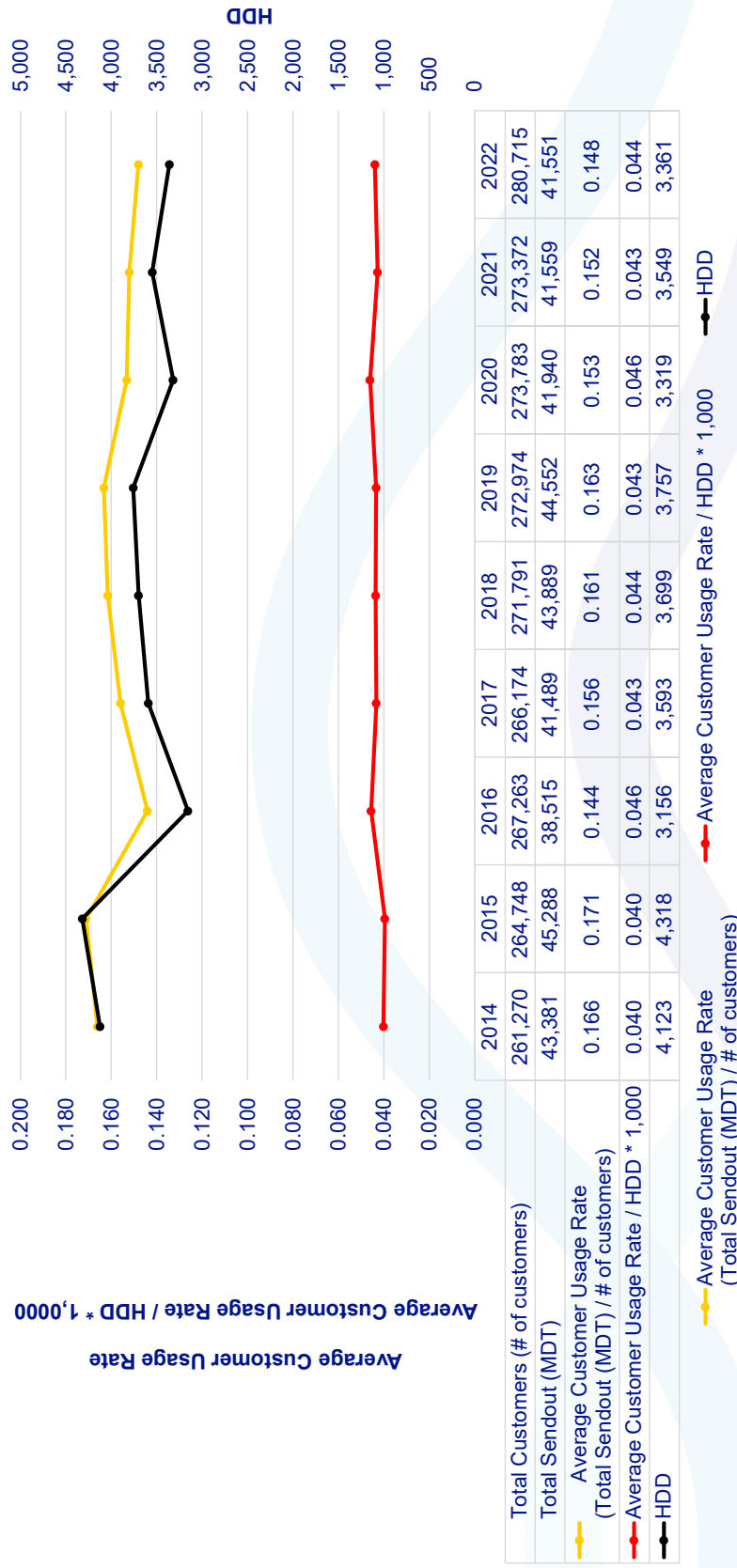
Total Customers



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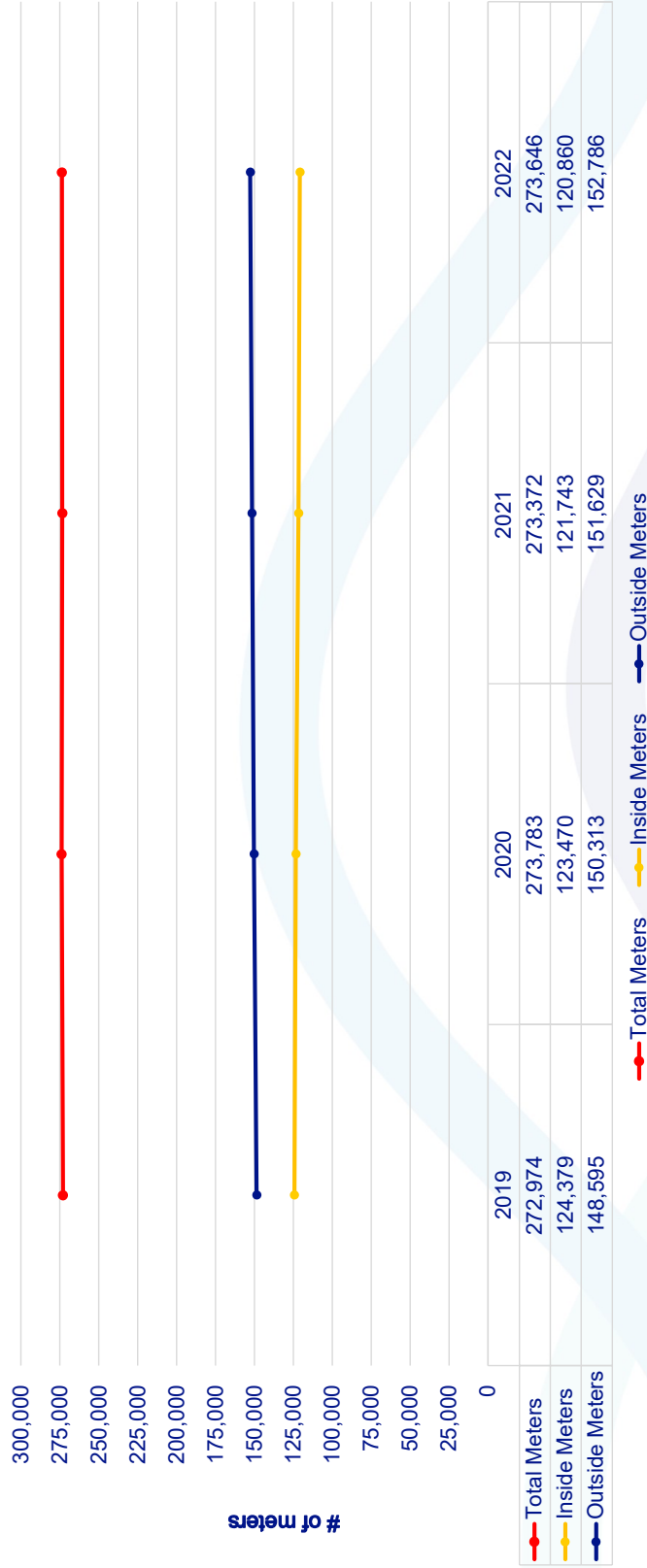
69

Customer Usage Rate (Compared to HDD)





Meter Population



-Inside/Outside meter data only available from 2019 forward
-Total meter data only available from 2015 forward (2015: 275,646, 2016: 276,137, 2017: 277,497, 2018: 282,106
-Maximo, introduced in 2019, improved meter data tracking capabilities substantially.



Meter Changes



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Unaccounted for Gas

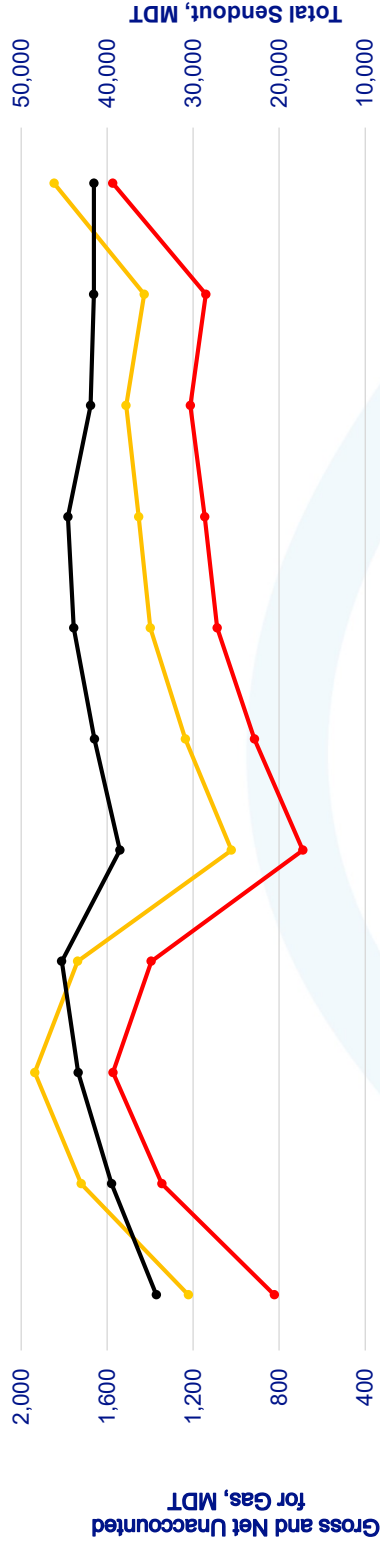


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Total Sendout, Gross Unaccounted for Gas, and Net Unaccounted for Gas (MDT)



	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
Net Unaccounted for Gas (MDT)	822	1,346	1,573	1,395	690	915	1,088	1,146	1,213	1,141	1,574
Gross Unaccounted for Gas (MDT)	1,222	1,721	1,937	1,738	1,022	1,236	1,399	1,454	1,512	1,428	1,847
Total Sendout (MDT)	34,286	39,493	43,381	45,288	38,515	41,489	43,889	44,552	41,940	41,559	41,551

● Net Unaccounted for Gas (MDT)
● Gross Unaccounted for Gas (MDT)
● Total Sendout (MDT)

-Total Sendout and Gross Unaccounted for Gas are values are supplied by the accounting/billing group (as of year end 06/30/20XX)
-Net Unaccounted for Gas is calculated using main and service inventory data and factors found in eCFR, Title 40, Chapter I, Subchapter C, Part 98, Subpart W,
Table 7



Gross and Net Unaccounted for Gas as a Percentage of Total Sendout



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Summary



Summary



2022

damages) was down 16.7% YoY, while the service leak rate (excluding damages) was down 37% YoY.

Total leak receipts (excluding damages) were down 12.4% YoY, while Type 1 leak receipts were up 8.7% YoY.

The total open leak backlog as of year end was down 13% YoY to its lowest level since 2018. The workable leak backlog was down 58% YoY to its lowest level since 2017. Type 3 open leaks were down 10.7% YoY to the lowest level since 2018.

Cast iron main breaks were the biggest area of concern amongst all leak metrics, more than doubling YoY, increasing 115%. Steel corrosion leaks continue to trend down, with corrosion leak repairs on mains decreasing 28.2% YoY and 36.4% YoY on services.

2022 was the largest YoY reduction in the LPP inventory since 2015 (64.2 miles). This includes 41.9 miles of cast iron abandonment, which is the largest YoY reduction in the cast iron inventory over the 10 year lookback.

The LPP inventory in the municipalities of Cranston, Pawtucket, and Providence accounts for 52.4% of the company's total LPP inventory. Moreover, that 52.4% contains 67% of the company's total cast/wrought iron inventory.

Net unaccounted for gas (both in terms of volume and as a % of total sendout) was at the highest level seen over the 10 year lookback.

-Main Leak Rate (excluding damages) = (Total Main Leak Repairs – Excavation Leaks) / Total Miles of Main
-Service Leak Rate (excluding damages) = (Total Service Leak Repairs – Excavation Leaks) / Total # of Services

Section 3

Revenue Requirement

Proposed FY2025 Gas Infrastructure,
Safety, and Reliability (“ISR”) Plan

Section 3: Gas Revenue Requirement FY2025 Proposal

Introduction

The proposed revenue requirement calculations on Attachment 1 reflect the revenue requirement related to the Company's proposed investment in its Gas ISR Plan for the fiscal year ("FY") 2025 ended March 31, 2025.

As shown on Attachment 1, Page 1, Column (b), the Company's FY2025 Gas ISR Plan cumulative revenue requirement totals \$74,096,163. The revenue requirement consists of the following elements: (1) the revenue requirement of \$6,875,828 on FY2025 proposed non-growth ISR capital investment of \$164,812,000, as calculated on Attachment 1, Page 24; (2) the FY2025 revenue requirement on incremental non-growth ISR capital investment for FY2018 through FY2024 totaling \$56,441,363, as summarized on Attachment 1, Page 1; and (3) property tax expense adjustments of \$14,037,447, as shown on Attachment 1, Page 33, in accordance with the property tax recovery mechanism included in the Amended Settlement Agreement in Docket No. 4323 and continued under the Amended Settlement Agreement in Docket No. 4770. The FY2025 revenue requirement was reduced by \$3,258,476 related to the impact of the PPL Rhode Island Holdings, LLC's¹ acquisition of 100 percent of the outstanding shares of common stock of the Company from National Grid USA ("National Grid") on May 25, 2022 (the "Acquisition") on the ISR rate base as described further below. Importantly, the incremental capital investment for the FY2025 ISR revenue requirement excludes capital investment embedded in base rates in

¹ PPL Rhode Island Holdings, LLC is a wholly owned indirect subsidiary of PPL Corporation.

Docket No. 4770 for FY2018 through FY2025. Incremental non-growth capital investment for this purpose is intended to represent the net change in net plant for non-growth infrastructure investments during the relevant fiscal year and is defined as capital additions plus cost of removal, less annual depreciation expense ultimately embedded in the Company's base distribution rates (excluding depreciation expense attributable to general plant, which is not eligible for inclusion in the Gas ISR Plan).

Gas Infrastructure Investment

Incremental Capital Investment

As noted above, Attachment 1, Page 24 calculates the revenue requirement of incremental capital investment associated with the Company's FY2025 Gas ISR Plan, that is, gas infrastructure investment (net of general plant) incremental to the amounts embedded in the Company's base distribution rates. As per the PUC's Order in Docket No. 5099 and the resulting revisions to the Company's Gas tariff, RIPUC NG-GAS No. 101 at Section 3, Schedule A, Sheets 4 and 5, the definition of ISR capital investment changed from "non-growth capital spending" to "non-growth capital investment recorded as in service" effective April 1, 2021. The Company has implemented the plant-in-service methodology to replace the non-growth capital spending method to align with the PUC order and the tariff revision. The proposed FY2025 vintage year ISR capital investments represent the non-growth capital investment projected to be in service in FY2025. The proposed capital investment and cost of removal was obtained from Table 1 in Section 2 of the Plan. The FY2025 revenue requirement also includes

the incremental capital investment associated with the Company's actual ISR capital investments from FY2018 through FY2023 and forecasted ISR capital investments approved in the FY2024 Gas ISR Plan, excluding investments reflected in rate base in Docket No. 4770.

Attachment 1, Page 27 calculates the incremental FY2018 through FY2023 capital investment and the related incremental cost of removal, incremental retirements, and incremental net operating loss ("NOL") position for the FY2025 gas ISR revenue requirement. The calculations on Page 27 compare ISR-eligible capital investment, cost of removal, retirements, and net NOL position for FY2018 through FY2024 to the corresponding amounts reflected in rate base in Docket No. 4770. Docket No. 4770 includes three rate years, and the forecasted rate base embedded in each rate year included an estimate of incremental capital, cost of removal, retirements and NOL/NOL utilization through Rate Year 3 which ended on August 31, 2021. As such, no estimate of the incremental non-growth capital investment, cost of removal, retirements, or NOL position to be incurred during FY2025 were included in Docket No. 4770. Therefore, all FY2025 ISR-eligible capital is deemed incremental.

Incremental Capital Investment Calculation

The ISR mechanism was established to allow the Company to recover outside of base distribution rates its costs associated with plant additions incurred to expand its gas infrastructure and improve the reliability and safety of its gas facilities. When new base distribution rates are implemented, as was the case in Docket No. 4770, the Company no longer recovers costs for pre-rate case ISR plant additions through a separate ISR factor. Instead, such costs are recovered

through base distribution rates, and the underlying ISR plant additions become a component of base distribution rate base from that point forward. The forecast used to develop rate base in the distribution rate case included forecasted ISR plant additions for FY2018, FY2019 and five months of FY2020 (using the level of plant additions approved in the FY2018 Gas ISR Plan as a proxy for FY2019 and FY2020). The effective date of new base distribution rates in Docket No. 4770 was September 1, 2018. Therefore, recovery of the approved FY2012 through FY2017 ISR revenue requirement through the ISR factor ended on August 31, 2018, and all future recovery of those ISR plant additions will be through the Company's base distribution rates.

As a result of the implementation of new base distribution rates pursuant to Docket No. 4770 effective September 1, 2018, the cumulative amount of forecasted ISR plant additions were rolled into base distribution rates effective at that date. The FY2025 revenue requirement for incremental FY2018 through FY2025 ISR investments reflect a full year of revenue requirement because none of these incremental investments are included in the Company's rate base in Docket 4770. These incremental fiscal year vintage amounts must remain in the ISR recovery mechanism as provided for in the terms of the approved Amended Settlement Agreement in Docket No. 4770. The current filing is based on the actual ISR investment made during the Company's fiscal years ended March 31, 2018, 2019, 2020, 2021, 2022, and 2023 and planned ISR investment levels for the Company's fiscal years ended March 31, 2024 and 2025, which are incremental to the levels reflected in rate base in Docket No. 4770.

Gas Infrastructure Revenue Requirement

The revenue requirement calculation on incremental gas infrastructure investment for vintage year FY2025 are shown on Attachment 1, Page 24. The revenue requirement calculation incorporates the incremental Gas ISR Plan capital investment, cost of removal, and retirements, and NOL Position, which are the basis for determining the two components of the revenue requirement: (1) the return on investment (i.e., average Plan rate base at the weighted average cost of capital) and (2) depreciation expense. The calculation on Page 24 begins with the determination of the depreciable net incremental capital that will be included in the Plan rate base. Because depreciation expense is affected by plant retirements, retirements have been deducted from the total allowed capital included in the Plan rate base in determining depreciation expense. Retirements, however, do not affect rate base because plant-in-service and the depreciation reserve are reduced by the installed value of the plant being retired and, therefore, have no impact on net plant. Incremental book depreciation expense on Line 12 is computed based on the net depreciable additions from Line 3 at the 2.99 percent composite depreciation rate approved in Docket No. 4770, and as shown on Line 9. The Company has assumed a half-year convention for the year of installation. Unlike retirements, cost of removal affects rate base, but not depreciation expense. Consequently, the cost of removal, as shown on Line 7, is combined with the incremental capital investment amount from Line 6 (vintage year ISR Plan allowable capital additions, less non-general plant depreciation expense included in base distribution rates) to arrive at the total incremental investment on Line 8 to be included in the rate base upon which the return component of the annual revenue requirement is calculated.

The rate base calculation incorporates net plant from Line 8 and accumulated depreciation on current vintage year investment and accumulated deferred tax reserves as shown on Lines 14 and 19, respectively. The deferred tax amount arising from the capital investment, as calculated on Lines 14 through 18, equals the difference between book depreciation and tax depreciation on the capital investment, multiplied by the effective tax rate, net of any tax NOL or NOL utilization. The calculation of tax depreciation is described below. The average rate base before deferred tax proration adjustment is shown on Line 23. This amount then nets with the deferred tax proration adjustment on Line 24 to derive the average ISR rate base on Line 25. This average rate base is multiplied by the pre-tax rate of return approved by the PUC in Docket No. 4770, as shown on Line 26, to compute the return and tax portion of the incremental revenue requirement, as shown on Line 27. Incremental depreciation expense is added to this amount on Line 28. The sum of these amounts reflects the annual revenue requirement associated with the capital investment portion of the Company's Gas ISR Plan on Line 29, which is carried forward to Page 1 as part of the total Gas ISR Plan revenue requirement. Similar revenue requirement calculations for the vintage FY2018 through FY2024 incremental ISR Plan capital investments are shown on Pages 2, 5, 8, 12, 15, 18 and 21, respectively. These capital investment revenue requirement amounts are added to the total property tax recovery on Page 1, Lines 11 and 12 to derive the total FY2025 Gas ISR Plan revenue requirements (before hold harmless adjustment) of \$77,354,638, as shown on Page 1, Line 14.

Accumulated deferred income tax (“ADIT”) included in rate base

As stated above, ADIT is included in the computation of rate base to determine the revenue requirement. Items considered in the computation of deferred taxes are book and tax depreciation, tax repairs deductions, tax gain or loss on retirements, cost of removal, NOL generation or utilization, and accumulated deferred tax proration, all of which are discussed further below except for book depreciation. In addition to the usual activity above impacting ADIT, the FY2025 Gas ISR plan continues to reflect an increased rate base due to the impact of the Acquisition on ADIT for the pre-acquisition vintage years. The increase in the revenue requirement attributable to this increased rate base is offset by a revenue credit reflected on Page 1, Line 15 of the Attachment in accordance with the commitments PPL Corporation (“PPL”) made during the acquisition proceeding in Docket No. D-21-09.²

PPL and National Grid elected to treat the acquisition as an asset sale for U.S. federal income tax purposes under Internal Revenue Code Section 338(h)(10). As a result of this election, PPL was deemed to acquire the assets of the Company at fair market value (essentially equivalent to book value) for tax purposes. The resulting “step-up” in tax basis eliminated most book/tax timing differences and the related net ADIT as of the Acquisition date, at which time PPL began depreciating the new tax basis and started the tracking of book and tax timing differences as if PPL purchased a new asset in the year of the Acquisition. The revenue requirement of each applicable vintage year reflects the elimination of ADIT in the “PPL 5/25/22

² See Report and Order, Docket No. D-21-09 at 257, Commitment #16 (February 23, 2023).

– 3-31-2023" column of the FY March 2023 sub-period. This includes the elimination of ADIT on any NOL balances that existed prior to PPL's Acquisition date as National Grid utilized all of the Company's NOLs as a result of the sale. In addition, the tax depreciation calculation for each respective vintage year reflects tax depreciation on the new tax basis that is equivalent to the Company's net book basis as of the Acquisition date.

Accumulated Deferred Income Tax Proration Adjustment

The Gas ISR Plan includes a proration calculation with respect to the ADIT balance included in rate base. The calculation fulfills requirements set out under IRS Regulation 26 C.F.R. §1.167(l)-1(h)(6). This regulation sets forth normalization requirements for regulated entities so that the benefits of accelerated depreciation are not passed back to customers too quickly. The penalty of a normalization violation is the loss of all federal income tax deductions for accelerated depreciation, including bonus depreciation. Any regulatory filing which includes capital expenditures, book depreciation expense, and ADIT related to those capital expenditures must follow the normalization requirements. When the regulatory filing is based on a future period, the deferred tax must be prorated to reflect the period of time that the ADIT balances are in rate base. This filing includes the FY2018 through FY2025 proration calculations at Attachment 1, on Pages 4, 7, 10, 14, 17, 20 and 23, respectively, the effects of which are included in each year's respective revenue requirement.

Tax Depreciation Calculation

The tax depreciation calculation for FY2025 is provided on Attachment 1, Page 25. The tax depreciation amount assumes that a portion of the incremental capital investment, as shown on Lines 1 through 3 of Page 24 will be eligible for immediate deduction on the Company's corresponding FY federal income tax return. This immediate deductibility is referred to as the capital repairs deduction.³ In addition, plant additions not subject to the capital repairs deduction may be subject to bonus depreciation, as shown on Page 25, Lines 7 through 15 for FY2025. As noted in the Company's previous Gas ISR filings, the Tax Cuts and Jobs Act of 2017 (the "Tax Act") went into effect on December 22, 2017. The 2017 Tax Act has many elements, but two particular aspects have an impact on the Gas ISR revenue requirement. The first is the reduction of the federal income tax rate from 35 percent to 21 percent commencing January 1, 2018. The second Tax Act element affecting the Gas ISR revenue requirement is changes to the bonus depreciation rules eliminating bonus depreciation for certain capital investments, including ISR-eligible investments, effective September 28, 2017. Based on the

³ In 2009, the Internal Revenue Service ("IRS") issued additional guidance, under Internal Revenue Code Section 162, related to certain work considered to be repair and maintenance expense, and eligible for immediate tax deduction for income tax purposes, but capitalized by the Company for book purposes. As a result of this additional guidance, the Company recorded a one-time tax expense for repair and maintenance costs in its FY2009 federal income tax return filed on December 11, 2009 by National Grid Holdings, Inc. Since that time, the Company has taken a capital repairs deduction on all subsequent fiscal year tax returns. This has formed the basis for the capital repairs deduction assumed in the Company's revenue requirement. This tax deduction has the effect of increasing deferred taxes and lowering the revenue requirement that customers will pay under the capital investment reconciliation mechanism. The Company's federal income tax returns are subject to audit by the IRS. If it is determined in the future that the Company's position on its tax returns on this matter was incorrect, the Company will reflect any related IRS disallowances, plus any associated interest assessed by the IRS in a subsequent reconciliation filing under the Gas ISR Plan.

Tax Act, property acquired prior to September 28, 2017 and placed in service in tax years beginning after December 31, 2017 is allowed bonus depreciation. The Company's original interpretation of the 2017 Tax Act was that no deduction for bonus depreciation would be allowed in FY2019 and FY2020. Based on bonus rules for long production period property, however, the Company included a deduction for bonus depreciation on its FY2019 and FY2020 tax returns. Starting in FY2021, the Company can no longer take bonus depreciation. The Company's FY2025 revenue requirement includes the above impacts of the 2017 Tax Act on vintage FY2018 through FY2025 investment.

Finally, the remaining plant additions not deducted as bonus depreciation are then subject to the IRC Modified Accelerated Cost-Recovery System ("MACRS") tax depreciation rate. Also, cost of removal ("COR") is 100% deductible due to the Company's partial disposition election filed with the IRS as part of the tangible property regulations. This election was submitted to the PUC, as required under IRS rules, on December 17, 2015. The vintage FY2018 through FY2025 tax depreciation calculations in this filing include an additional tax deduction related to COR. The total amount of tax depreciation equals the amount of capital repairs deduction plus the bonus depreciation deduction, MACRS depreciation, the tax loss on retirements, and COR. These annual total tax depreciation amounts are carried over to Attachment 1, Page 24, Line 10 and incorporated in the deferred tax calculation. Similar tax depreciation calculations are provided for FY2018 through FY2024 on Attachment 1, Pages 3, 6, 9, 13, 16, 19 and 22, respectively.

The Company must file two short-period tax returns for Calendar Year 2022, one with National Grid covering the period from March 31, 2022 to May 25, 2022 and one with PPL covering the period from May 26, 2022 to December 31, 2022. To finalize the March FY2023 vintage year in the FY2025 Gas ISR Plan filing, PPL must also file its Calendar Year 2023 tax return, expected in October 2024, in order to allocate a portion of the results to the January 1, 2023 through March 31, 2023 period of the March 2023 vintage year. In November, National Grid filed its consolidated March 2023 fiscal year tax return and on October 11, 2023, PPL filed its consolidated 2022 calendar year tax return. Both returns included NECO's short-period results, which are reflected in the March FY2023 vintage year calculation of ADIT. The January 1 through March 31, 2023 results for the March FY2023 vintage year calculation of ADIT will not be reflected in an ISR filing until after October of 2024.

Federal Net Operating Loss

Tax NOLs are generated when the Company has tax deductions on its income tax returns that exceed its taxable income. This does not mean that the Company is suffering losses in its financial statements; instead, the Company's tax NOLs are the result of the significant tax deductions that were generated by the bonus depreciation and capital repairs tax deductions in various years. In addition to first-year bonus tax depreciation, the US Tax Code allows the Company to classify certain costs as repairs expense, which the Company takes as an immediate deduction on its income tax return; however, such costs are recorded as plant investment on the Company's books. These significant bonus depreciation and capital repairs tax deductions have

exceeded the amount of taxable income reported in tax returns filed for FY2009 to FY2018, with the exception of FY2011 and FY2017. NOLs are recorded as non-cash assets on the Company's balance sheet and represent a benefit that the Company and customers will receive when the Company is able to realize actual cash savings and applies the NOLs against taxable income in the future.

As a result of the 2017 Tax Act, the Company originally did not expect to generate new NOLs in FY2018 or FY2019 and anticipated it would begin to utilize prior years' NOLs in FY2020. Therefore, estimated NOL utilization is included in base rates in Docket No. 4770, and the calculation of ADIT in this filing includes only the incremental amount of forecasted NOL utilization. Any remaining NOLs as of the March 2023 vintage year were completely utilized as a result of the Acquisition. NOL utilization increases the Company's ADIT and results in a credit or reduction in the calculation of rate base.

Property Tax Recovery Adjustment

The Property Tax Recovery Adjustment is set forth on Attachment 1, Pages 32 through 34. The method used to recover property tax expense under the Gas ISR Plan was modified by the rate case settlement agreement in Docket No. 4323 and continued by the Amended Settlement Agreement in Docket No. 4770. In determining the base on which property tax expense is calculated for purposes of the ISR revenue requirement, the Company includes an amount equal to the base rate allowance for depreciation expense and depreciation expense on incremental ISR plant additions in the accumulated reserve for depreciation that is deducted from

plant in service. The Property Tax Recovery Adjustment also includes the impact of any changes in the Company's effective property tax rates on base-rate embedded property, plus cumulative Plan net additions. Property tax impacts associated with non-ISR plant additions are excluded from the property tax recovery calculation. The FY2025 revenue requirement includes \$14,037,447 for the Net Property Tax Recovery Adjustment as shown on Page 1, Line 12.

Paving Costs

The Company performed an analysis on the FY2025 revenue requirement if the Commission were to order that final restoration paving costs were to be recovered through the Gas ISR Mechanism revenue requirement as O&M costs in the year of spend rather than as capital costs, which is how the costs are currently recovered. Section 3, Attachment 3 represents the FY2025 revenue requirement of \$85,183,144 if final restoration paving costs of \$12 million were included as O&M expense rather than capital in-service. The revenue requirement in Attachment 3 is calculated in the same manner as described for Attachment 1 above.

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Annual Revenue Requirement Summary

Line No.		Approved	Fiscal Year
		2024	2025
		(a)	(b)
Operation and Maintenance Expenses			
1	FY 2025 Operation and Maintenance Expense	\$0	\$0
Capital Investment:			
2	Actual Revenue Requirement on FY 2018 Incremental Capital Included in ISR Rate Base	\$362,365	\$370,111
3	Actual Revenue Requirement on FY 2019 Incremental Capital Included in ISR Rate Base	\$405,676	\$405,961
4	Actual Revenue Requirement on FY 2020 Incremental Capital Included in ISR Rate Base	\$9,422,592	\$9,102,120
5	Actual Revenue Requirement on FY 2021 Incremental Capital Included in ISR Rate Base	\$8,907,970	\$8,567,568
6	Actual Revenue Requirement on FY 2022 Incremental Capital Included in ISR Rate Base	\$14,293,737	\$13,805,560
7	Forecasted Revenue Requirement on FY 2023-NG Capital included in ISR Rate Base	\$12,827,683	\$12,161,768
8	Forecasted Revenue Requirement on FY 2024 Capital included in ISR Rate Base	\$6,096,711	\$12,028,274
9	Forecasted Revenue Requirement on FY 2025 Capital included in ISR Rate Base		\$6,875,828
10	Total Capital Investment Revenue Requirement	<u>\$52,316,734</u>	<u>\$63,317,191</u>
11	FY 2024 Property Tax Recovery Adjustment	\$10,806,916	
12	FY 2025 Property Tax Recovery Adjustment		\$14,037,447
13	Total Capital Investment Component of Revenue Requirement	<u>\$63,123,650</u>	<u>\$77,354,638</u>
14	Total Revenue Requirement	<u>\$63,123,650</u>	<u>\$77,354,638</u>
15	Per Tax Hold Harmless Adjustment Section 3 - Attachment 2 (C), Pages 1, Line 23	(\$4,499,963)	(\$3,258,476)
16	Total Net Capital Investment Component of Revenue Requirement	<u>\$58,623,688</u>	<u>\$74,096,163</u>
17	Incremental Rate Adjustment		\$15,472,475

Column Notes:

(a) RIPUC Docket No. 22-53-NG, Section 3, Attachment 1 (C), Page 1 of 32, Column (b)

Line Notes for Columns (b) only:

- 2 Page 2 of 35, Line 36, Col. (i)
- 3 Page 5 of 35, Line 35, Col. (h)
- 4 Page 8 of 35, Line 35, Col. (g)
- 5 Page 12 of 35, Line 35, Col. (f)
- 6 Page 15 of 35, Line 35, Col. (e)
- 7 Page 18 of 35, Line 35, Col. (d)
- 8 Page 21 of 35, Line 31, Col. (b)
- 9 Page 24 of 35, Line 29, Col. (a)
- 10 Sum of Lines 2 through 9
- 12 Page 33 of 35, Line 93, Col. (k) × 1,000
- 13 Sum of Line 10 through Line 12
- 14 Line 1 + Line 13
- 15 Section 3 - Attachment 2, Pages 1, Line 23
- 16 Line 14 + Line 15
- 17 Line 16 Col (b) - Line 16 Col (a)

The Narragansett Electric Company
d/b/a Rhode Island Energy
Proposed FY 2025 Gas Infrastructure, Safety,
and Reliability Plan Filing
Section 3: Attachment 1
Page 2 of 35

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Fiscal Year 2025 Revenue Requirement on FY 2018 Actual Incremental Gas Capital Investment

Line No.		Fiscal Year 2018 (a)	Fiscal Year 2019 (b)	Fiscal Year 2020 (c)	Fiscal Year 2021 (d)	Fiscal Year 2022 (e)	NG 4/1/22 - 5/24/2022 2023 (f)	PPL 5/25/22 - 3/31/23 2023 (g)	Fiscal Year 2024 (h)	Fiscal Year 2025 (i)	
1	Depreciable Net Capital Included in ISR Rate Base										
2	Total Allowed Capital Included in ISR Rate Base in Current Year Retirements	Page 27 of 35, Line 3, Col (a) Page 27 of 35, Line 9, Col (a)	\$4,632,718	\$12,059,428							
3	Net Depreciable Capital Included in ISR Rate Base	Year 1 = Line 1 - Line 2; then = Prior Year Line 3	(\$7,426,710)	(\$7,426,710)	(\$7,426,710)	(\$7,426,710)	(\$7,426,710)	(\$7,426,710)	(\$7,426,710)	(\$7,426,710)	
	Change in Net Capital Included in ISR Rate Base										
4	Capital Included in ISR Rate Base	Line 1	\$4,632,718	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
5	Depreciation Expense		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
6	Incremental Capital Amount	Year 1 = Line 4 - Line 5; then = Prior Year Line 6	\$4,632,718	\$4,632,718	\$4,632,718	\$4,632,718	\$4,632,718	\$4,632,718	\$4,632,718	\$4,632,718	
7	Cost of Removal	Page 27 of 35, Line 6, Col (a)	\$1,941,168								
8	Net Plant Amount	Year 1 = Line 6 + Line 7, Then = Prior Year	\$6,573,886	\$6,573,886	\$6,573,886	\$6,573,886	\$6,573,886	\$6,573,886	\$6,573,886	\$6,573,886	
	Deferred Tax Calculation:										
9	Composite Book Depreciation Rate	1/	3.38%	3.15%	2.99%	2.99%	2.99%	2.99%	2.99%	2.99%	
10	Number of days	2/					54	311			
11	Proration Percentage	2/					14.79%	85.21%			
12	Tax Depreciation and Year 1 Basis Adjustments	Year 1=Page 3 of 35, Line 30, Col (a); then = Page 3 of 35, Col (e)	\$7,820,728	\$21,720	\$20,089	\$18,585	\$17,189	\$2,353	\$213,427	\$410,861	\$380,014
13	Cumulative Tax Depreciation-NG	Year 1 = Line 12; then = Prior Year Line 13 + Current Year Line 12	\$7,820,728	\$7,842,448	\$7,862,538	\$7,881,123	\$7,898,312	\$7,900,664			
14	Cumulative Tax Depreciation-PPL	Year 1 = Line 12; then = Prior Year Line 14 + Current Year Line 12							\$213,427	\$624,288	\$1,004,302
15	Book Depreciation	Year 1= Line 3 x Line 9 x 50%; then = Line 3 x Line 9	(\$125,511)	(\$234,127)	(\$222,059)	(\$222,059)	(\$222,059)	(\$32,853)	(\$189,206)	(\$222,059)	(\$222,059)
16	Cumulative Book Depreciation	Year 1 = Line 14; then = Prior Year Line 15 + Current Year Line 14	(\$125,511)	(\$359,638)	(\$581,697)	(\$803,756)	(\$1,025,814)	(\$1,058,667)	(\$1,247,873)	(\$1,469,932)	(\$1,691,990)
17	Cumulative Book / Tax Timer	Columns (a) through (e): Line 13 - Line 16, Then Line 14 - Line 16	\$7,946,239	\$8,202,087	\$8,444,235	\$8,684,878	\$8,924,126	\$8,959,331	\$1,461,300	\$2,094,220	\$2,696,292
18	Less: Cumulative Book Depreciation at Acquisition	Line 16 Column (f)							(\$1,058,667)	(\$1,058,667)	(\$1,058,667)
19	Cumulative Book / Tax Timer - PPL	Line 17 + Line 18							\$402,633	\$1,035,553	\$1,637,625
20	Effective Tax Rate	Columns (a) through (f): Line 17 * Line 20, Then Line 19 * Line 20	21.00%	21.00%	21.00%	21.00%	21.00%	21.00%	21.00%	21.00%	21.00%
21	Deferred Tax Reserve	(Line 16 x 31.55% blended FY18 tax rate) - Line 20; then =	\$1,668,710	\$1,722,438	\$1,773,289	\$1,823,824	\$1,874,066	\$1,881,459	\$84,553	\$217,466	\$343,901
22	Less: FY 2018 Federal NOL (Generation) / Utilization	-Page 28 of 35, Line 12, Col (g)	(\$6,051,855)	(\$6,051,855)	(\$6,051,855)	(\$6,051,855)	(\$6,051,855)	(\$6,051,855)	\$0	\$0	\$0
23	Excess Deferred Tax	(Line 16 x 31.55% blended FY18 tax rate) - Line 20; then = Prior Year Line 22	\$838,328	\$838,328	\$838,328	\$838,328	\$838,328	\$838,328	\$838,328	\$838,328	\$838,328
24	Net Deferred Tax Reserve before Proration Adjustment	Line 21 + Line 22 + Line 23	(\$3,544,817)	(\$3,491,089)	(\$3,440,238)	(\$3,389,703)	(\$3,339,461)	(\$3,332,068)	\$922,881	\$1,055,794	\$1,182,230
	ISR Rate Base Calculation:										
25	Cumulative Incremental Capital Included in ISR Rate Base	Line 8	\$6,573,886	\$6,573,886	\$6,573,886	\$6,573,886	\$6,573,886	\$6,573,886	\$6,573,886	\$6,573,886	
26	Accumulated Depreciation	- Line 16	\$125,511	\$359,638	\$581,697	\$803,756	\$1,025,814	\$1,058,667	\$1,247,873	\$1,469,932	\$1,691,990
27	Deferred Tax Reserve	- Line 24	\$3,544,817	\$3,491,089	\$3,440,238	\$3,389,703	\$3,339,461	\$3,332,068	(\$922,881)	(\$1,055,794)	(\$1,182,230)
28	Year End Rate Base before Deferred Tax Proration	Sum of Lines 25 through 27	\$10,244,214	\$10,424,613	\$10,595,821	\$10,767,344	\$10,939,161	\$10,964,620	\$6,898,878	\$6,988,023	\$7,083,647
	Revenue Requirement Calculation:										
29	Average Rate Base before Deferred Tax Proration Adjustment	Year 1 = 0; then Average of (Prior + Current Year Line 28)					\$10,853,253	\$8,919,019	\$8,919,019	\$6,943,540	\$7,035,835
30	Proration Adjustment	Page 4 of 35, Line 41					\$2,157	\$3,947	\$5,705	\$5,427	
31	Average ISR Rate Base after Deferred Tax Proration	Line 29 + Line 30					\$10,855,409	\$8,922,966	\$8,922,966	\$6,949,155	\$7,041,262
32	Pre-Tax ROR	Page 35 of 35, Line 30, Column (e)					8.41%	8.41%	8.41%	8.41%	8.41%
33	Proration Percentage	Line 11						14.79%	85.21%		
34	Return and Taxes	Cols (e), (h) and (i): L 31 * L 32; Cols (f) and (g): L 31 * L 32 *						\$912,940	\$111,021	\$639,400	\$584,424
35	Book Depreciation	L 33						(\$222,059)	(\$32,853)	(\$189,206)	(\$222,059)
36	Annual Revenue Requirement	Sum of Lines 34 through 35	N/A	N/A	N/A	N/A	\$690,881	\$78,169	\$450,194	\$362,365	\$370,111

1/ 3.38%, Composite Book Depreciation Rate approved per RIPUC Docket No. 4323, in effect until Aug 31, 2018

2.99%, Composite Book Depreciation Rate approved per RIPUC Docket No. 4770, effective on Sep 1, 2018

FY 19 Composite Book Depreciation Rate = 3.38% x 5/12 + 2.99% x 7/12

2/ Columns (f) and (g) represent the 12 months within fiscal year 2023, but activity is separated to accommodate the impacts of the acquisition as described in note 3.

3/ National Grid and PPL Corporation ("PPL") elected to treat PPL's acquisition of The Narragansett Electric Company ("NECO") from National Grid on May 25, 2022 as an asset sale for U.S. federal income tax purposes under Internal Revenue Code Section 338(h)(10). As a result of this election, PPL was deemed to acquire the assets of NECO at fair market value (essentially equivalent to book value) for tax purposes. The resulting "step-up" in tax basis eliminates most book/tax timing differences and the related accumulated net deferred income tax liabilities as of the acquisition date, at which time PPL will begin depreciating the new tax basis and start the tracking of book/tax timing differences as if PPL purchased a new asset in the year of acquisition.

4/ The Federal Income Tax rate changed from 35% to 21% on January 1, 2018 per the Tax Cuts and Jobs Act of 2017

5/ Columns (f) and (g) takes the average of the "Year End Rate Base before Deferred Tax Proration" at the beginning of the fiscal year on Line 27, Column (e) and the end of the fiscal year on Line 32, Column (g). See note 2.

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Tax Depreciation and Repairs Deduction on FY 2018 Incremental Capital Investment

Line No.			Fiscal Year 2018 (a)	(b)	(c)	(d)	(e)	(f)
	Capital Repairs Deduction							
1	Plant Additions	Page 2 of 35, Line 1	\$4,632,718					
2	Capital Repairs Deduction Rate	Per Tax Department	85.43%					
3	Capital Repairs Deduction	Line 1 × Line 2	\$3,957,731					
4								
5								
6	Bonus Depreciation							
7	Plant Additions	Line 1	\$4,632,718					
8	Less Capital Repairs Deduction	Line 3	\$3,957,731					
9	Plant Additions Net of Capital Repairs Deduction	Line 7 - Line 8	\$674,987					
10	Percent of Plant Eligible for Bonus Depreciation	Per Tax Department	100.00%					
11	Plant Eligible for Bonus Depreciation	Line 9 × Line 10	\$674,987					
12	Bonus depreciation 100% category	100% × 15.86%	2/ 15.86%					
13	Bonus depreciation 50% category	50% × 58.05%	2/ 29.03%					
14	Bonus depreciation 40% category	40% × 26.35%	2/ 10.54%					
15	Bonus Depreciation Rate (October 2017 - March 2018)	1 × 50% × 0%	2/ 0.00%					
16	Total Bonus Depreciation Rate	Line 12 + Line 13 + Line 14 + Line 15	55.43%					
17	Bonus Depreciation	Line 11 × Line 16	\$374,112					
18								
19	Remaining Tax Depreciation							
20	Plant Additions	Line 1	\$4,632,718					
21	Less Capital Repairs Deduction	Line 3	\$3,957,731					
22	Less Bonus Depreciation	Line 17	\$374,112					
	Remaining Plant Additions Subject to 20 YR MACRS Tax							
23	Depreciation	Line 20 - Line 21 - Line 22	\$300,875					
24	20 YR MACRS Tax Depreciation Rates	IRS Publication 946	3.75%					
25	Remaining Tax Depreciation	Line 23 × Line 24	\$11,283					
26								
27	FY18 tax (gain)/loss on retirements	Per Tax Department	3/ \$1,536,434					
28	Cost of Removal	Page 2 of 35, Line 7	\$1,941,168					
29								
30	Total Tax Depreciation and Repairs Deduction	Sum of Lines 3, 17, 25, 27 & 28	\$7,820,728					

20 Year MACRS Depreciation			
MACRS basis:	Line 23, Column (a)	\$300,875	
		Annual	Cumulative
Fiscal Year	Prorated		
FY Mar-2018	3.750%	\$11,283	\$7,820,728
FY Mar-2019	7.219%	\$21,720	\$7,842,448
FY Mar-2020	6.677%	\$20,089	\$7,862,538
FY Mar-2021	6.177%	\$18,585	\$7,881,123
FY Mar-2022	5.713%	\$17,189	\$7,898,312
FY Mar-2023 (Apr-May 2022)	5.285%	\$2,353	\$7,900,664
Book Cost	Line 1, Column (a)	\$4,632,718	
Cumulative Book Depreciation	- Page 2 of 35, Line 16, Col (f)	\$1,058,667	
PPL MACRS basis:	Line 13 + Line 14	\$5,691,385	
FY Mar-2023 (Jun-Mar 2023)	3.750%	\$213,427	\$213,427
Mar-2024	7.219%	\$410,861	\$624,288
Mar-2025	6.677%	\$380,014	\$1,004,302
Mar-2026	6.177%	\$351,557	\$1,355,859
Mar-2027	5.713%	\$325,149	\$1,681,007
Mar-2028	5.285%	\$300,790	\$1,981,797
Mar-2029	4.888%	\$278,195	\$2,259,992
Mar-2030	4.522%	\$257,364	\$2,517,356
Mar-2031	4.462%	\$253,950	\$2,771,306
Mar-2032	4.461%	\$253,893	\$3,025,199
Mar-2033	4.462%	\$253,950	\$3,279,148
Mar-2034	4.461%	\$253,893	\$3,533,041
Mar-2035	4.462%	\$253,950	\$3,786,991
Mar-2036	4.461%	\$253,893	\$4,040,883
Mar-2037	4.462%	\$253,950	\$4,294,833
Mar-2038	4.461%	\$253,893	\$4,548,725
Mar-2039	4.462%	\$253,950	\$4,802,675
Mar-2040	4.461%	\$253,893	\$5,056,568
Mar-2041	4.462%	\$253,950	\$5,310,517
Mar-2042	4.461%	\$253,893	\$5,564,410
Mar-2043	2.231%	\$126,975	\$5,691,385
	100.000%	\$5,691,385	

Column (d), Line 11 = MACRS Rate 5.285% / 365 days x 54 days

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Net Deferred Tax Reserve Proration on FY 2018 Incremental Capital Investment**

Line No.	Deferred Tax Subject to Proration		Fiscal Year	Fiscal Year	Fiscal Year	Fiscal Year	
			2022 (a)	2023 (b)	2024 (c)	2025 (d)	
1	Book Depreciation	See the corresponding Fiscal Year on Page 2 of 35, Line 15. Note there are 2 columns to sum for FY23.	(\$222,059)	(\$222,059)	(\$222,059)	(\$222,059)	
2	Bonus Depreciation		\$0	\$0	\$0	\$0	
3	Remaining MACRS Tax Depreciation	See the corresponding Fiscal Year on Page 2 of 35, Line 12. Note there are 2 columns to sum for FY23.	(\$17,189)	(\$215,779)	(\$410,861)	(\$380,014)	
4	FY18 tax (gain)/loss on retirements		\$0	\$0	\$0	\$0	
5	Cumulative Book / Tax Timer	Sum of Lines 1 through 4	(\$239,248)	(\$437,838)	(\$632,920)	(\$602,072)	
6	Effective Tax Rate		21%	21%	21%	21%	
7	Deferred Tax Reserve	Line 5 × Line 6	(\$50,242)	(\$91,946)	(\$132,913)	(\$126,435)	
8	Deferred Tax Not Subject to Proration						
9	Capital Repairs Deduction						
10	Cost of Removal						
11	Book/Tax Depreciation Timing Difference at 3/31/2017						
12	Cumulative Book / Tax Timer	Line 8 + Line 9 + Line 10					
13	Effective Tax Rate						
14	Deferred Tax Reserve	Line 11 × Line 12					
14	Total Deferred Tax Reserve	Line 7 + Line 13	(\$50,242)	(\$91,946)	(\$132,913)	(\$126,435)	
15	Net Operating Loss		\$0	\$0	\$0	\$0	
16	Net Deferred Tax Reserve	Line 14 + Line 15	(\$50,242)	(\$91,946)	(\$132,913)	(\$126,435)	
17	Allocation of FY 2018 Estimated Federal NOL						
18	Cumulative Book/Tax Timer Subject to Proration	Line 5	(\$239,248)	(\$437,838)	(\$632,920)	(\$602,072)	
19	Cumulative Book/Tax Timer Not Subject to Proration	Line 11	\$0	\$0	\$0	\$0	
20	Total Cumulative Book/Tax Timer	Line 17 + Line 18	(\$239,248)	(\$437,838)	(\$632,920)	(\$602,072)	
21	Total FY 2018 Federal NOL		\$0	\$0	\$0	\$0	
22	Allocated FY 2018 Federal NOL Not Subject to Proration	(Line 18 ÷ Line 19) × Line 20	\$0	\$0	\$0	\$0	
23	Allocated FY 2018 Federal NOL Subject to Proration	(Line 17 ÷ Line 19) × Line 20	\$0	\$0	\$0	\$0	
24	Effective Tax Rate		21%	21%	21%	21%	
25	Deferred Tax Benefit subject to proration	Line 22 × Line 23	\$0	\$0	\$0	\$0	
25	Net Deferred Tax Reserve subject to proration	Line 7 + Line 24	(\$50,242)	(\$91,946)	(\$132,913)	(\$126,435)	
		(e)	(f)	(g)	(h)	(i)	(j)
	Proration Calculation	Number of Days in Month	Proration Percentage	Fiscal Year 2022	Fiscal Year 2023	Fiscal Year 2024	Fiscal Year 2025
26	April	30	91.78%	(\$3,843)	(\$7,032)	(\$10,166)	(\$9,670)
27	May	31	83.29%	(\$3,487)	(\$6,382)	(\$9,225)	(\$8,775)
28	June	30	75.07%	(\$3,143)	(\$5,752)	(\$8,315)	(\$7,909)
29	July	31	66.58%	(\$2,787)	(\$5,101)	(\$7,374)	(\$7,015)
30	August	31	58.08%	(\$2,432)	(\$4,450)	(\$6,433)	(\$6,120)
31	September	30	49.86%	(\$2,088)	(\$3,821)	(\$5,523)	(\$5,254)
32	October	31	41.37%	(\$1,732)	(\$3,170)	(\$4,582)	(\$4,359)
33	November	30	33.15%	(\$1,388)	(\$2,540)	(\$3,672)	(\$3,493)
34	December	31	24.66%	(\$1,032)	(\$1,889)	(\$2,731)	(\$2,598)
35	January	31	16.16%	(\$677)	(\$1,239)	(\$1,790)	(\$1,703)
36	February	28	8.49%	(\$356)	(\$651)	(\$941)	(\$895)
37	March	31	0.00%	\$0	\$0	\$0	\$0
38	Total	365		(\$22,964)	(\$42,026)	(\$60,752)	(\$57,791)
39	Deferred Tax Without Proration	Line 25		(\$50,242)	(\$91,946)	(\$132,913)	(\$126,435)
40	Average Deferred Tax without Proration	Line 39 × 50%		(\$25,121)	(\$45,973)	(\$66,457)	(\$63,218)
41	Proration Adjustment	Line 38 - Line 40		\$2,157	\$3,947	\$5,705	\$5,427

Column Notes:

- (f) Sum of remaining days in the year (Col (e)) ÷ 365
- (g) through (j) Current Year Line 25 ÷ 12 × Current Month Col (f)

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Fiscal Year 2025 Revenue Requirement on FY 2019 Actual Incremental Gas Capital Investment

Line No.		Fiscal Year 2019 (a)	Fiscal Year 2020 (b)	Fiscal Year 2021 (c)	Fiscal Year 2022 (d)	NG 4/1/22 - 5/24/2022 2023 (e)	PPL 5/25/22 - 3/31/23 2023 (f)	Fiscal Year 2024 (g)	Fiscal Year 2025 (h)
Depreciable Net Capital Included in ISR Rate Base									
1	Total Allowed Capital Included in ISR Rate Base in Current Year								
2	Retirements	Page 27 of 35, Line 3, Col (b) (\$914,000)							
3	Net Depreciable Capital Included in ISR Rate Base	Page 27 of 35, Line 9, Col (b) (\$1,368,021)	Year 1 = Line 1 - Line 2; then = Prior Year Line 3						
Change in Net Capital Included in ISR Rate Base									
4	Capital Included in ISR Rate Base	Line 1 (\$914,000)							
5	Depreciation Expense	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
6	Incremental Capital Amount	Year 1 = Line 4 - Line 5; then = Prior Year Line 6							
7	Cost of Removal	Page 27 of 35, Line 6, Col (b) \$5,626,564							
8	Net Plant Amount	Line 1 = Line 6+7; Then = Prior Year	\$4,712,564	\$4,712,564	\$4,712,564	\$4,712,564	\$4,712,564	\$4,712,564	\$4,712,564
Deferred Tax Calculation:									
9	Composite Book Depreciation Rate	As Approved in RIPUC Docket No. 4323 & 4770	1/ 3.15%	2.99%	2.99%	2.99%	2.99%	2.99%	2.99%
10	Number of days		2/			54	311		
11	Proration Percentage		2/			14.79%	85.21%		
12	Tax Depreciation and Year 1 Basis Adjustments	Year 1 = Page 6 of 35, Line 28, Col (a); then = Page 6 of 35, Col (e)							
13	Cumulative Tax Depreciation-NG	Year 1 = Line 12; then = Prior Year Line 13 + Current Year	3/ \$5,200,130	(\$8,390)	(\$7,760)	(\$7,179)	(\$982)	(\$36,146)	(\$69,583)
14	Cumulative Tax Depreciation-PPL	Year 1 = Line 12; then = Prior Year Line 14 + Current Year	3/ \$5,200,130	\$5,191,739	\$5,183,979	\$5,176,799	\$5,175,817		
15	Book Depreciation	Year 1 = Line 3 × Line 9 × 50%; then = Line 3 × Line 9	2/ \$7,157	\$13,575	\$13,575	\$13,575	\$2,008	\$11,567	\$13,575
16	Cumulative Book Depreciation	Year 1 = Line 15; then = Prior Year Line 16 + Current Year		Line 15					
17	Cumulative Book / Tax Timer	Columns (a) through (e): Line 13 - Line 16, Then Line 14 - Line 16	\$5,192,973	\$5,171,007	\$5,149,671	\$5,128,917	\$5,125,926	(\$97,604)	(\$180,762)
18	Less: Cumulative Book Depreciation at Acquisition	Line 16 Column (e)					\$49,891	\$49,891	\$49,891
19	Cumulative Book / Tax Timer - PPL	Line 17 + Line 18					(\$47,713)	(\$130,871)	(\$208,805)
20	Effective Tax Rate	Columns (a) through (e): Line 17 * Line 20, Then Line 19 *	21.00%	21.00%	21.00%	21.00%	21.00%	21.00%	21.00%
21	Deferred Tax Reserve	Line 20	\$1,090,524	\$1,085,911	\$1,081,431	\$1,077,072	\$1,076,444	(\$10,020)	(\$27,483)
22	Add: FY 2019 Federal NOL (Generation) / Utilization	Page 27 of 35, Line 12, Col (b)	\$286,350	\$286,350	\$286,350	\$286,350	\$286,350	\$0	\$0
23	Net Deferred Tax Reserve before Proration Adjustment	Line 21 + Line 22	\$1,376,874	\$1,372,261	\$1,367,781	\$1,363,422	\$1,362,794	(\$10,020)	(\$27,483)
ISR Rate Base Calculation:									
24	Cumulative Incremental Capital Included in ISR Rate Base	Line 8	\$4,712,564	\$4,712,564	\$4,712,564	\$4,712,564	\$4,712,564	\$4,712,564	\$4,712,564
25	Accumulated Depreciation	- Line 16	(\$7,157)	(\$20,732)	(\$34,307)	(\$47,883)	(\$49,891)	(\$61,458)	(\$75,033)
26	Deferred Tax Reserve	- Line 23	(\$1,376,874)	(\$1,372,261)	(\$1,367,781)	(\$1,363,422)	(\$1,362,794)	\$10,020	\$27,483
27	Year End Rate Base before Deferred Tax Proration	Sum of Lines 24 through 26	\$3,328,533	\$3,319,570	\$3,310,475	\$3,301,259	\$3,299,878	\$4,661,125	\$4,665,013
Revenue Requirement Calculation:									
28	Average Rate Base before Deferred Tax Proration Adjustment	Year 1 = Current Year Line 27 ÷ 2; then = (Prior Year Line 27 + Current Year Line 27) ÷ 2				\$3,305,867	\$3,981,192	\$3,981,192	\$4,663,069
29	Proration Adjustment	Page 7 of 35, Line 41				(\$187)	(\$457)	(\$457)	(\$750)
30	Average ISR Rate Base after Deferred Tax Proration	Line 28 + Line 29				\$3,305,680	\$3,980,735	\$3,980,735	\$4,662,320
31	Pre-Tax ROR	Page 35 of 35, Line 30, Column (e)				8.41%	8.41%	8.41%	8.41%
32	Proration Percentage	Line 11					14.79%	85.21%	
33	Return and Taxes	Cols (d), (g) and (h): L 30 * L 31; Cols (e) and (f): L 30 * L 31 * L 32				\$278,008	\$49,529	\$285,251	\$392,101
34	Book Depreciation	Line 15				\$13,575	\$2,008	\$11,567	\$13,575
35	Annual Revenue Requirement	Sum of Lines 33 through 34	N/A	N/A	N/A	\$291,583	\$51,537	\$296,818	\$405,676

1/ 3.38%, Composite Book Depreciation Rate approved per RIPUC Docket No. 4323, in effect until Aug 31, 2018
2.99%, Composite Book Depreciation Rate approved per RIPUC Docket No. 4770, effective on Sep 1, 2018
FY 19 Composite Book Depreciation Rate = 3.38% × 5 / 12 + 2.99% × 7 / 12

2/ Columns (e) and (f) represent the 12 months within fiscal year 2023, but activity is separated to accommodate the impacts of the acquisition as described in note 3.

3/ National Grid and PPL Corporation ("PPL") elected to treat PPL's acquisition of The Narragansett Electric Company ("NECO") from National Grid on May 25, 2022 as an asset sale for U.S. federal income tax purposes under Internal Revenue Code Section 338(h)(10). As a result of this election, PPL was deemed to acquire the assets of NECO at fair market value (essentially equivalent to book value) for tax purposes. The resulting "step-up" in tax basis eliminates most book/tax timing differences and the related accumulated net deferred income tax liabilities as of the acquisition date, at which time PPL will begin depreciating the new tax basis and start the tracking of book/tax timing differences as if PPL purchased a new asset in the year of acquisition.

4/ Columns (e) and (f) takes the average of the "Year End Rate Base before Deferred Tax Proration" at the beginning of the fiscal year on Line 31, Column (d) and the end of the fiscal year on Line 27, Column (f). See note 2.

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Tax Depreciation and Repairs Deduction on FY 2019 Incremental Capital Investment

Line No.			Fiscal Year 2019 (a)	(b)	(c)	(d)	(e)	(f)
	Capital Repairs Deduction							
1	Plant Additions	Page 5 of 35, Line 1	(\$914,000)					
2	Capital Repairs Deduction Rate	Per Tax Department	1/ 85.18%					
3	Capital Repairs Deduction	Line 1 × Line 2	(\$778,545)					
4								
5								
6	Bonus Depreciation							
7	Plant Additions	Line 1	(\$914,000)					
8	Less Capital Repairs Deduction	Line 3	(\$778,545)					
9	Plant Additions Net of Capital Repairs Deduction	Line 7 - Line 8	(\$135,455)					
10	Percent of Plant Eligible for Bonus Depreciation	Per Tax Department	100.00%					
11	Plant Eligible for Bonus Depreciation	Line 9 × Line 10	(\$135,455)					
12	Bonus Depreciation Rate (30% Eligible)	1 × 30% × 11.65%	2/ 3.50%					
13	Bonus Depreciation Rate (40% Eligible)	1 × 40% × 26.75%	2/ 10.70%					
14	Total Bonus Depreciation Rate	Line 12 + Line 13	14.20%					
15	Bonus Depreciation	Line 11 × Line 14	(\$19,228)					
16								
17	Remaining Tax Depreciation							
18	Plant Additions	Line 1	(\$914,000)					
19	Less Capital Repairs Deduction	Line 3	(\$778,545)					
20	Less Bonus Depreciation	Line 15	(\$19,228)					
21	Remaining Plant Additions Subject to 20 YR MACRS Tax Depreciation	Line 18 - Line 19 - Line 20	(\$116,227)					
22	20 YR MACRS Tax Depreciation Rates	IRS Publication 946	3.75%					
23	Remaining Tax Depreciation	Line 21 × Line 22	(\$4,359)					
24								
25	FY19 tax (gain)/loss on retirements	Per Tax Department	3/ \$375,698					
26	Cost of Removal	Page 5 of 35, Line 7	\$5,626,564					
27								
28	Total Tax Depreciation and Repairs Deduction	Sum of Lines 3, 15, 23, 25 & 26	\$5,200,130					

20 Year MACRS Depreciation			
MACRS basis:	Line 21, Column (a)	Annual	Cumulative
Fiscal Year	Prorated		
FY Mar-2019	3.750%	(\$4,359)	\$5,200,130
FY Mar-2020	7.219%	(\$8,390)	\$5,191,739
FY Mar-2021	6.677%	(\$7,760)	\$5,183,979
FY Mar-2022	6.177%	(\$7,179)	\$5,176,799
FY Mar-2023 (Apr-May 2022)	5.713% 0.845%	(\$982)	\$5,175,817
Book Cost	Line 1, Column (a)	(\$914,000)	
Cumulative Book Depreciation	- Page 5 of 35, Line 16, Col (e)	(\$49,891)	
PPL MACRS basis:	Line 12 + Line 13	(\$963,891)	
FY Mar-2023 (Jun-Mar 2023)	3.750%	(\$36,146)	(\$36,146)
Mar-2024	7.219%	(\$69,583)	(\$105,729)
Mar-2025	6.677%	(\$64,359)	(\$170,088)
Mar-2026	6.177%	(\$59,540)	(\$229,628)
Mar-2027	5.713%	(\$55,067)	(\$284,695)
Mar-2028	5.285%	(\$50,942)	(\$335,637)
Mar-2029	4.888%	(\$47,115)	(\$382,751)
Mar-2030	4.522%	(\$43,587)	(\$426,339)
Mar-2031	4.462%	(\$43,009)	(\$469,347)
Mar-2032	4.461%	(\$42,999)	(\$512,347)
Mar-2033	4.462%	(\$43,009)	(\$555,355)
Mar-2034	4.461%	(\$42,999)	(\$598,355)
Mar-2035	4.462%	(\$43,009)	(\$641,363)
Mar-2036	4.461%	(\$42,999)	(\$684,363)
Mar-2037	4.462%	(\$43,009)	(\$727,371)
Mar-2038	4.461%	(\$42,999)	(\$770,371)
Mar-2039	4.462%	(\$43,009)	(\$813,379)
Mar-2040	4.461%	(\$42,999)	(\$856,379)
Mar-2041	4.462%	(\$43,009)	(\$899,387)
Mar-2042	4.461%	(\$42,999)	(\$942,387)
Mar-2043	2.231%	(\$21,504)	(\$963,891)
	100.000%	(\$963,891)	

Column (d), Line 10 = MACRS Rate 5.713% / 365 days x 54 days

1/ Capital Repairs percentage is the actual result of FY2019 tax return
2/ Percent of Plant Eligible for Bonus Depreciation is the actual result of FY2019 tax return
3/ Actual Loss the actual result of FY2019 tax return
10 (d) 5.713% / 365 x 54

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Net Deferred Tax Reserve Proration on FY 2019 Incremental Capital Investment**

Line No.	Deferred Tax Subject to Proration		Fiscal Year	Fiscal Year	Fiscal Year	Fiscal Year	
			2022 (a)	2023 (b)	2024 (c)	2025 (d)	
1	Book Depreciation	See the corresponding Fiscal Year on Page 5 of 35, Line 15. Note there are 2 columns to sum for FY23.	\$13,575	\$13,575	\$13,575	\$13,575	
2	Bonus Depreciation		\$0	\$0	\$0	\$0	
3	Remaining MACRS Tax Depreciation	See the corresponding Fiscal Year on Page 5 of 35, Line 12. Note there are 2 columns to sum for FY23.	\$7,179	\$37,128	\$69,583	\$64,359	
4	FY19 tax (gain)/loss on retirements		\$0	\$0	\$0	\$0	
5	Cumulative Book / Tax Timer	Sum of Lines 1 through 4	\$20,755	\$50,703	\$83,159	\$77,934	
6	Effective Tax Rate		21%	21%	21%	21%	
7	Deferred Tax Reserve	Line 5 × Line 6	\$4,358	\$10,648	\$17,463	\$16,366	
Deferred Tax Not Subject to Proration							
8	Capital Repairs Deduction						
9	Cost of Removal						
10	Book/Tax Depreciation Timing Difference at 3/31/2019						
11	Cumulative Book / Tax Timer	Line 8 + Line 9 + Line 10	\$0	\$0	\$0	\$0	
12	Effective Tax Rate		21%	21%	21%	21%	
13	Deferred Tax Reserve	Line 11 × Line 12	\$0	\$0	\$0	\$0	
14	Total Deferred Tax Reserve	Line 7 + Line 13	\$4,358	\$10,648	\$17,463	\$16,366	
15	Net Operating Loss		\$0	\$0	\$0	\$0	
16	Net Deferred Tax Reserve	Line 14 + Line 15	\$4,358	\$10,648	\$17,463	\$16,366	
Allocation of FY 2019 Estimated Federal NOL							
17	Cumulative Book/Tax Timer Subject to Proration	Line 5	\$20,755	\$50,703	\$83,159	\$77,934	
18	Cumulative Book/Tax Timer Not Subject to Proration	Line 11	\$0	\$0	\$0	\$0	
19	Total Cumulative Book/Tax Timer	Line 17 + Line 18	\$20,755	\$50,703	\$83,159	\$77,934	
20	Total FY 2019 Federal NOL		\$0	\$0	\$0	\$0	
21	Allocated FY 2019 Federal NOL Not Subject to Proration	(Line 18 ÷ Line 19) × Line 20	\$0	\$0	\$0	\$0	
22	Allocated FY 2019 Federal NOL Subject to Proration	(Line 17 ÷ Line 19) × Line 20	\$0	\$0	\$0	\$0	
23	Effective Tax Rate		21%	21%	21%	21%	
24	Deferred Tax Benefit subject to proration	Line 22 × Line 23	\$0	\$0	\$0	\$0	
25	Net Deferred Tax Reserve subject to proration	Line 7 + Line 24	\$4,358	\$10,648	\$17,463	\$16,366	
Proration Calculation							
		(e) Number of Days in Month	(f) Proration Percentage	(g) Fiscal Year 2022	(h) Fiscal Year 2023	(i) Fiscal Year 2024	(j) Fiscal Year 2025
26	April	30	91.78%	\$333	\$814	\$1,336	\$1,252
27	May	31	83.29%	\$303	\$739	\$1,212	\$1,136
28	June	30	75.07%	\$273	\$666	\$1,092	\$1,024
29	July	31	66.58%	\$242	\$591	\$969	\$908
30	August	31	58.08%	\$211	\$515	\$845	\$792
31	September	30	49.86%	\$181	\$442	\$726	\$680
32	October	31	41.37%	\$150	\$367	\$602	\$564
33	November	30	33.15%	\$120	\$294	\$482	\$452
34	December	31	24.66%	\$90	\$219	\$359	\$336
35	January	31	16.16%	\$59	\$143	\$235	\$220
36	February	28	8.49%	\$31	\$75	\$124	\$116
37	March	31	0.00%	\$0	\$0	\$0	\$0
38	Total	365		\$1,992	\$4,867	\$7,982	\$7,481
39	Deferred Tax Without Proration		Line 25	\$4,358	\$10,648	\$17,463	\$16,366
40	Average Deferred Tax without Proration		Line 39 × 50%	\$2,179	\$5,324	\$8,732	\$8,183
41	Proration Adjustment		Line 38 - Line 40	(\$187)	(\$457)	(\$750)	(\$702)

Column Notes:

- (f) Sum of remaining days in the year (Col (e)) ÷ 365
- (g) through (j) Current Year Line 25 ÷ 12 × Current Month Col (f)

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Fiscal Year 2025 Revenue Requirement on FY 2020 Actual Incremental Gas Capital Investment

Line No.		Fiscal Year 2020 (a)	Fiscal Year 2021 (b)	Fiscal Year 2022 (c)	NG 4/1/22 - 5/24/2022 2023 (d)	PPL 5/25/22 - 3/31/23 2023 (e)	Fiscal Year 2024 (f)	Fiscal Year 2025 (g)
Depreciable Net Capital Included in ISR Rate Base								
1	Total Allowed Capital Included in ISR Rate Base in Current Year	Page 27 of 35, Line 3, Col (e)	\$105,296,046					
2	Retirements	Page 27 of 35, Line 9, Col (e)	\$4,276,135					
3	Net Depreciable Capital Included in ISR Rate Base	Year 1 = Line 1 - Line 2; then = Prior Year Line 3	\$101,019,911	\$101,019,911	\$101,019,911	\$101,019,911	\$101,019,911	\$101,019,911
Change in Net Capital Included in ISR Rate Base								
4	Capital Included in ISR Rate Base	Line 1	\$105,296,046	\$0	\$0	\$0	\$0	\$0
5	Depreciation Expense	Page 31 of 35, Line 72(c)	\$23,534,853	\$0	\$0	\$0	\$0	\$0
6	Incremental Capital Amount	Year 1 = Line 4 - Line 5; then = Prior Year Line 6	\$81,761,193	\$81,761,193	\$81,761,193	\$81,761,193	\$81,761,193	\$81,761,193
7	Cost of Removal	Page 27 of 35, Line 6, Col (c)	\$7,055,630					\$0
8	Net Plant Amount	Line 1 = Line 6+7; Then = Prior Year	\$88,816,823	\$88,816,823	\$88,816,823	\$88,816,823	\$88,816,823	\$88,816,823
Deferred Tax Calculation:								
9	Composite Book Depreciation Rate	Page 29 of 35, Line 86(e)	1/ 2.99%	2.99%	2.99%	2.99%	2.99%	2.99%
10	Number of days		2/ 54				311	
11	Proration Percentage		2/ 14.79%				85.21%	
12	Tax Depreciation and Year 1 Basis Adjustments	Year 1 = Page 9 of 35, Line 28, Col (a); then = Page 9 of 35, Col (e)	\$89,531,414	\$1,753,362	\$1,621,720	\$221,959	\$3,648,673	\$7,023,938
13	Cumulative Tax Depreciation-NG	Year 1 = Line 12; then = Prior Year Line 13 + Current Year Line 12	\$89,531,414	\$91,284,775	\$92,906,495	\$93,128,454		
14	Cumulative Tax Depreciation-PPL	Year 1 = Line 12; then = Prior Year Line 14 + Current Year Line 12					\$3,648,673	\$10,672,611
15	Book Depreciation	Year 1 = Line 3 x Line 9 x 50%; then = Line 3 x Line 9	\$1,510,248	\$3,020,495	\$3,020,495	\$446,868	\$2,573,628	\$3,020,495
16	Cumulative Book Depreciation	Year 1 = Line 15; then = Prior Year Line 16 + Current Year Line 15	\$1,510,248	\$4,530,743	\$7,551,238	\$7,998,106	\$10,571,734	\$13,592,229
17	Cumulative Book / Tax Timer	Columns (a) through (d): Line 13 - Line 16, Then Line 14 - Line 16	\$88,021,166	\$86,754,032	\$85,355,257	\$85,130,348	(\$6,923,061)	(\$2,919,618)
18	Less: Cumulative Book Depreciation at Acquisition	Line 16 Column (d)					\$7,998,106	\$7,998,106
19	Cumulative Book / Tax Timer - PPL	Line 17 + Line 18					\$1,075,045	\$5,078,488
20	Effective Tax Rate	Columns (a) through (d): Line 17 * Line 20, Then Line 19 *	21.00%	21.00%	21.00%	21.00%	21.00%	21.00%
21	Deferred Tax Reserve	Line 20	\$18,484,445	\$18,218,347	\$17,924,604	\$17,877,373	\$225,759	\$1,066,483
22	Add: FY 2020 Federal NOL (Generation) / Utilization	Page 27 of 35, Line 12, Col (c)	(\$3,063,059)	(\$3,063,059)	(\$3,063,059)	(\$3,063,059)	\$0	\$0
23	Net Deferred Tax Reserve before Proration Adjustment	Line 21 + Line 22	\$15,421,386	\$15,155,288	\$14,861,545	\$14,814,315	\$225,759	\$1,066,483
ISR Rate Base Calculation:								
24	Cumulative Incremental Capital Included in ISR Rate Base	Line 8	\$88,816,823	\$88,816,823	\$88,816,823	\$88,816,823	\$88,816,823	\$88,816,823
25	Accumulated Depreciation	- Line 16	(\$1,510,248)	(\$4,530,743)	(\$7,551,238)	(\$7,998,106)	(\$10,571,734)	(\$13,592,229)
26	Deferred Tax Reserve	- Line 23	(\$15,421,386)	(\$15,155,288)	(\$14,861,545)	(\$14,814,315)	(\$225,759)	(\$1,066,483)
27	Year End Rate Base before Deferred Tax Proration	Sum of Lines 24 through 26	\$71,885,189	\$69,130,792	\$66,404,039	\$66,004,402	\$78,019,330	\$74,158,111
Revenue Requirement Calculation:								
28	Average Rate Base before Deferred Tax Proration Adjustment	Year 1 = Line 27 x Page 11 of 35, Line 16; then = Average of (Prior Year Line 27 + Current Year Line 27/2)			\$67,767,415	\$72,211,684	\$72,211,684	\$76,088,721
29	Proration Adjustment	Page 10 of 35, Line 41			(\$12,608)	\$7,663	\$36,086	\$31,332
30	Average ISR Rate Base after Deferred Tax Proration	Line 28 + Line 29			\$67,754,807	\$72,219,347	\$72,219,347	\$76,124,806
31	Pre-Tax ROR	Page 35 of 35, Line 30, Column (e)			8.41%	8.41%	8.41%	8.41%
32	Proration Percentage	Line 11				14.79%	85.21%	
33	Return and Taxes	Cols (c), (f) and (g): L 30 * L 31; Cols (d) and (e): L 30 * L 31 * L 32			\$5,698,179	\$898,567	\$5,175,080	\$6,402,096
34	Book Depreciation	Line 15			\$3,020,495	\$446,868	\$2,573,628	\$3,020,495
35	Annual Revenue Requirement	Sum of Lines 33 through 34	N/A	N/A	\$8,718,675	\$1,345,435	\$7,748,708	\$9,422,592

1/ 2.99%, Composite Book Depreciation Rate of Distribution Plant approved per RIPUC Docket No. 4770, effective on Sep 1, 2018

2/ Columns (d) and (e) represent the 12 months within fiscal year 2023, but activity is separated to accommodate the impacts of the acquisition as described in note 3.

3/ National Grid and PPL Corporation ("PPL") elected to treat PPL's acquisition of The Narragansett Electric Company ("NECO") from National Grid on May 25, 2022 as an asset sale for U.S. federal income tax purposes under Internal Revenue Code Section 338(h)(10). As a result of this election, PPL was deemed to acquire the assets of NECO at fair market value (essentially equivalent to book value) for tax purposes. The resulting "step-up" in tax basis eliminates most book/tax timing differences and the related accumulated net deferred income tax liabilities as of the acquisition date, at which time PPL will begin depreciating the new tax basis and start the tracking of book/tax timing differences as if PPL purchased a new asset in the year of acquisition.

4/ Columns (d) and (e) takes the average of the "Year End Rate Base before Deferred Tax Proration" at the beginning of the fiscal year on Line 27, Column (c) and the end of the fiscal year on Line 31, Column (e). See note 2.

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Tax Depreciation and Repairs Deduction on FY 2020 Incremental Capital Investments

Line No.			Fiscal Year 2020 (a)	(b)	(c)	(d)	(e)	(f)
	Capital Repairs Deduction							
1	Plant Additions	Page 8 of 35, Line 1	\$105,296,046		20 Year MACRS Depreciation			
2	Capital Repairs Deduction Rate	Per Tax Department	76.14%					
3	Capital Repairs Deduction	Line 1 × Line 2	\$80,172,409	MACRS basis:	Line 21, Column (a)		\$24,288,150	
4							Annual	Cumulative
5								
6	Bonus Depreciation			Fiscal Year	Prorated			
7	Plant Additions	Line 1	\$105,296,046	FY Mar-2020	3.750%		\$910,806	\$89,531,414
8	Less Capital Repairs Deduction	Line 3	\$80,172,409	FY Mar-2021	7.219%		\$1,753,362	\$91,284,775
9	Plant Additions Net of Capital Repairs Deduction	Line 4 - Line 5	\$25,123,637	FY Mar-2022	6.677%		\$1,621,720	\$92,906,495
10	Percent of Plant Eligible for Bonus Depreciation	Per Tax Department	100.00%	FY Mar-2023 (Apr-May 2022)	6.177%	0.914%	\$221,959	\$93,128,454
11	Plant Eligible for Bonus Depreciation	Line 9 × Line 10	\$25,123,637	Book Cost	Line 1, Column (a)		\$105,296,046	
12	Bonus Depreciation Rate 30%, up to December 31, 2019	14.78% × 30% × 75%	3.33%	Cumulative Book Depreciation	- Page 8 of 35, Line 16, Col (d)		(\$7,998,106)	
13	Bonus Depreciation Rate 0%, after December 31, 2019		0.00%	PPL MACRS basis:	Line 11 + Line 12		\$97,297,940	
14	Total Bonus Depreciation Rate	Line 12 + Line 13	3.33%					
15	Bonus Depreciation	Line 11 × Line 14	\$835,487	FY Mar-2023 (Jun-Mar 2023)	3.750%		\$3,648,673	\$3,648,673
16				Mar-2024	7.219%		\$7,023,938	\$10,672,611
17	Remaining Tax Depreciation			Mar-2025	6.677%		\$6,496,583	\$17,169,194
18	Plant Additions	Line 1	\$105,296,046	Mar-2026	6.177%		\$6,010,094	\$23,179,288
19	Less Capital Repairs Deduction	Line 3	\$80,172,409	Mar-2027	5.713%		\$5,558,631	\$28,737,919
20	Less Bonus Depreciation	Line 15	\$835,487	Mar-2028	5.285%		\$5,142,196	\$33,880,116
21	Remaining Plant Additions Subject to 20 YR MACRS Tax Depreciation	Line 18 - Line 19 - Line 20	\$24,288,150	Mar-2029	4.888%		\$4,755,923	\$38,636,039
22	20 YR MACRS Tax Depreciation Rates	IRS Publication 946	3.75%	Mar-2030	4.522%		\$4,399,813	\$43,035,852
23	Remaining Tax Depreciation	Line 21 × Line 22	\$910,806	Mar-2031	4.462%		\$4,341,434	\$47,377,286
24				Mar-2032	4.461%		\$4,340,461	\$51,717,747
25	FY20 tax (gain)/loss on retirements	Per Tax Department	\$557,081	Mar-2033	4.462%		\$4,341,434	\$56,059,181
26	Cost of Removal	Page 8 of 35, Line 7	\$7,055,630	Mar-2034	4.461%		\$4,340,461	\$60,399,642
27				Mar-2035	4.462%		\$4,341,434	\$64,741,076
28	Total Tax Depreciation and Repairs Deduction	Sum of Lines 3, 15, 23, 25 & 26	\$89,531,414	Mar-2036	4.461%		\$4,340,461	\$69,081,537
29				Mar-2037	4.462%		\$4,341,434	\$73,422,971
30				Mar-2038	4.461%		\$4,340,461	\$77,763,432
31				Mar-2039	4.462%		\$4,341,434	\$82,104,866
32				Mar-2040	4.461%		\$4,340,461	\$86,445,327
33				Mar-2041	4.462%		\$4,341,434	\$90,786,762
34				Mar-2042	4.461%		\$4,340,461	\$95,127,223
35				Mar-2043	2.231%		\$2,170,717	\$97,297,940
36							100.000%	\$97,297,940
37								

1/ Capital Repairs percentage is the actual result of FY2020 tax return

2/ Percent of Plant Eligible for Bonus Depreciation is the actual result of FY2020 tax return

3/ Actual Loss based on FY2020 tax return

9 (d) 6.177% / 365 x 54

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Net Deferred Tax Reserve Proration on FY 2020 Incremental Capital Investments**

Line No.	Deferred Tax Subject to Proration		Fiscal Year	Fiscal Year	Fiscal Year	Fiscal Year		
			2022 (a)	2023 (b)	2024 (c)	2025 (d)		
1	Book Depreciation	See the corresponding Fiscal Year on Page 8 of 35, Line 15. Note there are 2 columns to sum for FY23.	\$3,020,495	\$3,020,495	\$3,020,495	\$3,020,495		
2	Bonus Depreciation		\$0	\$0	\$0	\$0		
3	Remaining MACRS Tax Depreciation	See the corresponding Fiscal Year on Page 8 of 35, Line 12. Note there are 2 columns to sum for FY23. Year 1 = Docket no. 4916, R.S. 3, Att. 1R, page 10 Col (a); then = 0	(\$1,621,720)	(\$3,870,632)	(\$7,023,938)	(\$6,496,583)		
4	FY20 tax (gain)/loss on retirements		\$0	\$0	\$0	\$0		
5	Cumulative Book / Tax Timer	Sum of Lines 1 through 4	\$1,398,776	(\$850,136)	(\$4,003,443)	(\$3,476,088)		
6	Effective Tax Rate		21%	21%	21%	21%		
7	Deferred Tax Reserve	Line 5 × Line 6	\$293,743	(\$178,529)	(\$840,723)	(\$729,979)		
Deferred Tax Not Subject to Proration								
8	Capital Repairs Deduction	Year 1 = Docket no. 4916, R.S. 3, Att. 1R, page 10 Col (a); then = 0						
9	Cost of Removal	Year 1 = Docket no. 4916, R.S. 3, Att. 1R, page 10 Col (a); then = 0						
10	Book/Tax Depreciation Timing Difference at 3/31/2020							
11	Cumulative Book / Tax Timer	Line 8 + Line 9 + Line 10						
12	Effective Tax Rate							
13	Deferred Tax Reserve	Line 11 × Line 12						
14	Total Deferred Tax Reserve	Line 7 + Line 13	\$293,743	(\$178,529)	(\$840,723)	(\$729,979)		
15	Net Operating Loss							
16	Net Deferred Tax Reserve	Line 14 + Line 15	\$293,743	(\$178,529)	(\$840,723)	(\$729,979)		
17	Allocation of FY 2018 Estimated Federal NOL							
18	Cumulative Book/Tax Timer Subject to Proration	Line 5	\$1,398,776	(\$850,136)	(\$4,003,443)	(\$3,476,088)		
19	Cumulative Book/Tax Timer Not Subject to Proration	Line 11	\$0	\$0	\$0	\$0		
19	Total Cumulative Book/Tax Timer	Line 17 + Line 18	\$1,398,776	(\$850,136)	(\$4,003,443)	(\$3,476,088)		
20	Total FY 2020 Federal NOL	Year 1 = Docket no. 4916, R.S. 3, Att. 1R, page 10 Col (a); then = 0						
21	Allocated FY 2020 Federal NOL Not Subject to Proration	(Line 18 ÷ Line 19) × Line 20						
22	Allocated FY 2020 Federal NOL Subject to Proration	(Line 17 ÷ Line 19) × Line 20						
23	Effective Tax Rate							
24	Deferred Tax Benefit subject to proration	Line 22 × Line 23						
25	Net Deferred Tax Reserve subject to proration	Line 7 + Line 24	\$293,743	(\$178,529)	(\$840,723)	(\$729,979)		
			(e)	(f)	(g)	(h)	(i)	(j)
Proration Calculation			Number of Days in Month	Proration Percentage	Fiscal Year 2022	Fiscal Year 2023	Fiscal Year 2024	Fiscal Year 2025
26	April		30	91.78%	\$22,467	(\$13,655)	(\$64,302)	(\$55,832)
27	May		31	83.29%	\$20,388	(\$12,391)	(\$58,352)	(\$50,665)
28	June		30	75.07%	\$18,376	(\$11,168)	(\$52,593)	(\$45,665)
29	July		31	66.58%	\$16,297	(\$9,905)	(\$46,643)	(\$40,499)
30	August		31	58.08%	\$14,218	(\$8,641)	(\$40,693)	(\$35,332)
31	September		30	49.86%	\$12,206	(\$7,418)	(\$34,934)	(\$30,332)
32	October		31	41.37%	\$10,127	(\$6,155)	(\$28,984)	(\$25,166)
33	November		30	33.15%	\$8,115	(\$4,932)	(\$23,225)	(\$20,166)
34	December		31	24.66%	\$6,036	(\$3,668)	(\$17,275)	(\$15,000)
35	January		31	16.16%	\$3,957	(\$2,405)	(\$11,325)	(\$9,833)
36	February		28	8.49%	\$2,079	(\$1,264)	(\$5,950)	(\$5,167)
37	March		31	0.00%	\$0	\$0	\$0	\$0
38	Total		365		\$134,263	(\$81,601)	(\$384,276)	(\$333,657)
39	Deferred Tax Without Proration	Line 25			\$293,743	(\$178,529)	(\$840,723)	(\$729,979)
40	Average Deferred Tax without Proration	Line 39 × 50%			\$146,871	(\$89,264)	(\$420,362)	(\$364,989)
41	Proration Adjustment	Line 38 - Line 40			(\$12,608)	\$7,663	\$36,086	\$31,332

Column Notes:
(f) Sum of remaining days in the year (Col (e)) ÷ 366
(g) through (j) Current Year Line 25 ÷ 12 × Current Month Col (f)

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
ISR Additions April 2019 through March 2020

Line No.	Month No.	Month	FY 2020 ISR Additions (a)	In Rates (b)	Not In Rates (c) = (a) - (b)	Weight for Days (d)	Weighted Average (e) = (d) × (c)	Weight for Investment (f)=(c)÷Total(c)
2	1	Apr-19	\$12,009,983	\$7,764,750	\$4,245,233	0.958	\$4,068,348	4.03%
3	2	May-19	\$12,009,983	\$7,764,750	\$4,245,233	0.875	\$3,714,579	4.03%
4	3	Jun-19	\$12,009,983	\$7,764,750	\$4,245,233	0.792	\$3,360,809	4.03%
5	4	Jul-19	\$12,009,983	\$7,764,750	\$4,245,233	0.708	\$3,007,040	4.03%
6	5	Aug-19	\$12,009,983	\$7,764,750	\$4,245,233	0.625	\$2,653,271	4.03%
7	6	Sep-19	\$12,009,983	\$0	\$12,009,983	0.542	\$6,505,407	11.41%
8	7	Oct-19	\$12,009,983	\$0	\$12,009,983	0.458	\$5,504,576	11.41%
9	8	Nov-19	\$12,009,983	\$0	\$12,009,983	0.375	\$4,503,744	11.41%
10	9	Dec-19	\$12,009,983	\$0	\$12,009,983	0.292	\$3,502,912	11.41%
11	10	Jan-20	\$12,009,983	\$0	\$12,009,983	0.208	\$2,502,080	11.41%
12	11	Feb-20	\$12,009,983	\$0	\$12,009,983	0.125	\$1,501,248	11.41%
13	12	Mar-20	\$12,009,983	\$0	\$12,009,983	0.042	\$500,416	11.41%
14	Total		\$144,119,796	\$38,823,750	\$105,296,046		\$41,324,429	100.00%
15	Total Additions September 2019 through March 2020				\$84,069,881			
16	FY 2020 Weighted Average Incremental Rate Base Percentage						39.25%	

Column (a)=Page 27 of 35 , Line 1 ,Col (c)
Column (b)=Page 27 of 35 , Line 2 ,Col (c)
Column (d) = (12.5 - Month No.) ÷ 12
Line 14 = Page 27 of 35 Line 1 Col (c)
Line 15 = Sum of Lines 7(c) through 13(c)
Line 16 = Line 14(e)/Line 14(c)

The Narragansett Electric Company
d/b/a Rhode Island Energy
Proposed FY 2025 Gas Infrastructure, Safety,
and Reliability Plan Filing
Section 3: Attachment 1
Page 12 of 35

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Fiscal Year 2025 Revenue Requirement on FY 2021 Actual Incremental Gas Capital Investment**

Line No.			Fiscal Year 2021 (a)	Fiscal Year 2022 (b)	NG 4/1/22 - 5/24/2022 2023 (c)	PPL 5/25/22 - 3/31/23 2023 (d)	Fiscal Year 2024 (e)	Fiscal Year 2025 (f)
Depreciable Net Capital Included in ISR Rate Base								
1	Total Allowed Capital Included in ISR Rate Base in Current Year	Page 27 of 35 , Line 3 ,Col (d)	\$110,177,659					
2	Retirements	Page 27 of 35 , Line 9 ,Col (d)	\$3,860,987					
3	Net Depreciable Capital Included in ISR Rate Base	Year 1 = Line 1 - Line 2; then = Prior Year Line 3	\$106,316,672	\$106,316,672	\$106,316,672	\$106,316,672	\$106,316,672	\$106,316,672
Change in Net Capital Included in ISR Rate Base								
4	Capital Included in ISR Rate Base	Line 1	\$110,177,659	\$0	\$0	\$0	\$0	\$0
5	Depreciation Expense	Page 31 of 35, Line 78(c)	\$40,700,586	\$0	\$0	\$0	\$0	\$0
6	Incremental Capital Amount	Year 1 = Line 4 - Line 5; then = Prior Year Line 6	\$69,477,072	\$69,477,072	\$69,477,072	\$69,477,072	\$69,477,072	\$69,477,072
7	Cost of Removal	Page 27 of 35 , Line 6 ,Col (d)	\$8,861,636					
8	Net Plant Amount	Line 6 + Line 7	\$78,338,709	\$78,338,709	\$78,338,709	\$78,338,709	\$78,338,709	\$78,338,709
Deferred Tax Calculation:								
9	Composite Book Depreciation Rate	Page 29 of 35, Line 86(e)	1/	2.99%	2.99%	2.99%	2.99%	2.99%
10	Number of days		2/		54	311		
11	Proration Percentage		2/		14.79%	85.21%		
12	Tax Depreciation and Year 1 Basis Adjustments	Year 1 =Page 13 of 35, Line 28, Col (a); then = Page 13 of 35, Col (e)	\$63,538,144	\$4,232,177	\$579,121	\$3,935,215	\$7,575,551	\$7,006,781
13	Cumulative Tax Depreciation-NG	Year 1 = Line 12; then = Prior Year Line 13 + Current Year Line 12	\$63,538,144	\$67,770,322	\$68,349,442			
14	Cumulative Tax Depreciation-PPL	Year 1 = Line 12; then = Prior Year Line 14 + Current Year Line 12				\$3,935,215	\$11,510,765	\$18,517,546
15	Book Depreciation	Year 1 = Line 3 × Line 9 × 50%; then = Line 3 × Line 9	\$1,589,434	\$3,178,868	\$470,298	\$2,708,570	\$3,178,868	\$3,178,868
16	Cumulative Book Depreciation	Year 1 = Line 15; then = Prior Year Line 16 + Current Year Line 15	\$1,589,434	\$4,768,303	\$5,238,601	\$7,947,171	\$11,126,040	\$14,304,908
17	Cumulative Book / Tax Timer	Columns (a) through (c): Line 13 - Line 16, Then Line 14 - Line 16	\$61,948,710	\$63,002,019	\$63,110,841	(\$4,011,957)	\$384,726	\$4,212,638
18	Less: Cumulative Book Depreciation at Acquisition	Line 16 Column (c)				\$5,238,601	\$5,238,601	\$5,238,601
19	Cumulative Book / Tax Timer - PPL	Line 17 + Line 18				\$1,226,645	\$5,623,327	\$9,451,239
20	Effective Tax Rate		21.00%	21.00%	21.00%	21.00%	21.00%	21.00%
21	Deferred Tax Reserve	Columns (a) through (c): Line 17 * Line 20, Then Line 19 * Line 20	\$13,009,229	\$13,230,424	\$13,253,277	\$257,595	\$1,180,899	\$1,984,760
22	Add: FY 2021 Federal NOL (Generation) / Utilization	Page 27 of 35; Line 12, Col (d)	(\$5,525,796)	(\$5,525,796)	(\$5,525,796)	\$0	\$0	\$0
23	Net Deferred Tax Reserve before Proration Adjustment	Line 21 + Line 22	\$7,483,434	\$7,704,628	\$7,727,481	\$257,595	\$1,180,899	\$1,984,760
ISR Rate Base Calculation:								
24	Cumulative Incremental Capital Included in ISR Rate Base	Line 8	\$78,338,709	\$78,338,709	\$78,338,709	\$78,338,709	\$78,338,709	\$78,338,709
25	Accumulated Depreciation	- Line 16	(\$1,589,434)	(\$4,768,303)	(\$5,238,601)	(\$7,947,171)	(\$11,126,040)	(\$14,304,908)
26	Deferred Tax Reserve	- Line 23	(\$7,483,434)	(\$7,704,628)	(\$7,727,481)	(\$257,595)	(\$1,180,899)	(\$1,984,760)
27	Year End Rate Base before Deferred Tax Proration	Sum of Lines 24 through 26	\$69,265,841	\$65,865,777	\$65,372,626	\$70,133,942	\$66,031,770	\$62,049,040
Revenue Requirement Calculation:								
28	Average Rate Base before Deferred Tax Proration Adjustment	Year 1 = Current Year Line 27 ÷ 2; then = (Prior Year Line 27 + Current Year Line 27) ÷ 2		\$67,565,809	\$67,999,860	\$67,999,860	\$68,082,856	\$64,040,405
29	Proration Adjustment	Page 14 of 35, Line 41		\$9,494	\$12,037	\$12,037	\$39,630	\$34,504
30	Average ISR Rate Base after Deferred Tax Proration	Line 28 + Line 29		\$67,575,303	\$68,011,897	\$68,011,897	\$68,122,487	\$64,074,909
31	Pre-Tax ROR	Page 35 of 35, Line 30, Column (e)		8.41%	8.41%	8.41%	8.41%	8.41%
32	Proration Percentage	Line 11			14.79%	85.21%		
33	Return and Taxes	Cols (b), (c) and (f): L 30 * L 31; Cols (c) and (d): L 30 * L 31 * L 32		\$5,683,083	\$846,217	\$4,873,583	\$5,729,101	\$5,388,700
34	Book Depreciation	Line 15		\$3,178,868	\$470,298	\$2,708,570	\$3,178,868	\$3,178,868
35	Annual Revenue Requirement	Sum of Lines 33 through 34	N/A	\$8,861,951	\$1,316,515	\$7,582,154	\$8,907,970	\$8,567,568

1/ 2.99%, Composite Book Depreciation Rate approved per RIPUC Docket No. 4770, effective on Sep 1, 2018

2/ Columns (c) and (d) represent the 12 months within fiscal year 2023, but activity is separated to accommodate the impacts of the acquisition as described in note 3.

3/ National Grid and PPL Corporation ("PPL") elected to treat PPL's acquisition of The Narragansett Electric Company ("NECO") from National Grid on May 25, 2022 as an asset sale for U.S. federal income tax purposes under Internal Revenue Code Section 338(h)(10). As a result of this election, PPL was deemed to acquire the assets of NECO at fair market value (essentially equivalent to book value) for tax purposes. The resulting "step-up" in tax basis eliminates most book/tax timing differences and the related accumulated net deferred income tax liabilities as of the acquisition date, at which time PPL will begin depreciating the new tax basis and start the tracking of book/tax timing differences as if PPL purchased a new asset in the year of acquisition.

4/ Columns (c) and (d) takes the average of the "Year End Rate Base before Deferred Tax Proration" at the beginning of the fiscal year on Line 27, Column (b) and the end of the fiscal year on Line 27, Column (d). See note 2.

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Tax Depreciation and Repairs Deduction on FY 2021 Incremental Capital Investments

Line No.			Fiscal Year 2021 (a)	(b)	(c)	(d)	(e)	(f)
1	Capital Repairs Deduction							
2	Plant Additions	Page 12 of 35, Line 1	\$110,177,659					
3	Capital Repairs Deduction Rate	Per Tax Department	46.79%					
4	Capital Repairs Deduction	Line 1 × Line 2	\$51,552,126					
5								
6	Bonus Depreciation							
7	Plant Additions	Line 1	\$110,177,659					
8	Less Capital Repairs Deduction	Line 3	\$51,552,126					
9	Plant Additions Net of Capital Repairs Deduction	Line 7 - Line 8	\$58,625,533					
10	Percent of Plant Eligible for Bonus Depreciation	Per Tax Department	0.00%					
11	Plant Eligible for Bonus Depreciation	Line 9 × Line 10	\$0					
12	Bonus Depreciation Rate ()	Per Tax Department	0.00%					
13	Bonus Depreciation Rate ()	Per Tax Department	0.00%					
14	Total Bonus Depreciation Rate	Line 12 + Line 13	0.00%					
15	Bonus Depreciation	Line 11 × Line 14	\$0					
16								
17	Remaining Tax Depreciation							
18	Plant Additions	Line 1	\$110,177,659					
19	Less Capital Repairs Deduction	Line 3	\$51,552,126					
20	Less Bonus Depreciation	Line 15	\$0					
21	Remaining Plant Additions Subject to 20 YR MACRS Tax Depreciation	Line 18 - Line 19 - Line 20	\$58,625,533					
22	20 YR MACRS Tax Depreciation Rates	IRS Publication 946	3.75%					
23	Remaining Tax Depreciation	Line 21 × Line 22	\$2,198,457					
24								
25	FY21 tax (gain)/loss on retirements	Per Tax Department	925,925					
26	Cost of Removal	Page 12 of 35, Line 7	\$8,861,636					
27								
28	Total Tax Depreciation and Repairs Deduction	Sum of Lines 3, 15, 23, 25 & 26	\$63,538,144					
29								
30								
31								
32								
33								
34								
35								
36								
37								

		20 Year MACRS Depreciation				
		MACRS basis:	Line 21, Column (a)			
			Annual Cumulative			
		Fiscal Year	Prorated			
		FY Mar-2021	3.750%	\$2,198,457	\$63,538,144	
		FY Mar-2022	7.219%	\$4,232,177	\$67,770,322	
		FY Mar-2023 (Apr-May 2022)	6.677%	0.988%	\$579,121	\$68,349,442
		PPL Acquisition - May 25, 2022				
		Book Cost		Line 1, Column (a)	\$110,177,659	
		Cumulative Book Depreciation		- Page 12 of 35, Line 16, Col (c)	(\$5,238,601)	
		PPL MACRS basis:		Line 11 + Line 12	\$104,939,057	
		FY Mar-2023 (Jun-Mar 2023)	3.750%	\$3,935,215	\$3,935,215	
		Mar-2024	7.219%	\$7,575,551	\$11,510,765	
		Mar-2025	6.677%	\$7,006,781	\$18,517,546	
		Mar-2026	6.177%	\$6,482,086	\$24,999,632	
		Mar-2027	5.713%	\$5,995,168	\$30,994,800	
		Mar-2028	5.285%	\$5,546,029	\$36,540,829	
		Mar-2029	4.888%	\$5,129,421	\$41,670,250	
		Mar-2030	4.522%	\$4,745,344	\$46,415,595	
		Mar-2031	4.462%	\$4,682,381	\$51,097,975	
		Mar-2032	4.461%	\$4,681,331	\$55,779,307	
		Mar-2033	4.462%	\$4,682,381	\$60,461,687	
		Mar-2034	4.461%	\$4,681,331	\$65,143,019	
		Mar-2035	4.462%	\$4,682,381	\$69,825,399	
		Mar-2036	4.461%	\$4,681,331	\$74,506,731	
		Mar-2037	4.462%	\$4,682,381	\$79,189,112	
		Mar-2038	4.461%	\$4,681,331	\$83,870,443	
		Mar-2039	4.462%	\$4,682,381	\$88,552,824	
		Mar-2040	4.461%	\$4,681,331	\$93,234,155	
		Mar-2041	4.462%	\$4,682,381	\$97,916,536	
		Mar-2042	4.461%	\$4,681,331	\$102,597,867	
		Mar-2043	2.231%	\$2,341,190	\$104,939,057	
			100.000%	\$104,939,057		

Column (d), Line 8 = MACRS Rate 6.677% / 365 days x 54 days

1/ Capital Repairs percentage is the actual result of FY2021 tax return
2/ Actual Loss based on FY2021 tax return

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Net Deferred Tax Reserve Proration on FY 2021 Incremental Capital Investments**

Line No.	Deferred Tax Subject to Proration	Fiscal Year <u>2022</u> (a)	Fiscal Year <u>2023</u> (b)	Fiscal Year <u>2024</u> (c)	Fiscal Year <u>2025</u> (d)
1	Book Depreciation				
		See the corresponding Fiscal Year on Page 12 of 35, Line 15. Note there are 2 columns to sum for FY23.			
		\$3,178,868	\$3,178,868	\$3,178,868	\$3,178,868
2	Bonus Depreciation				
3	Remaining MACRS Tax Depreciation				
		See the corresponding Fiscal Year on Page 12 of 35, Line 12. Note there are 2 columns to sum for FY23.			
		(\$4,232,177)	(\$4,514,335)	(\$7,575,551)	(\$7,006,781)
4	FY21 tax (gain)/loss on retirements				
		Page 13 of 35 , Line 25 ,Col (a)			
5	Cumulative Book / Tax Timer	\$0	\$0	\$0	\$0
		Sum of Lines 1 through 4			
6	Effective Tax Rate	21%	21%	21%	21%
7	Deferred Tax Reserve	(\$221,195)	(\$280,448)	(\$923,303)	(\$803,862)
	Deferred Tax Not Subject to Proration				
8	Capital Repairs Deduction				
		Col (a): Docket 4996, R.S. 3, Att. 1R, page 14 Col (a)			
9	Cost of Removal				
		Col (a): Docket 4996, R.S. 3, Att. 1R, page 14 Col (a)			
10	Book/Tax Depreciation Timing Difference at 3/31/2021				
11	Cumulative Book / Tax Timer				
		Line 8 + Line 9 + Line 10			
12	Effective Tax Rate				
13	Deferred Tax Reserve				
		Line 11 × Line 12			
14	Total Deferred Tax Reserve	(\$221,195)	(\$280,448)	(\$923,303)	(\$803,862)
15	Net Operating Loss				
		Col (a): Docket 4996, R.S. 3, Att. 1R, page 14 Col (a)			
16	Net Deferred Tax Reserve	(\$221,195)	(\$280,448)	(\$923,303)	(\$803,862)
		Line 14 + Line 15			
17	Allocation of FY 2021 Estimated Federal NOL				
		Line 5			
18	Cumulative Book/Tax Timer Subject to Proration	(\$1,053,309)	(\$1,335,467)	(\$4,396,682)	(\$3,827,912)
		Line 11			
19	Cumulative Book/Tax Timer Not Subject to Proration	\$0	\$0	\$0	\$0
		Line 17 + Line 18			
20	Total FY 2021 Federal NOL	(\$1,053,309)	(\$1,335,467)	(\$4,396,682)	(\$3,827,912)
21	Allocated FY 2021 Federal NOL Not Subject to Proration				
		Col (a): Docket 4996, R.S. 3, Att. 1R, page 14 Col (a) (Line 18 ÷ Line 19) × Line 20			
22	Allocated FY 2021 Federal NOL Subject to Proration				
		(Line 17 ÷ Line 19) × Line 20			
23	Effective Tax Rate				
24	Deferred Tax Benefit subject to proration				
		Line 22 × Line 23			
25	Net Deferred Tax Reserve subject to proration	(\$221,195)	(\$280,448)	(\$923,303)	(\$803,862)
		Line 7 + Line 24			
		(e)	(f)	(g)	(h)
		(i)	(j)	(k)	(l)
	Proration Calculation	<u>Number of Days in Month</u>	<u>Proration Percentage</u>	<u>Fiscal Year 2022</u>	<u>Fiscal Year 2023</u>
		<u>2024</u>	<u>2025</u>	<u>2026</u>	<u>2027</u>
26	April	30	91.78%	(\$16,918)	(\$21,450)
27	May	31	83.29%	(\$15,352)	(\$19,465)
28	June	30	75.07%	(\$13,837)	(\$17,544)
29	July	31	66.58%	(\$12,272)	(\$15,559)
30	August	31	58.08%	(\$10,706)	(\$13,574)
31	September	30	49.86%	(\$9,191)	(\$11,653)
32	October	31	41.37%	(\$7,626)	(\$9,668)
33	November	30	33.15%	(\$6,111)	(\$7,748)
34	December	31	24.66%	(\$4,545)	(\$5,763)
35	January	31	16.16%	(\$2,980)	(\$3,778)
36	February	28	8.49%	(\$1,566)	(\$1,985)
37	March	31	0.00%	\$0	\$0
38	Total	365		(\$101,103)	(\$128,187)
				(\$422,021)	(\$367,427)
39	Deferred Tax Without Proration		Line 25	(\$221,195)	(\$280,448)
40	Average Deferred Tax without Proration			(\$923,303)	(\$803,862)
		Line 39 × 0.5			
41	Proration Adjustment		Line 38 - Line 40	\$9,494	\$12,037
				\$39,630	\$34,504

Column Notes:
(f) Sum of remaining days in the year (Col (e)) ÷ 365
(g) through (j) Current Year Line 25 ÷ 12 × Current Month Col (f)

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Fiscal Year 2025 Revenue Requirement on FY 2022 Actual Incremental Gas Capital Investment

Line No.			NG		PPL		Fiscal Year	Fiscal Year
			2022 (a)	2023 (b)	2023 (c)	2024 (d)	2025 (e)	
Depreciable Net Capital Included in ISR Rate Base								
1	Total Allowed Capital Included in ISR Rate Base in Current Year	Page 27 of 35 , Line 3 ,Col (e)	\$156,694,227					
2	Retirements	Page 27 of 35 , Line 9 ,Col (e)	\$6,258,509					
3	Net Depreciable Capital Included in ISR Rate Base	Year 1 = Line 1 - Line 2; then = Prior Year Line 3	\$150,435,718	\$150,435,718	\$150,435,718	\$150,435,718	\$150,435,718	\$150,435,718
Change in Net Capital Included in ISR Rate Base								
4	Capital Included in ISR Rate Base	Line 1	\$156,694,227	\$0	\$0	\$0	\$0	\$0
5	Depreciation Expense	Page 31 of 35, Line 77(c)	\$40,954,246	\$0	\$0	\$0	\$0	\$0
6	Incremental Capital Amount	Year 1 = Line 4 - Line 5; then = Prior Year Line 6	\$115,739,981	\$115,739,981	\$115,739,981	\$115,739,981	\$115,739,981	\$115,739,981
7	Cost of Removal	Page 27 of 35 , Line 6 ,Col (e)	\$10,773,005					
8	Net Plant Amount	Line 6 + Line 7	\$126,512,985	\$126,512,985	\$126,512,985	\$126,512,985	\$126,512,985	\$126,512,985
Deferred Tax Calculation:								
9	Composite Book Depreciation Rate	Page 29 of 35, Line 86(e)	1/ 2.99%	2.99%	2.99%	2.99%	2.99%	2.99%
10	Number of days		2/ 54	311				
11	Proration Percentage		2/ 14.79%	85.21%				
12	Tax Depreciation and Year 1 Basis Adjustments	Year 1 =Page 16 of 35, Line 28, Col (a); then = Page 16 of 35, Col (e)	\$127,609,589	\$448,503	\$5,766,741	\$11,101,360	\$10,267,874	
13	Cumulative Tax Depreciation-NG	Year 1 = Line 12; then = Prior Year Line 13 + Current Year Line 12	3/ \$127,609,589	\$128,058,092				
14	Cumulative Tax Depreciation-PPL	Year 1 = Line 12; then = Prior Year Line 14 + Current Year Line 12	3/		\$5,766,741	\$16,868,101	\$27,135,975	
15	Book Depreciation	Year 1 = Line 3 × Line 9 × 50%; then = Line 3 × Line 9	2/ \$2,249,014	\$665,462	\$3,832,566	\$4,498,028	\$4,498,028	
16	Cumulative Book Depreciation	Year 1 = Line 15; then = Prior Year Line 16 + Current Year Line 15	\$2,249,014	\$2,914,476	\$6,747,042	\$11,245,070	\$15,743,098	
17	Cumulative Book / Tax Timer	Columns (a) and (b): Line 13 - Line 16, Then Line 14 - Line 16	\$125,360,575	\$125,143,617	(\$980,301)	\$5,623,031	\$11,392,877	
18	Less: Cumulative Book Depreciation at Acquisition	Line 16 Column (b)	3/		\$2,914,476	\$2,914,476	\$2,914,476	
19	Cumulative Book / Tax Timer - PPL	Line 17 + Line 18			\$1,934,174	\$8,537,507	\$14,307,353	
20	Effective Tax Rate		21.00%	21.00%	21.00%	21.00%	21.00%	
21	Deferred Tax Reserve	Columns (a) through (b): Line 17 * Line 20, Then Line 19 * Line 20	\$26,325,721	\$26,280,159	\$406,177	\$1,792,876	\$3,004,544	
22	Add: FY 2022 Federal NOL (Generation) / Utilization	Page 27 of 35 , Line 12 ,Col (e)	3/ (\$3,264,442)	(\$3,264,442)	\$0	\$0	\$0	
23	Net Deferred Tax Reserve before Proration Adjustment	Line 21 + Line 22	\$23,061,278	\$23,015,717	\$406,177	\$1,792,876	\$3,004,544	
ISR Rate Base Calculation:								
24	Cumulative Incremental Capital Included in ISR Rate Base	Line 8	\$126,512,985	\$126,512,985	\$126,512,985	\$126,512,985	\$126,512,985	
25	Accumulated Depreciation	- Line 16	(\$2,249,014)	(\$2,914,476)	(\$6,747,042)	(\$11,245,070)	(\$15,743,098)	
26	Deferred Tax Reserve	- Line 23	(\$23,061,278)	(\$23,015,717)	(\$406,177)	(\$1,792,876)	(\$3,004,544)	
27	Year End Rate Base before Deferred Tax Proration	Sum of Lines 24 through 26	\$101,202,693	\$100,582,792	\$119,359,767	\$113,475,039	\$107,765,343	
Revenue Requirement Calculation:								
28	Average Rate Base before Deferred Tax Proration Adjustment	Year 1 = Current Year Line 27 ÷ 2; then = (Prior Year Line 27 + Current Year Line 27) ÷ 2	4/ \$50,601,346	\$110,281,230	\$110,281,230	\$116,417,403	\$110,620,191	
29	Proration Adjustment	Page 17 of 35, Line 41	(\$6,077)	\$15,478	\$15,478	\$59,520	\$52,008	
30	Average ISR Rate Base after Deferred Tax Proration	Line 28 + Line 29	\$50,595,269	\$110,296,708	\$110,296,708	\$116,476,923	\$110,672,199	
31	Pre-Tax ROR	Page 35 of 35, Line 30, Column (e)	8.41%	8.41%	8.41%	8.41%	8.41%	
32	Proration Percentage	Line 11		14.79%	85.21%			
33	Return and Taxes	Cols (a), (d) and (e): L 30 * L 31; Cols (b) and (c): L 30 * L 31 * L 32	2/ \$4,255,062	\$1,372,333	\$7,903,620	\$9,795,709	\$9,307,532	
34	Book Depreciation	Line 15	\$2,249,014	\$665,462	\$3,832,566	\$4,498,028	\$4,498,028	
35	Annual Revenue Requirement	Sum of Lines 33 through 34	\$6,504,076	\$2,037,794	\$11,736,187	\$14,293,737	\$13,805,560	
36	Docket No. 5099 FY 2022 Gas ISR Reconciliation, Page 1, Line 6(b)		\$5,976,115					
37	2022 Tax True-Up		\$527,961					

1/ 2.99%, Composite Book Depreciation Rate approved per RIPUC Docket No. 4770, effective on Sep 1, 2018

2/ Columns (b) and (c) represent the 12 months within fiscal year 2023, but activity is separated to accommodate the impacts of the acquisition as described in note 3.

3/ National Grid and PPL Corporation ("PPL") elected to treat PPL's acquisition of The Narragansett Electric Company ("NECO") from National Grid on May 25, 2022 as an asset sale for U.S. federal income tax purposes under Internal Revenue Code Section 338(h)(10). As a result of this election, PPL was deemed to acquire the assets of NECO at fair market value (essentially equivalent to book value) for tax purposes. The resulting "step-up" in tax basis eliminates most book/tax timing differences and the related accumulated net deferred income tax liabilities as of the acquisition date, at which time PPL will begin depreciating the new tax basis and start the tracking of book/tax timing differences as if PPL purchased a new asset in the year of acquisition.

4/ Columns (b) and (c) takes the average of the "Year End Rate Base before Deferred Tax Proration" at the beginning of the fiscal year on Line 27, Column (a) and the end of the fiscal year on Line 27, Column (c). See note 2.

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Tax Depreciation and Repairs Deduction on FY 2022 Incremental Capital Investments

Line No.			Fiscal Year		(b)	(c)	(d)	(e)	(f)
			2022	(a)					
	Capital Repairs Deduction								
1	Plant Additions	Page 15 of 35, Line 1	\$156,694,227			20 Year MACRS Depreciation			
2	Capital Repairs Deduction Rate	Per Tax Department	73.20%	1/					
3	Capital Repairs Deduction	Line 1 × Line 2	\$114,700,174		MACRS basis:	Line 21, Column (a)	\$41,994,053		
4							Annual	Cumulative	
5					Fiscal Year	Prorated			
6	Bonus Depreciation				FY Mar-2022	3.750%	\$1,574,777	\$127,609,589	
7	Plant Additions	Line 1	\$156,694,227		FY Mar-2023 (Apr-May 2022)	7.219%	1.068%	\$448,503	\$128,058,092
8	Less Capital Repairs Deduction	Line 3	\$114,700,174						
9	Plant Additions Net of Capital Repairs Deduction	Line 7 - Line 8	\$41,994,053		PPL Acquisition - May 25, 2022				
10	Percent of Plant Eligible for Bonus Depreciation	Per Tax Department	0.00%		Book Cost	Line 1, Column (a)	\$156,694,227		
11	Plant Eligible for Bonus Depreciation	Line 9 × Line 10	\$0		Cumulative Book Depreciation	- Page 15 of 35, Line 16, Col (b)	(\$2,914,476)		
12	Bonus Depreciation Rate 30%	Per Tax Department	0.00%		PPL MACRS basis:	Line 10 + Line 11	\$153,779,751		
13	Bonus Depreciation Rate 0%	Per Tax Department	0.00%						
14	Total Bonus Depreciation Rate	Line 12 + Line 13	0.00%		FY Mar-2023 (Jun-Mar 2023)	3.750%	\$5,766,741	\$5,766,741	
15	Bonus Depreciation	Line 11 × Line 14	\$0		Mar-2024	7.219%	\$11,101,360	\$16,868,101	
16					Mar-2025	6.677%	\$10,267,874	\$27,135,975	
17	Remaining Tax Depreciation				Mar-2026	6.177%	\$9,498,975	\$36,634,950	
18	Plant Additions	Line 1	\$156,694,227		Mar-2027	5.713%	\$8,785,437	\$45,420,387	
19	Less Capital Repairs Deduction	Line 3	\$114,700,174		Mar-2028	5.285%	\$8,127,260	\$53,547,647	
20	Less Bonus Depreciation	Line 15	\$0		Mar-2029	4.888%	\$7,516,754	\$61,064,401	
21	Remaining Plant Additions Subject to 20 YR MACRS Tax Depreciation	Line 18 - Line 19 - Line 20	\$41,994,053		Mar-2030	4.522%	\$6,953,920	\$68,018,322	
22	20 YR MACRS Tax Depreciation Rates	IRS Publication 946	3.75%		Mar-2031	4.462%	\$6,861,653	\$74,879,974	
23	Remaining Tax Depreciation	Line 21 × Line 22	\$1,574,777		Mar-2032	4.461%	\$6,860,115	\$81,740,089	
24					Mar-2033	4.462%	\$6,861,653	\$88,601,742	
25	FY22 tax (gain)/loss on retirements	Per Tax Department	561,633	2/	Mar-2034	4.461%	\$6,860,115	\$95,461,856	
26	Cost of Removal	Page 15 of 35, Line 7	\$10,773,005		Mar-2035	4.462%	\$6,861,653	\$102,323,509	
27					Mar-2036	4.461%	\$6,860,115	\$109,183,623	
28	Total Tax Depreciation and Repairs Deduction	Sum of Lines 3, 15, 23, 25 & 26	\$127,609,589		Mar-2037	4.462%	\$6,861,653	\$116,045,276	
29					Mar-2038	4.461%	\$6,860,115	\$122,905,391	
30					Mar-2039	4.462%	\$6,861,653	\$129,767,043	
31					Mar-2040	4.461%	\$6,860,115	\$136,627,158	
32					Mar-2041	4.462%	\$6,861,653	\$143,488,810	
33					Mar-2042	4.461%	\$6,860,115	\$150,348,925	
34					Mar-2043	2.231%	\$3,430,826	\$153,779,751	
35						100.000%	\$153,779,751		
36									

Column (d), Line 7 = MACRS Rate 7.219% / 365 days x 54 days

1/ Capital Repairs percentage is the actual result of FY2022 tax return
2/ Actual Loss based on FY2022 tax return

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Net Deferred Tax Reserve Proration on FY 2022 Incremental Capital Investments**

Line No.	Deferred Tax Subject to Proration	Fiscal Year <u>2022</u> (a)	Fiscal Year <u>2023</u> (b)	Fiscal Year <u>2024</u> (c)	Fiscal Year <u>2025</u> (d)
1	Book Depreciation				
2	Bonus Depreciation				
		See the corresponding Fiscal Year on Page 15 of 35, Line 15. Note there are 2 columns to sum for FY23.			
		\$2,249,014	\$4,498,028	\$4,498,028	\$4,498,028
		Col (a): - Page 16 of 35, Line 23, column (a), thereafter, see the corresponding Fiscal Year on Page 15 of 35, Line 12. Note there are 2 columns to sum for FY23.			
3	Remaining MACRS Tax Depreciation	(\$1,574,777)	(\$6,215,244)	(\$11,101,360)	(\$10,267,874)
4	FY22 tax (gain)/loss on retirements	\$0	\$0	\$0	\$0
5	Cumulative Book / Tax Timer	\$674,237	(\$1,717,216)	(\$6,603,332)	(\$5,769,846)
6	Effective Tax Rate	21%	21%	21%	21%
7	Deferred Tax Reserve	\$141,590	(\$360,615)	(\$1,386,700)	(\$1,211,668)
		Line 5 × Line 6			
	Deferred Tax Not Subject to Proration				
8	Capital Repairs Deduction				
9	Cost of Removal				
10	Book/Tax Depreciation Timing Difference at 3/31/2022				
11	Cumulative Book / Tax Timer				
12	Effective Tax Rate				
13	Deferred Tax Reserve				
		Line 8 + Line 9 + Line 10			
14	Total Deferred Tax Reserve	\$141,590	(\$360,615)	(\$1,386,700)	(\$1,211,668)
15	Net Operating Loss				
16	Net Deferred Tax Reserve	\$141,590	(\$360,615)	(\$1,386,700)	(\$1,211,668)
		Line 14 + Line 15			
	Allocation of FY 2022 Estimated Federal NOL				
17	Cumulative Book/Tax Timer Subject to Proration				
18	Cumulative Book/Tax Timer Not Subject to Proration				
19	Total Cumulative Book/Tax Timer				
		Line 5 Line 11 Line 17 + Line 18			
20	Total FY 2022 Federal NOL				
21	Allocated FY 2022 Federal NOL Not Subject to Proration				
22	Allocated FY 2022 Federal NOL Subject to Proration				
23	Effective Tax Rate				
24	Deferred Tax Benefit subject to proration				
		- Page 15 of 35 , Line 22 ,Col (a)=21% (Line 18 ÷ Line 19) × Line 20 (Line 17 ÷ Line 19) × Line 20 Line 22 × Line 23			
25	Net Deferred Tax Reserve subject to proration	\$141,590	(\$360,615)	(\$1,386,700)	(\$1,211,668)
		Line 7 + Line 24			
		(e)	(f)	(g)	(h)
		(i)	(j)	(k)	(l)
	Proration Calculation	<u>Number of Days in Month</u>	<u>Proration Percentage</u>	<u>Fiscal Year 2022</u>	<u>Fiscal Year 2023</u>
26	April	30	91.78%	\$10,829	(\$27,581)
27	May	31	83.29%	\$9,827	(\$25,029)
28	June	30	75.07%	\$8,857	(\$22,559)
29	July	31	66.58%	\$7,855	(\$20,007)
30	August	31	58.08%	\$6,853	(\$17,454)
31	September	30	49.86%	\$5,883	(\$14,984)
32	October	31	41.37%	\$4,881	(\$12,432)
33	November	30	33.15%	\$3,911	(\$9,962)
34	December	31	24.66%	\$2,909	(\$7,410)
35	January	31	16.16%	\$1,907	(\$4,858)
36	February	28	8.49%	\$1,002	(\$2,552)
37	March	31	0.00%	\$0	\$0
38	Total	365		\$64,718	(\$164,829)
				(\$633,829)	(\$553,826)
39	Deferred Tax Without Proration			\$141,590	(\$360,615)
40	Average Deferred Tax without Proration			\$70,795	(\$180,308)
		Line 39 × 0.5			
41	Proration Adjustment			(\$6,077)	\$15,478
		Line 38 - Line 40			
				(\$693,350)	(\$605,834)
				\$59,520	\$52,008

Column Notes:
(f) Sum of remaining days in the year (Col (e)) ÷ 365
(g) through (j) Current Year Line 25 ÷ 12 × Current Month Col (f)

The Narragansett Electric Company
d/b/a Rhode Island Energy
Proposed FY 2025 Gas Infrastructure, Safety,
and Reliability Plan Filing
Section 3: Attachment 1
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The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Fiscal Year 2025 Revenue Requirement on FY 2023 Actual Incremental Gas Capital Investment

Line No.			NG		PPL		Fiscal Year 2024 (c)	Fiscal Year 2025 (d)
			4/1/22 - 5/24/2022 2023 (a)	5/25/22 - 3/31/23 2023 (b)				
Depreciable Net Capital Included in ISR Rate Base								
1	Total Allowed Capital Included in ISR Rate Base in Current Year	Page 27 of 35 , Line 3 ,Col (f)	2/	\$22,436,083	\$129,215,219			
2	Retirements	Page 27 of 35 , Line 9 ,Col (f)	2/	1,256,752	7,237,958			
3	Net Depreciable Capital Included in ISR Rate Base	Year 1 = Line 1 - Line 2; then = Prior Year Line 3		\$21,179,331	\$121,977,261	\$143,156,592	\$143,156,592	
Change in Net Capital Included in ISR Rate Base								
4	Capital Included in ISR Rate Base	Line 1		\$22,436,083	\$129,215,219			
5	Depreciation Expense	Page 31 of 35, Line 77(c)	2/	\$6,058,984	\$34,895,262			
6	Incremental Capital Amount	Year 1 = Line 4 - Line 5; then = Prior Year Line 6		\$16,377,099	\$94,319,957	\$110,697,056	\$110,697,056	
7	Cost of Removal	Page 27 of 35 , Line 6 ,Col (f)	2/	\$1,569,324	\$9,038,142			
8	Net Plant Amount	Line 6 + Line 7		\$17,946,422	\$103,358,099	\$121,304,521	\$121,304,521	
Deferred Tax Calculation:								
9	Composite Book Depreciation Rate	Page 29 of 35, Line 86(e)	1/	2.99%	2.99%	2.99%	2.99%	
10	Proration Percentage							
11	Tax Depreciation and Year 1 Basis Adjustments	Col (a) = Page 19 of 35, Column (a), Line 28; Col (b) = Page 19 of 35, Col (b), Lines 19,25,26 + Col (f), Line 15, Then remaining years from Page 19 of 35, Col (f)		\$15,784,290	\$91,735,295	\$4,878,410	\$4,512,141	
12	Cumulative Tax Depreciation-NG	Col (a) = Line 11; then = zero	3/	\$15,784,290				
13	Cumulative Tax Depreciation-PPL	Col (b) = Line 11; then = Prior Year Line 13 + Current Year Line 11	3/		\$91,735,295	\$96,613,705	\$101,125,846	
14	Book Depreciation	Year 1 (Columns (a) and (b)) = Line 3 × Line 9 × 50%; then = Line 3 × Line 9		\$316,631	\$1,823,560	\$4,280,382	\$4,280,382	
15	Cumulative Book Depreciation	Year 1 = Line 14; then = Prior Year Line 15 + Current Year Line 14		\$316,631	\$2,140,191	\$6,420,573	\$10,700,955	
16	Book / Tax Timer	Line 11 - Line 14		\$15,467,658	\$89,911,735	\$598,028	\$231,759	
17	Cumulative Book / Tax Timer -NG	Line 16, Column (a), then = zero	3/	\$15,467,658				
18	Cumulative Book / Tax Timer - PPL	Col (a) = zero; Col (b) = Line 16, Column (b); then = Prior Year Line 18 + Current Year Line 16	3/		\$89,911,735	\$90,509,763	\$90,741,522	
19	Cumulative Book / Tax Timer - Total	Line 17 + Line 18		\$15,467,658	\$89,911,735	\$90,509,763	\$90,741,522	
20	Effective Tax Rate			21.00%	21.00%	21.00%	21.00%	
21	Deferred Tax Reserve	Line 19 × Line 20		\$3,248,208	\$18,881,464	\$19,007,050	\$19,055,720	
22	Add: FY 2023-NG Federal NOL (Generation) / Utilization	Page 27 of 35 , Line 12 ,Col (f)	3/	\$43,762,725	\$0	\$0	\$0	
23	Net Deferred Tax Reserve before Proration Adjustment	Line 21 + Line 22		\$47,010,933	\$18,881,464	\$19,007,050	\$19,055,720	
ISR Rate Base Calculation:								
24	Cumulative Incremental Capital Included in ISR Rate Base	Line 8		\$17,946,422	\$103,358,099	\$121,304,521	\$121,304,521	
25	Accumulated Depreciation	Year 1 (Cols (a) and (b)) = -Line 14; Then = -Line 15		(\$316,631)	(\$1,823,560)	(\$6,420,573)	(\$10,700,955)	
26	Deferred Tax Reserve	- Line 23		(\$47,010,933)	(\$18,881,464)	(\$19,007,050)	(\$19,055,720)	
27	Year End Rate Base before Deferred Tax Proration	Sum of Lines 24 through 26		(\$29,381,142)	\$82,653,074	\$95,876,898	\$91,547,846	
Revenue Requirement Calculation:								
28	Average Rate Base before Deferred Tax Proration Adjustment	Year 1 (Cols (a) and (b)) = Current Year, Line 27 * 50%; Then = (Prior Year Line 27 + Current Year Line 27) ÷ 2		(\$14,690,571)	\$41,326,537	\$74,574,415	\$93,712,372	
29	Proration Adjustment	Page 20 of 35, Line 41	2/	(\$768,920)	(\$52,132)	\$5,390	\$2,089	
30	Average ISR Rate Base after Deferred Tax Proration	Line 28 + Line 29		(\$15,459,491)	\$41,274,405	\$74,579,806	\$93,714,461	
31	Pre-Tax ROR	Page 35 of 35, Line 30, Column (e)		8.41%	8.41%	8.41%	8.41%	
32	Proration	Line 10						
33	Return and Taxes	Line 30 x Line 31		(\$1,300,143)	\$3,471,177	\$6,272,162	\$7,881,386	
34	Book Depreciation	Line 14		\$316,631	\$1,823,560	\$4,280,382	\$4,280,382	
35	Annual Revenue Requirement	Sum of Lines 33 through 34		(\$983,512)	\$5,294,738	\$10,552,544	\$12,161,768	

1/ 2.99%, Composite Book Depreciation Rate approved per RIPUC Docket No. 4770, effective on Sep 1, 2018

2/ Columns (a) and (b) represent the 12 months within fiscal year 2023, but activity is separated to accommodate the impacts of the acquisition as described in note 3.

3/ National Grid and PPL Corporation ("PPL") elected to treat PPL's acquisition of The Narragansett Electric Company ("NECO") from National Grid on May 25, 2022 as an asset sale for U.S. federal income tax purposes under Internal Revenue Code Section 338(h)(10). As a result of this election, PPL was deemed to acquire the assets of NECO at fair market value (essentially equivalent to book value) for tax purposes. The resulting "step-up" in tax basis eliminates most book/tax timing differences and the related accumulated net deferred income tax liabilities as of the acquisition date, at which time PPL will begin depreciating the new tax basis and start the tracking of book/tax timing differences as if PPL purchased a new asset in the year of acquisition.

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Tax Depreciation and Repairs Deduction on FY 2023 Incremental Capital Investments

Line No.			NG		PPL		(c)	(d)	(e)	(f)	(g)	
			Apr 1-May 24, 2022		May 25-Mar 31, 2023							
			FY 2023	FY 2023	FY 2023	FY 2023						
		(a)	(b)									
1	Capital Repairs Deduction											
1	Plant Additions	Page 18 of 35, Line 1	\$22,436,083	\$129,215,219								
2	Capital Repairs Deduction Rate	Per Tax Department	64.82%	64.82%								
3	Capital Repairs Deduction	Line 1 × Line 2	\$14,543,069	\$83,757,305								
6	Bonus Depreciation											
7	Plant Additions	Line 1	\$22,436,083	\$129,215,219								
8	Less Capital Repairs Deduction	Line 3	\$14,543,069	\$83,757,305								
9	Plant Additions Net of Capital Repairs Deduction	Line 7 - Line 8	\$7,893,014	\$45,457,914								
10	Percent of Plant Eligible for Bonus Depreciation	Per Tax Department	0.00%	0.00%								
11	Plant Eligible for Bonus Depreciation	Line 9 × Line 10	\$0	\$0								
12	Bonus Depreciation Rate 1	Per Tax Department	0.00%	0.00%								
13	Bonus Depreciation Rate 2	Per Tax Department	0.00%	0.00%								
14	Total Bonus Depreciation Rate	Line 12 + Line 13	0.00%	0.00%								
15	Bonus Depreciation	Line 11 × Line 14	\$0	\$0								
18	Remaining Tax Depreciation											
18	Plant Additions	Line 1	\$22,436,083	\$129,215,219								
19	Less Capital Repairs Deduction	Line 3	\$14,543,069	\$83,757,305								
20	Less Bonus Depreciation	Line 15	\$0	\$0								
21	Remaining Plant Additions Subject to 20 YR MACRS Tax Depreciation	Line 18 - Line 19 - Line 20	\$7,893,014	\$45,457,914								
22	20 YR MACRS Tax Depreciation Rates	IRS Publication 946	3.75%	3.75%								
23	Remaining Tax Depreciation	Line 21 × Line 22	\$295,988	\$1,704,672								
25	FY23 tax (gain)/loss on retirements	Per Tax Department	(624,091)	(3,594,303)								
26	Cost of Removal	Page 18 of 35, Line 7	\$1,569,324	\$9,038,142								
28	Total Tax Depreciation and Repairs Deduction	Sum of Lines 3, 15, 23, 25 & 26	\$15,784,290	\$90,905,816								
30	Reconciliation of MACRS Tax Depreciation:											
31	Apr 1 -May 24, 2022 Plant Additions	Line 1, Column		\$22,436,083								
32	Cumulative Book Depreciation through May 24, 2022	, Line 19, Col		(\$316,631)								
33	2022 Plant Additions (Net Book) through Acquisition	Line 31 + Line 32		\$22,119,452								
34	20 YR MACRS Tax Depreciation Rates	Per IRS Publication 946		3.750%								
35	Tax Depreciation	Line 33 * Line 34		\$829,479								
37	MACRS Basis in May 25-Mar 2023 Plant Additions	Line 20, Column (a)		\$45,457,914								
38	20 YR MACRS Tax Depreciation Rates	Per IRS Publication 946		3.750%								
39	Tax Depreciation	Line 37 * Line 38		\$1,704,672								
41	Total MACRS Tax Depreciation	Sum of Lines 35, 39, Column (b)		\$2,534,151								

20 Year MACRS Depreciation			
MACRS basis:	Line 21, Column (a)	\$7,893,014	Cumulative
Fiscal Year	Prorated	Annual	Tax Depr
FY Mar-2023 (Apr-May 2022)	3.750%	\$43,790	\$15,784,290
PPL Acquisition - May 25, 2022			
Book Cost	Line 1, Column (a)	\$22,436,083	
Cumulative Book Depreciation	- Page 18 of 35, Line 14, Col (a)	(\$316,631)	
MACRS basis from Acquisition:	Line 9(f) + Line 10(f)	\$22,119,452	
MACRS basis (Jun-Mar 2023)	Line 21, Column (b)	\$45,457,914	
Total MACRS Basis thru 3/2023	Line 11(f) + Line 12(f)	\$67,577,366	
FY Mar-2023 (Jun-Mar 2023)	3.750%	\$2,534,151	\$91,735,295
Mar-2024	7.219%	\$4,878,410	\$96,613,705
Mar-2025	6.677%	\$4,512,141	\$101,125,846
Mar-2026	6.177%	\$4,174,254	\$105,300,100
Mar-2027	5.713%	\$3,860,695	\$109,160,795
Mar-2028	5.285%	\$3,571,464	\$112,732,259
Mar-2029	4.888%	\$3,303,182	\$116,035,440
Mar-2030	4.522%	\$3,055,848	\$119,091,289
Mar-2031	4.462%	\$3,015,302	\$122,106,591
Mar-2032	4.461%	\$3,014,626	\$125,121,217
Mar-2033	4.462%	\$3,015,302	\$128,136,519
Mar-2034	4.461%	\$3,014,626	\$131,151,146
Mar-2035	4.462%	\$3,015,302	\$134,166,448
Mar-2036	4.461%	\$3,014,626	\$137,181,074
Mar-2037	4.462%	\$3,015,302	\$140,196,376
Mar-2038	4.461%	\$3,014,626	\$143,211,002
Mar-2039	4.462%	\$3,015,302	\$146,226,304
Mar-2040	4.461%	\$3,014,626	\$149,240,931
Mar-2041	4.462%	\$3,015,302	\$152,256,233
Mar-2042	4.461%	\$3,014,626	\$155,270,859
Mar-2043	2.231%	\$1,507,651	\$156,778,510
	100.00%	\$67,577,366	

Column (e), Line 6 = MACRS Rate 3.75% / 365 days x 54 days

Capital Repairs percentage is based on the actual results of National Grid's short period FY2023 tax return and PPL's short period CY2022 tax return, which covers the period from April 2022 through December 1/ 2022. When PPL files its calendar year 2023 consolidated tax return in October of 2024, the tax repairs percentage will be updated to reflect the January through March 2023 actual tax repairs.
FY 2023 tax loss on retirements is based on actual tax losses from April through December 2022. When PPL files its calendar year 2023 consolidated tax return in October of 2024, a portion of the tax gain/loss on 2/ retirements will be allocated to the January through March 2023 period to finalize this fiscal year.

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Net Deferred Tax Reserve Proration on FY 2023 Incremental Capital Investments

Line No.	Deferred Tax Subject to Proration		NG	PPL	Fiscal Year	Fiscal Year
			4/1/22 - 5/24/2022	5/25/22 - 3/31/23	2024	2025
			2023	2023	(c)	(d)
			(a)	(b)		
		See the corresponding Fiscal Year on Page 18 of 35,				
1	Book Depreciation	Line 15	\$316,631	\$1,823,560	\$4,280,382	\$4,280,382
2	Bonus Depreciation	- Page 19 of 35 , Line 15 ,Col (a)	\$0	\$0	\$0	\$0
3	Remaining MACRS Tax Depreciation	- Page 19 of 35 ,column (f), Lines 6,15,16,17	(\$43,790)	(\$2,534,151)	(\$4,878,410)	(\$4,512,141)
4	FY23-NG tax (gain)/loss on retirements	- Page 19 of 35 , Line 25 ,Col (a)	\$624,091	\$3,594,303	\$0	\$0
5	Cumulative Book / Tax Timer	Sum of Lines 1 through 4	\$896,932	\$2,883,712	(\$598,028)	(\$231,759)
6	Effective Tax Rate		21%	21%	21%	21%
7	Deferred Tax Reserve	Line 5 × Line 6	\$188,356	\$605,579	(\$125,586)	(\$48,669)
	Deferred Tax Not Subject to Proration					
8	Capital Repairs Deduction	- Page 19 of 35 , Line 3 ,Col (a)	(\$14,543,069)	(\$83,757,305)	\$0	\$0
9	Cost of Removal	- Page 18 of 35 , Line 7 ,Col (a)	(\$1,569,324)	(\$9,038,142)	\$0	\$0
10	Book/Tax Depreciation Timing Difference at 3/31/2023					
11	Cumulative Book / Tax Timer	Line 8 + Line 9 + Line 10	(\$16,112,393)	(\$92,795,447)	\$0	\$0
12	Effective Tax Rate		21%	21%	21%	21%
13	Deferred Tax Reserve	Line 11 × Line 12	(\$3,383,602)	(\$19,487,044)	\$0	\$0
14	Total Deferred Tax Reserve	Line 7 + Line 13	(\$3,195,247)	(\$18,881,464)	(\$125,586)	(\$48,669)
15	Net Operating Loss	- Page 18 of 35 , Line 22 ,Col (a)	\$0	\$0	\$0	\$0
16	Net Deferred Tax Reserve	Line 14 + Line 15	(\$3,195,247)	(\$18,881,464)	(\$125,586)	(\$48,669)
	Allocation of FY 2023-NG Estimated Federal NOL					
17	Cumulative Book/Tax Timer Subject to Proration	Line 5	\$896,932	\$2,883,712	(\$598,028)	(\$231,759)
18	Cumulative Book/Tax Timer Not Subject to Proration	Line 11	(\$16,112,393)	(\$92,795,447)	\$0	\$0
19	Total Cumulative Book/Tax Timer	Line 17 + Line 18	(\$15,215,461)	(\$89,911,735)	(\$598,028)	(\$231,759)
20	Total FY 2023-NG Federal NOL	- Page 18 of 35 , Line 22 ,Col (a)÷21%	(\$208,393,929)	\$0	\$0	\$0
21	Allocated FY 2023-NG Federal NOL Not Subject to Proration	(Line 18 ÷ Line 19) × Line 20	(\$220,678,487)	\$0	\$0	\$0
22	Allocated FY 2023-NG Federal NOL Subject to Proration	(Line 17 ÷ Line 19) × Line 20	\$12,284,559	\$0	\$0	\$0
23	Effective Tax Rate		21%	21%	21%	21%
24	Deferred Tax Benefit subject to proration	Line 22 × Line 23	\$2,579,757	\$0	\$0	\$0
25	Net Deferred Tax Reserve subject to proration	Line 7 + Line 24	\$2,768,113	\$605,579	(\$125,586)	(\$48,669)
		(e) (f) (g) (h) (i) (j)				
			NG	PPL	Fiscal Year	Fiscal Year
			4/1/22 - 5/24/2022	5/25/22 - 3/31/23	2024	2025
			2023	2023		
	Proration Calculation	Number of Days in Month Proration Percentage				
26	April	30 91.78%	\$615,136	\$0	(\$9,605)	(\$3,722)
27	May	31 83.29%	\$0	\$48,326	(\$8,716)	(\$3,378)
28	June	30 75.07%	\$0	\$43,015	(\$7,856)	(\$3,045)
29	July	31 66.58%	\$0	\$37,528	(\$6,967)	(\$2,700)
30	August	31 58.08%	\$0	\$32,040	(\$6,079)	(\$2,356)
31	September	30 49.86%	\$0	\$26,730	(\$5,218)	(\$2,022)
32	October	31 41.37%	\$0	\$21,242	(\$4,330)	(\$1,678)
33	November	30 33.15%	\$0	\$15,932	(\$3,469)	(\$1,345)
34	December	31 24.66%	\$0	\$10,444	(\$2,581)	(\$1,000)
35	January	31 16.16%	\$0	\$4,957	(\$1,692)	(\$656)
36	February	28 8.49%	\$0	\$10,444	(\$889)	(\$344)
37	March	31 0.00%	\$0	\$0	\$0	\$0
38	Total	365	\$615,136	\$250,658	(\$57,402)	(\$22,246)
39	Deferred Tax Without Proration	Line 25	\$2,768,113	\$605,579	(\$125,586)	(\$48,669)
40	Average Deferred Tax without Proration	Line 39 × 0.5	\$1,384,057	\$302,790	(\$62,793)	(\$24,335)
41	Proration Adjustment	Line 38 - Line 40	(\$768,920)	(\$52,132)	\$5,390	\$2,089

Column Notes:

- (f) Sum of remaining days in the year (Col (e)) ÷ 365
- (g) through (j) Current Year Line 25 ÷ 12 × Current Month Col (f)

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Fiscal Year 2025 Revenue Requirement on FY 2024 Actual Incremental Gas Capital Investment

Line No.			Fiscal Year 2024 (a)	Fiscal Year 2025 (b)
<u>Depreciable Net Capital Included in ISR Rate Base</u>				
1	Total Allowed Capital Included in ISR Rate Base in Current Year	Page 27 of 35 , Line 3 ,Col (g)	\$155,814,000	
2	Retirements	Page 27 of 35 , Line 9 ,Col (g)	\$7,823,414	
3	Net Depreciable Capital Included in ISR Rate Base	Year 1 = Line 1 - Line 2; then = Prior Year Line 3	\$147,990,586	\$147,990,586
<u>Change in Net Capital Included in ISR Rate Base</u>				
4	Capital Included in ISR Rate Base	Line 1	\$155,814,000	\$0
5	Depreciation Expense	Page 31 of 35, Line 77(c)	\$40,954,246	\$0
6	Incremental Capital Amount	Year 1 = Line 4 - Line 5; then = Prior Year Line 6	\$114,859,754	\$114,859,754
7	Cost of Removal	Page 27 of 35 , Line 6 ,Col (g)	\$7,930,000	
8	Net Plant Amount	Line 6 + Line 7	\$122,789,754	\$122,789,754
<u>Deferred Tax Calculation:</u>				
9	Composite Book Depreciation Rate	Page 29 of 35, Line 86(e)	1/ 2.99%	2.99%
10	Proration Percentage			
11	Tax Depreciation and Year 1 Basis Adjustments	Year 1 =Page 22 of 35, Line 28, Col (a); then = Page 22 of 35, Col (d)	\$136,423,788	\$2,049,087
12	Cumulative Tax Depreciation-PPL	Year 1 = Line 10; then = Prior Year Line 11 + Current Year Line 10	\$136,423,788	\$138,472,875
13	Book Depreciation	Year 1 = Line 3 × Line 9 × 50% x Line 10; then = Line 3 × Line 9	\$2,212,459	\$4,424,919
14	Cumulative Book Depreciation	Year 1 = Line 12; then = Prior Year Line 13 + Current Year Line 12	\$2,212,459	\$6,637,378
15	Cumulative Book / Tax Timer	Line 11 - Line 13	\$134,211,329	\$131,835,497
16	Effective Tax Rate		21.00%	21.00%
17	Deferred Tax Reserve	Line 15 × Line 16	\$28,184,379	\$27,685,454
18	Add: CY 2024 Federal NOL (Generation) / Utilization	Page 27 of 35 , Line 12 ,Col (e)	\$0	\$0
19	Net Deferred Tax Reserve before Proration Adjustment	Line 17 + Line 18	\$28,184,379	\$27,685,454
<u>ISR Rate Base Calculation:</u>				
20	Cumulative Incremental Capital Included in ISR Rate Base	Line 8	\$122,789,754	\$122,789,754
21	Accumulated Depreciation	- Line 14	(\$2,212,459)	(\$6,637,378)
22	Deferred Tax Reserve	- Line 19	(\$28,184,379)	(\$27,685,454)
23	Year End Rate Base before Deferred Tax Proration	Sum of Lines 20 through 22	\$92,392,915	\$88,466,921
<u>Revenue Requirement Calculation:</u>				
24	Average Rate Base before Deferred Tax Proration Adjustment	Year 1 = Current Year Line 23 ÷ 2; then = (Prior Year Line 23 + Current Year Line 23) ÷ 2	\$46,196,458	\$90,429,918
25	Proration Adjustment	Page 23 of 35, Line 41	(\$10,348)	(\$21,415)
26	Average ISR Rate Base after Deferred Tax Proration	Line 23 + Line 24	\$46,186,110	\$90,408,503
27	Pre-Tax ROR	Page 35 of 35, Line 30, Column (e)	8.41%	8.41%
28	Proration Percentage	Line 10		
29	Return and Taxes	Line 26 × Line 27	\$3,884,252	\$7,603,355
30	Book Depreciation	Line 13	\$2,212,459	\$4,424,919
31	Annual Revenue Requirement	Sum of Lines 29 through 30	\$6,096,711	\$12,028,274

1/ 2.99%, Composite Book Depreciation Rate approved per RIPUC Docket No. 4770, effective on Sep 1, 2018

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Tax Depreciation and Repairs Deduction on FY 2024 Incremental Capital Investments

Line No.			Fiscal Year	(b)	(c)	(d)	(e)
			2024				
			(a)				
	Capital Repairs Deduction						
1	Plant Additions	Page 21 of 35, Line 1	\$155,814,000				
2	Capital Repairs Deduction Rate	Per Tax Department 1/	81.78%				
3	Capital Repairs Deduction	Line 1 × Line 2	\$127,429,364				
4							
5							
6	Bonus Depreciation						
7	Plant Additions	Line 1	\$155,814,000				
8	Less Capital Repairs Deduction	Line 3	\$127,429,364				
9	Plant Additions Net of Capital Repairs Deduction	Line 7 - Line 8	\$28,384,636				
10	Percent of Plant Eligible for Bonus Depreciation	Per Tax Department	0.00%				
11	Plant Eligible for Bonus Depreciation	Line 9 × Line 10	\$0				
12	Bonus Depreciation Rate 30%	Per Tax Department	0.00%				
13	Bonus Depreciation Rate 0%	Per Tax Department	0.00%				
14	Total Bonus Depreciation Rate	Line 12 + Line 13	0.00%				
15	Bonus Depreciation	Line 11 × Line 15	\$0				
16							
17	Remaining Tax Depreciation						
18	Plant Additions	Line 1	\$155,814,000				
19	Less Capital Repairs Deduction	Line 3	\$127,429,364				
20	Less Bonus Depreciation	Line 15	\$0				
21	Remaining Plant Additions Subject to 20 YR MACRS Tax Depreciation	Line 18 - Line 19 - Line 20	\$28,384,636				
22	20 YR MACRS Tax Depreciation Rates	IRS Publication 946	3.75%				
23	Remaining Tax Depreciation	Line 21 × Line 22	\$1,064,424				
24							
25	CY24 tax (gain)/loss on retirements	Per Tax Department 2/	-				
26	Cost of Removal	Page 21 of 35, Line 7	\$7,930,000				
27							
28	Total Tax Depreciation and Repairs Deduction	Sum of Lines 3, 15, 23, 25 & 26	\$136,423,788				

20 Year MACRS Depreciation			
MACRS basis:		\$28,384,636	
		Annual	Cumulative
Calendar Year			
Mar-2024	3.75%	\$1,064,424	\$136,423,788
Mar-2025	7.22%	\$2,049,087	\$138,472,875
Mar-2026	6.68%	\$1,895,242	\$140,368,117
Mar-2027	6.18%	\$1,753,319	\$142,121,436
Mar-2028	5.71%	\$1,621,614	\$143,743,050
Mar-2029	5.29%	\$1,500,128	\$145,243,178
Mar-2030	4.89%	\$1,387,441	\$146,630,619
Mar-2031	4.52%	\$1,283,553	\$147,914,172
Mar-2032	4.46%	\$1,266,522	\$149,180,695
Mar-2033	4.46%	\$1,266,239	\$150,446,934
Mar-2034	4.46%	\$1,266,522	\$151,713,456
Mar-2035	4.46%	\$1,266,239	\$152,979,695
Mar-2036	4.46%	\$1,266,522	\$154,246,217
Mar-2037	4.46%	\$1,266,239	\$155,512,456
Mar-2038	4.46%	\$1,266,522	\$156,778,978
Mar-2039	4.46%	\$1,266,239	\$158,045,217
Mar-2040	4.46%	\$1,266,522	\$159,311,739
Mar-2041	4.46%	\$1,266,239	\$160,577,978
Mar-2042	4.46%	\$1,266,522	\$161,844,500
Mar-2043	4.46%	\$1,266,239	\$163,110,739
Mar-2044	2.23%	\$633,261	\$163,744,000
	100.00%	\$28,384,636	

1/ Capital Repairs percentage is based on a three-year average of FYs 2020, 2021 and 2022 capital repairs rates.
2/ FY 2024 tax loss on retirements will be updated when actuals are known.

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Net Deferred Tax Reserve Proration on FY 2024 Incremental Capital Investments**

Line No.	Deferred Tax Subject to Proration	<u>Fiscal Year</u> 2024 (a)	<u>Fiscal Year</u> 2025 (b)
1	Book Depreciation	Page 21 of 35 , Line 15	\$2,212,459
2	Bonus Depreciation	- Page 22 of 35 , Line 15 ,Col (a)	\$4,424,919
3	Remaining MACRS Tax Depreciation	- Page 22 of 35 , Col (d), Lines 6 and 7	(\$1,064,424)
4	CY23 tax (gain)/loss on retirements	- Page 22 of 35 , Line 25 ,Col (a)	(\$2,049,087)
5	Cumulative Book / Tax Timer	Sum of Lines 1 through 4	\$1,148,035
6	Effective Tax Rate	21%	21%
7	Deferred Tax Reserve	Line 5 × Line 6	\$241,087
	Deferred Tax Not Subject to Proration		
8	Capital Repairs Deduction	- Page 22 of 35 , Line 3 ,Col (a)	(127,429,364)
9	Cost of Removal	- Page 21 of 35 , Line 7 ,Col (a)	(\$7,930,000)
10	Book/Tax Depreciation Timing Difference at 3/31/2024		
11	Cumulative Book / Tax Timer	Line 8 + Line 9 + Line 10	(\$135,359,364)
12	Effective Tax Rate	21%	21%
13	Deferred Tax Reserve	Line 11 × Line 12	(\$28,425,466)
14	Total Deferred Tax Reserve	Line 7 + Line 13	(\$28,184,379)
15	Net Operating Loss	- Page 21 of 35 , Line 18 ,Col (a)	\$498,925
16	Net Deferred Tax Reserve	Line 14 + Line 15	(\$28,184,379)
	Allocation of CY 2023 Estimated Federal NOL		
17	Cumulative Book/Tax Timer Subject to Proration	Line 5	\$1,148,035
18	Cumulative Book/Tax Timer Not Subject to Proration	Line 11	(\$135,359,364)
19	Total Cumulative Book/Tax Timer	Line 17 + Line 18	(\$134,211,329)
20	Total FY 2024 Federal NOL	- Page 21 of 35 , Line 18 ,Col (a)÷21%	\$0
21	Allocated FY 2024 Federal NOL Not Subject to Proration	(Line 18 ÷ Line 19) × Line 20	\$0
22	Allocated FY 2024 Federal NOL Subject to Proration	(Line 17 ÷ Line 19) × Line 20	\$0
23	Effective Tax Rate	21%	21%
24	Deferred Tax Benefit subject to proration	Line 22 × Line 23	\$0
25	Net Deferred Tax Reserve subject to proration	Line 7 + Line 24	\$241,087
		(c)	(d)
		<u>Number of Days in</u>	<u>Proration Percentage</u>
	Proration Calculation	<u>Month</u>	<u>Fiscal Year</u>
			2024
			2025
26	April	30	\$18,439
27	May	31	\$16,733
28	June	30	\$15,082
29	July	31	\$13,375
30	August	31	\$11,669
31	September	30	\$10,018
32	October	31	\$8,311
33	November	30	\$6,660
34	December	31	\$4,954
35	January	31	\$3,248
36	February	28	\$1,706
37	March	31	\$0
38	Total	365	\$110,196
39	Deferred Tax Without Proration	Line 25	\$241,087
40	Average Deferred Tax without Proration	Line 39 × 0.5	\$120,544
41	Proration Adjustment	Line 38 - Line 40	(\$10,348)

Column Notes:

- (d) Sum of remaining days in the year (Col (c)) ÷ 365
- (e) through (f) Current Year Line 25 ÷ 12 × Current Month Col (d)

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Fiscal Year 2025 Revenue Requirement on FY 2025 Actual Incremental Gas Capital Investment

Line No.			Fiscal Year <u>2025</u> (a)
<u>Depreciable Net Capital Included in ISR Rate Base</u>			
1	Total Allowed Capital Included in ISR Rate Base in Current Year	Section 2, Table 1	\$164,812,000
2	Retirements	Line 1 x 3-year average actual retirement rate FY21 - FY23	\$8,152,274
3	Net Depreciable Capital Included in ISR Rate Base	Year 1 = Line 1 - Line 2; then = Prior Year Line 3	\$156,659,726
<u>Change in Net Capital Included in ISR Rate Base</u>			
4	Capital Included in ISR Rate Base	Line 1	\$164,812,000
5	Depreciation Expense	Page 31 of 35, Line 77(c)	\$40,954,246
6	Incremental Capital Amount	Year 1 = Line 4 - Line 5; then = Prior Year Line 6	\$123,857,754
7	Cost of Removal	Section 2, Page 2	\$7,525,000
8	Net Plant Amount	Line 6 + Line 7	\$131,382,754
<u>Deferred Tax Calculation:</u>			
9	Composite Book Depreciation Rate	Page 29 of 35, Line 86(e)	1/ 2.99%
10	Tax Depreciation	Year 1 = Page 25 of 35, Line 28, Col (a); then = Page 25 of 35, Col (d)	\$103,427,454
11	Cumulative Tax Depreciation-PPL	Year 1 = Line 10; then = Prior Year Line 11 + Current Year Line 10	\$103,427,454
12	Book Depreciation	Year 1 = Line 3 x Line 9 x 50% ; then = Line 3 x Line 9	\$2,342,063
13	Cumulative Book Depreciation	Year 1 = Line 12; then = Prior Year Line 13 + Current Year Line 12	\$2,342,063
14	Cumulative Book / Tax Timer	Line 11 - Line 13	\$101,085,391
15	Effective Tax Rate		21.00%
16	Deferred Tax Reserve	Line 14 x Line 15	\$21,227,932
17	Add: CY 2025 Federal NOL (Generation) / Utilization	Page 27 of 35 , Line 12 ,Col (e)	\$0
18	Net Deferred Tax Reserve before Proration Adjustment	Line 16 + Line 17	\$21,227,932
<u>ISR Rate Base Calculation:</u>			
19	Cumulative Incremental Capital Included in ISR Rate Base	Line 8	\$131,382,754
20	Accumulated Depreciation	- Line 13	(\$2,342,063)
21	Deferred Tax Reserve	- Line 18	(\$21,227,932)
22	Year End Rate Base before Deferred Tax Proration	Sum of Lines 19 through 21	\$107,812,758
<u>Revenue Requirement Calculation:</u>			
23	Average Rate Base before Deferred Tax Proration Adjustment	Year 1 = Current Year Line 22 ÷ 2; then = (Prior Year Line 22 + Current Year Line 22) ÷ 2	\$53,906,379
24	Proration Adjustment	Page 26 of 35	\$2,843
25	Average ISR Rate Base after Deferred Tax Proration	Line 23 + Line 24	\$53,909,222
26	Pre-Tax ROR	Page 35 of 35, Line 30, Column (e)	8.41%
27	Return and Taxes	Line 25 x Line 26	\$4,533,766
28	Book Depreciation	Line 12	\$2,342,063
29	Annual Revenue Requirement	Sum of Lines 27 through 28	\$6,875,828

1/ 2.99%, Composite Book Depreciation Rate approved per RIPUC Docket No. 4770, effective on Sep 1, 2018

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Tax Depreciation and Repairs Deduction on FY 2025 Incremental Capital Investments

Line No.			Fiscal Year 2025 (a)	(b)	(c)	(d)	(e)
	Capital Repairs Deduction						
1	Plant Additions	Page 24 of 35, Line 1	\$164,812,000				
2	Capital Repairs Deduction Rate	Per Tax Department	1/ 56.56%				
3	Capital Repairs Deduction	Line 1 × Line 2	\$93,217,667				
4							
5							
6	Bonus Depreciation						
7	Plant Additions	Line 1	\$164,812,000				
8	Less Capital Repairs Deduction	Line 3	\$93,217,667				
9	Plant Additions Net of Capital Repairs Deduction	Line 7 - Line 8	\$71,594,333				
10	Percent of Plant Eligible for Bonus Depreciation	Per Tax Department	0.00%				
11	Plant Eligible for Bonus Depreciation	Line 9 × Line 10	\$0				
12	Bonus Depreciation Rate 30%	Per Tax Department	0.00%				
13	Bonus Depreciation Rate 0%	Per Tax Department	0.00%				
14	Total Bonus Depreciation Rate	Line 12 + Line 13	0.00%				
15	Bonus Depreciation	Line 11 × Line 14	\$0				
16							
17	Remaining Tax Depreciation						
18	Plant Additions	Line 1	\$164,812,000				
19	Less Capital Repairs Deduction	Line 3	\$93,217,667				
20	Less Bonus Depreciation	Line 15	\$0				
21	Remaining Plant Additions Subject to 20 YR MACRS Tax Depreciation	Line 18 - Line 19 - Line 20	\$71,594,333				
22	20 YR MACRS Tax Depreciation Rates	IRS Publication 946	3.75%				
23	Remaining Tax Depreciation	Line 21 × Line 22	\$2,684,787				
24							
25	FY25 tax (gain)/loss on retirements	Per Tax Department	2/ -				
26	Cost of Removal	Page 24 of 35, Line 7	\$7,525,000				
27							
28	Total Tax Depreciation and Repairs Deduction	Sum of Lines 3, 15, 23, 25 & 26	\$103,427,454				

20 Year MACRS Depreciation			
MACRS basis:		\$71,594,333	
		Annual	Cumulative
Calendar Year			
Mar-2025	3.75%	\$2,684,787	\$103,427,454
Mar-2026	7.22%	\$5,168,395	\$108,595,849
Mar-2027	6.68%	\$4,780,354	\$113,376,203
Mar-2028	6.18%	\$4,422,382	\$117,798,584
Mar-2029	5.71%	\$4,090,184	\$121,888,769
Mar-2030	5.29%	\$3,783,760	\$125,672,529
Mar-2031	4.89%	\$3,499,531	\$129,172,060
Mar-2032	4.52%	\$3,237,496	\$132,409,556
Mar-2033	4.46%	\$3,194,539	\$135,604,095
Mar-2034	4.46%	\$3,193,823	\$138,797,918
Mar-2035	4.46%	\$3,194,539	\$141,992,457
Mar-2036	4.46%	\$3,193,823	\$145,186,281
Mar-2037	4.46%	\$3,194,539	\$148,380,820
Mar-2038	4.46%	\$3,193,823	\$151,574,643
Mar-2039	4.46%	\$3,194,539	\$154,769,182
Mar-2040	4.46%	\$3,193,823	\$157,963,005
Mar-2041	4.46%	\$3,194,539	\$161,157,544
Mar-2042	4.46%	\$3,193,823	\$164,351,368
Mar-2043	4.46%	\$3,194,539	\$167,545,907
Mar-2044	4.46%	\$3,193,823	\$170,739,730
Mar-2045	2.23%	\$1,597,270	\$172,337,000
	100.00%	\$71,594,333	

1/ Capital Repairs percentage is based on a three-year average of FYs 2021, 2022 and 2023 capital repairs rates.
2/ FY 2025 tax loss on retirements will be updated when actuals are known.

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Net Deferred Tax Reserve Proration on FY 2025 Incremental Capital Investments

Line No.	Deferred Tax Subject to Proration		(a)	
			Fiscal Year 2025	
1	Book Depreciation	Page 18 of 35 , Line 14 ,Col (a) and Col (e)	\$2,342,063	
2	Bonus Depreciation	- Page 19 of 35 , Line 15 ,Col (a)		
3	Remaining MACRS Tax Depreciation	- Page 25 of 35, Col (a), Line 23	(\$2,684,787)	
4	CY24 tax (gain)/loss on retirements	- Page 19 of 35 , Line 25 ,Col (a)		
5	Cumulative Book / Tax Timer	Sum of Lines 1 through 4	(\$342,725)	
6	Effective Tax Rate		21%	
7	Deferred Tax Reserve	Line 5 × Line 6	(\$71,972)	
	Deferred Tax Not Subject to Proration			
8	Capital Repairs Deduction	- Page 25 of 35 , Line 3 ,Col (a)	(\$93,217,667)	
9	Cost of Removal	- Page 24 of 35 , Line 7 ,Col (a)	(\$7,525,000)	
10	Book/Tax Depreciation Timing Difference at 3/31/2025			
11	Cumulative Book / Tax Timer	Line 8 + Line 9 + Line 10	(\$100,742,667)	
12	Effective Tax Rate		21%	
13	Deferred Tax Reserve	Line 11 × Line 12	(\$21,155,960)	
14	Total Deferred Tax Reserve	Line 7 + Line 13	(\$21,227,932)	
15	Net Operating Loss	- Page 18 of 35 , Line 22 ,Col (a)		
16	Net Deferred Tax Reserve	Line 14 + Line 15	(\$21,227,932)	
	Allocation of CY 2024 Estimated Federal NOL			
17	Cumulative Book/Tax Timer Subject to Proration	Line 5	(\$342,725)	
18	Cumulative Book/Tax Timer Not Subject to Proration	Line 11	(\$100,742,667)	
19	Total Cumulative Book/Tax Timer	Line 17 + Line 18	(\$101,085,392)	
20	Total CY 2024 Federal NOL	- Page 18 of 35 , Line 22 ,Col (a)÷21%	\$0	
21	Allocated FY 2024 Federal NOL Not Subject to Proration	(Line 18 ÷ Line 19) × Line 20	\$0	
22	Allocated FY 2024 Federal NOL Subject to Proration	(Line 17 ÷ Line 19) × Line 20	\$0	
23	Effective Tax Rate		21%	
24	Deferred Tax Benefit subject to proration	Line 22 × Line 23	\$0	
25	Net Deferred Tax Reserve subject to proration	Line 7 + Line 24	(\$71,972)	
	Proration Calculation	(b) (c) (d)		
		Number of Days in		
		Month	Fiscal Year2025	
26	January	31	91.51%	(\$5,488)
27	February	28	83.84%	(\$5,028)
28	March	31	75.34%	(\$4,519)
29	April	30	67.12%	(\$4,026)
30	May	31	58.63%	(\$3,516)
31	June	30	50.41%	(\$3,023)
32	July	31	41.92%	(\$2,514)
33	August	31	33.42%	(\$2,005)
34	September	30	25.21%	(\$1,512)
35	October	31	16.71%	(\$1,002)
36	November	30	8.49%	(\$509)
37	December	31	0.00%	\$0
38	Total	365		(\$33,143)
39	Deferred Tax Without Proration	Line 25		(\$71,972)
40	Average Deferred Tax without Proration	Line 39 × 0.5		(\$35,986)
41	Proration Adjustment	Line 38 - Line 40		\$2,843

Column Notes:

- (c) Sum of remaining days in the year (Col (h)) divided by 365
- (d) Current Year Line 25 ÷ 12 × Current Month Col (c)

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
FY 2018 - FY 2023 Incremental Capital Investment Summary

Line No.		Actual Fiscal Year 2018 (a)	Actual Fiscal Year 2019 (b)	Actual Fiscal Year 2020 (c)	Actual Fiscal Year 2021 (d)	Actual Fiscal Year 2022 (e)	Actual Fiscal Year 2023 (f)	Actual Fiscal Year 2024 (g)
<u>Capital Investment</u>								
1	ISR-eligible Capital Investment	Col (a)=Docket No. 4678 FY18 ISR Reconciliation Filing; Col (b)=Docket No. 4781 FY19 ISR Reconciliation Filing; Col (c)=Docket No. 4916 FY20 ISR Reconciliation Filing; Col (d)=Docket No. 4996 FY21 ISR Reconciliation Filing; Col (e)=Docket No. 5099 FY22 ISR Plan Filing						
		\$97,809,718	\$92,263,000	\$144,119,796	\$110,177,659	\$156,694,227	\$151,651,302	\$155,814,000
2	ISR-eligible Capital Additions included in Rate Base per RIPUC Docket No. 4770	Docket No. 4770 Schedule MAL-11-Gas Page 5, Col (a)=Lines 1(a) + 1(b); Col(b)=Lines 1(c) + 1(d); Col(c)= Line 1(e); Col(d) = Line 1(h) + 1(j)						
		\$93,177,000	\$93,177,000	\$38,823,750	\$0	\$0	\$0	\$0
3	Incremental ISR Capital Investment	Line 1 - Line 2						
		\$4,632,718	(\$914,000)	\$105,296,046	\$110,177,659	\$156,694,227	\$151,651,302	\$155,814,000
<u>Cost of Removal</u>								
4	ISR-eligible Cost of Removal	Col (a)=Docket No. 4678 FY18 ISR Reconciliation Filing; Col (b)=Docket No. 4781 FY19 ISR Reconciliation Filing; Col (c)=Docket No. 4916 FY20 ISR Reconciliation Filing; Col (d)=Docket No. 4996 FY21 ISR Reconciliation Filing; Col (e)=Docket No. 5099 FY22 ISR Plan Filing						
		\$8,603,224	\$11,583,085	\$10,161,508	\$9,975,152	\$11,244,351	\$10,607,466	\$7,930,000
5	ISR-eligible Cost of Removal in Rate Base per RIPUC Docket No. 4770	Schedule 6-GAS, Docket No. 4770: Col(a)=[P1]L23+L42×7÷12+Docket 4678 Page 2, Line 7x3÷12; Col(b)=[P1]L42×5÷12+[P2]L18×7÷12; Col (c)=[P2]L18×5÷12+L39×7÷12; Col (d) = [P2] L39×5÷12+L60×7÷12; Col (e)= [P2] L60×5÷12						
		\$6,662,056	\$5,956,522	\$3,105,878	\$1,113,515	\$471,346	\$0	\$0
6	Incremental Cost of Removal	Line 4 - Line 5						
		\$1,941,168	\$5,626,564	\$7,055,630	\$8,861,636	\$10,773,005	\$10,607,466	\$7,930,000
<u>Retirements</u>								
7	ISR-eligible Retirements	Col (a)=Docket No. 4678 FY18 ISR Reconciliation Filing; Col (b)=Docket No. 4781 FY19 ISR Reconciliation Filing; Col (c)=Docket No. 4916 FY20 ISR Reconciliation Filing; Col (d)=Docket No. 4996 FY21 ISR Reconciliation Filing; Col (e)=Docket No. 5099 FY22 ISR Plan Filing;						
		\$24,056,661	\$6,531,844	\$8,395,321	\$5,337,792	\$6,883,634	\$8,494,710	\$7,823,414
8	ISR-eligible Retirements per RIPUC Docket No. 4770	Schedule 6-GAS, Docket No. 4770: Col(a)=[P1]L24+L43×7÷12+ Docket 4678 Page 2, Line 2x3÷12; Col(b)=[P1]L43×5÷12+[P2]L19×7÷12 Col (c)=[P2]L19×5÷12+L40×7÷12; Col (d) = [P2]L40×5÷12+L61×7÷12; Col (e)= L61×5÷12						
		\$11,997,233	\$7,899,865	\$4,119,186	\$1,476,805	\$625,125	\$0	\$0
9	Incremental Retirements	Line 7 - Line 8						
		\$12,059,428	(\$1,368,021)	\$4,276,135	\$3,860,987	\$6,258,509	\$8,494,710	\$7,823,414
<u>(NOL)/NOL Utilization</u>								
10	ISR (NOL)/NOL Utilization Per ISR	Page 28 of 35, Line 12						
		(\$6,051,855)	\$1,091,119	\$0	\$2,072,387	\$893,329	\$43,762,725	\$0
11	ISR NOL Utilization Per Docket 4770	Schedule 11-Gas Page 11, Docket No. 4770: Col (a)= L40×5÷12; Col (b) = L40×5÷12+L48×7÷12; Col (c) = P11,L48×5÷12+P12,L39×7÷12; Col (d) = P12,L39×5÷12+P12,L49×7÷12; Col (e)= P12,L49×5÷12						
		\$0	\$804,769	\$3,063,059	\$7,598,182	\$4,157,771	\$0	\$0
12	Incremental (NOL)/NOL Utilization	Line 10 - Line 11						
		(\$6,051,855)	\$286,350	(\$3,063,059)	(\$5,525,796)	(\$3,264,442)	\$43,762,725	\$0

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Deferred Income Tax ("DIT") Provisions and Net Operating Losses ("NOL")

	(a)	(b) Test Year July 2016 - June 2017	(c)	(d)	(e)	(f)	(g) Jul & Aug 2017	(h) 12 Mths Aug 31 2018	(i) 12 Mths Aug 31 2019	(j) 12 Mths Aug 31 2020	(k) 12 Mths Aug 31 2021	(l) 12 Mths Aug 31 2022
1 Total Base Rate Plant DIT Provision		\$29,439,421					\$5,223,437	\$20,453,237	\$16,078,372	\$5,085,206	\$7,746,916	\$0
2 Excess DIT amortization							\$0	\$0	(\$1,470,238)	(\$1,470,238)	(\$1,470,238)	\$0
	<u>FY 2018</u>	<u>FY 2019</u>	<u>FY 2020</u>	<u>FY 2021</u>	<u>FY 2022</u>	<u>FY 2023-NG</u>	<u>FY 2018</u>	<u>FY 2019</u>	<u>FY 2020</u>	<u>FY 2021</u>	<u>FY 2022</u>	<u>FY 2023</u>
3 Total Base Rate Plant DIT Provision							\$24,514,347.17	\$17,043,594	\$8,195,453.84	\$5,167,632	\$2,615,282.52	\$0
4 Incremental FY 18	\$2,507,039	\$2,560,766	\$2,611,618	\$2,662,153	\$2,712,395	\$2,719,788	\$2,507,039	\$53,728	\$50,851	\$50,535	\$50,242	\$7,393
5 Incremental FY 19		\$1,090,524	\$1,085,911	\$1,081,431	\$1,077,072	\$1,076,444	\$0	\$1,090,524	(\$4,613)	(\$4,480)	(\$4,358)	(\$628)
6 Incremental FY 20			\$18,484,445	\$18,218,347	\$17,924,604	\$17,877,373	\$0	\$0	\$18,484,445	(\$266,098)	(\$293,743)	(\$47,231)
7 Incremental FY 21				\$13,009,229	\$13,230,424	\$13,253,277			\$0	\$13,009,229	\$221,195	\$22,853
8 Incremental FY 22					\$26,325,721	\$26,280,159					\$26,325,721	(\$45,561)
9 Incremental FY 23						\$3,248,208						\$3,248,208
10 TOTAL Plant DIT Provision	\$2,507,039	\$3,651,291	\$22,181,974	\$34,971,160	\$61,270,216	\$64,455,250	\$27,021,386	\$18,187,846	\$26,726,137	\$17,956,818	\$28,914,339	\$3,185,034
11 NOL (Utilization)							\$6,051,855	(\$1,091,119)	\$0	(\$2,072,387)	(\$893,329)	(\$43,762,725)
12 Lesser of NOL or DIT Provision							\$6,051,855	(\$1,091,119)	\$0	(\$2,072,387)	(\$893,329)	(\$43,762,725)

Line Notes:

- 1(b) RIPUC Docket Nos. 4770/4780, Compliance, Revised Rebuttal Attachment 1, Schedule 11-GAS, Page 2 of 23, Line 29, Col (e) minus Col (b)
- 1(g) RIPUC Docket Nos. 4770/4780, Compliance, Revised Rebuttal Attachment 1, Schedule 11-GAS, Page 11 of 23, Line 3 plus Line 4
- 1(h) RIPUC Docket Nos. 4770/4780, Compliance, Revised Rebuttal Attachment 1, Schedule 11-GAS, Page 11 of 23, Line 7
- 1(i) RIPUC Docket Nos. 4770/4780, Compliance, Revised Rebuttal Attachment 1, Schedule 11-GAS, Page 11 of 23, Line 50
- 1(j) RIPUC Docket Nos. 4770/4780, Compliance, Revised Rebuttal Attachment 1, Schedule 11-GAS, Page 12 of 23, Line 41
- 1(k) RIPUC Docket Nos. 4770/4780, Compliance, Revised Rebuttal Attachment 1, Schedule 11-GAS, Page 12 of 23, Line 51
- 1(l) RIPUC Docket Nos. 4770/4780 third rate year ends at Aug 31, 2021
- 2 RIPUC Docket Nos. 4770/4780, Compliance, Revised Rebuttal Attachment 1, Schedule 11-GAS, Page 12 of 23, Line 52
- 3 Col (f) = Line 1(b) × 25% + Line 1(f) + Line 1(g) × 7/12; Col (g) = Line 1(g) × 5/12 + Line 1(h) × 7/12 + Line 2(g) × 5/12 + Line 2(h) × 7/12; Col (h) = Line 1(h) × 5/12 + Line 1(i) × 7/12 + Line 2(h) × 5/12 + Line 2(i)
- 4(a)-9(f) Cumulative DIT plus Deferred Income Tax (Page 2, Line 21 + Line 23; Page 5, Line 21; Page 8, Line 21; Page 12, Line 21; Page 15, Line 21; Page 18, Line 21)
- 4(g)-9(m) Year over year change in cumulative DIT shown in Cols (a) through (f)
 - 10 Sum of Lines 3 through 9
 - 11 Col (g)-(h) = Docket no. 4916 FY 20 ISR Rec, Att. MAL-1, p.19, L. 8; Col (i) ~Col (l) Per Tax Department
 - 12 Lesser of Line 9 or Line 10

The Narragansett Electric Company
d/b/a Rhode Island Energy
Proposed FY 2025 Gas Infrastructure, Safety,
and Reliability Plan Filing
Section 3: Attachment 1
Page 29 of 35

**The Narragansett Electric Company
d/b/a Rhode Island Energy
ISR Depreciation Expense per Rate Case RIPUC Docket No. 4770**

Account No.	Account Title	Test Year June 30, 2017 (a)	1/ ARO Adjustment (b)	Adjustments June 30, 2017 (c)	Adjusted Balance (d) = (a) + (b) + (c)	Proposed Rate (e)	Depreciation Expense (f) = (d) x (e)	
Intangible Plant								
1	302.00	Franchises And Consents	\$213,499	\$0	\$0	\$213,499	0.00%	\$0
2	303.00	Misc. Intangible Plant	\$25,427	\$0	\$0	\$25,427	0.00%	\$0
3	303.01	Misc. Int Cap Software	\$19,833,370	\$0	\$9,991,374	\$29,824,944	0.00%	\$0
4								
5		Total Intangible Plant	\$20,072,496	\$0	\$9,991,374	\$30,063,870		\$0
6								
Production Plant								
9	304.00	Production Land Land Rights	\$364,912	\$0	\$0	\$364,912	0.00%	\$0
10	305.00	Prod. Structures & Improvements	\$2,693,397	\$0	\$0	\$2,693,397	15.05%	\$405,356
11	307.00	Production Other Power	\$46,159	\$0	\$0	\$46,159	7.16%	\$3,305
12	311.00	Production LNG Equipme	\$3,167,445	\$0	\$0	\$3,167,445	11.40%	\$361,089
13	320.00	Prod. Other Equipment	\$1,106,368	\$0	\$0	\$1,106,368	6.69%	\$74,016
14								
15		Total Production Plant	\$7,378,281	\$0	\$0	\$7,378,281		\$843,766
16								
Storage Plant								
19	360.00	Stor Land & Land Rights	\$261,151	\$0	\$0	\$261,151	0.00%	\$0
20	361.03	Storage Structures Improvements	\$3,385,049	\$0	\$0	\$3,385,049	0.99%	\$33,512
21	362.04	Storage Gas Holders	\$4,606,338	\$0	\$0	\$4,606,338	0.04%	\$1,843
22	363.00	Stor. Purification Equipment	\$13,891,210	\$0	\$0	\$13,891,210	3.37%	\$468,134
23								
24		Total Storage Plant	\$22,143,748	\$0	\$0	\$22,143,748		\$503,488
25								
Distribution Plant								
28	374.00	Dist. Land & Land Rights	\$956,717	\$0	\$0	\$956,717	0.00%	\$0
29	375.00	Gas Dist Station Structure	\$10,642,632	\$0	\$0	\$10,642,632	1.15%	\$122,390
30	376.00	Distribution Mains	\$46,080,760	\$0	\$0	\$46,080,760	3.61%	\$1,663,515
31	376.03	Dist. River Crossing Main	\$695,165	\$0	\$0	\$695,165	3.61%	\$25,095
32	376.04	Mains - Steel And Other - SI	\$4,190	\$0	\$0	\$4,190	0.00%	\$0
33	376.06	Dist. District Regulator	\$14,213,837	\$0	\$0	\$14,213,837	3.61%	\$513,120
34	376.11	Gas Mains Steel	\$57,759,572	\$0	\$0	\$57,759,572	3.31%	\$1,908,954
35	376.12	Gas Mains Plastic	\$382,797,443	\$0	\$0	\$382,797,443	2.70%	\$10,316,391
36	376.13	Gas Mains Cast Iron	\$5,556,209	\$0	\$0	\$5,556,209	8.39%	\$465,888
37	376.14	Gas Mains Valves	\$222,104	\$0	\$0	\$222,104	3.61%	\$8,018
38	376.15	Propane Lines	\$0	\$0	\$0	\$0	3.61%	\$0
39	376.16	Dist. Catholic Protect	\$1,569,576	\$0	\$0	\$1,569,576	3.61%	\$56,662
40	376.17	Dist. Joint Seals	\$63,067,055	\$0	\$0	\$63,067,055	4.63%	\$2,920,005
41	377.00	T&D Compressor Sta Equipment	\$248,656	\$0	\$0	\$248,656	1.07%	\$2,661
42	377.62	1/ 5360-Tanks ARO	\$299	(\$299)	\$0	\$0	0.00%	\$0
43	378.10	Gas Measur & Reg Sta Equipment	\$19,586,255	\$0	\$0	\$19,586,255	2.08%	\$407,394
44	378.55	Gas M&Reg Sta Eq RTU	\$372,772	\$0	\$0	\$372,772	6.35%	\$23,671
45	379.00	Dist. Measur. Reg. Gs	\$11,033,164	\$0	\$0	\$11,033,164	2.22%	\$244,936
46	379.01	Dist. Meas. Reg. Gs Eq	\$1,399,586	\$0	\$0	\$1,399,586	0.00%	\$0
47	380.00	Gas Services All Sizes	\$331,205,854	\$0	\$0	\$331,205,854	3.05%	\$10,101,779
48	381.10	Sml Meter& Reg Bare Co	\$26,829,565	\$0	\$0	\$26,829,565	1.76%	\$472,200
49	381.30	Lrg Meter& Reg Bare Co	\$15,779,214	\$0	\$0	\$15,779,214	1.76%	\$277,714
50	381.40	Meters	\$9,332,227	\$0	\$0	\$9,332,227	0.96%	\$89,589
51	382.00	Meter Installations	\$675,201	\$0	\$0	\$675,201	3.66%	\$24,712
52	382.20	Sml Meter& Reg Installation	\$43,145,998	\$0	\$0	\$43,145,998	3.66%	\$1,579,144
53	382.30	Lrg Meter&Reg Installation	\$2,524,025	\$0	\$0	\$2,524,025	3.66%	\$92,379
54	383.00	Dist. House Regulators	\$937,222	\$0	\$0	\$937,222	0.67%	\$6,279
55	384.00	T&D Gas Reg Installs	\$1,216,551	\$0	\$0	\$1,216,551	1.56%	\$18,978
56	385.00	Industrial Measuring And Regulating Station Equipment	\$540,187	\$0	\$0	\$540,187	4.18%	\$22,580
57	385.01	Industrial Measuring And Regulating Station Equipment	\$255,921	\$0	\$0	\$255,921	0.00%	\$0
58	386.00	Other Property On Customer Premises	\$271,765	\$0	\$0	\$271,765	0.23%	\$625
59	386.02	Dist. Consumer Prem Equipment	\$110,131	\$0	\$0	\$110,131	0.00%	\$0
60	387.00	Dist. Other Equipment	\$930,079	\$0	\$0	\$930,079	2.15%	\$19,997
61	388.00	1/ ARO	\$5,736,827	(\$5,736,827)	\$0	\$0	0.00%	\$0
62								
63		Total Distribution Plant	\$1,055,696,761	(\$5,737,126)	\$0	\$1,049,959,635	2.99%	\$31,384,677
64								
General Plant								
67	389.01	General Plant Land Lan	\$285,357	\$0	\$0	\$285,357	0.00%	\$0
68	390.00	Structures And Improvements	\$7,094,532	\$0	\$0	\$7,094,532	3.12%	\$221,349
69	391.01	Gas Office Furniture & Fixture	\$274,719	\$0	\$0	\$274,719	6.67%	\$18,324
70	394.00	General Plant Tools Shop (Fully Dep)	\$26,487	\$0	\$0	\$26,487	0.00%	\$0
71	394.00	General Plant Tools Shop	\$5,513,613	\$0	\$0	\$5,513,613	5.00%	\$275,681
72	395.00	General Plant Laboratory	\$221,565	\$0	\$0	\$221,565	6.67%	\$14,778
73	397.30	Communication Radio Site Specific	\$387,650	\$0	\$0	\$387,650	5.00%	\$19,383
74	397.42	Communication Equip Tel Site	\$63,481	\$0	\$0	\$63,481	20.00%	\$12,696
75	398.10	Miscellaneous Equipment (Fully Dep)	\$1,341,386	\$0	\$0	\$1,341,386	0.00%	\$0
76	398.10	Miscellaneous Equipment	\$2,789,499	\$0	\$0	\$2,789,499	6.67%	\$186,060
77	399.10	1/ ARO	\$342,146	(\$342,146)	\$0	\$0	0.00%	\$0
78								
79		Total General Plant	\$18,340,436	(\$342,146)	\$0	\$17,998,289	4.16%	\$748,271
80								
81		Grand Total - All Categories	\$1,123,631,722	(\$6,079,273)	\$9,991,374	\$1,127,543,823	3.05%	\$33,480,202
82							2.97%	
Other Utility Plant Assets								
84			Line 63		Total Distribution Plant	\$1,049,959,635	2.99%	\$31,384,677
85			Line 73 + Line 74		Communication Equipment	\$451,132	7.11%	\$32,079
86					Total ISR Tangible Plant	\$1,050,410,767	2.99%	\$31,416,756
					Non ISR Assets	\$77,133,057		

Lines 1 through 81 - per RIPUC Docket No. 4770 Compliance filing dated August 16, 2018 , Compliance Attachment 2, Schedule 6-GAS, Pages 3 & 4

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THE NARRAGANSETT ELECTRIC COMPANY
d/b/a NATIONAL GRID
RIPUC Docket Nos. 4770/4780
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The Narragansett Electric Company d/b/a National Grid
Depreciation Expense - Gas
For the Test Year Ended June 30, 2017 and the Rate Year Ending August 31, 2019

The Narragansett Electric Company
d/b/a National Grid
Gas ISR Depreciation Expense

Line No	Description	Reference	Amount	Less non-ISR eligible	
				Plant	ISR Amount
			(a)	(b)	(c)
1	Total Company Rate Year Depreciation	Sum of Page 2, Line 16 and Line 17	\$39,136,909		
2	Total Company Test Year Depreciation	Per Company Books	\$33,311,851		
3	Less: Reserve adjustments	Page 4, Line 29, Col (b) + Col (c)	(\$15,649)		
4	Adjusted Total Company Test Year Depreciation Expense	Line 2 + Line 3	\$33,296,202		
5	Depreciation Expense Adjustmen	Line 1 - Line 4	\$5,840,707		
6					
7			Per Book		
8	Test Year Depreciation Expense 12 Months Ended 06/30/17:		Amount		
9	Total Gas Utility Plant 06/30/17	Page 4, Line 27, Col (d) Sum of Page 3, Line 5, Col (d) and Page 4, Line 25,	\$1,405,994,678	(\$77,133,057)	\$1,328,861,622
10	Less Non Depreciable Plant	Col (e)	(\$308,514,725)		(\$308,514,725)
11	Depreciable Utility Plant 06/30/17	Line 9 + Line 10	\$1,097,479,953	(\$77,133,057)	\$1,020,346,897
12					
13	Plus: Added Plant 2 Mos Ended 08/31/17	Schedule 11-GAS, Page 3, Line 4	\$19,592,266		\$19,592,266
14	Less: Retired Plant 2 Months Ended 08/31/17	1/ Line 13 x Retirement Rate	(\$1,345,989)		(\$1,345,989)
15	Depreciable Utility Plant 08/31/17	Line 11 + Line 13 + Line 14	\$1,115,726,231	(\$77,133,057)	\$1,020,346,897
16					
17	Average Depreciable Plant for Year Ended 08/31/17	(Line 11 + Line 15)/2	\$1,106,603,092		\$1,106,603,092
18					
19	Composite Book Rate %	As Approved in RIPUC Docket No. 4323	3.38%		
20					
21	Book Depreciation Reserve 06/30/17	Page 5, Line 72, Col (d)	\$357,576,825		\$357,576,825
22	Plus: Book Depreciation Expense	Line 17 x Line 19	\$6,233,864		\$6,233,864
23	Less: Net Cost of Removal/(Salvage)	2/ Line 13 x Cost of Removal Rate	(\$1,014,879)		(\$1,014,879)
24	Less: Retired Plant	Line 14	(\$1,345,989)		(\$1,345,989)
25	Book Depreciation Reserve 08/31/17	Sum of Line 21 through Line 24	\$361,449,821		
26					
27	Depreciation Expense 12 Months Ended 08/31/18				
28	Total Utility Plant 08/31/17	Line 9 + Line 13 + Line 14	\$1,424,240,956	(\$77,133,057)	\$1,347,107,900
29	Less Non Depreciable Plant	Line 10	(\$308,514,725)		(\$308,514,725)
30	Depreciable Utility Plant 08/31/17	Line 28 + Line 29	\$1,115,726,231		\$1,038,593,175
31					
32	Plus: Plant Added in 12 Months Ended 08/31/18	Schedule 11-GAS, Page 3, Line 11	\$115,710,016		\$115,710,016
33	Less: Plant Retired in 12 Months Ended 08/31/18	Line 32 x Retirement rate	(\$7,949,278)		(\$7,949,278)
34	Depreciable Utility Plant 08/31/18	Sum of Line 30 through Line 33	\$1,223,486,969		\$1,146,353,912
35					
36	Average Depreciable Plant for 12 Months Ended 08/31/18	(Line 30 + Line 34)/2	\$1,169,606,600		\$1,092,473,543
37					
38	Composite Book Rate %	As Approved in RIPUC Docket No. 4323	3.38%		3.38%
39					
40	Book Depreciation Reserve 08/31/17	Line 25	\$361,449,821		
41	Plus: Book Depreciation 08/31/18	Line 36 x Line 38	\$39,532,703		\$36,925,606
42	Less: Net Cost of Removal/(Salvage)	Line 32 x Cost of Removal Rate	(\$5,993,779)		
43	Less: Retired Plant	Line 33	(\$7,949,278)		
44	Book Depreciation Reserve 08/31/18	Sum of Line 40 through Line 43	\$387,039,467		
1/	3 year average retirement over plant addition in service FY 15 ~ FY17		6.87%	Retirements	
2/	3 year average Cost of Removal over plant addition in service FY 15 ~ FY17		5.18%	COR	

The Narragansett Electric Company
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THE NARRAGANSETT ELECTRIC COMPANY
d/b/a NATIONAL GRID
RIPUC Docket Nos. 4770/4780
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The Narragansett Electric Company d/b/a National Grid
Depreciation Expense - Gas
For the Test Year Ended June 30, 2017 and the Rate Year Ending August 31, 2021

The Narragansett Electric Company
d/b/a National Grid
Gas ISR Depreciation Expense

Line No	Description	Reference	Amount (a)	Less non-ISR eligible	
				Plant (b)	ISR Amount (c)
1	Rate Year Depreciation Expense 12 Months Ended 08/31/19:				
2	Total Utility Plant 08/31/18	Page 1, Line 28 + Line 32 + Line 33	\$1,532,001,694	(\$77,133,057)	\$1,454,868,637
3	Less Non-Depreciable Plant	Page 1, Line 10	(\$308,514,725)		(\$308,514,725)
4	Depreciable Utility Plant 08/31/18	Line 2 + Line 3	\$1,223,486,969		\$1,146,353,912
5					
6	Plus: Added Plant 12 Months Ended 08/31/19	Schedule 11-GAS, Page 3, Line 35	\$114,477,000	(\$1,348,000)	\$113,129,000
7	Less: Depreciable Retired Plant	1/ Line 6 x Retirement rate	(\$7,864,570)	\$92,608	(\$7,771,962)
8					
9	Depreciable Utility Plant 08/31/19	Sum of Line 4 through Line 7	\$1,330,099,399	(\$78,388,449)	\$1,251,710,950
10					
11	Average Depreciable Plant for Rate Year Ended 08/31/19	(Line 4 + Line 9)/2	\$1,276,793,184		\$1,199,032,431
12					
13	Proposed Composite Rate %	Page 4, Line 17, Col (e)	3.05%		2.99%
14					
15	Book Depreciation Reserve 08/31/18	Page 1, Line 44	\$387,039,467		\$0
16	Plus: Book Depreciation Expense	Line 11 x Line 13	\$38,950,409		\$35,851,070
17	Plus: Unrecovered Reserve Adjustment	Schedule NWA-1-GAS, Part VI, Page 6	\$186,500		\$186,500
18	Less: Net Cost of Removal/(Salvage)	2/ Line 6 x Cost of Removal Rate	(\$5,929,909)		\$0
19	Less: Retired Plant	Line 7	(\$7,864,570)		\$0
20	Book Depreciation Reserve 08/31/15	Sum of Line 15 through Line 15	\$412,381,898		\$36,037,570
21					
22	Rate Year Depreciation Expense 12 Months Ended 08/31/20:				
23	Total Utility Plant 08/31/19	Line 2 + Line 6 + Line 7	\$1,638,614,124	(\$78,388,449)	\$1,560,225,675
24	Less Non-Depreciable Plant	Page 1, Line 10	(\$308,514,725)		(\$308,514,725)
25	Depreciable Utility Plant 08/31/15	Line 23 + Line 24	\$1,330,099,399		\$1,251,710,950
26					
27	Plus: Added Plant 12 Months Ended 08/31/20	Schedule 11-GAS, Page 5, Line 11(i)	\$21,017,630	(\$750,000)	\$20,267,630
28	Less: Depreciable Retired Plant	1/ Line 27 x Retirement rate	(\$1,443,911)	\$51,525	(\$1,392,386)
29					\$0
30	Depreciable Utility Plant 08/31/20	Sum of Line 25 through Line 28	\$1,349,673,118	(\$79,086,924)	\$1,270,586,194
31					
32	Average Depreciable Plant for Rate Year Ended 08/31/20	(Line 25 + Line 30)/2	\$1,339,886,258		\$1,261,148,572
33					
34	Proposed Composite Rate %	Page 4, Line 17, Col (e)	3.05%		2.99%
35					
36	Book Depreciation Reserve 08/31/20	Line 20	\$412,381,898		\$0
37	Plus: Book Depreciation Expense	Line 32 x Line 34	\$40,875,154		\$37,708,342
38	Plus: Unrecovered Reserve Adjustment	Schedule NWA-1-GAS, Part VI, Page 6	\$186,500		\$186,500
39	Less: Net Cost of Removal/(Salvage)	2/ Line 27 x Cost of Removal Rate	(\$1,088,713)		\$0
40	Less: Retired Plant	Line 28	(\$1,443,911)		\$0
41	Book Depreciation Reserve 08/31/20	Sum of Line 36 through Line 40	\$450,910,927		\$37,894,842
42					
43	Rate Year Depreciation Expense 12 Months Ended 08/31/21:				
44	Total Utility Plant 08/31/20	Line 23 + Line 27 + Line 28	\$1,658,187,843	(\$79,086,924)	\$1,579,100,919
45	Less Non-Depreciable Plant	Page 1, Line 10	(\$308,514,725)		(\$308,514,725)
46	Depreciable Utility Plant 08/31/20	Line 44 + Line 45	\$1,349,673,118		\$1,270,586,194
47					
48	Plus: Added Plant 12 Months Ended 08/31/21	Schedule 11-GAS, Page 5, Line 11(i)	\$21,838,436	(\$750,000)	\$21,088,436
49	Less: Depreciable Retired Plant	1/ Line 48 x Retirement rate	(\$1,500,301)	\$51,525	(\$1,448,776)
50					
51	Depreciable Utility Plant 08/31/21	Sum of Line 46 through Line 49	\$1,370,011,253	(\$79,785,399)	\$1,290,225,854
52					
53	Average Depreciable Plant for Rate Year Ended 08/31/21	(Line 46 + Line 51)/2	\$1,359,842,185		\$1,280,406,024
54					
55	Proposed Composite Rate %	Page 4, Line 17, Col (e)	3.05%		2.99%
56					
57	Book Depreciation Reserve 08/31/20	Line 41	\$450,910,927		\$0
58	Plus: Book Depreciation Expense	Line 53 x Line 55	\$41,483,938		\$38,284,140
59	Plus: Unrecovered Reserve Adjustment	Schedule NWA-1-GAS, Part VI, Page 6	\$186,500		\$186,500
60	Less: Net Cost of Removal/(Salvage)	2/ Line 48 x Cost of Removal Rate	(\$1,131,231)		\$0
61	Less: Retired Plant	Line 49	(\$1,500,301)		\$0
62	Book Depreciation Reserve 08/31/21	Sum of Line 57 through Line 61	\$489,949,834		\$38,470,640
63					
64	1/ 3 year average retirement over plant addition in service FY 15 ~ FY17	0.0687	Retirements		
65	2/ 3 year average Cost of Removal over plant addition in service FY 15 ~ FY17	0.0518	COR		
66					
67	Book Depreciation RY2	Line 37 (a) + Line 38 (b)			\$41,061,654
68	Less: General Plant Depreciation (assuming add=retirement)	Page 10, Line 79(f)			(\$748,271)
69	Plus: Comm Equipment Depreciation	Page 10, Line 73 + Line 74			\$32,079
70	Total				\$40,345,462
71	7 Months				x7/12
72	FY 2020 Depreciation Expense				\$23,534,853
73					
74	Book Depreciation RY3	Line 58 (a) + Line 59 (b)			\$41,670,438
75	Less: General Plant Depreciation	Page 10, Line 79(f)			(\$748,271)
76	Plus: Comm Equipment Depreciation	Page 10, Line 73 + Line 74			\$32,079
77	Total				\$40,954,246
78	FY 2021 Depreciation Expense	5 Months of RY 2 and 7 Months of RY 3			\$40,700,586

The Narragansett Electric Company
d/b/a Rhode Island Energy
Fiscal Year 2023 ISR Property Tax Recovery Adjustment
(000s)

Line		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
		<u>End of FY 2018</u>	<u>ISR Additions</u>	<u>Non-ISR Add's</u>	<u>Total Add's</u>	<u>Bk Depr (1)</u>	<u>Retirements</u>	<u>COR</u>	<u>Adjustment</u>	<u>End of FY 2019</u>
1	Plant In Service	\$1,195,705	\$92,263	\$24,845	\$117,108		(\$6,844)		\$0	\$1,305,969
2	Accumulated Depr	\$414,713				\$40,858	(\$6,844)	(\$6,123)		\$442,604
3	Net Plant	\$780,992								\$863,364
4	Property Tax Expense	\$22,678								\$23,283
5	Effective Prop tax Rate	2.90%								2.70%
		<u>End of FY 2019</u>	<u>ISR Additions</u>	<u>Non-ISR Add's</u>	<u>Total Add's</u>	<u>Bk Depr (1)</u>	<u>Retirements</u>	<u>COR</u>	<u>Adjustment</u>	<u>End of FY 2020</u>
6	Plant In Service	\$1,305,969	\$144,120	\$22,074	\$166,193		(\$8,567)		\$0	\$1,463,595
7	Accumulated Depr	\$442,604				\$41,588	(\$8,567)	(\$10,162)		\$465,463
8	Net Plant	\$863,364								\$998,132
9	Property Tax Expense	\$23,283								\$25,959
10	Effective Prop tax Rate	2.70%								2.60%
		<u>End of FY 2020</u>	<u>ISR Additions</u>	<u>Non-ISR Add's</u>	<u>Total Add's</u>	<u>Bk Depr (1)</u>	<u>Retirements</u>	<u>COR</u>	<u>Adjustment</u>	<u>End of FY 2021</u>
11	Plant In Service	\$1,463,595	\$110,178	\$97,667	\$207,844		(\$5,766)		(\$26,386)	\$1,639,288
12	Accumulated Depr	\$465,463				\$45,652	(\$5,766)	(\$11,566)	(\$32,599)	\$461,185
13	Net Plant	\$998,132								\$1,178,103
14	Property Tax Expense	\$25,959								\$28,846
15	Effective Prop tax Rate	2.60%								2.45%
		<u>End of FY 2021</u>	<u>ISR Additions</u>	<u>Non-ISR Add's</u>	<u>Total Add's</u>	<u>Bk Depr</u>	<u>Retirements</u>	<u>COR</u>	<u>Adjustment</u>	<u>End of FY 2022</u>
16	Plant In Service	\$1,639,288	\$156,694	\$29,406	\$186,100		(\$7,443)			\$1,817,945
17	Accumulated Depr	\$461,185				\$51,439	(\$7,443)	(\$11,244)		\$493,937
18	Net Plant	\$1,178,103								\$1,324,008
19	Property Tax Expense	\$28,846								\$33,631
20	Effective Prop tax Rate	2.45%								2.54%
		<u>End of FY 2022</u>	<u>ISR Additions</u>	<u>Non-ISR Add's</u>	<u>Total Add's</u>	<u>Bk Depr</u>	<u>Retirements</u>	<u>COR</u>	<u>Adjustment</u>	<u>End of FY 2023</u>
21	Plant In Service	\$1,817,945	\$151,651	\$56,556	\$208,207		(\$13,374)			\$2,012,779
22	Accumulated Depr	\$493,937				\$55,565	(\$13,374)	(\$10,607)		\$525,521
23	Net Plant	\$1,324,008								\$1,487,258
24	Property Tax Expense	\$33,631								\$38,297
25	Effective Prop tax Rate	2.54%								2.58%
		<u>End of FY 2023</u>	<u>ISR Additions</u>	<u>Non-ISR Add's</u>	<u>Total Add's</u>	<u>Bk Depr</u>	<u>Retirements</u>	<u>COR</u>	<u>Adjustment</u>	<u>End of FY 2024</u>
26	Plant In Service	\$2,012,779	\$155,814	\$29,406	\$185,220		(\$7,823)			\$2,190,176
27	Accumulated Depr	\$525,521				\$59,650	(\$7,823)	(\$7,930)		\$569,418
28	Net Plant	\$1,487,258								\$1,620,757
29	Property Tax Expense	\$38,297								\$41,167
30	Effective Prop tax Rate	2.58%								2.54%
		<u>End of FY 2024</u>	<u>ISR Additions</u>	<u>Non-ISR Add's</u>	<u>Total Add's</u>	<u>Bk Depr</u>	<u>Retirements</u>	<u>COR</u>	<u>Adjustment</u>	<u>End of FY 2025</u>
31	Plant In Service	\$2,190,176	\$164,812	\$56,556	\$221,368		(\$8,152)			\$2,403,391
32	Accumulated Depr	\$569,418				\$63,350	(\$8,152)	(\$7,525)		\$617,091
33	Net Plant	\$1,620,757								\$1,786,300
34	Property Tax Expense	\$41,167								\$46,087
35	Effective Prop tax Rate	2.54%								2.58%

The Narragansett Electric Company
d/b/a Rhode Island Energy
Fiscal Year 2023 ISR Property Tax Recovery Adjustment
Fiscal Year 2023 ISR Property Tax Recovery Adjustment (Continued) 1

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	
	Cumulative Increm. ISR Prop. Tax for FY2018				Cumulative Increm. ISR Prop. Tax for FY2019 1st 5 month				Cumulative Increm. ISR Prop. Tax for FY2019			
36	Incremental ISR Additions		\$97,810				\$92,263				(\$914)	
37	Book Depreciation: base allowance on ISR eligible plant		(\$24,356)				(\$24,356)				\$0	
38	Book Depreciation: current year ISR additions		(\$1,246)				(\$1,449)				(\$7)	
39	COR		\$8,603				\$11,583				\$5,627	
40	Net Plant Additions		\$80,811				\$78,041				\$4,705	
41	RY Effective Tax Rate		3.06%				3.06%				2.92%	
42	ISR Year Effective Tax Rate		2.90%				2.70%		7 mos		1.70%	
43	RY Effective Tax Rate		3.06%	-0.15%			3.06%	-0.36%			2.70%	
44	RY Effective Tax Rate 5 mos for FY 2019					5 month		-0.15%			2.92%	
45	RY Net Plant times 5 mo rate	7 month	\$458,057	-0.15%	(\$694)		\$458,057	-0.15%	(\$684)		-0.22%	
46	FY 2014 Net Adds times ISR Year Effective Tax rate	7 month	\$6,343	2.90%	\$184		\$5,950	1.12%	\$67		-0.13% 7 mos	
47	FY 2015 Net Adds times ISR Year Effective Tax rate	7 month	\$42,913	2.90%	\$1,246		\$39,920	1.12%	\$449		\$0	
48	FY 2016 Net Adds times ISR Year Effective Tax rate		\$59,527	2.90%	\$1,729		\$55,693	1.12%	\$626	\$6,934	1.57%	
49	FY 2017 Net Adds times ISR Year Effective Tax rate		\$58,883	2.90%	\$1,710		\$56,076	1.12%	\$630	\$4,705	1.57%	
50	FY 2018 Net Adds times ISR Year Effective Tax rate		\$80,810	2.90%	\$2,347		\$77,664	1.12%	\$873		\$74	
51	FY 2019 Net Adds times ISR Year Effective Tax rate						\$78,041	1.12%	\$877			
52	Total ISR Property Tax Recovery		\$6,521				\$2,837				(\$1,020)	
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)
		Cumulative Increm. ISR Prop. Tax for FY2020				Cumulative Increm. ISR Prop. Tax for FY2021				Cumulative Increm. ISR Prop. Tax for FY2022		
53	Incremental ISR Additions		\$105,296				\$110,178				\$156,694	
54	Book Depreciation: base allowance on ISR eligible plant		\$0				\$0				(\$23,890)	
55	Book Depreciation: current year ISR additions		(\$1,510)				(\$1,589)				(\$2,249)	
56	COR		\$7,056				\$8,862				\$10,773	
57	Net Plant Additions		\$110,841				\$117,450				\$141,328	
58	RY Effective Tax Rate		2.96%				3.02%				3.05%	
60	Property Tax Recovery on Growth and non-ISR											
61	ISR Year Effective Tax Rate		2.60%				2.45%				2.54%	
62	RY Effective Tax Rate		2.96%	-0.36%			3.02%	-0.57%			3.05%	
63	RY Effective Tax Rate 7 mos for FY 2019			-0.36%				-0.57%			-0.51%	
64	RY Net Plant times Rate Difference	7 month	\$908,586	* -0.36%	(\$3,246)		\$889,353	* -0.57%	(\$5,080)		\$881,383	
65	Growth and non-ISR Incremental times rate difference		(\$20,407)	* -0.36%	\$73		(\$41,336)	* -0.57%	\$236		(\$51,615)	
66	FY 2018 Net Incremental times rate difference		\$7,156	* 2.6%	\$186		\$7,378	* 2.45%	\$181		\$7,600	
67	FY 2019 Net Incremental times rate difference		\$4,692	* 2.6%	\$122		\$4,678	* 2.45%	\$115		\$4,665	
68	FY 2020 Net Incremental times rate difference		\$110,841	* 2.6%	\$2,882		\$107,821	* 2.45%	\$2,642		\$104,800	
69	FY 2021 Net Incremental times rate difference						\$117,450	* 2.45%	\$2,878		\$114,271	
70	FY 2022 Net Adds times rate difference										\$141,328	
71	Total ISR Property Tax Recovery		\$17				\$970				\$5,242	
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)
		Cumulative Increm. ISR Prop. Tax for FY2023				Cumulative Increm. ISR Prop. Tax for FY2024				Cumulative Increm. ISR Prop. Tax for FY2025		
72	Incremental ISR Additions		\$151,651				\$155,814				\$164,812	
73	Book Depreciation: base allowance on ISR eligible plant		(\$40,954)				(\$40,954)				(\$40,954)	
74	Book Depreciation: current year ISR additions		(\$2,140)				(\$2,212)				(\$2,342)	
75	COR		\$10,607				\$7,930				\$7,525	
76	Net Plant Additions		\$119,164				\$120,577				\$129,041	
77	RY Effective Tax Rate		3.05%				3.05%				3.05%	
79	Property Tax Recovery on Growth and non-ISR											
80	ISR Year Effective Tax Rate		2.58%				2.54%				2.58%	
81	RY Effective Tax Rate		3.05%	-0.47%			3.05%	-0.51%			3.05%	
82	RY Effective Tax Rate 7 mos for FY 2019			-0.47%				-0.51%			-0.47%	
83	RY Net Plant times Rate Difference		\$881,383	* -0.47%	(\$4,134)		\$881,383	* -0.51%	(\$4,482)		\$881,383	
84	Growth and non-ISR Incremental times rate difference		(\$51,615)	* -0.47%	\$242		(\$51,615)	* -0.51%	\$262		(\$51,615)	
85	FY 2018 Net Incremental times rate difference		\$7,822	* 2.58%	\$202		\$8,044	* 2.54%	\$204		\$8,266	
86	FY 2019 Net Incremental times rate difference		\$4,651	* 2.58%	\$120		\$4,638	* 2.54%	\$118		\$4,624	
87	FY 2020 Net Incremental times rate difference		\$101,780	* 2.58%	\$2,626		\$98,759	* 2.54%	\$2,508		\$95,739	
88	FY 2021 Net Incremental times rate difference		\$111,092	* 2.58%	\$2,866		\$107,913	* 2.54%	\$2,741		\$104,734	
89	FY 2022 Net Adds times rate difference		\$136,830	* 2.58%	\$3,530		\$132,332	* 2.54%	\$3,361		\$127,834	
90	FY 2023 Net Adds times rate difference		\$119,164	* 2.58%	\$3,074		\$114,884	* 2.54%	\$2,918		\$110,604	
91	FY 2024 Net Adds times rate difference						\$120,577	* 2.54%	\$3,063		\$113,940	
92	FY 2025 Net Adds times rate difference										\$129,041	
93	Total ISR Property Tax Recovery		\$8,527				\$10,694				\$14,037	

The Narragansett Electric Company
d/b/a Rhode Island Energy
Fiscal Year 2023 ISR Property Tax Recovery Adjustment
(000s)

Line	Notes
1(a) - 5(i)	Docket No. 4781 Attachment MAL-2, Page 10 of 13, I(a) to 5(h)
6(i) - 10(i)	Docket No. 4916 Attachment MAL-1, Page 17 of 20, 6(a) to 10(h)
11(a) - 15(i)	Docket No. 4996 Attachment MAL-1, Page 20 of 22, 11(a) to 15(i)
16(a) - 20(a)	11(i) - 15(i)
16(b)	Page 27 of 35 , Line 1 ,Col (e)=1000
16(c)	Docket No. 5099, Section 3, Att. 1 (C), Page 23, 16 (c)
16(d)	Docket No. 5099, Section 3, Att. 1 (C), Page 23, 16 (d)
16(f)	Docket No. 5099, Section 3, Att. 1 (C), Page 23, 16 (f)
16(i)	Line 16(a) + (d) + (f)
17(e)	P25, (L58+L59)+(P2, L3 (a))+P5, L3 (a)+P8, L3 (a)+P12, L3 (a))+1000*3.05%+Inc (L1(c)+L6(c)+L11(c))*0.0416+ P15, L3 (a)*0.5*3.05%+1000+ L16(c)*0.5*0.0416
17(f)	=16(f)
17(g)	Docket No. 5099, Section 3, Att. 1 (C), Page 23, 17 (g)
17(i)	Line 17(a) + (e) + (f) + (g)
18(i)	Line 16(i) - 17(i)
19(i)	Line 18(h) × 20(h)
20(i)	Docket No. 5099, Section 3, Att. 1 (C), Page 23, 20 (h)
21(a) - 25(a)	16(i) - 20(i)
21(b)	Page 18 of 35 , Line 1 ,Col (d)=1000
21(c)	Line 6(c)
21(d)	Line 16(b) + 16(c)
21(f)	- Page 18 of 35 , Line 2 ,Col (d)=1000
21(i)	Line 21 (a) + (d) + (f)
22(e)	Page 31, (Line 58 + Line 59) + (Page 2 , Line 3, Col (a) + Page 5 , Line 3, Col (a) + Page 8 , Line 3, Col (a) + Page 12 , Line 3, Col (a) + Page 15 , Line 3, Col (a))=1000 × 3.05%+ Incremental (L1(c)+L6(c)+L11(c)+L16(c))*3.05% + Page 18 , Line 3, Col (a)+ L21(c))*0.5*3.05%+1000
22(f)	=21(f)
22(g)	- Page 18 of 35 , Line 7 ,Col (d)=1000
22(i)	Line 22 (a) + (e) + (f) + (g)
23(i)	Line 21(i) - 22(i)
24(i)	Line 23(i) × 25(i)
25(i)	=20(a) most recent actual property tax rate
26(a) - 30(a)	21(i) - 25(i)
26(b)	
26(c)	Line 16(c)
26(d)	Line 26(b) + 26(c)
26(f)	
26(i)	Line 26 (a) + (d) + (f)
27(e)	Page 31, (Line 58 + Line 59) + (Page 2 , Line 3, Col (a) + Page 5 , Line 3, Col (a) + Page 8 , Line 3, Col (a) + Page 12 , Line 3, Col (a) + Page 15 , Line 3, Col (a))=1000 × 3.05%+ Incremental (L1(c)+L6(c)+L11(c)+L16(c))*3.05% + Page 18 , Line 3, Col (a)+ L21(c))*0.5*3.05%+1000
27(f)	=26(f)
27(g)	
27(i)	Line 27 (a) + (e) + (f) + (g)
28(i)	Line 26(i) - 27(i)
29(i)	Line 28(i) × 30(i)
30(i)	=20(i) most recent actual property tax rate

Line	Notes
36(a) - 52(h)	Docket No. 4781 Rec, Attachment MAL-1, Page 29 of 35, 82(e) to 107(k)
53(a)-71 (c)	Docket No. 4781 Rec, Attachment MAL-2, Page 10 of 13, 31(a) to 50 (c)
53(e)-71(g)	Docket No. 4916 Rec, Attachment MAL-1, Page 18 of 20, 28(e) to 48 (g)
53(j)	Page 15 of 35, Line 4(a)=1000
54(j)	-(Page 31 of 35, Line 77(c) *7-12)=1000
55(j)	- Page 15 of 35, Line 15(a)=1000
56(j)	Page 15 of 35, Line 7(a)=1000
57(j)	Sum of Lines 53(j) through 56(j)
59(j)	=Rate Case, Docket 4770, Compliance, Revised Rebuttal. Att. 1, Sch 1-G, P3, L15, Col (e) + 64(j)
61(i)	=20(i)
62(i)	=59(j)
62(j)	61(i)-62(i)
63(j)	=62(j)
64(i)	=Rate Case, Docket 4770, Compliance, Revised Rebuttal. Att. 1: 64(a) × 5+12 + (Sch 6-G, P2, L30 - L41 + P3, L5(d) - P5, L4(d) - Sch 5-G, P1, L1(e) - L1(g)) × 7-12000
64(k)	64(i)*63(j)
65(i)	= - Rate Case, Docket 4770, Compliance, Revised Rebuttal Att. 1: Sch 11-G, P5, L3(e)+L3(i)+L7(e)+L7(i)+L3(l)+L7(l)*
65(k)	65(i)*63(j)
66(i)	Line 66(c) - Page 2 of 35, Line 15(e)=1000
66(k)	=66(i)*61(i)
67(i)	Line 67(c) - Page 5 of 35, Line 15(d)=1000
67(k)	=67(i)*61(i)
68(i)	Line 68(c) - Page 8 of 35, Line 15(c)=1000
68(k)	=68(i)*61(i)
69(i)	Line 69(c) - Page 12 of 35, Line 15(c)=1000
69(k)	=69(i)*61(i)

Line	Notes
70(i)	57(j)
70(k)	=70(i)*61(i)
71(k)	sum of 64(k) through 70(k)
72(b)	Page 18 of 35, Line 4(a)=1000
73(b)	- Page 18 of 35, Line 5(a)=1000
74(b)	- Page 18 of 35, Line 14(a)=1000
75(b)	Page 18 of 35, Line 7(a)=1000
76(b)	Sum of Lines 72(b) through 75(b)
78(b)	59(j)
80(a)	25(i)
81(a)	78(b)
81(b)	80(a)-81(a)
82(b)	81(b)
83(a)	64(i)
83(c)	83(a)*82(b)
84(a)	65(i)
84(c)	84(a)*82(b)
85(a)	Line 66(j) - (Page 2 of 35, Line 15(f) through (h))=1000
85(c)	=85(a)*80(a)
86(a)	Line 67(i) - (Page 5 of 35, Line 15(e) through (g))=1000
86(c)	=86(a)*80(a)
87(a)	Line 68(i) - (Page 8 of 35, Line 15(d) through (f))=1000
87(c)	=87(a)*80(a)
88(a)	Line 69(i) - (Page 12 of 35, Line 15(c) through (e))=1000
88(c)	=88(a)*80(a)
89(a)	(Line 70(i) - (Page 15 of 35, Line 15(b) through (d))=1000
89(c)	=89(a)*80(a)
90(a)	=76(b)
90(c)	=90(a)*80(a)
93(c)	sum of 83(c) through 90(c)

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Weighted Average Cost of Capital

Line No.

Weighted Average Cost of Capital as approved in RIPUC Docket No. 4323 at 35% income tax rate effective April 1, 2013

	(a)	(b)	(c)	(d)	(e)
	Ratio	Rate	Weighted Rate	Taxes	Return
Long Term Debt	49.95%	5.70%	2.85%		2.85%
Short Term Debt	0.76%	0.80%	0.01%		0.01%
Preferred Stock	0.15%	4.50%	0.01%		0.01%
Common Equity	49.14%	9.50%	4.67%	2.51%	7.18%
	100.00%		7.54%	2.51%	10.05%

9

(d) - Column (c) x 35% divided by (1 - 35%)

11

12

Weighted Average Cost of Capital as approved in RIPUC Docket No. 4323 at 21% income tax rate effective January 1, 2018

	(a)	(b)	(c)	(d)	(e)
	Ratio	Rate	Weighted Rate	Taxes	Return
Long Term Debt	49.95%	5.70%	2.85%		2.85%
Short Term Debt	0.76%	0.80%	0.01%		0.01%
Preferred Stock	0.15%	4.50%	0.01%		0.01%
Common Equity	49.14%	9.50%	4.67%	1.24%	5.91%
	100.00%		7.54%	1.24%	8.78%

20

(d) - Column (c) x 21% divided by (1 - 21%)

22

Weighted Average Cost of Capital as approved in RIPUC Docket No. 4770 effective September 1, 2018

	(a)	(b)	(c)	(d)	(e)
	Ratio	Rate	Weighted Rate	Taxes	Return
Long Term Debt	48.35%	4.98%	2.41%		2.41%
Short Term Debt	0.60%	1.76%	0.01%		0.01%
Preferred Stock	0.10%	4.50%	0.00%		0.00%
Common Equity	50.95%	9.28%	4.73%	1.26%	5.99%
	100.00%		7.15%	1.26%	8.41%

30

(d) - Column (c) x 21% divided by (1 - 21%)

31

32

FY18 Blended Rate $\text{Line 8(e)} \times 75\% + \text{Line 20(e)} \times 25\%$ 9.73%

34

FY19 Blended Rate $\text{Line 20} \times 5 \div 12 + \text{Line 30} \times 7 \div 12$ 8.56%

35

Inputs		
1	Tax Rate	21.00%
Gas and Distribution		
2	Long Term Debt	48.350%
3	Short Term Debt	0.600%
4	Preferred Stock	0.100%
5	Debt Weighting	Lines 2+3+4
		49.050%
6	Equity Weighting	1 - Line 5
		50.950%
7	Long Term Debt Rate	4.980%
8	Short Term Debt Rate	1.760%
9	Cost of Debt	Line 2 / Line 5 * Line 7 + Line 3 / Line 5 * Line 8
		4.941%
10	Cost of Equity	9.275%
11	Revenue WACC (pre-tax)	Line 9 * Line 5 + (Line 10 / (1 - Line 1)) * Line 6
		8.4100%
12	WACC (after-tax)	(Line 9 * Line 5) + (Line 10 * Line 6)
		7.149%
13	Rate Base - PPL (after purchase)	Page 2, Line 8, Column (c)
		\$352,482,744 FY 2025
14	Rate Base - NG (before sale)	Page 2, Line 8, Column (f)
		\$313,737,491 FY 2025
15	Deferred Taxes / Hold Harmless	Lines 13 - 14
		\$38,745,253 Elimination of Deferred Taxes

ROE Mechanics

Notes:

- The sale of the business is treated as a sale of assets for income tax purposes causing the reversal of cumulative timing differences and a payment to the government of the amounts that had been recorded as deferred tax liabilities by National Grid ("NG").
- PPL does not assume the interest-free liability of ADIT from NG because NG paid this tax liability to the government as a result of the sales transaction. As such, PPL has to replace the no-cost capital with other capital. This calculation assumes that the substitute for the eliminated DTL is debt and equity in the same proportion as stated in Lines 5 and 6.
- The revenue credit for hold harmless is reflected on Line 23.
- Line 28 reflects the goodwill tax deduction needed to hold customers harmless from the increased revenue requirement due to the rate base increase from the elimination of deferred taxes. Any tax deduction lower than the amount reflected on this line will not provide enough of a tax benefit to share with customers.
- Line 29 reflects the cash tax benefit of the goodwill tax deduction and is recorded for GAAP reporting (not reflected for FERC reporting). There is not an income statement tax benefit since the goodwill tax deduction is a flip between current and deferred taxes. This amount grossed up for tax shown on Line 30 is the revenue credit reflected on Line 23.

		Post-Acquisition	Results for ISR	Difference	
		Results for ISR	Capital		
		Capital	Adjustments		
		through the Date of	through the Date of		
		Acquisition	Acquisition as if the		
		(a)	Acquisition did not	(c) = (a) - (b)	
			occur		
16	Rate Base after Acquisition	Line 13	352,482,744	352,482,744	-
17	ADIT Adjustment	- Line 15	-	(38,745,253)	38,745,253
18	Adjusted Rate Base	Lines 16 + 17	352,482,744	313,737,491	38,745,253
19	Debt Return (4.576%)	Lines 18 * 5 * 9	8,541,822	7,602,896	938,926
20	Equity Return (9.275%)	Lines 18 * 6 * 10	16,656,969	14,826,018	1,830,951
21	Taxes on Equity (21%)	(Line 20 / (1 - Line 1)) * Line 1	4,427,802	3,941,093	486,708
22	Total Unadjusted Revenue	Sum of Lines 19 , 20, 21	29,626,592	26,370,008	3,256,584
23	Revenue Adjustment for Fiscal Year 2025	- Line 15 * Line 11	(3,258,476)	-	(3,258,476) Note 1
24	Total Revenue	Lines 22 + 23	26,368,116	26,370,008	(1,891)
25	Interest Expense	Lines 18, Col (b) * 5 * 9	7,602,896	7,602,896	-
26	Tax Expense	(Lines 24 - 25) * Line 1	3,940,696	3,941,093	(397)
27	Net Income	Lines 24 - 25 - 26	14,824,524	14,826,018	(1,494)
Impact of Transaction					
28	Transaction-related Tax Deduction	- Line 23 * (1-Line 1) / Line 1	12,258,075		
29	Cash Tax Benefit at 21%	Line 28 * Line 1	2,574,196		
30	Cash Tax Benefit Grossed Up	Line 29 / (1-Line 1)	3,258,476		

Note 1: There is a slight variation in the calculated hold harmless amount in the ISR filing due to the roundings that are used to calculate the WACC in the ISR files.

The Narragansett Electric Company
d/b/a Rhode Island Energy
Average ISR Rate Base after Deferred Tax Proration

	Post-Acquisition (a)	Prorated (b)	Post-Acquisition After Proration (c)	No Acquisition (d)	Prorated (e)	No Acquisition After Proration (f)
1 Plan Year 2025						
2 FY 2018	7,041,262	100%	7,041,262	11,371,995	100%	11,371,995
3 FY 2019	4,665,706	100%	4,665,706	3,277,555	100%	3,277,555
4 FY 2020	72,314,207	100%	72,314,207	59,681,674	100%	59,681,674
5 FY 2021	64,074,909	100%	64,074,909	57,654,872	100%	57,654,872
6 FY 2022	110,672,199	100%	110,672,199	90,804,104	100%	90,804,104
7 FY 2023	93,714,461	100%	93,714,461	90,947,292	100%	90,947,292
8 Total	<u>352,482,744</u>		<u>352,482,744</u>	<u>313,737,491</u>		<u>313,737,491</u>

Page 1, Line 13

Page 1, Line 14

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Annual Revenue Requirement Summary

Line No.		Approved	Fiscal Year
		2024	2025
		(a)	(b)
<u>Operation and Maintenance Expenses</u>			
1	FY 2025 Operation and Maintenance Paving Expense	\$0	\$12,000,000
<u>Capital Investment:</u>			
2	Actual Revenue Requirement on FY 2018 Incremental Capital Included in ISR Rate Base	\$362,365	\$370,111
3	Actual Revenue Requirement on FY 2019 Incremental Capital Included in ISR Rate Base	\$405,676	\$405,961
4	Actual Revenue Requirement on FY 2020 Incremental Capital Included in ISR Rate Base	\$9,422,592	\$9,102,120
5	Actual Revenue Requirement on FY 2021 Incremental Capital Included in ISR Rate Base	\$8,907,970	\$8,567,568
6	Actual Revenue Requirement on FY 2022 Incremental Capital Included in ISR Rate Base	\$14,293,737	\$13,805,560
7	Forecasted Revenue Requirement on FY 2023-NG Capital included in ISR Rate Base	\$12,827,683	\$12,161,768
8	Forecasted Revenue Requirement on FY 2024 Capital included in ISR Rate Base	\$6,096,711	\$12,028,274
9	Forecasted Revenue Requirement on FY 2025 Capital included in ISR Rate Base		\$6,268,010
10	Total Capital Investment Revenue Requirement	<u>\$52,316,734</u>	<u>\$62,709,373</u>
11	FY 2024 Property Tax Recovery Adjustment	\$10,806,916	
12	FY 2025 Property Tax Recovery Adjustment		\$13,732,247
13	Total Capital Investment Component of Revenue Requirement	<u>\$63,123,650</u>	<u>\$76,441,620</u>
14	Total Revenue Requirement	<u>\$63,123,650</u>	<u>\$88,441,620</u>
15	Per Tax Hold Harmless Adjustment Section 3 - Attachment 2 (C), Pages 1, Line 23	(\$4,499,963)	(\$3,258,476)
16	Total Net Capital Investment Component of Revenue Requirement	<u>\$58,623,688</u>	<u>\$85,183,144</u>
17	Incremental Rate Adjustment		\$26,559,456

Column Notes:

(a) RIPUC Docket No. 22-53-NG, Section 3, Attachment 1 (C), Page 1 of 32, Column (b)

Line Notes for Columns (b) only:

2 Page 2 of 35, Line 36, Col. (i)
3 Page 5 of 35, Line 35, Col. (h)
4 Page 8 of 35, Line 35, Col. (g)
5 Page 12 of 35, Line 35, Col. (f)
6 Page 15 of 35, Line 35, Col. (e)
7 Page 18 of 35, Line 35, Col. (d)
8 Page 21 of 35, Line 31, Col. (b)
9 Page 24 of 35, Line 29, Col. (a)
10 Sum of Lines 2 through 9
12 Page 33 of 35, Line 93, Col. (k) × 1,000
13 Sum of Line 10 through Line 12
14 Line 1 + Line 13
15 Section 3 - Attachment 2, Pages 1, Line 23
16 Line 14 + Line 15
17 Line 16 Col (b) - Line 16 Col (a)

The Narragansett Electric Company
d/b/a Rhode Island Energy
Proposed FY 2025 Gas Infrastructure, Safety,
and Reliability Plan Filing
Section 3: Attachment 3
Page 2 of 35

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Fiscal Year 2025 Revenue Requirement on FY 2018 Actual Incremental Gas Capital Investment

Line No.		Fiscal Year 2018 (a)	Fiscal Year 2019 (b)	Fiscal Year 2020 (c)	Fiscal Year 2021 (d)	Fiscal Year 2022 (e)	NG 4/1/22 - 5/24/2022 2023 (f)	PPL 5/25/22 - 3/31/23 2023 (g)	Fiscal Year 2024 (h)	Fiscal Year 2025 (i)	
1	Depreciable Net Capital Included in ISR Rate Base										
2	Total Allowed Capital Included in ISR Rate Base in Current Year Retirements	Page 27 of 35, Line 3, Col (a) Page 27 of 35, Line 9, Col (a)	\$4,632,718	\$12,059,428							
3	Net Depreciable Capital Included in ISR Rate Base	Year 1 = Line 1 - Line 2; then = Prior Year Line 3	(\$7,426,710)	(\$7,426,710)	(\$7,426,710)	(\$7,426,710)	(\$7,426,710)	(\$7,426,710)	(\$7,426,710)	(\$7,426,710)	
	Change in Net Capital Included in ISR Rate Base										
4	Capital Included in ISR Rate Base	Line 1	\$4,632,718	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
5	Depreciation Expense		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
6	Incremental Capital Amount	Year 1 = Line 4 - Line 5; then = Prior Year Line 6	\$4,632,718	\$4,632,718	\$4,632,718	\$4,632,718	\$4,632,718	\$4,632,718	\$4,632,718	\$4,632,718	
7	Cost of Removal	Page 27 of 35, Line 6, Col (a)	\$1,941,168								
8	Net Plant Amount	Year 1 = Line 6 + Line 7, Then = Prior Year	\$6,573,886	\$6,573,886	\$6,573,886	\$6,573,886	\$6,573,886	\$6,573,886	\$6,573,886	\$6,573,886	
	Deferred Tax Calculation:										
9	Composite Book Depreciation Rate	1/	3.38%	3.15%	2.99%	2.99%	2.99%	2.99%	2.99%	2.99%	
10	Number of days	2/					54	311			
11	Proration Percentage	2/					14.79%	85.21%			
12	Tax Depreciation and Year 1 Basis Adjustments	Year 1=Page 3 of 35, Line 30, Col (a); then = Page 3 of 35, Col (e)	\$7,820,728	\$21,720	\$20,089	\$18,585	\$17,189	\$2,353	\$213,427	\$410,861	\$380,014
13	Cumulative Tax Depreciation-NG	Year 1 = Line 12; then = Prior Year Line 13 + Current Year Line 12	\$7,820,728	\$7,842,448	\$7,862,538	\$7,881,123	\$7,898,312	\$7,900,664			
14	Cumulative Tax Depreciation-PPL	Year 1 = Line 12; then = Prior Year Line 14 + Current Year Line 12							\$213,427	\$624,288	\$1,004,302
15	Book Depreciation	Year 1= Line 3 x Line 9 x 50%; then = Line 3 x Line 9	(\$125,511)	(\$234,127)	(\$222,059)	(\$222,059)	(\$222,059)	(\$32,853)	(\$189,206)	(\$222,059)	(\$222,059)
16	Cumulative Book Depreciation	Year 1 = Line 14; then = Prior Year Line 15 + Current Year Line 14	(\$125,511)	(\$359,638)	(\$581,697)	(\$803,756)	(\$1,025,814)	(\$1,058,667)	(\$1,247,873)	(\$1,469,932)	(\$1,691,990)
17	Cumulative Book / Tax Timer	Columns (a) through (e): Line 13 - Line 16, Then Line 14 - Line 16	\$7,946,239	\$8,202,087	\$8,444,235	\$8,684,878	\$8,924,126	\$8,959,331	\$1,461,300	\$2,094,220	\$2,696,292
18	Less: Cumulative Book Depreciation at Acquisition	Line 16 Column (f)							(\$1,058,667)	(\$1,058,667)	(\$1,058,667)
19	Cumulative Book / Tax Timer - PPL	Line 17 + Line 18							\$402,633	\$1,035,553	\$1,637,625
20	Effective Tax Rate	Columns (a) through (f): Line 17 * Line 20, Then Line 19 * Line 20	21.00%	21.00%	21.00%	21.00%	21.00%	21.00%	21.00%	21.00%	21.00%
21	Deferred Tax Reserve	20	\$1,668,710	\$1,722,438	\$1,773,289	\$1,823,824	\$1,874,066	\$1,881,459	\$84,553	\$217,466	\$343,901
22	Less: FY 2018 Federal NOL (Generation) / Utilization	-Page 28 of 35, Line 12, Col (g)	(\$6,051,855)	(\$6,051,855)	(\$6,051,855)	(\$6,051,855)	(\$6,051,855)	(\$6,051,855)	\$0	\$0	\$0
23	Excess Deferred Tax	(Line 16 x 31.55% blended FY18 tax rate) - Line 20; then = Prior Year Line 22	\$838,328	\$838,328	\$838,328	\$838,328	\$838,328	\$838,328	\$838,328	\$838,328	\$838,328
24	Net Deferred Tax Reserve before Proration Adjustment	Line 21 + Line 22 + Line 23	(\$3,544,817)	(\$3,491,089)	(\$3,440,238)	(\$3,389,703)	(\$3,339,461)	(\$3,332,068)	\$922,881	\$1,055,794	\$1,182,230
	ISR Rate Base Calculation:										
25	Cumulative Incremental Capital Included in ISR Rate Base	Line 8	\$6,573,886	\$6,573,886	\$6,573,886	\$6,573,886	\$6,573,886	\$6,573,886	\$6,573,886	\$6,573,886	
26	Accumulated Depreciation	- Line 16	\$125,511	\$359,638	\$581,697	\$803,756	\$1,025,814	\$1,058,667	\$1,247,873	\$1,469,932	\$1,691,990
27	Deferred Tax Reserve	- Line 24	\$3,544,817	\$3,491,089	\$3,440,238	\$3,389,703	\$3,339,461	\$3,332,068	(\$922,881)	(\$1,055,794)	(\$1,182,230)
28	Year End Rate Base before Deferred Tax Proration	Sum of Lines 25 through 27	\$10,244,214	\$10,424,613	\$10,595,821	\$10,767,344	\$10,939,161	\$10,964,620	\$6,898,878	\$6,988,023	\$7,083,647
	Revenue Requirement Calculation:										
29	Average Rate Base before Deferred Tax Proration Adjustment	Year 1 = 0; then Average of (Prior + Current Year Line 28)					\$10,853,253	\$8,919,019	\$8,919,019	\$6,943,540	\$7,035,835
30	Proration Adjustment	Page 4 of 35, Line 41					\$2,157	\$3,947	\$5,705	\$5,427	
31	Average ISR Rate Base after Deferred Tax Proration	Line 29 + Line 30					\$10,855,409	\$8,922,966	\$8,922,966	\$6,949,155	\$7,041,262
32	Pre-Tax ROR	Page 35 of 35, Line 30, Column (e)					8.41%	8.41%	8.41%	8.41%	8.41%
33	Proration Percentage	Line 11						14.79%	85.21%		
34	Return and Taxes	Cols (e), (h) and (i): L 31 * L 32; Cols (f) and (g): L 31 * L 32 *						\$912,940	\$111,021	\$639,400	\$584,424
35	Book Depreciation	L 33 Year 1 = N/A; then = Line 15					(\$222,059)	(\$32,853)	(\$189,206)	(\$222,059)	(\$222,059)
36	Annual Revenue Requirement	Sum of Lines 34 through 35	N/A	N/A	N/A	N/A	\$690,881	\$78,169	\$450,194	\$362,365	\$370,111

1/ 3.38%, Composite Book Depreciation Rate approved per RIPUC Docket No. 4323, in effect until Aug 31, 2018
2.99%, Composite Book Depreciation Rate approved per RIPUC Docket No. 4770, effective on Sep 1, 2018

FY 19 Composite Book Depreciation Rate = 3.38% x 5/12 + 2.99% x 7/12

2/ Columns (f) and (g) represent the 12 months within fiscal year 2023, but activity is separated to accommodate the impacts of the acquisition as described in note 3.

3/ National Grid and PPL Corporation ("PPL") elected to treat PPL's acquisition of The Narragansett Electric Company ("NECO") from National Grid on May 25, 2022 as an asset sale for U.S. federal income tax purposes under Internal Revenue Code Section 338(h)(10). As a result of this election, PPL was deemed to acquire the assets of NECO at fair market value (essentially equivalent to book value) for tax purposes. The resulting "step-up" in tax basis eliminates most book/tax timing differences and the related accumulated net deferred income tax liabilities as of the acquisition date, at which time PPL will begin depreciating the new tax basis and start the tracking of book/tax timing differences as if PPL purchased a new asset in the year of acquisition.

4/ The Federal Income Tax rate changed from 35% to 21% on January 1, 2018 per the Tax Cuts and Jobs Act of 2017

5/ Columns (f) and (g) takes the average of the "Year End Rate Base before Deferred Tax Proration" at the beginning of the fiscal year on Line 27, Column (e) and the end of the fiscal year on Line 32, Column (g). See note 2.

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Tax Depreciation and Repairs Deduction on FY 2018 Incremental Capital Investment

Line No.			Fiscal Year 2018 (a)	(b)	(c)	(d)	(e)	(f)
	Capital Repairs Deduction							
1	Plant Additions	Page 2 of 35, Line 1	\$4,632,718					
2	Capital Repairs Deduction Rate	Per Tax Department	85.43%					
3	Capital Repairs Deduction	Line 1 × Line 2	\$3,957,731					
4								
5								
6	Bonus Depreciation							
7	Plant Additions	Line 1	\$4,632,718					
8	Less Capital Repairs Deduction	Line 3	\$3,957,731					
9	Plant Additions Net of Capital Repairs Deduction	Line 7 - Line 8	\$674,987					
10	Percent of Plant Eligible for Bonus Depreciation	Per Tax Department	100.00%					
11	Plant Eligible for Bonus Depreciation	Line 9 × Line 10	\$674,987					
12	Bonus depreciation 100% category	100% × 15.86%	2/ 15.86%					
13	Bonus depreciation 50% category	50% × 58.05%	2/ 29.03%					
14	Bonus depreciation 40% category	40% × 26.35%	2/ 10.54%					
15	Bonus Depreciation Rate (October 2017 - March 2018)	1 × 50% × 0%	2/ 0.00%					
16	Total Bonus Depreciation Rate	Line 12 + Line 13 + Line 14 + Line 15	55.43%					
17	Bonus Depreciation	Line 11 × Line 16	\$374,112					
18								
19	Remaining Tax Depreciation							
20	Plant Additions	Line 1	\$4,632,718					
21	Less Capital Repairs Deduction	Line 3	\$3,957,731					
22	Less Bonus Depreciation	Line 17	\$374,112					
	Remaining Plant Additions Subject to 20 YR MACRS Tax							
23	Depreciation	Line 20 - Line 21 - Line 22	\$300,875					
24	20 YR MACRS Tax Depreciation Rates	IRS Publication 946	3.75%					
25	Remaining Tax Depreciation	Line 23 × Line 24	\$11,283					
26								
27	FY18 tax (gain)/loss on retirements	Per Tax Department	3/ \$1,536,434					
28	Cost of Removal	Page 2 of 35, Line 7	\$1,941,168					
29								
30	Total Tax Depreciation and Repairs Deduction	Sum of Lines 3, 17, 25, 27 & 28	\$7,820,728					

20 Year MACRS Depreciation			
MACRS basis:	Line 23, Column (a)	\$300,875	
		Annual	Cumulative
Fiscal Year	Prorated		
FY Mar-2018	3.750%	\$11,283	\$7,820,728
FY Mar-2019	7.219%	\$21,720	\$7,842,448
FY Mar-2020	6.677%	\$20,089	\$7,862,538
FY Mar-2021	6.177%	\$18,585	\$7,881,123
FY Mar-2022	5.713%	\$17,189	\$7,898,312
FY Mar-2023 (Apr-May 2022)	5.285%	\$2,353	\$7,900,664
Book Cost	Line 1, Column (a)	\$4,632,718	
Cumulative Book Depreciation	- Page 2 of 35, Line 16, Col (f)	\$1,058,667	
PPL MACRS basis:	Line 13 + Line 14	\$5,691,385	
FY Mar-2023 (Jun-Mar 2023)	3.750%	\$213,427	\$213,427
Mar-2024	7.219%	\$410,861	\$624,288
Mar-2025	6.677%	\$380,014	\$1,004,302
Mar-2026	6.177%	\$351,557	\$1,355,859
Mar-2027	5.713%	\$325,149	\$1,681,007
Mar-2028	5.285%	\$300,790	\$1,981,797
Mar-2029	4.888%	\$278,195	\$2,259,992
Mar-2030	4.522%	\$257,364	\$2,517,356
Mar-2031	4.462%	\$253,950	\$2,771,306
Mar-2032	4.461%	\$253,893	\$3,025,199
Mar-2033	4.462%	\$253,950	\$3,279,148
Mar-2034	4.461%	\$253,893	\$3,533,041
Mar-2035	4.462%	\$253,950	\$3,786,991
Mar-2036	4.461%	\$253,893	\$4,040,883
Mar-2037	4.462%	\$253,950	\$4,294,833
Mar-2038	4.461%	\$253,893	\$4,548,725
Mar-2039	4.462%	\$253,950	\$4,802,675
Mar-2040	4.461%	\$253,893	\$5,056,568
Mar-2041	4.462%	\$253,950	\$5,310,517
Mar-2042	4.461%	\$253,893	\$5,564,410
Mar-2043	2.231%	\$126,975	\$5,691,385
	100.000%	\$5,691,385	

Column (d), Line 11 = MACRS Rate 5.285% / 365 days x 54 days

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Net Deferred Tax Reserve Proration on FY 2018 Incremental Capital Investment**

Line No.	Deferred Tax Subject to Proration	Fiscal Year <u>2022</u> (a)	Fiscal Year <u>2023</u> (b)	Fiscal Year <u>2024</u> (c)	Fiscal Year <u>2025</u> (d)	
1	Book Depreciation					
2	Bonus Depreciation					
	See the corresponding Fiscal Year on Page 2 of 35, Line 15. Note there are 2 columns to sum for FY23.	(\$222,059)	(\$222,059)	(\$222,059)	(\$222,059)	
		\$0	\$0	\$0	\$0	
	See the corresponding Fiscal Year on Page 2 of 35, Line 12. Note there are 2 columns to sum for FY23.	(\$17,189)	(\$215,779)	(\$410,861)	(\$380,014)	
3	Remaining MACRS Tax Depreciation	\$0	\$0	\$0	\$0	
4	FY18 tax (gain)/loss on retirements	(\$239,248)	(\$437,838)	(\$632,920)	(\$602,072)	
5	Cumulative Book / Tax Timer	Sum of Lines 1 through 4				
6	Effective Tax Rate	21%	21%	21%	21%	
7	Deferred Tax Reserve	(\$50,242)	(\$91,946)	(\$132,913)	(\$126,435)	
	Line 5 × Line 6					
	Deferred Tax Not Subject to Proration					
8	Capital Repairs Deduction					
9	Cost of Removal					
10	Book/Tax Depreciation Timing Difference at 3/31/2017					
11	Cumulative Book / Tax Timer	Line 8 + Line 9 + Line 10				
12	Effective Tax Rate					
13	Deferred Tax Reserve	Line 11 × Line 12				
14	Total Deferred Tax Reserve	(\$50,242)	(\$91,946)	(\$132,913)	(\$126,435)	
15	Net Operating Loss	\$0	\$0	\$0	\$0	
16	Net Deferred Tax Reserve	(\$50,242)	(\$91,946)	(\$132,913)	(\$126,435)	
	Line 14 + Line 15					
	Allocation of FY 2018 Estimated Federal NOL					
17	Cumulative Book/Tax Timer Subject to Proration	(\$239,248)	(\$437,838)	(\$632,920)	(\$602,072)	
18	Cumulative Book/Tax Timer Not Subject to Proration	\$0	\$0	\$0	\$0	
19	Total Cumulative Book/Tax Timer	(\$239,248)	(\$437,838)	(\$632,920)	(\$602,072)	
	Line 5					
	Line 11					
	Line 17 + Line 18					
20	Total FY 2018 Federal NOL	\$0	\$0	\$0	\$0	
21	Allocated FY 2018 Federal NOL Not Subject to Proration	\$0	\$0	\$0	\$0	
22	Allocated FY 2018 Federal NOL Subject to Proration	\$0	\$0	\$0	\$0	
	(Line 18 ÷ Line 19) × Line 20					
	(Line 17 ÷ Line 19) × Line 20					
23	Effective Tax Rate	21%	21%	21%	21%	
24	Deferred Tax Benefit subject to proration	\$0	\$0	\$0	\$0	
	Line 22 × Line 23					
25	Net Deferred Tax Reserve subject to proration	(\$50,242)	(\$91,946)	(\$132,913)	(\$126,435)	
	Line 7 + Line 24					
	(e)		(g)	(h)	(i)	(j)
	(f)		Fiscal Year	Fiscal Year	Fiscal Year	Fiscal Year
			<u>2022</u>	<u>2023</u>	<u>2024</u>	<u>2025</u>
26	Proration Calculation	<u>Number of Days in Month</u>	<u>Proration Percentage</u>			
27	April	30	91.78%	(\$3,843)	(\$7,032)	(\$10,166)
28	May	31	83.29%	(\$3,487)	(\$6,382)	(\$9,225)
29	June	30	75.07%	(\$3,143)	(\$5,752)	(\$8,315)
30	July	31	66.58%	(\$2,787)	(\$5,101)	(\$7,374)
31	August	31	58.08%	(\$2,432)	(\$4,450)	(\$6,433)
32	September	30	49.86%	(\$2,088)	(\$3,821)	(\$5,523)
33	October	31	41.37%	(\$1,732)	(\$3,170)	(\$4,582)
34	November	30	33.15%	(\$1,388)	(\$2,540)	(\$3,672)
35	December	31	24.66%	(\$1,032)	(\$1,889)	(\$2,731)
36	January	31	16.16%	(\$677)	(\$1,239)	(\$1,790)
37	February	28	8.49%	(\$356)	(\$651)	(\$941)
38	March	31	0.00%	\$0	\$0	\$0
	Total	365		(\$22,964)	(\$42,026)	(\$60,752)
				(\$57,791)		
39	Deferred Tax Without Proration	Line 25				
40	Average Deferred Tax without Proration	Line 39 × 50%				
41	Proration Adjustment	Line 38 - Line 40				
			(\$50,242)	(\$91,946)	(\$132,913)	(\$126,435)
			(\$25,121)	(\$45,973)	(\$66,457)	(\$63,218)
			\$2,157	\$3,947	\$5,705	\$5,427

Column Notes:

- (f) Sum of remaining days in the year (Col (e)) ÷ 365
- (g) through (j) Current Year Line 25 ÷ 12 × Current Month Col (f)

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Fiscal Year 2025 Revenue Requirement on FY 2019 Actual Incremental Gas Capital Investment

Line No.		Fiscal Year 2019 (a)	Fiscal Year 2020 (b)	Fiscal Year 2021 (c)	Fiscal Year 2022 (d)	NG 4/1/22 - 5/24/2022 2023 (e)	PPL 5/25/22 - 3/31/23 2023 (f)	Fiscal Year 2024 (g)	Fiscal Year 2025 (h)
Depreciable Net Capital Included in ISR Rate Base									
1	Total Allowed Capital Included in ISR Rate Base in Current Year								
2	Retirements								
3	Net Depreciable Capital Included in ISR Rate Base								
Change in Net Capital Included in ISR Rate Base									
4	Capital Included in ISR Rate Base								
5	Depreciation Expense								
6	Incremental Capital Amount								
7	Cost of Removal								
8	Net Plant Amount								
Deferred Tax Calculation:									
9	Composite Book Depreciation Rate								
10	Number of days								
11	Proration Percentage								
12	Tax Depreciation and Year 1 Basis Adjustments								
13	Cumulative Tax Depreciation-NG								
14	Cumulative Tax Depreciation-PPL								
15	Book Depreciation								
16	Cumulative Book Depreciation								
17	Cumulative Book / Tax Timer								
18	Less: Cumulative Book Depreciation at Acquisition								
19	Cumulative Book / Tax Timer - PPL								
20	Effective Tax Rate								
21	Deferred Tax Reserve								
22	Add: FY 2019 Federal NOL (Generation) / Utilization								
23	Net Deferred Tax Reserve before Proration Adjustment								
ISR Rate Base Calculation:									
24	Cumulative Incremental Capital Included in ISR Rate Base								
25	Accumulated Depreciation								
26	Deferred Tax Reserve								
27	Year End Rate Base before Deferred Tax Proration								
Revenue Requirement Calculation:									
28	Average Rate Base before Deferred Tax Proration Adjustment								
29	Proration Adjustment								
30	Average ISR Rate Base after Deferred Tax Proration								
31	Pre-Tax ROR								
32	Proration Percentage								
33	Return and Taxes								
34	Book Depreciation								
35	Annual Revenue Requirement								

1/ 3.38%, Composite Book Depreciation Rate approved per RIPUC Docket No. 4323, in effect until Aug 31, 2018
2.99%, Composite Book Depreciation Rate approved per RIPUC Docket No. 4770, effective on Sep 1, 2018
FY 19 Composite Book Depreciation Rate = 3.38% × 5 / 12 + 2.99% × 7 / 12

2/ Columns (e) and (f) represent the 12 months within fiscal year 2023, but activity is separated to accommodate the impacts of the acquisition as described in note 3.

3/ National Grid and PPL Corporation ("PPL") elected to treat PPL's acquisition of The Narragansett Electric Company ("NECO") from National Grid on May 25, 2022 as an asset sale for U.S. federal income tax purposes under Internal Revenue Code Section 338(h)(10). As a result of this election, PPL was deemed to acquire the assets of NECO at fair market value (essentially equivalent to book value) for tax purposes. The resulting "step-up" in tax basis eliminates most book/tax timing differences and the related accumulated net deferred income tax liabilities as of the acquisition date, at which time PPL will begin depreciating the new tax basis and start the tracking of book/tax timing differences as if PPL purchased a new asset in the year of acquisition.

4/ Columns (e) and (f) takes the average of the "Year End Rate Base before Deferred Tax Proration" at the beginning of the fiscal year on Line 31, Column (d) and the end of the fiscal year on Line 27, Column (f). See note 2.

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Tax Depreciation and Repairs Deduction on FY 2019 Incremental Capital Investment

Line No.			Fiscal Year 2019 (a)	(b)	(c)	(d)	(e)	(f)
	Capital Repairs Deduction							
1	Plant Additions	Page 5 of 35, Line 1	(\$914,000)					
2	Capital Repairs Deduction Rate	Per Tax Department	1/ 85.18%					
3	Capital Repairs Deduction	Line 1 × Line 2	(\$778,545)					
4								
5								
6	Bonus Depreciation							
7	Plant Additions	Line 1	(\$914,000)					
8	Less Capital Repairs Deduction	Line 3	(\$778,545)					
9	Plant Additions Net of Capital Repairs Deduction	Line 7 - Line 8	(\$135,455)					
10	Percent of Plant Eligible for Bonus Depreciation	Per Tax Department	100.00%					
11	Plant Eligible for Bonus Depreciation	Line 9 × Line 10	(\$135,455)					
12	Bonus Depreciation Rate (30% Eligible)	1 × 30% × 11.65%	2/ 3.50%					
13	Bonus Depreciation Rate (40% Eligible)	1 × 40% × 26.75%	2/ 10.70%					
14	Total Bonus Depreciation Rate	Line 12 + Line 13	14.20%					
15	Bonus Depreciation	Line 11 × Line 14	(\$19,228)					
16								
17	Remaining Tax Depreciation							
18	Plant Additions	Line 1	(\$914,000)					
19	Less Capital Repairs Deduction	Line 3	(\$778,545)					
20	Less Bonus Depreciation	Line 15	(\$19,228)					
21	Remaining Plant Additions Subject to 20 YR MACRS Tax Depreciation	Line 18 - Line 19 - Line 20	(\$116,227)					
22	20 YR MACRS Tax Depreciation Rates	IRS Publication 946	3.75%					
23	Remaining Tax Depreciation	Line 21 × Line 22	(\$4,359)					
24								
25	FY19 tax (gain)/loss on retirements	Per Tax Department	3/ \$375,698					
26	Cost of Removal	Page 5 of 35, Line 7	\$5,626,564					
27								
28	Total Tax Depreciation and Repairs Deduction	Sum of Lines 3, 15, 23, 25 & 26	\$5,200,130					

20 Year MACRS Depreciation			
MACRS basis:	Line 21, Column (a)	Annual	Cumulative
Fiscal Year	Prorated		
FY Mar-2019	3.750%	(\$4,359)	\$5,200,130
FY Mar-2020	7.219%	(\$8,390)	\$5,191,739
FY Mar-2021	6.677%	(\$7,760)	\$5,183,979
FY Mar-2022	6.177%	(\$7,179)	\$5,176,799
FY Mar-2023 (Apr-May 2022)	5.713% 0.845%	(\$982)	\$5,175,817
Book Cost	Line 1, Column (a)	(\$914,000)	
Cumulative Book Depreciation	- Page 5 of 35, Line 16, Col (e)	(\$49,891)	
PPL MACRS basis:	Line 12 + Line 13	(\$963,891)	
FY Mar-2023 (Jun-Mar 2023)	3.750%	(\$36,146)	(\$36,146)
Mar-2024	7.219%	(\$69,583)	(\$105,729)
Mar-2025	6.677%	(\$64,359)	(\$170,088)
Mar-2026	6.177%	(\$59,540)	(\$229,628)
Mar-2027	5.713%	(\$55,067)	(\$284,695)
Mar-2028	5.285%	(\$50,942)	(\$335,637)
Mar-2029	4.888%	(\$47,115)	(\$382,751)
Mar-2030	4.522%	(\$43,587)	(\$426,339)
Mar-2031	4.462%	(\$43,009)	(\$469,347)
Mar-2032	4.461%	(\$42,999)	(\$512,347)
Mar-2033	4.462%	(\$43,009)	(\$555,355)
Mar-2034	4.461%	(\$42,999)	(\$598,355)
Mar-2035	4.462%	(\$43,009)	(\$641,363)
Mar-2036	4.461%	(\$42,999)	(\$684,363)
Mar-2037	4.462%	(\$43,009)	(\$727,371)
Mar-2038	4.461%	(\$42,999)	(\$770,371)
Mar-2039	4.462%	(\$43,009)	(\$813,379)
Mar-2040	4.461%	(\$42,999)	(\$856,379)
Mar-2041	4.462%	(\$43,009)	(\$899,387)
Mar-2042	4.461%	(\$42,999)	(\$942,387)
Mar-2043	2.231%	(\$21,504)	(\$963,891)
	100.000%	(\$963,891)	

Column (d), Line 10 = MACRS Rate 5.713% / 365 days x 54 days

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Net Deferred Tax Reserve Proration on FY 2019 Incremental Capital Investment**

Line No.	Deferred Tax Subject to Proration		Fiscal Year	Fiscal Year	Fiscal Year	Fiscal Year	
			2022 (a)	2023 (b)	2024 (c)	2025 (d)	
1	Book Depreciation	See the corresponding Fiscal Year on Page 5 of 35, Line 15. Note there are 2 columns to sum for FY23.	\$13,575	\$13,575	\$13,575	\$13,575	
2	Bonus Depreciation		\$0	\$0	\$0	\$0	
3	Remaining MACRS Tax Depreciation	See the corresponding Fiscal Year on Page 5 of 35, Line 12. Note there are 2 columns to sum for FY23.	\$7,179	\$37,128	\$69,583	\$64,359	
4	FY19 tax (gain)/loss on retirements		\$0	\$0	\$0	\$0	
5	Cumulative Book / Tax Timer	Sum of Lines 1 through 4	\$20,755	\$50,703	\$83,159	\$77,934	
6	Effective Tax Rate		21%	21%	21%	21%	
7	Deferred Tax Reserve	Line 5 × Line 6	\$4,358	\$10,648	\$17,463	\$16,366	
Deferred Tax Not Subject to Proration							
8	Capital Repairs Deduction						
9	Cost of Removal						
10	Book/Tax Depreciation Timing Difference at 3/31/2019						
11	Cumulative Book / Tax Timer	Line 8 + Line 9 + Line 10	\$0	\$0	\$0	\$0	
12	Effective Tax Rate		21%	21%	21%	21%	
13	Deferred Tax Reserve	Line 11 × Line 12	\$0	\$0	\$0	\$0	
14	Total Deferred Tax Reserve	Line 7 + Line 13	\$4,358	\$10,648	\$17,463	\$16,366	
15	Net Operating Loss		\$0	\$0	\$0	\$0	
16	Net Deferred Tax Reserve	Line 14 + Line 15	\$4,358	\$10,648	\$17,463	\$16,366	
Allocation of FY 2019 Estimated Federal NOL							
17	Cumulative Book/Tax Timer Subject to Proration	Line 5	\$20,755	\$50,703	\$83,159	\$77,934	
18	Cumulative Book/Tax Timer Not Subject to Proration	Line 11	\$0	\$0	\$0	\$0	
19	Total Cumulative Book/Tax Timer	Line 17 + Line 18	\$20,755	\$50,703	\$83,159	\$77,934	
20	Total FY 2019 Federal NOL		\$0	\$0	\$0	\$0	
21	Allocated FY 2019 Federal NOL Not Subject to Proration	(Line 18 ÷ Line 19) × Line 20	\$0	\$0	\$0	\$0	
22	Allocated FY 2019 Federal NOL Subject to Proration	(Line 17 ÷ Line 19) × Line 20	\$0	\$0	\$0	\$0	
23	Effective Tax Rate		21%	21%	21%	21%	
24	Deferred Tax Benefit subject to proration	Line 22 × Line 23	\$0	\$0	\$0	\$0	
25	Net Deferred Tax Reserve subject to proration	Line 7 + Line 24	\$4,358	\$10,648	\$17,463	\$16,366	
Proration Calculation							
		(e) Number of Days in Month	(f) Proration Percentage	(g) Fiscal Year 2022	(h) Fiscal Year 2023	(i) Fiscal Year 2024	(j) Fiscal Year 2025
26	April	30	91.78%	\$333	\$814	\$1,336	\$1,252
27	May	31	83.29%	\$303	\$739	\$1,212	\$1,136
28	June	30	75.07%	\$273	\$666	\$1,092	\$1,024
29	July	31	66.58%	\$242	\$591	\$969	\$908
30	August	31	58.08%	\$211	\$515	\$845	\$792
31	September	30	49.86%	\$181	\$442	\$726	\$680
32	October	31	41.37%	\$150	\$367	\$602	\$564
33	November	30	33.15%	\$120	\$294	\$482	\$452
34	December	31	24.66%	\$90	\$219	\$359	\$336
35	January	31	16.16%	\$59	\$143	\$235	\$220
36	February	28	8.49%	\$31	\$75	\$124	\$116
37	March	31	0.00%	\$0	\$0	\$0	\$0
38	Total	365		\$1,992	\$4,867	\$7,982	\$7,481
39	Deferred Tax Without Proration		Line 25	\$4,358	\$10,648	\$17,463	\$16,366
40	Average Deferred Tax without Proration		Line 39 × 50%	\$2,179	\$5,324	\$8,732	\$8,183
41	Proration Adjustment		Line 38 - Line 40	(\$187)	(\$457)	(\$750)	(\$702)

Column Notes:

- (f) Sum of remaining days in the year (Col (e)) ÷ 365
- (g) through (j) Current Year Line 25 ÷ 12 × Current Month Col (f)

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Fiscal Year 2025 Revenue Requirement on FY 2020 Actual Incremental Gas Capital Investment

Line No.		Fiscal Year 2020 (a)	Fiscal Year 2021 (b)	Fiscal Year 2022 (c)	NG 4/1/22 - 5/24/2022 2023 (d)	PPL 5/25/22 - 3/31/23 2023 (e)	Fiscal Year 2024 (f)	Fiscal Year 2025 (g)	
Depreciable Net Capital Included in ISR Rate Base									
1	Total Allowed Capital Included in ISR Rate Base in Current Year	Page 27 of 35, Line 3, Col (e)							\$105,296,046
2	Retirements	Page 27 of 35, Line 9, Col (e)							\$4,276,135
3	Net Depreciable Capital Included in ISR Rate Base	Year 1 = Line 1 - Line 2; then = Prior Year Line 3							\$101,019,911
Change in Net Capital Included in ISR Rate Base									
4	Capital Included in ISR Rate Base	Line 1							\$105,296,046
5	Depreciation Expense	Page 31 of 35, Line 72(c)							\$23,534,853
6	Incremental Capital Amount	Year 1 = Line 4 - Line 5; then = Prior Year Line 6							\$81,761,193
7	Cost of Removal	Page 27 of 35, Line 6, Col (c)							\$7,055,630
8	Net Plant Amount	Line 1 = Line 6+7; Then = Prior Year							\$88,816,823
Deferred Tax Calculation:									
9	Composite Book Depreciation Rate	Page 29 of 35, Line 86(e)							1/ 2.99%
10	Number of days								2/ 54
11	Proration Percentage								2/ 14.79%
12	Tax Depreciation and Year 1 Basis Adjustments	Year 1 = Page 9 of 35, Line 28, Col (a); then = Page 9 of 35, Col (e)							\$89,531,414
13	Cumulative Tax Depreciation-NG	Year 1 = Line 12; then = Prior Year Line 13 + Current Year Line 12							\$89,531,414
14	Cumulative Tax Depreciation-PPL	Year 1 = Line 12; then = Prior Year Line 14 + Current Year Line 12							\$92,906,495
15	Book Depreciation	Year 1 = Line 3 x Line 9 x 50%; then = Line 3 x Line 9							\$1,510,248
16	Cumulative Book Depreciation	Year 1 = Line 15; then = Prior Year Line 16 + Current Year Line 15							\$3,020,495
17	Cumulative Book / Tax Timer	Columns (a) through (d): Line 13 - Line 16, Then Line 14 - Line 16							\$88,021,166
18	Less: Cumulative Book Depreciation at Acquisition	Line 16 Column (d)							\$7,998,106
19	Cumulative Book / Tax Timer - PPL	Line 17 + Line 18							\$80,023,060
20	Effective Tax Rate	Columns (a) through (d): Line 17 * Line 20, Then Line 19 *							21.00%
21	Deferred Tax Reserve	Line 20							\$18,484,445
22	Add: FY 2020 Federal NOL (Generation) / Utilization	Page 27 of 35, Line 12, Col (c)							3/ (\$3,063,059)
23	Net Deferred Tax Reserve before Proration Adjustment	Line 21 + Line 22							\$15,421,386
ISR Rate Base Calculation:									
24	Cumulative Incremental Capital Included in ISR Rate Base	Line 8							\$88,816,823
25	Accumulated Depreciation	- Line 16							(\$1,510,248)
26	Deferred Tax Reserve	- Line 23							(\$15,421,386)
27	Year End Rate Base before Deferred Tax Proration	Sum of Lines 24 through 26							\$71,885,189
Revenue Requirement Calculation:									
28	Average Rate Base before Deferred Tax Proration Adjustment	Year 1 = Line 27 x Page 11 of 35, Line 16; then = Average of (Prior Year Line 27 + Current Year Line 27/2)							\$67,767,415
29	Proration Adjustment	Page 10 of 35, Line 41							(\$12,608)
30	Average ISR Rate Base after Deferred Tax Proration	Line 28 + Line 29							\$67,754,807
31	Pre-Tax ROR	Page 35 of 35, Line 30, Column (e)							8.41%
32	Proration Percentage	Line 11							14.79%
33	Return and Taxes	Cols (c), (f) and (g): L 30 * L 31; Cols (d) and (e): L 30 * L 31 * L 32							\$5,698,179
34	Book Depreciation	Line 15							\$3,020,495
35	Annual Revenue Requirement	Sum of Lines 33 through 34							\$8,718,675

1/ 2.99%, Composite Book Depreciation Rate of Distribution Plant approved per RIPUC Docket No. 4770, effective on Sep 1, 2018

2/ Columns (d) and (e) represent the 12 months within fiscal year 2023, but activity is separated to accommodate the impacts of the acquisition as described in note 3.

3/ National Grid and PPL Corporation ("PPL") elected to treat PPL's acquisition of The Narragansett Electric Company ("NECO") from National Grid on May 25, 2022 as an asset sale for U.S. federal income tax purposes under Internal Revenue Code Section 338(h)(10). As a result of this election, PPL was deemed to acquire the assets of NECO at fair market value (essentially equivalent to book value) for tax purposes. The resulting "step-up" in tax basis eliminates most book/tax timing differences and the related accumulated net deferred income tax liabilities as of the acquisition date, at which time PPL will begin depreciating the new tax basis and start the tracking of book/tax timing differences as if PPL purchased a new asset in the year of acquisition.

4/ Columns (d) and (e) takes the average of the "Year End Rate Base before Deferred Tax Proration" at the beginning of the fiscal year on Line 27, Column (c) and the end of the fiscal year on Line 31, Column (e). See note 2.

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Tax Depreciation and Repairs Deduction on FY 2020 Incremental Capital Investments

Line No.			Fiscal Year 2020 (a)	(b)	(c)	(d)	(e)	(f)
	Capital Repairs Deduction							
1	Plant Additions	Page 8 of 35, Line 1	\$105,296,046		20 Year MACRS Depreciation			
2	Capital Repairs Deduction Rate	Per Tax Department	76.14%					
3	Capital Repairs Deduction	Line 1 × Line 2	\$80,172,409	MACRS basis:	Line 21, Column (a)	\$24,288,150		
4						Annual	Cumulative	
5								
6	Bonus Depreciation							
7	Plant Additions	Line 1	\$105,296,046					
8	Less Capital Repairs Deduction	Line 3	\$80,172,409					
9	Plant Additions Net of Capital Repairs Deduction	Line 4 - Line 5	\$25,123,637					
10	Percent of Plant Eligible for Bonus Depreciation	Per Tax Department	100.00%					
11	Plant Eligible for Bonus Depreciation	Line 9 × Line 10	\$25,123,637					
12	Bonus Depreciation Rate 30%, up to December 31, 2019	14.78% × 30% × 75%	3.33%					
13	Bonus Depreciation Rate 0%, after December 31, 2019		0.00%					
14	Total Bonus Depreciation Rate	Line 12 + Line 13	3.33%					
15	Bonus Depreciation	Line 11 × Line 14	\$835,487					
16								
17	Remaining Tax Depreciation							
18	Plant Additions	Line 1	\$105,296,046					
19	Less Capital Repairs Deduction	Line 3	\$80,172,409					
20	Less Bonus Depreciation	Line 15	\$835,487					
21	Remaining Plant Additions Subject to 20 YR MACRS Tax Depreciation	Line 18 - Line 19 - Line 20	\$24,288,150					
22	20 YR MACRS Tax Depreciation Rates	IRS Publication 946	3.75%					
23	Remaining Tax Depreciation	Line 21 × Line 22	\$910,806					
24								
25	FY20 tax (gain)/loss on retirements	Per Tax Department	\$557,081					
26	Cost of Removal	Page 8 of 35, Line 7	\$7,055,630					
27								
28	Total Tax Depreciation and Repairs Deduction	Sum of Lines 3, 15, 23, 25 & 26	\$89,531,414					
29								
30								
31								
32								
33								
34								
35								
36								
37								

1/ Capital Repairs percentage is the actual result of FY2020 tax return
2/ Percent of Plant Eligible for Bonus Depreciation is the actual result of FY2020 tax return
3/ Actual Loss based on FY2020 tax return
9 (d) 6.177% / 365 x 54

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Net Deferred Tax Reserve Proration on FY 2020 Incremental Capital Investments**

Line No.	Deferred Tax Subject to Proration	Fiscal Year 2022 (a)	Fiscal Year 2023 (b)	Fiscal Year 2024 (c)	Fiscal Year 2025 (d)
1	Book Depreciation	\$3,020,495	\$3,020,495	\$3,020,495	\$3,020,495
2	Bonus Depreciation	\$0	\$0	\$0	\$0
3	Remaining MACRS Tax Depreciation	(\$1,621,720)	(\$3,870,632)	(\$7,023,938)	(\$6,496,583)
4	FY20 tax (gain)/loss on retirements	\$0	\$0	\$0	\$0
5	Cumulative Book / Tax Timer	\$1,398,776	(\$850,136)	(\$4,003,443)	(\$3,476,088)
6	Effective Tax Rate	21%	21%	21%	21%
7	Deferred Tax Reserve	\$293,743	(\$178,529)	(\$840,723)	(\$729,979)
Deferred Tax Not Subject to Proration					
8	Capital Repairs Deduction				
9	Cost of Removal				
10	Book/Tax Depreciation Timing Difference at 3/31/2020				
11	Cumulative Book / Tax Timer				
12	Effective Tax Rate				
13	Deferred Tax Reserve				
14	Total Deferred Tax Reserve	\$293,743	(\$178,529)	(\$840,723)	(\$729,979)
15	Net Operating Loss				
16	Net Deferred Tax Reserve	\$293,743	(\$178,529)	(\$840,723)	(\$729,979)
17	Allocation of FY 2018 Estimated Federal NOL				
18	Cumulative Book/Tax Timer Subject to Proration	\$1,398,776	(\$850,136)	(\$4,003,443)	(\$3,476,088)
19	Cumulative Book/Tax Timer Not Subject to Proration	\$0	\$0	\$0	\$0
20	Total Cumulative Book/Tax Timer	\$1,398,776	(\$850,136)	(\$4,003,443)	(\$3,476,088)
21	Allocated FY 2020 Federal NOL Not Subject to Proration				
22	Allocated FY 2020 Federal NOL Subject to Proration				
23	Effective Tax Rate				
24	Deferred Tax Benefit subject to proration				
25	Net Deferred Tax Reserve subject to proration	\$293,743	(\$178,529)	(\$840,723)	(\$729,979)
		(e)	(f)	(g)	(h)
		Number of Days in Month	Proration Percentage	Fiscal Year 2022	Fiscal Year 2023
		(i)	(j)	Fiscal Year 2024	Fiscal Year 2025
26	April	30	91.78%	\$22,467	(\$13,655)
27	May	31	83.29%	\$20,388	(\$12,391)
28	June	30	75.07%	\$18,376	(\$11,168)
29	July	31	66.58%	\$16,297	(\$9,905)
30	August	31	58.08%	\$14,218	(\$8,641)
31	September	30	49.86%	\$12,206	(\$7,418)
32	October	31	41.37%	\$10,127	(\$6,155)
33	November	30	33.15%	\$8,115	(\$4,932)
34	December	31	24.66%	\$6,036	(\$3,668)
35	January	31	16.16%	\$3,957	(\$2,405)
36	February	28	8.49%	\$2,079	(\$1,264)
37	March	31	0.00%	\$0	\$0
38	Total	365		\$134,263	(\$81,601)
39	Deferred Tax Without Proration		Line 25	\$293,743	(\$178,529)
40	Average Deferred Tax without Proration		Line 39 × 50%	\$146,871	(\$89,264)
41	Proration Adjustment		Line 38 - Line 40	(\$12,608)	\$7,663

Column Notes:
(f) Sum of remaining days in the year (Col (e)) ÷ 366
(g) through (j) Current Year Line 25 ÷ 12 × Current Month Col (f)

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
ISR Additions April 2019 through March 2020

Line No.	Month No.	Month	FY 2020 ISR Additions (a)	In Rates (b)	Not In Rates (c) = (a) - (b)	Weight for Days (d)	Weighted Average (e) = (d) × (c)	Weight for Investment (f)=(c)÷Total(c)
2	1	Apr-19	\$12,009,983	\$7,764,750	\$4,245,233	0.958	\$4,068,348	4.03%
3	2	May-19	\$12,009,983	\$7,764,750	\$4,245,233	0.875	\$3,714,579	4.03%
4	3	Jun-19	\$12,009,983	\$7,764,750	\$4,245,233	0.792	\$3,360,809	4.03%
5	4	Jul-19	\$12,009,983	\$7,764,750	\$4,245,233	0.708	\$3,007,040	4.03%
6	5	Aug-19	\$12,009,983	\$7,764,750	\$4,245,233	0.625	\$2,653,271	4.03%
7	6	Sep-19	\$12,009,983	\$0	\$12,009,983	0.542	\$6,505,407	11.41%
8	7	Oct-19	\$12,009,983	\$0	\$12,009,983	0.458	\$5,504,576	11.41%
9	8	Nov-19	\$12,009,983	\$0	\$12,009,983	0.375	\$4,503,744	11.41%
10	9	Dec-19	\$12,009,983	\$0	\$12,009,983	0.292	\$3,502,912	11.41%
11	10	Jan-20	\$12,009,983	\$0	\$12,009,983	0.208	\$2,502,080	11.41%
12	11	Feb-20	\$12,009,983	\$0	\$12,009,983	0.125	\$1,501,248	11.41%
13	12	Mar-20	\$12,009,983	\$0	\$12,009,983	0.042	\$500,416	11.41%
14	Total		\$144,119,796	\$38,823,750	\$105,296,046		\$41,324,429	100.00%
15	Total Additions September 2019 through March 2020				\$84,069,881			
16	FY 2020 Weighted Average Incremental Rate Base Percentage						39.25%	

Column (a)=Page 27 of 35 , Line 1 ,Col (c)
Column (b)=Page 27 of 35 , Line 2 ,Col (c)
Column (d) = (12.5 - Month No.) ÷ 12
Line 14 = Page 27 of 35 Line 1 Col (c)
Line 15 = Sum of Lines 7(c) through 13(c)
Line 16 = Line 14(e)/Line 14(c)

The Narragansett Electric Company
d/b/a Rhode Island Energy
Proposed FY 2025 Gas Infrastructure, Safety,
and Reliability Plan Filing
Section 3: Attachment 3
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**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Fiscal Year 2025 Revenue Requirement on FY 2021 Actual Incremental Gas Capital Investment**

Line No.			Fiscal Year 2021 (a)	Fiscal Year 2022 (b)	NG 4/1/22 - 5/24/2022 2023 (c)	PPL 5/25/22 - 3/31/23 2023 (d)	Fiscal Year 2024 (e)	Fiscal Year 2025 (f)
Depreciable Net Capital Included in ISR Rate Base								
1	Total Allowed Capital Included in ISR Rate Base in Current Year	Page 27 of 35 , Line 3 ,Col (d)	\$110,177,659					
2	Retirements	Page 27 of 35 , Line 9 ,Col (d)	\$3,860,987					
3	Net Depreciable Capital Included in ISR Rate Base	Year 1 = Line 1 - Line 2; then = Prior Year Line 3	\$106,316,672	\$106,316,672	\$106,316,672	\$106,316,672	\$106,316,672	\$106,316,672
Change in Net Capital Included in ISR Rate Base								
4	Capital Included in ISR Rate Base	Line 1	\$110,177,659	\$0	\$0	\$0	\$0	\$0
5	Depreciation Expense	Page 31 of 35, Line 78(c)	\$40,700,586	\$0	\$0	\$0	\$0	\$0
6	Incremental Capital Amount	Year 1 = Line 4 - Line 5; then = Prior Year Line 6	\$69,477,072	\$69,477,072	\$69,477,072	\$69,477,072	\$69,477,072	\$69,477,072
7	Cost of Removal	Page 27 of 35 , Line 6 ,Col (d)	\$8,861,636					
8	Net Plant Amount	Line 6 + Line 7	\$78,338,709	\$78,338,709	\$78,338,709	\$78,338,709	\$78,338,709	\$78,338,709
Deferred Tax Calculation:								
9	Composite Book Depreciation Rate	Page 29 of 35, Line 86(e)	1/	2.99%	2.99%	2.99%	2.99%	2.99%
10	Number of days		2/		54	311		
11	Proration Percentage		2/		14.79%	85.21%		
12	Tax Depreciation and Year 1 Basis Adjustments	Year 1 =Page 13 of 35, Line 28, Col (a); then = Page 13 of 35, Col (e)	\$63,538,144	\$4,232,177	\$579,121	\$3,935,215	\$7,575,551	\$7,006,781
13	Cumulative Tax Depreciation-NG	Year 1 = Line 12; then = Prior Year Line 13 + Current Year Line 12	\$63,538,144	\$67,770,322	\$68,349,442			
14	Cumulative Tax Depreciation-PPL	Year 1 = Line 12; then = Prior Year Line 14 + Current Year Line 12				\$3,935,215	\$11,510,765	\$18,517,546
15	Book Depreciation	Year 1 = Line 3 × Line 9 × 50%; then = Line 3 × Line 9	\$1,589,434	\$3,178,868	\$470,298	\$2,708,570	\$3,178,868	\$3,178,868
16	Cumulative Book Depreciation	Year 1 = Line 15; then = Prior Year Line 16 + Current Year Line 15	\$1,589,434	\$4,768,303	\$5,238,601	\$7,947,171	\$11,126,040	\$14,304,908
17	Cumulative Book / Tax Timer	Columns (a) through (c): Line 13 - Line 16, Then Line 14 - Line 16	\$61,948,710	\$63,002,019	\$63,110,841	(\$4,011,957)	\$384,726	\$4,212,638
18	Less: Cumulative Book Depreciation at Acquisition	Line 16 Column (c)				\$5,238,601	\$5,238,601	\$5,238,601
19	Cumulative Book / Tax Timer - PPL	Line 17 + Line 18				\$1,226,645	\$5,623,327	\$9,451,239
20	Effective Tax Rate		21.00%	21.00%	21.00%	21.00%	21.00%	21.00%
21	Deferred Tax Reserve	Columns (a) through (c): Line 17 * Line 20, Then Line 19 * Line 20	\$13,009,229	\$13,230,424	\$13,253,277	\$257,595	\$1,180,899	\$1,984,760
22	Add: FY 2021 Federal NOL (Generation) / Utilization	Page 27 of 35; Line 12, Col (d)	(\$5,525,796)	(\$5,525,796)	(\$5,525,796)	\$0	\$0	\$0
23	Net Deferred Tax Reserve before Proration Adjustment	Line 21 + Line 22	\$7,483,434	\$7,704,628	\$7,727,481	\$257,595	\$1,180,899	\$1,984,760
ISR Rate Base Calculation:								
24	Cumulative Incremental Capital Included in ISR Rate Base	Line 8	\$78,338,709	\$78,338,709	\$78,338,709	\$78,338,709	\$78,338,709	\$78,338,709
25	Accumulated Depreciation	- Line 16	(\$1,589,434)	(\$4,768,303)	(\$5,238,601)	(\$7,947,171)	(\$11,126,040)	(\$14,304,908)
26	Deferred Tax Reserve	- Line 23	(\$7,483,434)	(\$7,704,628)	(\$7,727,481)	(\$257,595)	(\$1,180,899)	(\$1,984,760)
27	Year End Rate Base before Deferred Tax Proration	Sum of Lines 24 through 26	\$69,265,841	\$65,865,777	\$65,372,626	\$70,133,942	\$66,031,770	\$62,049,040
Revenue Requirement Calculation:								
28	Average Rate Base before Deferred Tax Proration Adjustment	Year 1 = Current Year Line 27 ÷ 2; then = (Prior Year Line 27 + Current Year Line 27) ÷ 2		\$67,565,809	\$67,999,860	\$67,999,860	\$68,082,856	\$64,040,405
29	Proration Adjustment	Page 14 of 35, Line 41		\$9,494	\$12,037	\$12,037	\$39,630	\$34,504
30	Average ISR Rate Base after Deferred Tax Proration	Line 28 + Line 29		\$67,575,303	\$68,011,897	\$68,011,897	\$68,122,487	\$64,074,909
31	Pre-Tax ROR	Page 35 of 35, Line 30, Column (e)		8.41%	8.41%	8.41%	8.41%	8.41%
32	Proration Percentage	Line 11			14.79%	85.21%		
33	Return and Taxes	Cols (b), (c) and (f): L 30 * L 31; Cols (c) and (d): L 30 * L 31 * L 32		\$5,683,083	\$846,217	\$4,873,583	\$5,729,101	\$5,388,700
34	Book Depreciation	Line 15		\$3,178,868	\$470,298	\$2,708,570	\$3,178,868	\$3,178,868
35	Annual Revenue Requirement	Sum of Lines 33 through 34	N/A	\$8,861,951	\$1,316,515	\$7,582,154	\$8,907,970	\$8,567,568

1/ 2.99%, Composite Book Depreciation Rate approved per RIPUC Docket No. 4770, effective on Sep 1, 2018

2/ Columns (c) and (d) represent the 12 months within fiscal year 2023, but activity is separated to accommodate the impacts of the acquisition as described in note 3.

3/ National Grid and PPL Corporation ("PPL") elected to treat PPL's acquisition of The Narragansett Electric Company ("NECO") from National Grid on May 25, 2022 as an asset sale for U.S. federal income tax purposes under Inter Revenue Code Section 338(h)(10). As a result of this election, PPL was deemed to acquire the assets of NECO at fair market value (essentially equivalent to book value) for tax purposes. The resulting "step-up" in tax basis eliminates most book/tax timing differences and the related accumulated net deferred income tax liabilities as of the acquisition date, at which time PPL will begin depreciating the new tax basis and start the tracking of book/tax timing differences as if PPL purchased a new asset in the year of acquisition.

4/ Columns (c) and (d) takes the average of the "Year End Rate Base before Deferred Tax Proration" at the beginning of the fiscal year on Line 27, Column (b) and the end of the fiscal year on Line 27, Column (d). See note 2.

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Tax Depreciation and Repairs Deduction on FY 2021 Incremental Capital Investments

Line No.			Fiscal Year 2021 (a)	(b)	(c)	(d)	(e)	(f)
1	Capital Repairs Deduction							
2	Plant Additions	Page 12 of 35, Line 1	\$110,177,659					
3	Capital Repairs Deduction Rate	Per Tax Department	46.79%					
4	Capital Repairs Deduction	Line 1 × Line 2	\$51,552,126					
5								
6	Bonus Depreciation							
7	Plant Additions	Line 1	\$110,177,659					
8	Less Capital Repairs Deduction	Line 3	\$51,552,126					
9	Plant Additions Net of Capital Repairs Deduction	Line 7 - Line 8	\$58,625,533					
10	Percent of Plant Eligible for Bonus Depreciation	Per Tax Department	0.00%					
11	Plant Eligible for Bonus Depreciation	Line 9 × Line 10	\$0					
12	Bonus Depreciation Rate ()	Per Tax Department	0.00%					
13	Bonus Depreciation Rate ()	Per Tax Department	0.00%					
14	Total Bonus Depreciation Rate	Line 12 + Line 13	0.00%					
15	Bonus Depreciation	Line 11 × Line 14	\$0					
16								
17	Remaining Tax Depreciation							
18	Plant Additions	Line 1	\$110,177,659					
19	Less Capital Repairs Deduction	Line 3	\$51,552,126					
20	Less Bonus Depreciation	Line 15	\$0					
21	Remaining Plant Additions Subject to 20 YR MACRS Tax Depreciation	Line 18 - Line 19 - Line 20	\$58,625,533					
22	20 YR MACRS Tax Depreciation Rates	IRS Publication 946	3.75%					
23	Remaining Tax Depreciation	Line 21 × Line 22	\$2,198,457					
24								
25	FY21 tax (gain)/loss on retirements	Per Tax Department	925,925					
26	Cost of Removal	Page 12 of 35, Line 7	\$8,861,636					
27								
28	Total Tax Depreciation and Repairs Deduction	Sum of Lines 3, 15, 23, 25 & 26	\$63,538,144					
29								
30								
31								
32								
33								
34								
35								
36								
37								

		20 Year MACRS Depreciation	
		MACRS basis:	Line 21, Column (a)
			Annual
			Cumulative
Fiscal Year	Prorated		
FY Mar-2021	3.750%	\$2,198,457	\$63,538,144
FY Mar-2022	7.219%	\$4,232,177	\$67,770,322
FY Mar-2023 (Apr-May 2022)	6.677%	\$579,121	\$68,349,442
PPL Acquisition - May 25, 2022			
Book Cost		Line 1, Column (a)	\$110,177,659
Cumulative Book Depreciation		- Page 12 of 35, Line 16, Col (c)	(\$5,238,601)
PPL MACRS basis:		Line 11 + Line 12	\$104,939,057
FY Mar-2023 (Jun-Mar 2023)	3.750%	\$3,935,215	\$3,935,215
Mar-2024	7.219%	\$7,575,551	\$11,510,765
Mar-2025	6.677%	\$7,006,781	\$18,517,546
Mar-2026	6.177%	\$6,482,086	\$24,999,632
Mar-2027	5.713%	\$5,995,168	\$30,994,800
Mar-2028	5.285%	\$5,546,029	\$36,540,829
Mar-2029	4.888%	\$5,129,421	\$41,670,250
Mar-2030	4.522%	\$4,745,344	\$46,415,595
Mar-2031	4.462%	\$4,682,381	\$51,097,975
Mar-2032	4.461%	\$4,681,331	\$55,779,307
Mar-2033	4.462%	\$4,682,381	\$60,461,687
Mar-2034	4.461%	\$4,681,331	\$65,143,019
Mar-2035	4.462%	\$4,682,381	\$69,825,399
Mar-2036	4.461%	\$4,681,331	\$74,506,731
Mar-2037	4.462%	\$4,682,381	\$79,189,112
Mar-2038	4.461%	\$4,681,331	\$83,870,443
Mar-2039	4.462%	\$4,682,381	\$88,552,824
Mar-2040	4.461%	\$4,681,331	\$93,234,155
Mar-2041	4.462%	\$4,682,381	\$97,916,536
Mar-2042	4.461%	\$4,681,331	\$102,597,867
Mar-2043	2.231%	\$2,341,190	\$104,939,057
	100.000%	\$104,939,057	

Column (d), Line 8 = MACRS Rate 6.677% / 365 days x 54 days

1/ Capital Repairs percentage is the actual result of FY2021 tax return
2/ Actual Loss based on FY2021 tax return

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Net Deferred Tax Reserve Proration on FY 2021 Incremental Capital Investments**

Line No.	Deferred Tax Subject to Proration	Fiscal Year <u>2022</u> (a)	Fiscal Year <u>2023</u> (b)	Fiscal Year <u>2024</u> (c)	Fiscal Year <u>2025</u> (d)						
1	Book Depreciation	See the corresponding Fiscal Year on Page 12 of 35, Line 15. Note there are 2 columns to sum for FY23.				\$3,178,868	\$3,178,868	\$3,178,868	\$3,178,868		
2	Bonus Depreciation										
3	Remaining MACRS Tax Depreciation	See the corresponding Fiscal Year on Page 12 of 35, Line 12. Note there are 2 columns to sum for FY23.				(\$4,232,177)	(\$4,514,335)	(\$7,575,551)	(\$7,006,781)		
4	FY21 tax (gain)/loss on retirements	Page 13 of 35 , Line 25 ,Col (a)				\$0	\$0	\$0	\$0		
5	Cumulative Book / Tax Timer	Sum of Lines 1 through 4				(\$1,053,309)	(\$1,335,467)	(\$4,396,682)	(\$3,827,912)		
6	Effective Tax Rate	21%				21%	21%	21%	21%		
7	Deferred Tax Reserve	Line 5 × Line 6				(\$221,195)	(\$280,448)	(\$923,303)	(\$803,862)		
Deferred Tax Not Subject to Proration											
8	Capital Repairs Deduction	Col (a): Docket 4996, R.S. 3, Att. 1R, page 14 Col (a)									
9	Cost of Removal	Col (a): Docket 4996, R.S. 3, Att. 1R, page 14 Col (a)									
10	Book/Tax Depreciation Timing Difference at 3/31/2021										
11	Cumulative Book / Tax Timer	Line 8 + Line 9 + Line 10									
12	Effective Tax Rate										
13	Deferred Tax Reserve	Line 11 × Line 12									
14	Total Deferred Tax Reserve	Line 7 + Line 13				(\$221,195)	(\$280,448)	(\$923,303)	(\$803,862)		
15	Net Operating Loss	Col (a): Docket 4996, R.S. 3, Att. 1R, page 14 Col (a)									
16	Net Deferred Tax Reserve	Line 14 + Line 15				(\$221,195)	(\$280,448)	(\$923,303)	(\$803,862)		
17	Allocation of FY 2021 Estimated Federal NOL Cumulative Book/Tax Timer Subject to Proration	Line 5				(\$1,053,309)	(\$1,335,467)	(\$4,396,682)	(\$3,827,912)		
18	Cumulative Book/Tax Timer Not Subject to Proration	Line 11				\$0	\$0	\$0	\$0		
19	Total Cumulative Book/Tax Timer	Line 17 + Line 18				(\$1,053,309)	(\$1,335,467)	(\$4,396,682)	(\$3,827,912)		
20	Total FY 2021 Federal NOL	Col (a): Docket 4996, R.S. 3, Att. 1R, page 14 Col (a)									
21	Allocated FY 2021 Federal NOL Not Subject to Proration	(Line 18 ÷ Line 19) × Line 20									
22	Allocated FY 2021 Federal NOL Subject to Proration	(Line 17 ÷ Line 19) × Line 20									
23	Effective Tax Rate										
24	Deferred Tax Benefit subject to proration	Line 22 × Line 23									
25	Net Deferred Tax Reserve subject to proration	Line 7 + Line 24				(\$221,195)	(\$280,448)	(\$923,303)	(\$803,862)		
						(e)	(f)	(g)	(h)	(i)	(j)
Proration Calculation						<u>Number of Days in Month</u>	<u>Proration Percentage</u>	<u>Fiscal Year 2022</u>	<u>Fiscal Year 2023</u>	<u>Fiscal Year 2024</u>	<u>Fiscal Year 2025</u>
26	April	30		91.78%		(\$16,918)	(\$21,450)	(\$70,618)	(\$61,483)		
27	May	31		83.29%		(\$15,352)	(\$19,465)	(\$64,083)	(\$55,793)		
28	June	30		75.07%		(\$13,837)	(\$17,544)	(\$57,759)	(\$50,287)		
29	July	31		66.58%		(\$12,272)	(\$15,559)	(\$51,224)	(\$44,598)		
30	August	31		58.08%		(\$10,706)	(\$13,574)	(\$44,690)	(\$38,908)		
31	September	30		49.86%		(\$9,191)	(\$11,653)	(\$38,366)	(\$33,402)		
32	October	31		41.37%		(\$7,626)	(\$9,668)	(\$31,831)	(\$27,713)		
33	November	30		33.15%		(\$6,111)	(\$7,748)	(\$25,507)	(\$22,207)		
34	December	31		24.66%		(\$4,545)	(\$5,763)	(\$18,972)	(\$16,518)		
35	January	31		16.16%		(\$2,980)	(\$3,778)	(\$12,437)	(\$10,828)		
36	February	28		8.49%		(\$1,566)	(\$1,985)	(\$6,535)	(\$5,689)		
37	March	31		0.00%		\$0	\$0	\$0	\$0		
38	Total	365				(\$101,103)	(\$128,187)	(\$422,021)	(\$367,427)		
39	Deferred Tax Without Proration	Line 25				(\$221,195)	(\$280,448)	(\$923,303)	(\$803,862)		
40	Average Deferred Tax without Proration	Line 39 × 0.5				(\$110,597)	(\$140,224)	(\$461,652)	(\$401,931)		
41	Proration Adjustment	Line 38 - Line 40				\$9,494	\$12,037	\$39,630	\$34,504		

Column Notes:
(f) Sum of remaining days in the year (Col (e)) ÷ 365
(g) through (j) Current Year Line 25 ÷ 12 × Current Month Col (f)

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Fiscal Year 2025 Revenue Requirement on FY 2022 Actual Incremental Gas Capital Investment

Line No.			NG		PPL		Fiscal Year 2024 (d)	Fiscal Year 2025 (e)
			Fiscal Year 2022 (a)	4/1/22 - 5/24/2022 2023 (b)	5/25/22 - 3/31/23 2023 (c)			
Depreciable Net Capital Included in ISR Rate Base								
1	Total Allowed Capital Included in ISR Rate Base in Current Year	Page 27 of 35 , Line 3 ,Col (e)	\$156,694,227					
2	Retirements	Page 27 of 35 , Line 9 ,Col (e)	\$6,258,509					
3	Net Depreciable Capital Included in ISR Rate Base	Year 1 = Line 1 - Line 2; then = Prior Year Line 3	\$150,435,718	\$150,435,718	\$150,435,718	\$150,435,718	\$150,435,718	\$150,435,718
Change in Net Capital Included in ISR Rate Base								
4	Capital Included in ISR Rate Base	Line 1	\$156,694,227	\$0	\$0	\$0	\$0	\$0
5	Depreciation Expense	Page 31 of 35, Line 77(c)	\$40,954,246	\$0	\$0	\$0	\$0	\$0
6	Incremental Capital Amount	Year 1 = Line 4 - Line 5; then = Prior Year Line 6	\$115,739,981	\$115,739,981	\$115,739,981	\$115,739,981	\$115,739,981	\$115,739,981
7	Cost of Removal	Page 27 of 35 , Line 6 ,Col (e)	\$10,773,005					
8	Net Plant Amount	Line 6 + Line 7	\$126,512,985	\$126,512,985	\$126,512,985	\$126,512,985	\$126,512,985	\$126,512,985
Deferred Tax Calculation:								
9	Composite Book Depreciation Rate	Page 29 of 35, Line 86(e)	1/ 2.99%	2.99%	2.99%	2.99%	2.99%	2.99%
10	Number of days		2/ 54	311				
11	Proration Percentage		2/ 14.79%	85.21%				
12	Tax Depreciation and Year 1 Basis Adjustments	Year 1 =Page 16 of 35, Line 28, Col (a); then = Page 16 of 35, Col (e)	\$127,609,589	\$448,503	\$5,766,741	\$11,101,360	\$10,267,874	
13	Cumulative Tax Depreciation-NG	Year 1 = Line 12; then = Prior Year Line 13 + Current Year Line 12	3/ \$127,609,589	\$128,058,092				
14	Cumulative Tax Depreciation-PPL	Year 1 = Line 12; then = Prior Year Line 14 + Current Year Line 12	3/		\$5,766,741	\$16,868,101	\$27,135,975	
15	Book Depreciation	Year 1 = Line 3 × Line 9 × 50%; then = Line 3 × Line 9	2/ \$2,249,014	\$665,462	\$3,832,566	\$4,498,028	\$4,498,028	
16	Cumulative Book Depreciation	Year 1 = Line 15; then = Prior Year Line 16 + Current Year Line 15	\$2,249,014	\$2,914,476	\$6,747,042	\$11,245,070	\$15,743,098	
17	Cumulative Book / Tax Timer	Columns (a) and (b): Line 13 - Line 16, Then Line 14 - Line 16	\$125,360,575	\$125,143,617	(\$980,301)	\$5,623,031	\$11,392,877	
18	Less: Cumulative Book Depreciation at Acquisition	Line 16 Column (b)	3/		\$2,914,476	\$2,914,476	\$2,914,476	
19	Cumulative Book / Tax Timer - PPL	Line 17 + Line 18			\$1,934,174	\$8,537,507	\$14,307,353	
20	Effective Tax Rate		21.00%	21.00%	21.00%	21.00%	21.00%	21.00%
21	Deferred Tax Reserve	Columns (a) through (b): Line 17 * Line 20, Then Line 19 * Line 20	\$26,325,721	\$26,280,159	\$406,177	\$1,792,876	\$3,004,544	
22	Add: FY 2022 Federal NOL (Generation) / Utilization	Page 27 of 35 , Line 12 ,Col (e)	3/ (\$3,264,442)	(\$3,264,442)	\$0	\$0	\$0	
23	Net Deferred Tax Reserve before Proration Adjustment	Line 21 + Line 22	\$23,061,278	\$23,015,717	\$406,177	\$1,792,876	\$3,004,544	
ISR Rate Base Calculation:								
24	Cumulative Incremental Capital Included in ISR Rate Base	Line 8	\$126,512,985	\$126,512,985	\$126,512,985	\$126,512,985	\$126,512,985	
25	Accumulated Depreciation	- Line 16	(\$2,249,014)	(\$2,914,476)	(\$6,747,042)	(\$11,245,070)	(\$15,743,098)	
26	Deferred Tax Reserve	- Line 23	(\$23,061,278)	(\$23,015,717)	(\$406,177)	(\$1,792,876)	(\$3,004,544)	
27	Year End Rate Base before Deferred Tax Proration	Sum of Lines 24 through 26	\$101,202,693	\$100,582,792	\$119,359,767	\$113,475,039	\$107,765,343	
Revenue Requirement Calculation:								
28	Average Rate Base before Deferred Tax Proration Adjustment	Year 1 = Current Year Line 27 ÷ 2; then = (Prior Year Line 27 + Current Year Line 27) ÷ 2	4/ \$50,601,346	\$110,281,230	\$110,281,230	\$116,417,403	\$110,620,191	
29	Proration Adjustment	Page 17 of 35, Line 41	(\$6,077)	\$15,478	\$15,478	\$59,520	\$52,008	
30	Average ISR Rate Base after Deferred Tax Proration	Line 28 + Line 29	\$50,595,269	\$110,296,708	\$110,296,708	\$116,476,923	\$110,672,199	
31	Pre-Tax ROR	Page 35 of 35, Line 30, Column (e)	8.41%	8.41%	8.41%	8.41%	8.41%	8.41%
32	Proration Percentage	Line 11		14.79%	85.21%			
33	Return and Taxes	Cols (a), (d) and (e): L 30 * L 31; Cols (b) and (c): L 30 * L 31 * L 32	2/ \$4,255,062	\$1,372,333	\$7,903,620	\$9,795,709	\$9,307,532	
34	Book Depreciation	Line 15	\$2,249,014	\$665,462	\$3,832,566	\$4,498,028	\$4,498,028	
35	Annual Revenue Requirement	Sum of Lines 33 through 34	\$6,504,076	\$2,037,794	\$11,736,187	\$14,293,737	\$13,805,560	
36	Docket No. 5099 FY 2022 Gas ISR Reconciliation, Page 1, Line 6(b)		\$5,976,115					
37	2022 Tax True-Up		\$527,961					

1/ 2.99%, Composite Book Depreciation Rate approved per RIPUC Docket No. 4770, effective on Sep 1, 2018

2/ Columns (b) and (c) represent the 12 months within fiscal year 2023, but activity is separated to accommodate the impacts of the acquisition as described in note 3.

3/ National Grid and PPL Corporation ("PPL") elected to treat PPL's acquisition of The Narragansett Electric Company ("NECO") from National Grid on May 25, 2022 as an asset sale for U.S. federal income tax purposes under Internal Revenue Code Section 338(h)(10). As a result of this election, PPL was deemed to acquire the assets of NECO at fair market value (essentially equivalent to book value) for tax purposes. The resulting "step-up" in tax basis eliminates most book/tax timing differences and the related accumulated net deferred income tax liabilities as of the acquisition date, at which time PPL will begin depreciating the new tax basis and start the tracking of book/tax timing differences as if PPL purchased a new asset in the year of acquisition.

4/ Columns (b) and (c) takes the average of the "Year End Rate Base before Deferred Tax Proration" at the beginning of the fiscal year on Line 27, Column (a) and the end of the fiscal year on Line 27, Column (c). See note 2.

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Tax Depreciation and Repairs Deduction on FY 2022 Incremental Capital Investments

Line No.			Fiscal Year							
			2022	(a)	(b)	(c)	(d)	(e)	(f)	
	Capital Repairs Deduction									
1	Plant Additions	Page 15 of 35, Line 1	\$156,694,227			20 Year MACRS Depreciation				
2	Capital Repairs Deduction Rate	Per Tax Department	73.20%	1/						
3	Capital Repairs Deduction	Line 1 × Line 2	\$114,700,174			MACRS basis:	Line 21, Column (a)	\$41,994,053		
4								Annual		
5								Cumulative		
6	Bonus Depreciation					Fiscal Year	Prorated			
7	Plant Additions	Line 1	\$156,694,227			FY Mar-2022	3.750%	\$1,574,777	\$127,609,589	
8	Less Capital Repairs Deduction	Line 3	\$114,700,174			FY Mar-2023 (Apr-May 2022)	7.219%	1.068%	\$448,503	\$128,058,092
9	Plant Additions Net of Capital Repairs Deduction	Line 7 - Line 8	\$41,994,053			PPL Acquisition - May 25, 2022				
10	Percent of Plant Eligible for Bonus Depreciation	Per Tax Department	0.00%			Book Cost	Line 1, Column (a)	\$156,694,227		
11	Plant Eligible for Bonus Depreciation	Line 9 × Line 10	\$0			Cumulative Book Depreciation	- Page 15 of 35, Line 16, Col (b)	(\$2,914,476)		
12	Bonus Depreciation Rate 30%	Per Tax Department	0.00%			PPL MACRS basis:	Line 10 + Line 11	\$153,779,751		
13	Bonus Depreciation Rate 0%	Per Tax Department	0.00%							
14	Total Bonus Depreciation Rate	Line 12 + Line 13	0.00%			FY Mar-2023 (Jun-Mar 2023)	3.750%	\$5,766,741	\$5,766,741	
15	Bonus Depreciation	Line 11 × Line 14	\$0			Mar-2024	7.219%	\$11,101,360	\$16,868,101	
16						Mar-2025	6.677%	\$10,267,874	\$27,135,975	
17	Remaining Tax Depreciation					Mar-2026	6.177%	\$9,498,975	\$36,634,950	
18	Plant Additions	Line 1	\$156,694,227			Mar-2027	5.713%	\$8,785,437	\$45,420,387	
19	Less Capital Repairs Deduction	Line 3	\$114,700,174			Mar-2028	5.285%	\$8,127,260	\$53,547,647	
20	Less Bonus Depreciation	Line 15	\$0			Mar-2029	4.888%	\$7,516,754	\$61,064,401	
21	Remaining Plant Additions Subject to 20 YR MACRS Tax Depreciation	Line 18 - Line 19 - Line 20	\$41,994,053			Mar-2030	4.522%	\$6,953,920	\$68,018,322	
22	20 YR MACRS Tax Depreciation Rates	IRS Publication 946	3.75%			Mar-2031	4.462%	\$6,861,653	\$74,879,974	
23	Remaining Tax Depreciation	Line 21 × Line 22	\$1,574,777			Mar-2032	4.461%	\$6,860,115	\$81,740,089	
24						Mar-2033	4.462%	\$6,861,653	\$88,601,742	
25	FY22 tax (gain)/loss on retirements	Per Tax Department	561,633	2/		Mar-2034	4.461%	\$6,860,115	\$95,461,856	
26	Cost of Removal	Page 15 of 35, Line 7	\$10,773,005			Mar-2035	4.462%	\$6,861,653	\$102,323,509	
27						Mar-2036	4.461%	\$6,860,115	\$109,183,623	
28	Total Tax Depreciation and Repairs Deduction	Sum of Lines 3, 15, 23, 25 & 26	\$127,609,589			Mar-2037	4.462%	\$6,861,653	\$116,045,276	
29						Mar-2038	4.461%	\$6,860,115	\$122,905,391	
30						Mar-2039	4.462%	\$6,861,653	\$129,767,043	
31						Mar-2040	4.461%	\$6,860,115	\$136,627,158	
32						Mar-2041	4.462%	\$6,861,653	\$143,488,810	
33						Mar-2042	4.461%	\$6,860,115	\$150,348,925	
34						Mar-2043	2.231%	\$3,430,826	\$153,779,751	
35							100.000%	\$153,779,751		
36										

Column (d), Line 7 = MACRS Rate 7.219% / 365 days x 54 days

1/ Capital Repairs percentage is the actual result of FY2022 tax return
2/ Actual Loss based on FY2022 tax return

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Net Deferred Tax Reserve Proration on FY 2022 Incremental Capital Investments**

Line No.	Deferred Tax Subject to Proration	Fiscal Year <u>2022</u> (a)	Fiscal Year <u>2023</u> (b)	Fiscal Year <u>2024</u> (c)	Fiscal Year <u>2025</u> (d)
1	Book Depreciation				
2	Bonus Depreciation				
		See the corresponding Fiscal Year on Page 15 of 35, Line 15. Note there are 2 columns to sum for FY23.			
		\$2,249,014	\$4,498,028	\$4,498,028	\$4,498,028
		Col (a): - Page 16 of 35, Line 23, column (a), thereafter, see the corresponding Fiscal Year on Page 15 of 35, Line 12. Note there are 2 columns to sum for FY23.			
3	Remaining MACRS Tax Depreciation	(\$1,574,777)	(\$6,215,244)	(\$11,101,360)	(\$10,267,874)
4	FY22 tax (gain)/loss on retirements	\$0	\$0	\$0	\$0
5	Cumulative Book / Tax Timer	\$674,237	(\$1,717,216)	(\$6,603,332)	(\$5,769,846)
6	Effective Tax Rate	21%	21%	21%	21%
7	Deferred Tax Reserve	\$141,590	(\$360,615)	(\$1,386,700)	(\$1,211,668)
		Line 5 × Line 6			
	Deferred Tax Not Subject to Proration				
8	Capital Repairs Deduction				
9	Cost of Removal				
10	Book/Tax Depreciation Timing Difference at 3/31/2022				
11	Cumulative Book / Tax Timer				
12	Effective Tax Rate				
13	Deferred Tax Reserve				
		Line 8 + Line 9 + Line 10			
14	Total Deferred Tax Reserve	\$141,590	(\$360,615)	(\$1,386,700)	(\$1,211,668)
		Line 7 + Line 13			
15	Net Operating Loss				
16	Net Deferred Tax Reserve	\$141,590	(\$360,615)	(\$1,386,700)	(\$1,211,668)
		Line 14 + Line 15			
	Allocation of FY 2022 Estimated Federal NOL				
17	Cumulative Book/Tax Timer Subject to Proration				
18	Cumulative Book/Tax Timer Not Subject to Proration				
19	Total Cumulative Book/Tax Timer				
		Line 5			
		Line 11			
		Line 17 + Line 18			
20	Total FY 2022 Federal NOL				
21	Allocated FY 2022 Federal NOL Not Subject to Proration				
22	Allocated FY 2022 Federal NOL Subject to Proration				
23	Effective Tax Rate				
24	Deferred Tax Benefit subject to proration				
		Line 15 of 35 , Line 22 ,Col (a)+21% (Line 18 ÷ Line 19) × Line 20 (Line 17 ÷ Line 19) × Line 20			
25	Net Deferred Tax Reserve subject to proration	\$141,590	(\$360,615)	(\$1,386,700)	(\$1,211,668)
		Line 7 + Line 24			
		(e)	(f)	(g)	(h)
		(i)	(j)	(k)	(l)
		Fiscal Year <u>2022</u>	Fiscal Year <u>2023</u>	Fiscal Year <u>2024</u>	Fiscal Year <u>2025</u>
26	Proration Calculation	<u>Number of Days in Month</u>	<u>Proration Percentage</u>	\$10,829	(\$27,581)
27	April	30	91.78%	(\$106,060)	(\$92,673)
28	May	31	83.29%	\$9,827	(\$84,097)
29	June	30	75.07%	\$8,857	(\$86,748)
30	July	31	66.58%	\$7,855	(\$76,933)
31	August	31	58.08%	\$6,853	(\$67,119)
32	September	30	49.86%	\$5,883	(\$57,621)
33	October	31	41.37%	\$4,881	(\$47,806)
34	November	30	33.15%	\$3,911	(\$38,308)
35	December	31	24.66%	\$2,909	(\$28,494)
36	January	31	16.16%	\$1,907	(\$18,679)
37	February	28	8.49%	\$1,002	(\$9,815)
38	March	31	0.00%	\$0	\$0
	Total	365		\$64,718	(\$164,829)
				(\$633,829)	(\$553,826)
39	Deferred Tax Without Proration				
40	Average Deferred Tax without Proration				
		Line 25			
		Line 39 × 0.5			
41	Proration Adjustment				
		Line 38 - Line 40			
		\$70,795	(\$180,308)	(\$693,350)	(\$605,834)
		(\$6,077)	\$15,478	\$59,520	\$52,008

Column Notes:

(f) Sum of remaining days in the year (Col (e)) ÷ 365
(g) through (j) Current Year Line 25 ÷ 12 × Current Month Col (f)

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Fiscal Year 2025 Revenue Requirement on FY 2023 Actual Incremental Gas Capital Investment

Line No.			NG		PPL		Fiscal Year 2024 (c)	Fiscal Year 2025 (d)
			4/1/22 - 5/24/2022 2023 (a)	5/25/22 - 3/31/23 2023 (b)				
Depreciable Net Capital Included in ISR Rate Base								
1	Total Allowed Capital Included in ISR Rate Base in Current Year	Page 27 of 35 , Line 3 ,Col (f)	2/	\$22,436,083	\$129,215,219			
2	Retirements	Page 27 of 35 , Line 9 ,Col (f)	2/	1,256,752	7,237,958			
3	Net Depreciable Capital Included in ISR Rate Base	Year 1 = Line 1 - Line 2; then = Prior Year Line 3		\$21,179,331	\$121,977,261	\$143,156,592	\$143,156,592	
Change in Net Capital Included in ISR Rate Base								
4	Capital Included in ISR Rate Base	Line 1		\$22,436,083	\$129,215,219			
5	Depreciation Expense	Page 31 of 35, Line 77(c)	2/	\$6,058,984	\$34,895,262			
6	Incremental Capital Amount	Year 1 = Line 4 - Line 5; then = Prior Year Line 6		\$16,377,099	\$94,319,957	\$110,697,056	\$110,697,056	
7	Cost of Removal	Page 27 of 35 , Line 6 ,Col (f)	2/	\$1,569,324	\$9,038,142			
8	Net Plant Amount	Line 6 + Line 7		\$17,946,422	\$103,358,099	\$121,304,521	\$121,304,521	
Deferred Tax Calculation:								
9	Composite Book Depreciation Rate	Page 29 of 35, Line 86(e)	1/	2.99%	2.99%	2.99%	2.99%	
10	Proration Percentage							
11	Tax Depreciation and Year 1 Basis Adjustments	Col (a) = Page 19 of 35, Column (a), Line 28; Col (b) = Page 19 of 35, Col (b), Lines 19,25,26 + Col (f), Line 15, Then remaining years from Page 19 of 35, Col (f)		\$15,784,290	\$91,735,295	\$4,878,410	\$4,512,141	
12	Cumulative Tax Depreciation-NG	Col (a) = Line 11; then = zero	3/	\$15,784,290				
13	Cumulative Tax Depreciation-PPL	Col (b) = Line 11; then = Prior Year Line 13 + Current Year Line 11	3/		\$91,735,295	\$96,613,705	\$101,125,846	
14	Book Depreciation	Year 1 (Columns (a) and (b)) = Line 3 × Line 9 × 50%; then = Line 3 × Line 9		\$316,631	\$1,823,560	\$4,280,382	\$4,280,382	
15	Cumulative Book Depreciation	Year 1 = Line 14; then = Prior Year Line 15 + Current Year Line 14		\$316,631	\$2,140,191	\$6,420,573	\$10,700,955	
16	Book / Tax Timer	Line 11 - Line 14		\$15,467,658	\$89,911,735	\$598,028	\$231,759	
17	Cumulative Book / Tax Timer -NG	Line 16, Column (a), then = zero	3/	\$15,467,658				
18	Cumulative Book / Tax Timer - PPL	Col (a) = zero; Col (b) = Line 16, Column (b); then = Prior Year Line 18 + Current Year Line 16	3/		\$89,911,735	\$90,509,763	\$90,741,522	
19	Cumulative Book / Tax Timer - Total	Line 17 + Line 18		\$15,467,658	\$89,911,735	\$90,509,763	\$90,741,522	
20	Effective Tax Rate			21.00%	21.00%	21.00%	21.00%	
21	Deferred Tax Reserve	Line 19 × Line 20		\$3,248,208	\$18,881,464	\$19,007,050	\$19,055,720	
22	Add: FY 2023-NG Federal NOL (Generation) / Utilization	Page 27 of 35 , Line 12 ,Col (f)	3/	\$43,762,725	\$0	\$0	\$0	
23	Net Deferred Tax Reserve before Proration Adjustment	Line 21 + Line 22		\$47,010,933	\$18,881,464	\$19,007,050	\$19,055,720	
ISR Rate Base Calculation:								
24	Cumulative Incremental Capital Included in ISR Rate Base	Line 8		\$17,946,422	\$103,358,099	\$121,304,521	\$121,304,521	
25	Accumulated Depreciation	Year 1 (Cols (a) and (b)) = -Line 14; Then = -Line 15		(\$316,631)	(\$1,823,560)	(\$6,420,573)	(\$10,700,955)	
26	Deferred Tax Reserve	- Line 23		(\$47,010,933)	(\$18,881,464)	(\$19,007,050)	(\$19,055,720)	
27	Year End Rate Base before Deferred Tax Proration	Sum of Lines 24 through 26		(\$29,381,142)	\$82,653,074	\$95,876,898	\$91,547,846	
Revenue Requirement Calculation:								
28	Average Rate Base before Deferred Tax Proration Adjustment	Year 1 (Cols (a) and (b)) = Current Year, Line 27 * 50%; Then = (Prior Year Line 27 + Current Year Line 27) ÷ 2		(\$14,690,571)	\$41,326,537	\$74,574,415	\$93,712,372	
29	Proration Adjustment	Page 20 of 35, Line 41	2/	(\$768,920)	(\$52,132)	\$5,390	\$2,089	
30	Average ISR Rate Base after Deferred Tax Proration	Line 28 + Line 29		(\$15,459,491)	\$41,274,405	\$74,579,806	\$93,714,461	
31	Pre-Tax ROR	Page 35 of 35, Line 30, Column (e)		8.41%	8.41%	8.41%	8.41%	
32	Proration	Line 10						
33	Return and Taxes	Line 30 x Line 31		(\$1,300,143)	\$3,471,177	\$6,272,162	\$7,881,386	
34	Book Depreciation	Line 14		\$316,631	\$1,823,560	\$4,280,382	\$4,280,382	
35	Annual Revenue Requirement	Sum of Lines 33 through 34		(\$983,512)	\$5,294,738	\$10,552,544	\$12,161,768	

1/ 2.99%, Composite Book Depreciation Rate approved per RIPUC Docket No. 4770, effective on Sep 1, 2018

2/ Columns (a) and (b) represent the 12 months within fiscal year 2023, but activity is separated to accommodate the impacts of the acquisition as described in note 3.

3/ National Grid and PPL Corporation ("PPL") elected to treat PPL's acquisition of The Narragansett Electric Company ("NECO") from National Grid on May 25, 2022 as an asset sale for U.S. federal income tax purposes under Internal Revenue Code Section 338(h)(10). As a result of this election, PPL was deemed to acquire the assets of NECO at fair market value (essentially equivalent to book value) for tax purposes. The resulting "step-up" in tax basis eliminates most book/tax timing differences and the related accumulated net deferred income tax liabilities as of the acquisition date, at which time PPL will begin depreciating the new tax basis and start the tracking of book/tax timing differences as if PPL purchased a new asset in the year of acquisition.

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Tax Depreciation and Repairs Deduction on FY 2023 Incremental Capital Investments

Line No.			NG	PPL	(c)	(d)	(e)	(f)	(g)	
			Apr 1-May 24,	May 25-Mar 31,						
			2022	2023						
			FY 2023	FY 2023						
			(a)	(b)						
1	Capital Repairs Deduction									
1	Plant Additions	Page 18 of 35, Line 1	\$22,436,083	\$129,215,219						
2	Capital Repairs Deduction Rate	Per Tax Department	64.82%	64.82%						
3	Capital Repairs Deduction	Line 1 × Line 2	\$14,543,069	\$83,757,305						
6	Bonus Depreciation									
7	Plant Additions	Line 1	\$22,436,083	\$129,215,219						
8	Less Capital Repairs Deduction	Line 3	\$14,543,069	\$83,757,305						
9	Plant Additions Net of Capital Repairs Deduction	Line 7 - Line 8	\$7,893,014	\$45,457,914						
10	Percent of Plant Eligible for Bonus Depreciation	Per Tax Department	0.00%	0.00%						
11	Plant Eligible for Bonus Depreciation	Line 9 × Line 10	\$0	\$0						
12	Bonus Depreciation Rate 1	Per Tax Department	0.00%	0.00%						
13	Bonus Depreciation Rate 2	Per Tax Department	0.00%	0.00%						
14	Total Bonus Depreciation Rate	Line 12 + Line 13	0.00%	0.00%						
15	Bonus Depreciation	Line 11 × Line 14	\$0	\$0						
18	Remaining Tax Depreciation									
18	Plant Additions	Line 1	\$22,436,083	\$129,215,219						
19	Less Capital Repairs Deduction	Line 3	\$14,543,069	\$83,757,305						
20	Less Bonus Depreciation	Line 15	\$0	\$0						
21	Remaining Plant Additions Subject to 20 YR MACRS Tax Depreciation	Line 18 - Line 19 - Line 20	\$7,893,014	\$45,457,914						
22	20 YR MACRS Tax Depreciation Rates	IRS Publication 946	3.75%	3.75%						
23	Remaining Tax Depreciation	Line 21 × Line 22	\$295,988	\$1,704,672						
25	FY23 tax (gain)/loss on retirements	Per Tax Department	(624,091)	(3,594,303)						
26	Cost of Removal	Page 18 of 35, Line 7	\$1,569,324	\$9,038,142						
28	Total Tax Depreciation and Repairs Deduction	Sum of Lines 3, 15, 23, 25 & 26	\$15,784,290	\$90,905,816						
30	Reconciliation of MACRS Tax Depreciation:									
31	Apr 1 -May 24, 2022 Plant Additions	Line 1, Column		\$22,436,083						
32	Cumulative Book Depreciation through May 24, 2022	, Line 19, Col		(\$316,631)						
33	2022 Plant Additions (Net Book) through Acquisition	Line 31 + Line 32		\$22,119,452						
34	20 YR MACRS Tax Depreciation Rates	Per IRS Publication 946		3.750%						
35	Tax Depreciation	Line 33 * Line 34		\$829,479						
37	MACRS Basis in May 25-Mar 2023 Plant Additions	Line 20, Column (a)		\$45,457,914						
38	20 YR MACRS Tax Depreciation Rates	Per IRS Publication 946		3.750%						
39	Tax Depreciation	Line 37 * Line 38		\$1,704,672						
41	Total MACRS Tax Depreciation	Sum of Lines 35, 39, Column (b)		\$2,534,151						

20 Year MACRS Depreciation				
MACRS basis:	Line 21, Column (a)		\$7,893,014	
Fiscal Year		Prorated	Annual	Cumulative
FY Mar-2023 (Apr-May 2022)	3.750%	0.555%	MACRS	Tax Depr
			\$43,790	\$15,784,290
PPL Acquisition - May 25, 2022				
Book Cost	Line 1, Column (a)		\$22,436,083	
Cumulative Book Depreciation	- Page 18 of 35, Line 14, Col (a)		(\$316,631)	
MACRS basis from Acquisition:	Line 9(f) + Line 10(f)		\$22,119,452	
MACRS basis (Jun-Mar 2023)	Line 21, Column (b)		\$45,457,914	
Total MACRS Basis thru 3/2023	Line 11(f) + Line 12(f)		\$67,577,366	
FY Mar-2023 (Jun-Mar 2023)	3.750%		\$2,534,151	\$91,735,295
Mar-2024	7.219%		\$4,878,410	\$96,613,705
Mar-2025	6.677%		\$4,512,141	\$101,125,846
Mar-2026	6.177%		\$4,174,254	\$105,300,100
Mar-2027	5.713%		\$3,860,695	\$109,160,795
Mar-2028	5.285%		\$3,571,464	\$112,732,259
Mar-2029	4.888%		\$3,303,182	\$116,035,440
Mar-2030	4.522%		\$3,055,848	\$119,091,289
Mar-2031	4.462%		\$3,015,302	\$122,106,591
Mar-2032	4.461%		\$3,014,626	\$125,121,217
Mar-2033	4.462%		\$3,015,302	\$128,136,519
Mar-2034	4.461%		\$3,014,626	\$131,151,146
Mar-2035	4.462%		\$3,015,302	\$134,166,448
Mar-2036	4.461%		\$3,014,626	\$137,181,074
Mar-2037	4.462%		\$3,015,302	\$140,196,376
Mar-2038	4.461%		\$3,014,626	\$143,211,002
Mar-2039	4.462%		\$3,015,302	\$146,226,304
Mar-2040	4.461%		\$3,014,626	\$149,240,931
Mar-2041	4.462%		\$3,015,302	\$152,256,233
Mar-2042	4.461%		\$3,014,626	\$155,270,859
Mar-2043	2.231%		\$1,507,651	\$156,778,510
	100.00%		\$67,577,366	

Column (e), Line 6 = MACRS Rate 3.75% / 365 days x 54 days

Capital Repairs percentage is based on the actual results of National Grid's short period FY2023 tax return and PPL's short period CY2022 tax return, which covers the period from April 2022 through December 1/ 2022. When PPL files its calendar year 2023 consolidated tax return in October of 2024, the tax repairs percentage will be updated to reflect the January through March 2023 actual tax repairs.
FY 2023 tax loss on retirements is based on actual tax losses from April through December 2022. When PPL files its calendar year 2023 consolidated tax return in October of 2024, a portion of the tax gain/loss on 2/ retirements will be allocated to the January through March 2023 period to finalize this fiscal year.

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Net Deferred Tax Reserve Proration on FY 2023 Incremental Capital Investments

Line No.	Deferred Tax Subject to Proration		NG	PPL	Fiscal Year	Fiscal Year
			4/1/22 - 5/24/2022	5/25/22 - 3/31/23	2024	2025
			2023	2023	(c)	(d)
			(a)	(b)		
		See the corresponding Fiscal Year on Page 18 of 35,				
1	Book Depreciation	Line 15	\$316,631	\$1,823,560	\$4,280,382	\$4,280,382
2	Bonus Depreciation	- Page 19 of 35 , Line 15 ,Col (a)	\$0	\$0	\$0	\$0
3	Remaining MACRS Tax Depreciation	- Page 19 of 35 ,column (f), Lines 6,15,16,17	(\$43,790)	(\$2,534,151)	(\$4,878,410)	(\$4,512,141)
4	FY23-NG tax (gain)/loss on retirements	- Page 19 of 35 , Line 25 ,Col (a)	\$624,091	\$3,594,303	\$0	\$0
5	Cumulative Book / Tax Timer	Sum of Lines 1 through 4	\$896,932	\$2,883,712	(\$598,028)	(\$231,759)
6	Effective Tax Rate		21%	21%	21%	21%
7	Deferred Tax Reserve	Line 5 × Line 6	\$188,356	\$605,579	(\$125,586)	(\$48,669)
	Deferred Tax Not Subject to Proration					
8	Capital Repairs Deduction	- Page 19 of 35 , Line 3 ,Col (a)	(\$14,543,069)	(\$83,757,305)	\$0	\$0
9	Cost of Removal	- Page 18 of 35 , Line 7 ,Col (a)	(\$1,569,324)	(\$9,038,142)	\$0	\$0
10	Book/Tax Depreciation Timing Difference at 3/31/2023					
11	Cumulative Book / Tax Timer	Line 8 + Line 9 + Line 10	(\$16,112,393)	(\$92,795,447)	\$0	\$0
12	Effective Tax Rate		21%	21%	21%	21%
13	Deferred Tax Reserve	Line 11 × Line 12	(\$3,383,602)	(\$19,487,044)	\$0	\$0
14	Total Deferred Tax Reserve	Line 7 + Line 13	(\$3,195,247)	(\$18,881,464)	(\$125,586)	(\$48,669)
15	Net Operating Loss	- Page 18 of 35 , Line 22 ,Col (a)	\$0	\$0	\$0	\$0
16	Net Deferred Tax Reserve	Line 14 + Line 15	(\$3,195,247)	(\$18,881,464)	(\$125,586)	(\$48,669)
	Allocation of FY 2023-NG Estimated Federal NOL					
17	Cumulative Book/Tax Timer Subject to Proration	Line 5	\$896,932	\$2,883,712	(\$598,028)	(\$231,759)
18	Cumulative Book/Tax Timer Not Subject to Proration	Line 11	(\$16,112,393)	(\$92,795,447)	\$0	\$0
19	Total Cumulative Book/Tax Timer	Line 17 + Line 18	(\$15,215,461)	(\$89,911,735)	(\$598,028)	(\$231,759)
20	Total FY 2023-NG Federal NOL	- Page 18 of 35 , Line 22 ,Col (a)÷21%	(\$208,393,929)	\$0	\$0	\$0
21	Allocated FY 2023-NG Federal NOL Not Subject to Proration	(Line 18 ÷ Line 19) × Line 20	(\$220,678,487)	\$0	\$0	\$0
22	Allocated FY 2023-NG Federal NOL Subject to Proration	(Line 17 ÷ Line 19) × Line 20	\$12,284,559	\$0	\$0	\$0
23	Effective Tax Rate		21%	21%	21%	21%
24	Deferred Tax Benefit subject to proration	Line 22 × Line 23	\$2,579,757	\$0	\$0	\$0
25	Net Deferred Tax Reserve subject to proration	Line 7 + Line 24	\$2,768,113	\$605,579	(\$125,586)	(\$48,669)
		(e) (f) (g) (h) (i) (j)				
			NG	PPL	Fiscal Year	Fiscal Year
			4/1/22 - 5/24/2022	5/25/22 - 3/31/23	2024	2025
			2023	2023		
	Proration Calculation	Number of Days in Month Proration Percentage				
26	April	30 91.78%	\$615,136	\$0	(\$9,605)	(\$3,722)
27	May	31 83.29%	\$0	\$48,326	(\$8,716)	(\$3,378)
28	June	30 75.07%		\$43,015	(\$7,856)	(\$3,045)
29	July	31 66.58%		\$37,528	(\$6,967)	(\$2,700)
30	August	31 58.08%		\$32,040	(\$6,079)	(\$2,356)
31	September	30 49.86%		\$26,730	(\$5,218)	(\$2,022)
32	October	31 41.37%		\$21,242	(\$4,330)	(\$1,678)
33	November	30 33.15%		\$15,932	(\$3,469)	(\$1,345)
34	December	31 24.66%		\$10,444	(\$2,581)	(\$1,000)
35	January	31 16.16%		\$4,957	(\$1,692)	(\$656)
36	February	28 8.49%		\$10,444	(\$889)	(\$344)
37	March	31 0.00%		\$0	\$0	\$0
38	Total	365	\$615,136	\$250,658	(\$57,402)	(\$22,246)
39	Deferred Tax Without Proration	Line 25	\$2,768,113	\$605,579	(\$125,586)	(\$48,669)
40	Average Deferred Tax without Proration					
41	Proration Adjustment	Line 39 × 0.5 Line 38 - Line 40	\$1,384,057 (\$768,920)	\$302,790 (\$52,132)	(\$62,793) \$5,390	(\$24,335) \$2,089

Column Notes:

- (f) Sum of remaining days in the year (Col (e)) ÷ 365
- (g) through (j) Current Year Line 25 ÷ 12 × Current Month Col (f)

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Fiscal Year 2025 Revenue Requirement on FY 2024 Actual Incremental Gas Capital Investment

Line No.			Fiscal Year 2024 (a)	Fiscal Year 2025 (b)
<u>Depreciable Net Capital Included in ISR Rate Base</u>				
1	Total Allowed Capital Included in ISR Rate Base in Current Year	Page 27 of 35 , Line 3 ,Col (g)	\$155,814,000	
2	Retirements	Page 27 of 35 , Line 9 ,Col (g)	\$7,823,414	
3	Net Depreciable Capital Included in ISR Rate Base	Year 1 = Line 1 - Line 2; then = Prior Year Line 3	\$147,990,586	\$147,990,586
<u>Change in Net Capital Included in ISR Rate Base</u>				
4	Capital Included in ISR Rate Base	Line 1	\$155,814,000	\$0
5	Depreciation Expense	Page 31 of 35, Line 77(c)	\$40,954,246	\$0
6	Incremental Capital Amount	Year 1 = Line 4 - Line 5; then = Prior Year Line 6	\$114,859,754	\$114,859,754
7	Cost of Removal	Page 27 of 35 , Line 6 ,Col (g)	\$7,930,000	
8	Net Plant Amount	Line 6 + Line 7	\$122,789,754	\$122,789,754
<u>Deferred Tax Calculation:</u>				
9	Composite Book Depreciation Rate	Page 29 of 35, Line 86(e)	1/ 2.99%	2.99%
10	Proration Percentage			
11	Tax Depreciation and Year 1 Basis Adjustments	Year 1 =Page 22 of 35, Line 28, Col (a); then = Page 22 of 35, Col (d)	\$136,423,788	\$2,049,087
12	Cumulative Tax Depreciation-PPL	Year 1 = Line 10; then = Prior Year Line 11 + Current Year Line 10	\$136,423,788	\$138,472,875
13	Book Depreciation	Year 1 = Line 3 × Line 9 × 50% x Line 10; then = Line 3 × Line 9	\$2,212,459	\$4,424,919
14	Cumulative Book Depreciation	Year 1 = Line 12; then = Prior Year Line 13 + Current Year Line 12	\$2,212,459	\$6,637,378
15	Cumulative Book / Tax Timer	Line 11 - Line 13	\$134,211,329	\$131,835,497
16	Effective Tax Rate		21.00%	21.00%
17	Deferred Tax Reserve	Line 15 × Line 16	\$28,184,379	\$27,685,454
18	Add: CY 2024 Federal NOL (Generation) / Utilization	Page 27 of 35 , Line 12 ,Col (e)	\$0	\$0
19	Net Deferred Tax Reserve before Proration Adjustment	Line 17 + Line 18	\$28,184,379	\$27,685,454
<u>ISR Rate Base Calculation:</u>				
20	Cumulative Incremental Capital Included in ISR Rate Base	Line 8	\$122,789,754	\$122,789,754
21	Accumulated Depreciation	- Line 14	(\$2,212,459)	(\$6,637,378)
22	Deferred Tax Reserve	- Line 19	(\$28,184,379)	(\$27,685,454)
23	Year End Rate Base before Deferred Tax Proration	Sum of Lines 20 through 22	\$92,392,915	\$88,466,921
<u>Revenue Requirement Calculation:</u>				
24	Average Rate Base before Deferred Tax Proration Adjustment	Year 1 = Current Year Line 23 ÷ 2; then = (Prior Year Line 23 + Current Year Line 23) ÷ 2	\$46,196,458	\$90,429,918
25	Proration Adjustment	Page 23 of 35, Line 41	(\$10,348)	(\$21,415)
26	Average ISR Rate Base after Deferred Tax Proration	Line 23 + Line 24	\$46,186,110	\$90,408,503
27	Pre-Tax ROR	Page 35 of 35, Line 30, Column (e)	8.41%	8.41%
28	Proration Percentage	Line 10		
29	Return and Taxes	Line 26 × Line 27	\$3,884,252	\$7,603,355
30	Book Depreciation	Line 13	\$2,212,459	\$4,424,919
31	Annual Revenue Requirement	Sum of Lines 29 through 30	\$6,096,711	\$12,028,274

1/ 2.99%, Composite Book Depreciation Rate approved per RIPUC Docket No. 4770, effective on Sep 1, 2018

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Tax Depreciation and Repairs Deduction on FY 2024 Incremental Capital Investments

Line No.			Fiscal Year	(b)	(c)	(d)	(e)
			2024				
			(a)				
	Capital Repairs Deduction						
1	Plant Additions	Page 21 of 35, Line 1	\$155,814,000				
2	Capital Repairs Deduction Rate	Per Tax Department 1/	81.78%				
3	Capital Repairs Deduction	Line 1 × Line 2	\$127,429,364				
4							
5							
6	Bonus Depreciation						
7	Plant Additions	Line 1	\$155,814,000				
8	Less Capital Repairs Deduction	Line 3	\$127,429,364				
9	Plant Additions Net of Capital Repairs Deduction	Line 7 - Line 8	\$28,384,636				
10	Percent of Plant Eligible for Bonus Depreciation	Per Tax Department	0.00%				
11	Plant Eligible for Bonus Depreciation	Line 9 × Line 10	\$0				
12	Bonus Depreciation Rate 30%	Per Tax Department	0.00%				
13	Bonus Depreciation Rate 0%	Per Tax Department	0.00%				
14	Total Bonus Depreciation Rate	Line 12 + Line 13	0.00%				
15	Bonus Depreciation	Line 11 × Line 15	\$0				
16							
17	Remaining Tax Depreciation						
18	Plant Additions	Line 1	\$155,814,000				
19	Less Capital Repairs Deduction	Line 3	\$127,429,364				
20	Less Bonus Depreciation	Line 15	\$0				
21	Remaining Plant Additions Subject to 20 YR MACRS Tax Depreciation	Line 18 - Line 19 - Line 20	\$28,384,636				
22	20 YR MACRS Tax Depreciation Rates	IRS Publication 946	3.75%				
23	Remaining Tax Depreciation	Line 21 × Line 22	\$1,064,424				
24							
25	CY24 tax (gain)/loss on retirements	Per Tax Department 2/	-				
26	Cost of Removal	Page 21 of 35, Line 7	\$7,930,000				
27							
28	Total Tax Depreciation and Repairs Deduction	Sum of Lines 3, 15, 23, 25 & 26	\$136,423,788				

20 Year MACRS Depreciation			
MACRS basis:		\$28,384,636	
		Annual	Cumulative
Calendar Year			
Mar-2024	3.75%	\$1,064,424	\$136,423,788
Mar-2025	7.22%	\$2,049,087	\$138,472,875
Mar-2026	6.68%	\$1,895,242	\$140,368,117
Mar-2027	6.18%	\$1,753,319	\$142,121,436
Mar-2028	5.71%	\$1,621,614	\$143,743,050
Mar-2029	5.29%	\$1,500,128	\$145,243,178
Mar-2030	4.89%	\$1,387,441	\$146,630,619
Mar-2031	4.52%	\$1,283,553	\$147,914,172
Mar-2032	4.46%	\$1,266,522	\$149,180,695
Mar-2033	4.46%	\$1,266,239	\$150,446,934
Mar-2034	4.46%	\$1,266,522	\$151,713,456
Mar-2035	4.46%	\$1,266,239	\$152,979,695
Mar-2036	4.46%	\$1,266,522	\$154,246,217
Mar-2037	4.46%	\$1,266,239	\$155,512,456
Mar-2038	4.46%	\$1,266,522	\$156,778,978
Mar-2039	4.46%	\$1,266,239	\$158,045,217
Mar-2040	4.46%	\$1,266,522	\$159,311,739
Mar-2041	4.46%	\$1,266,239	\$160,577,978
Mar-2042	4.46%	\$1,266,522	\$161,844,500
Mar-2043	4.46%	\$1,266,239	\$163,110,739
Mar-2044	2.23%	\$633,261	\$163,744,000
	100.00%	\$28,384,636	

1/ Capital Repairs percentage is based on a three-year average of FYs 2020, 2021 and 2022 capital repairs rates.
2/ FY 2024 tax loss on retirements will be updated when actuals are known.

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Net Deferred Tax Reserve Proration on FY 2024 Incremental Capital Investments**

Line No.	Deferred Tax Subject to Proration	<u>Fiscal Year</u> 2024 (a)	<u>Fiscal Year</u> 2025 (b)
1	Book Depreciation	Page 21 of 35 , Line 15	\$2,212,459
2	Bonus Depreciation	- Page 22 of 35 , Line 15 ,Col (a)	\$4,424,919
3	Remaining MACRS Tax Depreciation	- Page 22 of 35 , Col (d), Lines 6 and 7	(\$1,064,424)
4	CY23 tax (gain)/loss on retirements	- Page 22 of 35 , Line 25 ,Col (a)	(\$2,049,087)
5	Cumulative Book / Tax Timer	Sum of Lines 1 through 4	\$1,148,035
6	Effective Tax Rate	21%	21%
7	Deferred Tax Reserve	Line 5 × Line 6	\$241,087
	Deferred Tax Not Subject to Proration		
8	Capital Repairs Deduction	- Page 22 of 35 , Line 3 ,Col (a)	(127,429,364)
9	Cost of Removal	- Page 21 of 35 , Line 7 ,Col (a)	(\$7,930,000)
10	Book/Tax Depreciation Timing Difference at 3/31/2024		
11	Cumulative Book / Tax Timer	Line 8 + Line 9 + Line 10	(\$135,359,364)
12	Effective Tax Rate	21%	21%
13	Deferred Tax Reserve	Line 11 × Line 12	(\$28,425,466)
14	Total Deferred Tax Reserve	Line 7 + Line 13	(\$28,184,379)
15	Net Operating Loss	- Page 21 of 35 , Line 18 ,Col (a)	\$498,925
16	Net Deferred Tax Reserve	Line 14 + Line 15	(\$28,184,379)
	Allocation of CY 2023 Estimated Federal NOL		
17	Cumulative Book/Tax Timer Subject to Proration	Line 5	\$1,148,035
18	Cumulative Book/Tax Timer Not Subject to Proration	Line 11	(\$135,359,364)
19	Total Cumulative Book/Tax Timer	Line 17 + Line 18	(\$134,211,329)
20	Total FY 2024 Federal NOL	- Page 21 of 35 , Line 18 ,Col (a)÷21%	\$0
21	Allocated FY 2024 Federal NOL Not Subject to Proration	(Line 18 ÷ Line 19) × Line 20	\$0
22	Allocated FY 2024 Federal NOL Subject to Proration	(Line 17 ÷ Line 19) × Line 20	\$0
23	Effective Tax Rate	21%	21%
24	Deferred Tax Benefit subject to proration	Line 22 × Line 23	\$0
25	Net Deferred Tax Reserve subject to proration	Line 7 + Line 24	\$241,087
		(c)	(d)
		<u>Number of Days in</u>	<u>Proration Percentage</u>
	Proration Calculation	<u>Month</u>	<u>Fiscal Year</u>
26	April	30	2024
27	May	31	2025
28	June	30	2024
29	July	31	2025
30	August	31	2024
31	September	30	2025
32	October	31	2024
33	November	30	2025
34	December	31	2024
35	January	31	2025
36	February	28	2024
37	March	31	2025
38	Total	365	\$0
39	Deferred Tax Without Proration	Line 25	\$241,087
40	Average Deferred Tax without Proration	Line 39 × 0.5	\$120,544
41	Proration Adjustment	Line 38 - Line 40	(\$10,348)

Column Notes:

- (d) Sum of remaining days in the year (Col (c)) ÷ 365
- (e) through (f) Current Year Line 25 ÷ 12 × Current Month Col (d)

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Fiscal Year 2025 Revenue Requirement on FY 2025 Actual Incremental Gas Capital Investment

Line No.			Fiscal Year 2025 (a)
<u>Depreciable Net Capital Included in ISR Rate Base</u>			
1	Total Allowed Capital Included in ISR Rate Base in Current Year	Section 2, Table 1	\$152,812,000
2	Retirements	Line 1 x 3-year average actual retirement rate FY21 - FY23	\$7,558,705
3	Net Depreciable Capital Included in ISR Rate Base	Year 1 = Line 1 - Line 2; then = Prior Year Line 3	\$145,253,295
<u>Change in Net Capital Included in ISR Rate Base</u>			
4	Capital Included in ISR Rate Base	Line 1	\$152,812,000
5	Depreciation Expense	Page 31 of 35, Line 77(c)	\$40,954,246
6	Incremental Capital Amount	Year 1 = Line 4 - Line 5; then = Prior Year Line 6	\$111,857,754
7	Cost of Removal	Section 2, Page 2	\$7,525,000
8	Net Plant Amount	Line 6 + Line 7	\$119,382,754
<u>Deferred Tax Calculation:</u>			
9	Composite Book Depreciation Rate	Page 29 of 35, Line 86(e)	1/ 2.99%
10	Tax Depreciation	Year 1 = Page 25 of 35, Line 28, Col (a); then = Page 25 of 35, Col (d)	\$96,444,774
11	Cumulative Tax Depreciation-PPL	Year 1 = Line 10; then = Prior Year Line 11 + Current Year Line 10	\$96,444,774
12	Book Depreciation	Year 1 = Line 3 x Line 9 x 50%; then = Line 3 x Line 9	\$2,171,537
13	Cumulative Book Depreciation	Year 1 = Line 12; then = Prior Year Line 13 + Current Year Line 12	\$2,171,537
14	Cumulative Book / Tax Timer	Line 11 - Line 13	\$94,273,237
15	Effective Tax Rate		21.00%
16	Deferred Tax Reserve	Line 14 x Line 15	\$19,797,380
17	Add: CY 2025 Federal NOL (Generation) / Utilization	Page 27 of 35, Line 12, Col (e)	\$0
18	Net Deferred Tax Reserve before Proration Adjustment	Line 16 + Line 17	\$19,797,380
<u>ISR Rate Base Calculation:</u>			
19	Cumulative Incremental Capital Included in ISR Rate Base	Line 8	\$119,382,754
20	Accumulated Depreciation	- Line 13	(\$2,171,537)
21	Deferred Tax Reserve	- Line 18	(\$19,797,380)
22	Year End Rate Base before Deferred Tax Proration	Sum of Lines 19 through 21	\$97,413,837
<u>Revenue Requirement Calculation:</u>			
23	Average Rate Base before Deferred Tax Proration Adjustment	Year 1 = Current Year Line 22 ÷ 2; then = (Prior Year Line 22 + Current Year Line 22) ÷ 2	\$48,706,918
24	Proration Adjustment	Page 26 of 35	\$2,636
25	Average ISR Rate Base after Deferred Tax Proration	Line 23 + Line 24	\$48,709,554
26	Pre-Tax ROR	Page 35 of 35, Line 30, Column (e)	8.41%
27	Return and Taxes	Line 25 x Line 26	\$4,096,474
28	Book Depreciation	Line 12	\$2,171,537
29	Annual Revenue Requirement	Sum of Lines 27 through 28	\$6,268,010

1/ 2.99%, Composite Book Depreciation Rate approved per RIPUC Docket No. 4770, effective on Sep 1, 2018

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Tax Depreciation and Repairs Deduction on FY 2025 Incremental Capital Investments

Line No.			Fiscal Year 2025 (a)	(b)	(c)	(d)	(e)
	Capital Repairs Deduction						
1	Plant Additions	Page 24 of 35, Line 1	\$152,812,000				
2	Capital Repairs Deduction Rate	Per Tax Department	1/ 56.56%				
3	Capital Repairs Deduction	Line 1 × Line 2	\$86,430,467				
4							
5							
6	Bonus Depreciation						
7	Plant Additions	Line 1	\$152,812,000				
8	Less Capital Repairs Deduction	Line 3	\$86,430,467				
9	Plant Additions Net of Capital Repairs Deduction	Line 7 - Line 8	\$66,381,533				
10	Percent of Plant Eligible for Bonus Depreciation	Per Tax Department	0.00%				
11	Plant Eligible for Bonus Depreciation	Line 9 × Line 10	\$0				
12	Bonus Depreciation Rate 30%	Per Tax Department	0.00%				
13	Bonus Depreciation Rate 0%	Per Tax Department	0.00%				
14	Total Bonus Depreciation Rate	Line 12 + Line 13	0.00%				
15	Bonus Depreciation	Line 11 × Line 14	\$0				
16							
17	Remaining Tax Depreciation						
18	Plant Additions	Line 1	\$152,812,000				
19	Less Capital Repairs Deduction	Line 3	\$86,430,467				
20	Less Bonus Depreciation	Line 15	\$0				
21	Remaining Plant Additions Subject to 20 YR MACRS Tax Depreciation	Line 18 - Line 19 - Line 20	\$66,381,533				
22	20 YR MACRS Tax Depreciation Rates	IRS Publication 946	3.75%				
23	Remaining Tax Depreciation	Line 21 × Line 22	\$2,489,307				
24							
25	FY25 tax (gain)/loss on retirements	Per Tax Department	2/ -				
26	Cost of Removal	Page 24 of 35, Line 7	\$7,525,000				
27							
28	Total Tax Depreciation and Repairs Deduction	Sum of Lines 3, 15, 23, 25 & 26	\$96,444,774				

20 Year MACRS Depreciation			
MACRS basis:		\$66,381,533	
		Annual	Cumulative
Calendar Year			
Mar-2025	3.75%	\$2,489,307	\$96,444,774
Mar-2026	7.22%	\$4,792,083	\$101,236,857
Mar-2027	6.68%	\$4,432,295	\$105,669,152
Mar-2028	6.18%	\$4,100,387	\$109,769,539
Mar-2029	5.71%	\$3,792,377	\$113,561,916
Mar-2030	5.29%	\$3,508,264	\$117,070,180
Mar-2031	4.89%	\$3,244,729	\$120,314,909
Mar-2032	4.52%	\$3,001,773	\$123,316,682
Mar-2033	4.46%	\$2,961,944	\$126,278,626
Mar-2034	4.46%	\$2,961,280	\$129,239,907
Mar-2035	4.46%	\$2,961,944	\$132,201,851
Mar-2036	4.46%	\$2,961,280	\$135,163,131
Mar-2037	4.46%	\$2,961,944	\$138,125,075
Mar-2038	4.46%	\$2,961,280	\$141,086,355
Mar-2039	4.46%	\$2,961,944	\$144,048,299
Mar-2040	4.46%	\$2,961,280	\$147,009,579
Mar-2041	4.46%	\$2,961,944	\$149,971,523
Mar-2042	4.46%	\$2,961,280	\$152,932,803
Mar-2043	4.46%	\$2,961,944	\$155,894,747
Mar-2044	4.46%	\$2,961,280	\$158,856,028
Mar-2045	2.23%	\$1,480,972	\$160,337,000
	100.00%	\$66,381,533	

1/ Capital Repairs percentage is based on a three-year average of FYs 2021, 2022 and 2023 capital repairs rates.
2/ FY 2025 tax loss on retirements will be updated when actuals are known.

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Net Deferred Tax Reserve Proration on FY 2025 Incremental Capital Investments**

Line No.	Deferred Tax Subject to Proration		(a) <u>Fiscal Year</u> <u>2025</u>
1	Book Depreciation	Page 18 of 35 , Line 14 ,Col (a) and Col (e)	\$2,171,537
2	Bonus Depreciation	- Page 19 of 35 , Line 15 ,Col (a)	
3	Remaining MACRS Tax Depreciation	- Page 25 of 35, Col (a), Line 23	(\$2,489,307)
4	CY24 tax (gain)/loss on retirements	- Page 19 of 35 , Line 25 ,Col (a)	
5	Cumulative Book / Tax Timer	Sum of Lines 1 through 4	(\$317,771)
6	Effective Tax Rate		21%
7	Deferred Tax Reserve	Line 5 × Line 6	(\$66,732)
	Deferred Tax Not Subject to Proration		
8	Capital Repairs Deduction	- Page 25 of 35 , Line 3 ,Col (a)	(\$86,430,467)
9	Cost of Removal	- Page 24 of 35 , Line 7 ,Col (a)	(\$7,525,000)
10	Book/Tax Depreciation Timing Difference at 3/31/2025		
11	Cumulative Book / Tax Timer	Line 8 + Line 9 + Line 10	(\$93,955,467)
12	Effective Tax Rate		21%
13	Deferred Tax Reserve	Line 11 × Line 12	(\$19,730,648)
14	Total Deferred Tax Reserve	Line 7 + Line 13	(\$19,797,380)
15	Net Operating Loss	- Page 18 of 35 , Line 22 ,Col (a)	
16	Net Deferred Tax Reserve	Line 14 + Line 15	(\$19,797,380)
	Allocation of CY 2024 Estimated Federal NOL		
17	Cumulative Book/Tax Timer Subject to Proration	Line 5	(\$317,771)
18	Cumulative Book/Tax Timer Not Subject to Proration	Line 11	(\$93,955,467)
19	Total Cumulative Book/Tax Timer	Line 17 + Line 18	(\$94,273,238)
20	Total CY 2024 Federal NOL	- Page 18 of 35 , Line 22 ,Col (a)÷21%	\$0
21	Allocated FY 2024 Federal NOL Not Subject to Proration	(Line 18 ÷ Line 19) × Line 20	\$0
22	Allocated FY 2024 Federal NOL Subject to Proration	(Line 17 ÷ Line 19) × Line 20	\$0
23	Effective Tax Rate		21%
24	Deferred Tax Benefit subject to proration	Line 22 × Line 23	\$0
25	Net Deferred Tax Reserve subject to proration	Line 7 + Line 24	(\$66,732)
		(b) (c) (d)	
		<u>Number of Days in</u>	
	Proration Calculation	<u>Month</u> <u>Proration Percentage</u>	<u>Fiscal Year2025</u>
26	January	31 91.51%	(\$5,089)
27	February	28 83.84%	(\$4,662)
28	March	31 75.34%	(\$4,190)
29	April	30 67.12%	(\$3,733)
30	May	31 58.63%	(\$3,260)
31	June	30 50.41%	(\$2,803)
32	July	31 41.92%	(\$2,331)
33	August	31 33.42%	(\$1,859)
34	September	30 25.21%	(\$1,402)
35	October	31 16.71%	(\$929)
36	November	30 8.49%	(\$472)
37	December	31 0.00%	\$0
38	Total	365	(\$30,730)
39	Deferred Tax Without Proration	Line 25	(\$66,732)
40	Average Deferred Tax without Proration	Line 39 × 0.5	(\$33,366)
41	Proration Adjustment	Line 38 - Line 40	\$2,636

Column Notes:

- (c) Sum of remaining days in the year (Col (h)) divided by 365
- (d) Current Year Line 25 ÷ 12 × Current Month Col (c)

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
FY 2018 - FY 2023 Incremental Capital Investment Summary

Line No.		Actual Fiscal Year 2018 (a)	Actual Fiscal Year 2019 (b)	Actual Fiscal Year 2020 (c)	Actual Fiscal Year 2021 (d)	Actual Fiscal Year 2022 (e)	Actual Fiscal Year 2023 (f)	Actual Fiscal Year 2024 (g)
<u>Capital Investment</u>								
1	ISR-eligible Capital Investment	Col (a)=Docket No. 4678 FY18 ISR Reconciliation Filing; Col (b)=Docket No. 4781 FY19 ISR Reconciliation Filing; Col (c)=Docket No. 4916 FY20 ISR Reconciliation Filing; Col (d)=Docket No. 4996 FY21 ISR Reconciliation Filing; Col (e)=Docket No. 5099 FY22 ISR Plan Filing						
		\$97,809,718	\$92,263,000	\$144,119,796	\$110,177,659	\$156,694,227	\$151,651,302	\$155,814,000
2	ISR-eligible Capital Additions included in Rate Base per RIPUC Docket No. 4770	Docket No. 4770 Schedule MAL-11-Gas Page 5, Col (a)=Lines 1(a) + 1(b); Col(b)=Lines 1(c) + 1(d); Col(c)= Line 1(e); Col(d) = Line 1(h) + 1(j)						
		\$93,177,000	\$93,177,000	\$38,823,750	\$0	\$0	\$0	\$0
3	Incremental ISR Capital Investment	Line 1 - Line 2						
		\$4,632,718	(\$914,000)	\$105,296,046	\$110,177,659	\$156,694,227	\$151,651,302	\$155,814,000
<u>Cost of Removal</u>								
4	ISR-eligible Cost of Removal	Col (a)=Docket No. 4678 FY18 ISR Reconciliation Filing; Col (b)=Docket No. 4781 FY19 ISR Reconciliation Filing; Col (c)=Docket No. 4916 FY20 ISR Reconciliation Filing; Col (d)=Docket No. 4996 FY21 ISR Reconciliation Filing; Col (e)=Docket No. 5099 FY22 ISR Plan Filing						
		\$8,603,224	\$11,583,085	\$10,161,508	\$9,975,152	\$11,244,351	\$10,607,466	\$7,930,000
5	ISR-eligible Cost of Removal in Rate Base per RIPUC Docket No. 4770	Schedule 6-GAS, Docket No. 4770: Col(a)=[P1]L23+L42×7÷12+Docket 4678 Page 2, Line 7x3÷12; Col(b)=[P1]L42×5÷12+[P2]L18×7÷12; Col (c)=[P2]L18×5÷12+L39×7÷12; Col (d) = [P2] L39×5÷12+L60×7÷12; Col (e)= [P2] L60×5÷12						
		\$6,662,056	\$5,956,522	\$3,105,878	\$1,113,515	\$471,346	\$0	\$0
6	Incremental Cost of Removal	Line 4 - Line 5						
		\$1,941,168	\$5,626,564	\$7,055,630	\$8,861,636	\$10,773,005	\$10,607,466	\$7,930,000
<u>Retirements</u>								
7	ISR-eligible Retirements	Col (a)=Docket No. 4678 FY18 ISR Reconciliation Filing; Col (b)=Docket No. 4781 FY19 ISR Reconciliation Filing; Col (c)=Docket No. 4916 FY20 ISR Reconciliation Filing; Col (d)=Docket No. 4996 FY21 ISR Reconciliation Filing; Col (e)=Docket No. 5099 FY22 ISR Plan Filing;						
		\$24,056,661	\$6,531,844	\$8,395,321	\$5,337,792	\$6,883,634	\$8,494,710	\$7,823,414
8	ISR-eligible Retirements per RIPUC Docket No. 4770	Schedule 6-GAS, Docket No. 4770: Col(a)=[P1]L24+L43×7÷12+ Docket 4678 Page 2, Line 2x3÷12; Col(b)=[P1]L43×5÷12+[P2]L19×7÷12 Col (c)=[P2]L19×5÷12+L40×7÷12; Col (d) = [P2]L40×5÷12+L61×7÷12; Col (e)= L61×5÷12						
		\$11,997,233	\$7,899,865	\$4,119,186	\$1,476,805	\$625,125	\$0	\$0
9	Incremental Retirements	Line 7 - Line 8						
		\$12,059,428	(\$1,368,021)	\$4,276,135	\$3,860,987	\$6,258,509	\$8,494,710	\$7,823,414
<u>(NOL)/NOL Utilization</u>								
10	ISR (NOL)/NOL Utilization Per ISR	Page 28 of 35, Line 12						
		(\$6,051,855)	\$1,091,119	\$0	\$2,072,387	\$893,329	\$43,762,725	\$0
11	ISR NOL Utilization Per Docket 4770	Schedule 11-Gas Page 11, Docket No. 4770: Col (a)= L40×5÷12; Col (b) = L40×5÷12+L48×7÷12; Col (c) = P11,L48×5÷12+P12,L39×7÷12; Col (d) = P12,L39×5÷12+P12,L49×7÷12; Col (e)= P12,L49×5÷12						
		\$0	\$804,769	\$3,063,059	\$7,598,182	\$4,157,771	\$0	\$0
12	Incremental (NOL)/NOL Utilization	Line 10 - Line 11						
		(\$6,051,855)	\$286,350	(\$3,063,059)	(\$5,525,796)	(\$3,264,442)	\$43,762,725	\$0

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Deferred Income Tax ("DIT") Provisions and Net Operating Losses ("NOL")

	(a)	(b) Test Year July 2016 - June 2017	(c)	(d)	(e)	(f)	(g) Jul & Aug 2017	(h) 12 Mths Aug 31 2018	(i) 12 Mths Aug 31 2019	(j) 12 Mths Aug 31 2020	(k) 12 Mths Aug 31 2021	(l) 12 Mths Aug 31 2022
1 Total Base Rate Plant DIT Provision		\$29,439,421					\$5,223,437	\$20,453,237	\$16,078,372	\$5,085,206	\$7,746,916	\$0
2 Excess DIT amortization							\$0	\$0	(\$1,470,238)	(\$1,470,238)	(\$1,470,238)	\$0
	<u>FY 2018</u>	<u>FY 2019</u>	<u>FY 2020</u>	<u>FY 2021</u>	<u>FY 2022</u>	<u>FY 2023-NG</u>	<u>FY 2018</u>	<u>FY 2019</u>	<u>FY 2020</u>	<u>FY 2021</u>	<u>FY 2022</u>	<u>FY 2023</u>
3 Total Base Rate Plant DIT Provision							\$24,514,347.17	\$17,043,594	\$8,195,453.84	\$5,167,632	\$2,615,282.52	\$0
4 Incremental FY 18	\$2,507,039	\$2,560,766	\$2,611,618	\$2,662,153	\$2,712,395	\$2,719,788	\$2,507,039	\$53,728	\$50,851	\$50,535	\$50,242	\$7,393
5 Incremental FY 19		\$1,090,524	\$1,085,911	\$1,081,431	\$1,077,072	\$1,076,444	\$0	\$1,090,524	(\$4,613)	(\$4,480)	(\$4,358)	(\$628)
6 Incremental FY 20			\$18,484,445	\$18,218,347	\$17,924,604	\$17,877,373	\$0	\$0	\$18,484,445	(\$266,098)	(\$293,743)	(\$47,231)
7 Incremental FY 21				\$13,009,229	\$13,230,424	\$13,253,277			\$0	\$13,009,229	\$221,195	\$22,853
8 Incremental FY 22					\$26,325,721	\$26,280,159					\$26,325,721	(\$45,561)
9 Incremental FY 23						\$3,248,208						\$3,248,208
10 TOTAL Plant DIT Provision	\$2,507,039	\$3,651,291	\$22,181,974	\$34,971,160	\$61,270,216	\$64,455,250	\$27,021,386	\$18,187,846	\$26,726,137	\$17,956,818	\$28,914,339	\$3,185,034
11 NOL (Utilization)							\$6,051,855	(\$1,091,119)	\$0	(\$2,072,387)	(\$893,329)	(\$43,762,725)
12 Lesser of NOL or DIT Provision							\$6,051,855	(\$1,091,119)	\$0	(\$2,072,387)	(\$893,329)	(\$43,762,725)

Line Notes:

- 1(b) RIPUC Docket Nos. 4770/4780, Compliance, Revised Rebuttal Attachment 1, Schedule 11-GAS, Page 2 of 23, Line 29, Col (e) minus Col (b)
- 1(g) RIPUC Docket Nos. 4770/4780, Compliance, Revised Rebuttal Attachment 1, Schedule 11-GAS, Page 11 of 23, Line 3 plus Line 4
- 1(h) RIPUC Docket Nos. 4770/4780, Compliance, Revised Rebuttal Attachment 1, Schedule 11-GAS, Page 11 of 23, Line 7
- 1(i) RIPUC Docket Nos. 4770/4780, Compliance, Revised Rebuttal Attachment 1, Schedule 11-GAS, Page 11 of 23, Line 50
- 1(j) RIPUC Docket Nos. 4770/4780, Compliance, Revised Rebuttal Attachment 1, Schedule 11-GAS, Page 12 of 23, Line 41
- 1(k) RIPUC Docket Nos. 4770/4780, Compliance, Revised Rebuttal Attachment 1, Schedule 11-GAS, Page 12 of 23, Line 51
- 1(l) RIPUC Docket Nos. 4770/4780 third rate year ends at Aug 31, 2021
- 2 RIPUC Docket Nos. 4770/4780, Compliance, Revised Rebuttal Attachment 1, Schedule 11-GAS, Page 12 of 23, Line 52
- 3 Col (f) = Line 1(b) × 25% + Line 1(f) + Line 1(g) × 7/12; Col (g) = Line 1(g) × 5/12 + Line 1(h) × 7/12 + Line 2(g) × 5/12 + Line 2(h) × 7/12; Col (h) = Line 1(h) × 5/12 + Line 1(i) × 7/12 + Line 2(h) × 5/12 + Line 2(i)
- 4(a)-9(f) Cumulative DIT plus Deferred Income Tax (Page 2, Line 21 + Line 23; Page 5, Line 21; Page 8, Line 21; Page 12, Line 21; Page 15, Line 21; Page 18, Line 21)
- 4(g)-9(m) Year over year change in cumulative DIT shown in Cols (a) through (f)
- 10 Sum of Lines 3 through 9
- 11 Col (g)-(h) = Docket no. 4916 FY 20 ISR Rec, Att. MAL-1, p.19, L. 8; Col (i) ~Col (l) Per Tax Department
- 12 Lesser of Line 9 or Line 10

The Narragansett Electric Company
d/b/a Rhode Island Energy
Proposed FY 2025 Gas Infrastructure, Safety,
and Reliability Plan Filing
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**The Narragansett Electric Company
d/b/a Rhode Island Energy
ISR Depreciation Expense per Rate Case RIPUC Docket No. 4770**

Account No.	Account Title	Test Year June 30, 2017 (a)	1/ ARO Adjustment (b)	Adjustments June 30, 2017 (c)	Adjusted Balance (d) = (a) + (b) + (c)	Proposed Rate (e)	Depreciation Expense (f) = (d) x (e)	
Intangible Plant								
1	302.00	Franchises And Consents	\$213,499	\$0	\$0	\$213,499	0.00%	\$0
2	303.00	Misc. Intangible Plant	\$25,427	\$0	\$0	\$25,427	0.00%	\$0
3	303.01	Misc. Int Cap Software	\$19,833,370	\$0	\$9,991,374	\$29,824,944	0.00%	\$0
4								
5		Total Intangible Plant	\$20,072,496	\$0	\$9,991,374	\$30,063,870		\$0
6								
Production Plant								
9	304.00	Production Land Land Rights	\$364,912	\$0	\$0	\$364,912	0.00%	\$0
10	305.00	Prod. Structures & Improvements	\$2,693,397	\$0	\$0	\$2,693,397	15.05%	\$405,356
11	307.00	Production Other Power	\$46,159	\$0	\$0	\$46,159	7.16%	\$3,305
12	311.00	Production LNG Equipme	\$3,167,445	\$0	\$0	\$3,167,445	11.40%	\$361,089
13	320.00	Prod. Other Equipment	\$1,106,368	\$0	\$0	\$1,106,368	6.69%	\$74,016
14								
15		Total Production Plant	\$7,378,281	\$0	\$0	\$7,378,281		\$843,766
16								
Storage Plant								
19	360.00	Stor Land & Land Rights	\$261,151	\$0	\$0	\$261,151	0.00%	\$0
20	361.03	Storage Structures Improvements	\$3,385,049	\$0	\$0	\$3,385,049	0.99%	\$33,512
21	362.04	Storage Gas Holders	\$4,606,338	\$0	\$0	\$4,606,338	0.04%	\$1,843
22	363.00	Stor. Purification Equipment	\$13,891,210	\$0	\$0	\$13,891,210	3.37%	\$468,134
23								
24		Total Storage Plant	\$22,143,748	\$0	\$0	\$22,143,748		\$503,488
25								
Distribution Plant								
28	374.00	Dist. Land & Land Rights	\$956,717	\$0	\$0	\$956,717	0.00%	\$0
29	375.00	Gas Dist Station Structure	\$10,642,632	\$0	\$0	\$10,642,632	1.15%	\$122,390
30	376.00	Distribution Mains	\$46,080,760	\$0	\$0	\$46,080,760	3.61%	\$1,663,515
31	376.03	Dist. River Crossing Main	\$695,165	\$0	\$0	\$695,165	3.61%	\$25,095
32	376.04	Mains - Steel And Other - SI	\$4,190	\$0	\$0	\$4,190	0.00%	\$0
33	376.06	Dist. District Regulator	\$14,213,837	\$0	\$0	\$14,213,837	3.61%	\$513,120
34	376.11	Gas Mains Steel	\$57,759,572	\$0	\$0	\$57,759,572	3.31%	\$1,908,954
35	376.12	Gas Mains Plastic	\$382,797,443	\$0	\$0	\$382,797,443	2.70%	\$10,316,391
36	376.13	Gas Mains Cast Iron	\$5,556,209	\$0	\$0	\$5,556,209	8.39%	\$465,888
37	376.14	Gas Mains Valves	\$222,104	\$0	\$0	\$222,104	3.61%	\$8,018
38	376.15	Propane Lines	\$0	\$0	\$0	\$0	3.61%	\$0
39	376.16	Dist. Catholic Protect	\$1,569,576	\$0	\$0	\$1,569,576	3.61%	\$56,662
40	376.17	Dist. Joint Seals	\$63,067,055	\$0	\$0	\$63,067,055	4.63%	\$2,920,005
41	377.00	T&D Compressor Sta Equipment	\$248,656	\$0	\$0	\$248,656	1.07%	\$2,661
42	377.62	1/ 5360-Tanks ARO	\$299	(\$299)	\$0	\$0	0.00%	\$0
43	378.10	Gas Measur & Reg Sta Equipment	\$19,586,255	\$0	\$0	\$19,586,255	2.08%	\$407,394
44	378.55	Gas M&Reg Sta Eqp RTU	\$372,772	\$0	\$0	\$372,772	6.35%	\$23,671
45	379.00	Dist. Measur. Reg. Gs	\$11,033,164	\$0	\$0	\$11,033,164	2.22%	\$244,936
46	379.01	Dist. Meas. Reg. Gs Eq	\$1,399,586	\$0	\$0	\$1,399,586	0.00%	\$0
47	380.00	Gas Services All Sizes	\$331,205,854	\$0	\$0	\$331,205,854	3.05%	\$10,101,779
48	381.10	Sml Meter& Reg Bare Co	\$26,829,565	\$0	\$0	\$26,829,565	1.76%	\$472,200
49	381.30	Lrg Meter& Reg Bare Co	\$15,779,214	\$0	\$0	\$15,779,214	1.76%	\$277,714
50	381.40	Meters	\$9,332,227	\$0	\$0	\$9,332,227	0.96%	\$89,589
51	382.00	Meter Installations	\$675,201	\$0	\$0	\$675,201	3.66%	\$24,712
52	382.20	Sml Meter& Reg Installation	\$43,145,998	\$0	\$0	\$43,145,998	3.66%	\$1,579,144
53	382.30	Lrg Meter&Reg Installation	\$2,524,025	\$0	\$0	\$2,524,025	3.66%	\$92,379
54	383.00	Dist. House Regulators	\$937,222	\$0	\$0	\$937,222	0.67%	\$6,279
55	384.00	T&D Gas Reg Installs	\$1,216,551	\$0	\$0	\$1,216,551	1.56%	\$18,978
56	385.00	Industrial Measuring And Regulating Station Equipment	\$540,187	\$0	\$0	\$540,187	4.18%	\$22,580
57	385.01	Industrial Measuring And Regulating Station Equipment	\$255,921	\$0	\$0	\$255,921	0.00%	\$0
58	386.00	Other Property On Customer Premises	\$271,765	\$0	\$0	\$271,765	0.23%	\$625
59	386.02	Dist. Consumer Prem Equipment	\$110,131	\$0	\$0	\$110,131	0.00%	\$0
60	387.00	Dist. Other Equipment	\$930,079	\$0	\$0	\$930,079	2.15%	\$19,997
61	388.00	1/ ARO	\$5,736,827	(\$5,736,827)	\$0	\$0	0.00%	\$0
62								
63		Total Distribution Plant	\$1,055,696,761	(\$5,737,126)	\$0	\$1,049,959,635	2.99%	\$31,384,677
64								
General Plant								
67	389.01	General Plant Land Lan	\$285,357	\$0	\$0	\$285,357	0.00%	\$0
68	390.00	Structures And Improvements	\$7,094,532	\$0	\$0	\$7,094,532	3.12%	\$221,349
69	391.01	Gas Office Furniture & Fixture	\$274,719	\$0	\$0	\$274,719	6.67%	\$18,324
70	394.00	General Plant Tools Shop (Fully Dep)	\$26,487	\$0	\$0	\$26,487	0.00%	\$0
71	394.00	General Plant Tools Shop	\$5,513,613	\$0	\$0	\$5,513,613	5.00%	\$275,681
72	395.00	General Plant Laboratory	\$221,565	\$0	\$0	\$221,565	6.67%	\$14,778
73	397.30	Communication Radio Site Specific	\$387,650	\$0	\$0	\$387,650	5.00%	\$19,383
74	397.42	Communication Equip Tel Site	\$63,481	\$0	\$0	\$63,481	20.00%	\$12,696
75	398.10	Miscellaneous Equipment (Fully Dep)	\$1,341,386	\$0	\$0	\$1,341,386	0.00%	\$0
76	398.10	Miscellaneous Equipment	\$2,789,499	\$0	\$0	\$2,789,499	6.67%	\$186,060
77	399.10	1/ ARO	\$342,146	(\$342,146)	\$0	\$0	0.00%	\$0
78								
79		Total General Plant	\$18,340,436	(\$342,146)	\$0	\$17,998,289	4.16%	\$748,271
80								
81		Grand Total - All Categories	\$1,123,631,722	(\$6,079,273)	\$9,991,374	\$1,127,543,823	3.05%	\$33,480,202
82							2.97%	
Other Utility Plant Assets								
84			Line 63		Total Distribution Plant	\$1,049,959,635	2.99%	\$31,384,677
85			Line 73 + Line 74		Communication Equipment	\$451,132	7.11%	\$32,079
86					Total ISR Tangible Plant	\$1,050,410,767	2.99%	\$31,416,756
					Non ISR Assets	\$77,133,057		

Lines 1 through 81 - per RIPUC Docket No. 4770 Compliance filing dated August 16, 2018 , Compliance Attachment 2, Schedule 6-GAS, Pages 3 & 4

The Narragansett Electric Company
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THE NARRAGANSETT ELECTRIC COMPANY
d/b/a NATIONAL GRID
RIPUC Docket Nos. 4770/4780
Compliance Attachment 2
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The Narragansett Electric Company d/b/a National Grid
Depreciation Expense - Gas
For the Test Year Ended June 30, 2017 and the Rate Year Ending August 31, 2019

The Narragansett Electric Company
d/b/a National Grid
Gas ISR Depreciation Expense

Line No	Description	Reference	Amount	Less non-ISR eligible	
				Plant	ISR Amount
			(a)	(b)	(c)
1	Total Company Rate Year Depreciation	Sum of Page 2, Line 16 and Line 17	\$39,136,909		
2	Total Company Test Year Depreciation	Per Company Books	\$33,311,851		
3	Less: Reserve adjustments	Page 4, Line 29, Col (b) + Col (c)	(\$15,649)		
4	Adjusted Total Company Test Year Depreciation Expense	Line 2 + Line 3	\$33,296,202		
5	Depreciation Expense Adjustmen	Line 1 - Line 4	\$5,840,707		
6					
7			Per Book		
8	Test Year Depreciation Expense 12 Months Ended 06/30/17:		Amount		
9	Total Gas Utility Plant 06/30/17	Page 4, Line 27, Col (d) Sum of Page 3, Line 5, Col (d) and Page 4, Line 25,	\$1,405,994,678	(\$77,133,057)	\$1,328,861,622
10	Less Non Depreciable Plant	Col (e)	(\$308,514,725)		(\$308,514,725)
11	Depreciable Utility Plant 06/30/17	Line 9 + Line 10	\$1,097,479,953	(\$77,133,057)	\$1,020,346,897
12					
13	Plus: Added Plant 2 Mos Ended 08/31/17	Schedule 11-GAS, Page 3, Line 4	\$19,592,266		\$19,592,266
14	Less: Retired Plant 2 Months Ended 08/31/17	1/ Line 13 x Retirement Rate	(\$1,345,989)		(\$1,345,989)
15	Depreciable Utility Plant 08/31/17	Line 11 + Line 13 + Line 14	\$1,115,726,231	(\$77,133,057)	\$1,020,346,897
16					
17	Average Depreciable Plant for Year Ended 08/31/17	(Line 11 + Line 15)/2	\$1,106,603,092		\$1,106,603,092
18					
19	Composite Book Rate %	As Approved in RIPUC Docket No. 4323	3.38%		
20					
21	Book Depreciation Reserve 06/30/17	Page 5, Line 72, Col (d)	\$357,576,825		\$357,576,825
22	Plus: Book Depreciation Expense	Line 17 x Line 19	\$6,233,864		\$6,233,864
23	Less: Net Cost of Removal/(Salvage)	2/ Line 13 x Cost of Removal Rate	(\$1,014,879)		(\$1,014,879)
24	Less: Retired Plant	Line 14	(\$1,345,989)		(\$1,345,989)
25	Book Depreciation Reserve 08/31/17	Sum of Line 21 through Line 24	\$361,449,821		
26					
27	Depreciation Expense 12 Months Ended 08/31/18				
28	Total Utility Plant 08/31/17	Line 9 + Line 13 + Line 14	\$1,424,240,956	(\$77,133,057)	\$1,347,107,900
29	Less Non Depreciable Plant	Line 10	(\$308,514,725)		(\$308,514,725)
30	Depreciable Utility Plant 08/31/17	Line 28 + Line 29	\$1,115,726,231		\$1,038,593,175
31					
32	Plus: Plant Added in 12 Months Ended 08/31/18	Schedule 11-GAS, Page 3, Line 11	\$115,710,016		\$115,710,016
33	Less: Plant Retired in 12 Months Ended 08/31/18	Line 32 x Retirement rate	(\$7,949,278)		(\$7,949,278)
34	Depreciable Utility Plant 08/31/18	Sum of Line 30 through Line 33	\$1,223,486,969		\$1,146,353,912
35					
36	Average Depreciable Plant for 12 Months Ended 08/31/18	(Line 30 + Line 34)/2	\$1,169,606,600		\$1,092,473,543
37					
38	Composite Book Rate %	As Approved in RIPUC Docket No. 4323	3.38%		3.38%
39					
40	Book Depreciation Reserve 08/31/17	Line 25	\$361,449,821		
41	Plus: Book Depreciation 08/31/18	Line 36 x Line 38	\$39,532,703		\$36,925,606
42	Less: Net Cost of Removal/(Salvage)	Line 32 x Cost of Removal Rate	(\$5,993,779)		
43	Less: Retired Plant	Line 33	(\$7,949,278)		
44	Book Depreciation Reserve 08/31/18	Sum of Line 40 through Line 43	\$387,039,467		
1/	3 year average retirement over plant addition in service FY 15 ~ FY17		6.87%	Retirements	
2/	3 year average Cost of Removal over plant addition in service FY 15 ~ FY17		5.18%	COR	

The Narragansett Electric Company
d/b/a Rhode Island Energy
Proposed FY 2025 Gas Infrastructure, Safety,
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THE NARRAGANSETT ELECTRIC COMPANY
d/b/a NATIONAL GRID
RIPUC Docket Nos. 4770/4780
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The Narragansett Electric Company d/b/a National Grid
Depreciation Expense - Gas
For the Test Year Ended June 30, 2017 and the Rate Year Ending August 31, 2021

The Narragansett Electric Company
d/b/a National Grid
Gas ISR Depreciation Expense

Line No	Description	Reference	Amount (a)	Less non-ISR eligible	
				Plant (b)	ISR Amount (c)
1	Rate Year Depreciation Expense 12 Months Ended 08/31/19:				
2	Total Utility Plant 08/31/18	Page 1, Line 28 + Line 32 + Line 33	\$1,532,001,694	(\$77,133,057)	\$1,454,868,637
3	Less Non-Depreciable Plant	Page 1, Line 10	(\$308,514,725)		(\$308,514,725)
4	Depreciable Utility Plant 08/31/18	Line 2 + Line 3	\$1,223,486,969		\$1,146,353,912
5					
6	Plus: Added Plant 12 Months Ended 08/31/19	Schedule 11-GAS, Page 3, Line 35	\$114,477,000	(\$1,348,000)	\$113,129,000
7	Less: Depreciable Retired Plant	1/ Line 6 x Retirement rate	(\$7,864,570)	\$92,608	(\$7,771,962)
8					
9	Depreciable Utility Plant 08/31/19	Sum of Line 4 through Line 7	\$1,330,099,399	(\$78,388,449)	\$1,251,710,950
10					
11	Average Depreciable Plant for Rate Year Ended 08/31/19	(Line 4 + Line 9)/2	\$1,276,793,184		\$1,199,032,431
12					
13	Proposed Composite Rate %	Page 4, Line 17, Col (e)	3.05%		2.99%
14					
15	Book Depreciation Reserve 08/31/18	Page 1, Line 44	\$387,039,467		\$0
16	Plus: Book Depreciation Expense	Line 11 x Line 13	\$38,950,409		\$35,851,070
17	Plus: Unrecovered Reserve Adjustment	Schedule NWA-1-GAS, Part VI, Page 6	\$186,500		\$186,500
18	Less: Net Cost of Removal/(Salvage)	2/ Line 6 x Cost of Removal Rate	(\$5,929,909)		\$0
19	Less: Retired Plant	Line 7	(\$7,864,570)		\$0
20	Book Depreciation Reserve 08/31/15	Sum of Line 15 through Line 15	\$412,381,898		\$36,037,570
21					
22	Rate Year Depreciation Expense 12 Months Ended 08/31/20:				
23	Total Utility Plant 08/31/19	Line 2 + Line 6 + Line 7	\$1,638,614,124	(\$78,388,449)	\$1,560,225,675
24	Less Non-Depreciable Plant	Page 1, Line 10	(\$308,514,725)		(\$308,514,725)
25	Depreciable Utility Plant 08/31/15	Line 23 + Line 24	\$1,330,099,399		\$1,251,710,950
26					
27	Plus: Added Plant 12 Months Ended 08/31/20	Schedule 11-GAS, Page 5, Line 11(i)	\$21,017,630	(\$750,000)	\$20,267,630
28	Less: Depreciable Retired Plant	1/ Line 27 x Retirement rate	(\$1,443,911)	\$51,525	(\$1,392,386)
29					\$0
30	Depreciable Utility Plant 08/31/20	Sum of Line 25 through Line 28	\$1,349,673,118	(\$79,086,924)	\$1,270,586,194
31					
32	Average Depreciable Plant for Rate Year Ended 08/31/20	(Line 25 + Line 30)/2	\$1,339,886,258		\$1,261,148,572
33					
34	Proposed Composite Rate %	Page 4, Line 17, Col (e)	3.05%		2.99%
35					
36	Book Depreciation Reserve 08/31/20	Line 20	\$412,381,898		\$0
37	Plus: Book Depreciation Expense	Line 32 x Line 34	\$40,875,154		\$37,708,342
38	Plus: Unrecovered Reserve Adjustment	Schedule NWA-1-GAS, Part VI, Page 6	\$186,500		\$186,500
39	Less: Net Cost of Removal/(Salvage)	2/ Line 27 x Cost of Removal Rate	(\$1,088,713)		\$0
40	Less: Retired Plant	Line 28	(\$1,443,911)		\$0
41	Book Depreciation Reserve 08/31/20	Sum of Line 36 through Line 40	\$450,910,927		\$37,894,842
42					
43	Rate Year Depreciation Expense 12 Months Ended 08/31/21:				
44	Total Utility Plant 08/31/20	Line 23 + Line 27 + Line 28	\$1,658,187,843	(\$79,086,924)	\$1,579,100,919
45	Less Non-Depreciable Plant	Page 1, Line 10	(\$308,514,725)		(\$308,514,725)
46	Depreciable Utility Plant 08/31/20	Line 44 + Line 45	\$1,349,673,118		\$1,270,586,194
47					
48	Plus: Added Plant 12 Months Ended 08/31/21	Schedule 11-GAS, Page 5, Line 11(i)	\$21,838,436	(\$750,000)	\$21,088,436
49	Less: Depreciable Retired Plant	1/ Line 48 x Retirement rate	(\$1,500,301)	\$51,525	(\$1,448,776)
50					
51	Depreciable Utility Plant 08/31/21	Sum of Line 46 through Line 49	\$1,370,011,253	(\$79,785,399)	\$1,290,225,854
52					
53	Average Depreciable Plant for Rate Year Ended 08/31/21	(Line 46 + Line 51)/2	\$1,359,842,185		\$1,280,406,024
54					
55	Proposed Composite Rate %	Page 4, Line 17, Col (e)	3.05%		2.99%
56					
57	Book Depreciation Reserve 08/31/20	Line 41	\$450,910,927		\$0
58	Plus: Book Depreciation Expense	Line 53 x Line 55	\$41,483,938		\$38,284,140
59	Plus: Unrecovered Reserve Adjustment	Schedule NWA-1-GAS, Part VI, Page 6	\$186,500		\$186,500
60	Less: Net Cost of Removal/(Salvage)	2/ Line 48 x Cost of Removal Rate	(\$1,131,231)		\$0
61	Less: Retired Plant	Line 49	(\$1,500,301)		\$0
62	Book Depreciation Reserve 08/31/21	Sum of Line 57 through Line 61	\$489,949,834		\$38,470,640
63					
64	1/ 3 year average retirement over plant addition in service FY 15 ~ FY17	0.0687	Retirements		
65	2/ 3 year average Cost of Removal over plant addition in service FY 15 ~ FY17	0.0518	COR		
66					
67	Book Depreciation RY2	Line 37 (a) + Line 38 (b)			\$41,061,654
68	Less: General Plant Depreciation (assuming add=retirement)	Page 10, Line 79(f)			(\$748,271)
69	Plus: Comm Equipment Depreciation	Page 10, Line 73 + Line 74			\$32,079
70	Total				\$40,345,462
71	7 Months				x7/12
72	FY 2020 Depreciation Expense				\$23,534,853
73					
74	Book Depreciation RY3	Line 58 (a) + Line 59 (b)			\$41,670,438
75	Less: General Plant Depreciation	Page 10, Line 79(f)			(\$748,271)
76	Plus: Comm Equipment Depreciation	Page 10, Line 73 + Line 74			\$32,079
77	Total				\$40,954,246
78	FY 2021 Depreciation Expense	5 Months of RY 2 and 7 Months of RY 3			\$40,700,586

The Narragansett Electric Company
d/b/a Rhode Island Energy
Proposed FY 2025 Gas Infrastructure, Safety,
and Reliability Plan Filing
Section 3: Attachment 3
Page 32 of 35

The Narragansett Electric Company
d/b/a Rhode Island Energy
Fiscal Year 2023 ISR Property Tax Recovery Adjustment
(000s)

Line		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
		<u>End of FY 2018</u>	<u>ISR Additions</u>	<u>Non-ISR Add's</u>	<u>Total Add's</u>	<u>Bk Depr (1)</u>	<u>Retirements</u>	<u>COR</u>	<u>Adjustment</u>	<u>End of FY 2019</u>
1	Plant In Service	\$1,195,705	\$92,263	\$24,845	\$117,108		(\$6,844)		\$0	\$1,305,969
2	Accumulated Depr	\$414,713				\$40,858	(\$6,844)	(\$6,123)		\$442,604
3	Net Plant	\$780,992								\$863,364
4	Property Tax Expense	\$22,678								\$23,283
5	Effective Prop tax Rate	2.90%								2.70%
		<u>End of FY 2019</u>	<u>ISR Additions</u>	<u>Non-ISR Add's</u>	<u>Total Add's</u>	<u>Bk Depr (1)</u>	<u>Retirements</u>	<u>COR</u>	<u>Adjustment</u>	<u>End of FY 2020</u>
6	Plant In Service	\$1,305,969	\$144,120	\$22,074	\$166,193		(\$8,567)		\$0	\$1,463,595
7	Accumulated Depr	\$442,604				\$41,588	(\$8,567)	(\$10,162)		\$465,463
8	Net Plant	\$863,364								\$998,132
9	Property Tax Expense	\$23,283								\$25,959
10	Effective Prop tax Rate	2.70%								2.60%
		<u>End of FY 2020</u>	<u>ISR Additions</u>	<u>Non-ISR Add's</u>	<u>Total Add's</u>	<u>Bk Depr (1)</u>	<u>Retirements</u>	<u>COR</u>	<u>Adjustment</u>	<u>End of FY 2021</u>
11	Plant In Service	\$1,463,595	\$110,178	\$97,667	\$207,844		(\$5,766)		(\$26,386)	\$1,639,288
12	Accumulated Depr	\$465,463				\$45,652	(\$5,766)	(\$11,566)	(\$32,599)	\$461,185
13	Net Plant	\$998,132								\$1,178,103
14	Property Tax Expense	\$25,959								\$28,846
15	Effective Prop tax Rate	2.60%								2.45%
		<u>End of FY 2021</u>	<u>ISR Additions</u>	<u>Non-ISR Add's</u>	<u>Total Add's</u>	<u>Bk Depr</u>	<u>Retirements</u>	<u>COR</u>	<u>Adjustment</u>	<u>End of FY 2022</u>
16	Plant In Service	\$1,639,288	\$156,694	\$29,406	\$186,100		(\$7,443)			\$1,817,945
17	Accumulated Depr	\$461,185				\$51,439	(\$7,443)	(\$11,244)		\$493,937
18	Net Plant	\$1,178,103								\$1,324,008
19	Property Tax Expense	\$28,846								\$33,631
20	Effective Prop tax Rate	2.45%								2.54%
		<u>End of FY 2022</u>	<u>ISR Additions</u>	<u>Non-ISR Add's</u>	<u>Total Add's</u>	<u>Bk Depr</u>	<u>Retirements</u>	<u>COR</u>	<u>Adjustment</u>	<u>End of FY 2023</u>
21	Plant In Service	\$1,817,945	\$151,651	\$56,556	\$208,207		(\$13,374)			\$2,012,779
22	Accumulated Depr	\$493,937				\$55,565	(\$13,374)	(\$10,607)		\$525,521
23	Net Plant	\$1,324,008								\$1,487,258
24	Property Tax Expense	\$33,631								\$38,297
25	Effective Prop tax Rate	2.54%								2.58%
		<u>End of FY 2023</u>	<u>ISR Additions</u>	<u>Non-ISR Add's</u>	<u>Total Add's</u>	<u>Bk Depr</u>	<u>Retirements</u>	<u>COR</u>	<u>Adjustment</u>	<u>End of FY 2024</u>
26	Plant In Service	\$2,012,779	\$155,814	\$29,406	\$185,220		(\$7,823)			\$2,190,176
27	Accumulated Depr	\$525,521				\$59,650	(\$7,823)	(\$7,930)		\$569,418
28	Net Plant	\$1,487,258								\$1,620,757
29	Property Tax Expense	\$38,297								\$41,167
30	Effective Prop tax Rate	2.58%								2.54%
		<u>End of FY 2024</u>	<u>ISR Additions</u>	<u>Non-ISR Add's</u>	<u>Total Add's</u>	<u>Bk Depr</u>	<u>Retirements</u>	<u>COR</u>	<u>Adjustment</u>	<u>End of FY 2025</u>
31	Plant In Service	\$2,190,176	\$152,812	\$56,556	\$209,368		(\$7,559)			\$2,391,985
32	Accumulated Depr	\$569,418				\$63,176	(\$7,559)	(\$7,525)		\$617,511
33	Net Plant	\$1,620,757								\$1,774,474
34	Property Tax Expense	\$41,167								\$45,781
35	Effective Prop tax Rate	2.54%								2.58%

The Narragansett Electric Company
d/b/a Rhode Island Energy
Fiscal Year 2023 ISR Property Tax Recovery Adjustment
Fiscal Year 2023 ISR Property Tax Recovery Adjustment (Continued) 1

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	
	Cumulative Increm. ISR Prop. Tax for FY2018				Cumulative Increm. ISR Prop. Tax for FY2019 1st 5 month				Cumulative Increm. ISR Prop. Tax for FY2019			
36	Incremental ISR Additions		\$97,810				\$92,263				(\$914)	
37	Book Depreciation: base allowance on ISR eligible plant		(\$24,356)				(\$24,356)				\$0	
38	Book Depreciation: current year ISR additions		(\$1,246)				(\$1,449)				(\$7)	
39	COR		\$8,603				\$11,583				\$5,627	
40	Net Plant Additions		\$80,811				\$78,041				\$4,705	
41	RY Effective Tax Rate		3.06%				3.06%				2.92%	
42	ISR Year Effective Tax Rate		2.90%				2.70%		7 mos		1.70%	
43	RY Effective Tax Rate		3.06%	-0.15%			3.06%	-0.36%			2.70%	
44	RY Effective Tax Rate 5 mos for FY 2019							-0.15%			2.92%	
45	RY Net Plant times 5 mo rate	7 month	\$458,057	-0.15%	(\$694)	5 month	\$458,057	-0.15%	(\$684)		-0.22%	
46	FY 2014 Net Adds times ISR Year Effective Tax rate	7 month	\$6,343	2.90%	\$184		\$5,950	1.12%	\$67		\$919,892	
47	FY 2015 Net Adds times ISR Year Effective Tax rate	7 month	\$42,913	2.90%	\$1,246		\$39,920	1.12%	\$449		* -0.13%	
48	FY 2016 Net Adds times ISR Year Effective Tax rate		\$59,527	2.90%	\$1,729		\$55,693	1.12%	\$626		\$0	
49	FY 2017 Net Adds times ISR Year Effective Tax rate		\$58,883	2.90%	\$1,710		\$56,076	1.12%	\$630		1.57%	
50	FY 2018 Net Adds times ISR Year Effective Tax rate		\$80,810	2.90%	\$2,347		\$77,664	1.12%	\$873		1.57%	
51	FY 2019 Net Adds times ISR Year Effective Tax rate						\$78,041	1.12%	\$877		\$74	
52	Total ISR Property Tax Recovery		\$6,521				\$2,837				(\$1,020)	
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)
		Cumulative Increm. ISR Prop. Tax for FY2020				Cumulative Increm. ISR Prop. Tax for FY2021				Cumulative Increm. ISR Prop. Tax for FY2022		
53	Incremental ISR Additions		\$105,296				\$110,178				\$156,694	
54	Book Depreciation: base allowance on ISR eligible plant		\$0				\$0				(\$23,890)	
55	Book Depreciation: current year ISR additions		(\$1,510)				(\$1,589)				(\$2,249)	
56	COR		\$7,056				\$8,862				\$10,773	
57	Net Plant Additions		\$110,841				\$117,450				\$141,328	
58	RY Effective Tax Rate		2.96%				3.02%				3.05%	
60	Property Tax Recovery on Growth and non-ISR											
61	ISR Year Effective Tax Rate		2.60%				2.45%				2.54%	
62	RY Effective Tax Rate		2.96%	-0.36%			3.02%	-0.57%			3.05%	
63	RY Effective Tax Rate 7 mos for FY 2019			-0.36%				-0.57%			-0.51%	
64	RY Net Plant times Rate Difference	7 month	\$908,586	* -0.36%	(\$3,246)		\$889,353	* -0.57%	(\$5,080)		\$881,383	
65	Growth and non-ISR Incremental times rate difference		(\$20,407)	* -0.36%	\$73		(\$41,336)	* -0.57%	\$236		(\$51,615)	
66	FY 2018 Net Incremental times rate difference		\$7,156	* 2.6%	\$186		\$7,378	* 2.45%	\$181		\$7,600	
67	FY 2019 Net Incremental times rate difference		\$4,692	* 2.6%	\$122		\$4,678	* 2.45%	\$115		\$4,665	
68	FY 2020 Net Incremental times rate difference		\$110,841	* 2.6%	\$2,882		\$107,821	* 2.45%	\$2,642		\$104,800	
69	FY 2021 Net Incremental times rate difference						\$117,450	* 2.45%	\$2,878		\$114,271	
70	FY 2022 Net Adds times rate difference										\$141,328	
71	Total ISR Property Tax Recovery		\$17				\$970				\$5,242	
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)
		Cumulative Increm. ISR Prop. Tax for FY2023				Cumulative Increm. ISR Prop. Tax for FY2024				Cumulative Increm. ISR Prop. Tax for FY2025		
72	Incremental ISR Additions		\$151,651				\$155,814				\$152,812	
73	Book Depreciation: base allowance on ISR eligible plant		(\$40,954)				(\$40,954)				(\$40,954)	
74	Book Depreciation: current year ISR additions		(\$2,140)				(\$2,212)				(\$2,172)	
75	COR		\$10,607				\$7,930				\$7,525	
76	Net Plant Additions		\$119,164				\$120,577				\$117,211	
77	RY Effective Tax Rate		3.05%				3.05%				3.05%	
79	Property Tax Recovery on Growth and non-ISR											
80	ISR Year Effective Tax Rate		2.58%				2.54%				2.58%	
81	RY Effective Tax Rate		3.05%	-0.47%			3.05%	-0.51%			3.05%	
82	RY Effective Tax Rate 7 mos for FY 2019			-0.47%				-0.51%			-0.47%	
83	RY Net Plant times Rate Difference		\$881,383	* -0.47%	(\$4,134)		\$881,383	* -0.51%	(\$4,482)		\$881,383	
84	Growth and non-ISR Incremental times rate difference		(\$51,615)	* -0.47%	\$242		(\$51,615)	* -0.51%	\$262		(\$51,615)	
85	FY 2018 Net Incremental times rate difference		\$7,822	* 2.58%	\$202		\$8,044	* 2.54%	\$204		\$8,266	
86	FY 2019 Net Incremental times rate difference		\$4,651	* 2.58%	\$120		\$4,638	* 2.54%	\$118		\$4,624	
87	FY 2020 Net Incremental times rate difference		\$101,780	* 2.58%	\$2,626		\$98,759	* 2.54%	\$2,508		\$95,739	
88	FY 2021 Net Incremental times rate difference		\$111,092	* 2.58%	\$2,866		\$107,913	* 2.54%	\$2,741		\$104,734	
89	FY 2022 Net Adds times rate difference		\$136,830	* 2.58%	\$3,530		\$132,332	* 2.54%	\$3,361		\$127,834	
90	FY 2023 Net Adds times rate difference		\$119,164	* 2.58%	\$3,074		\$114,884	* 2.54%	\$2,918		\$110,604	
91	FY 2024 Net Adds times rate difference						\$120,577	* 2.54%	\$3,063		\$113,940	
92	FY 2025 Net Adds times rate difference										\$117,211	
93	Total ISR Property Tax Recovery		\$8,527				\$10,694				\$13,732	

The Narragansett Electric Company
d/b/a Rhode Island Energy
Fiscal Year 2023 ISR Property Tax Recovery Adjustment
(000s)

Line Notes

1(a) - 5(i) Docket No. 4781 Attachment MAL-2, Page 10 of 13, 1(a) to 5(h)
6(i) - 10(i) Docket No. 4916 Attachment MAL-1, Page 17 of 20, 6(a) to 10(h)
11(a) - 15(i) Docket No. 4996 Attachment MAL-1, Page 20 of 22, 11(a) to 15(i)
16(a) - 20(a) 11(i) - 15(i)
16(b) Page 27 of 35, Line 1, Col (e)=1000
16(c) Docket No. 5099, Section 3, Att. 1 (C), Page 23, 16 (c)
16(d) Docket No. 5099, Section 3, Att. 1 (C), Page 23, 16 (d)
16(f) Docket No. 5099, Section 3, Att. 1 (C), Page 23, 16 (f)
16(i) Line 16(a) + (d) + (f)
17(e) P25, (L58+L59)+(P2, L3 (a)+P5, L3 (a)+P8, L3 (a)+P12, L3 (a))=1000*3.05%+Inc
(L1(c)+L6(c)+L11(c))*0.0416+ P15, L3 (a)*0.5*3.05%-1000+ L16(c)*0.5*0.0416
=16(f)
17(f) Docket No. 5099, Section 3, Att. 1 (C), Page 23, 17 (g)
17(g) Docket No. 5099, Section 3, Att. 1 (C), Page 23, 17 (g)
17(i) Line 17(a) + (e) + (f) + (g)
18(i) Line 16(i) - 17(i)
19(i) Line 18(h) * 20(h)
20(i) Docket No. 5099, Section 3, Att. 1 (C), Page 23, 20 (h)
21(a) - 25(a) 16(i) - 20(i)
21(b) Page 18 of 35, Line 1, Col (d)=1000
21(c) Line 6(c)
21(d) Line 16(b) + 16(c)
21(f) - Page 18 of 35, Line 2, Col (d)=1000
21(i) Line 21 (a) + (d) + (f)
22(e) Page 31, (Line 58 + Line 59) + (Page 2, Line 3, Col (a) + Page 5, Line 3, Col (a) + Page 8, Line 3, Col (a) + Page 12, Line 3, Col (a) + Page 15, Line 3, Col (a))=1000 * 3.05%+
Incremental (L1(c)+L6(c)+L11(c)+L16(c))*3.05% + Page 18, Line 3, Col (a)+
L21(c))*0.5*3.05%-1000
22(f) =21(f)
22(g) - Page 18 of 35, Line 7, Col (d)=1000
22(i) Line 22 (a) + (e) + (f) + (g)
23(i) Line 21(i) - 22(i)
24(i) Line 23(i) * 25(i)
25(i) =20(a) most recent actual property tax rate
26(a) - 30(a) 21(i) - 25(i)
26(b) Line 16(c)
26(c) Line 16(c)
26(d) Line 26(b) + 26(c)
26(f) Line 26 (a) + (d) + (f)
26(i) Page 31, (Line 58 + Line 59) + (Page 2, Line 3, Col (a) + Page 5, Line 3, Col (a) + Page 8, Line 3, Col (a) + Page 12, Line 3, Col (a) + Page 15, Line 3, Col (a))=1000 * 3.05%+
Incremental (L1(c)+L6(c)+L11(c)+L16(c))*3.05% + Page 18, Line 3, Col (a)+
L21(c))*0.5*3.05%-1000
=26(f)
27(f) Line 27 (a) + (e) + (f) + (g)
27(g) Line 26(i) - 27(i)
28(i) Line 28(i) * 30(i)
29(i) Line 28(i) * 30(i)
30(i) =20(i) most recent actual property tax rate

Line Notes

36(a) - 52(h) Docket No. 4781 Rec, Attachment MAL-1, Page 29 of 35, 82(e) to 107(k)
53(a)-71 (c) Docket No. 4781 Rec, Attachment MAL-2, Page 10 of 13, 31(a) to 50 (c)
53(e) -71(g) Docket No. 4916 Rec, Attachment MAL-1, Page 18 of 20, 28(e) to 48 (g)
53(j) Page 15 of 35, Line 4(a)=1000
54(j) - (Page 31 of 35, Line 77(c) *7=12)=1000
55(j) - Page 15 of 35, Line 15(a)=1000
56(j) Page 15 of 35, Line 7(a)=1000
57(j) Sum of Lines 53(j) through 56(j)
59(j) =Rate Case, Docket 4770, Compliance, Revised Rebuttal.
Att. 1, Sch 1-G, P3, L15, Col (e) = 64(j)
61(i) =20(i)
62(i) =59(j)
62(j) 61(i)-62(i)
63(j) =62(j)
64(i) =Rate Case, Docket 4770, Compliance, Revised Rebuttal. Att. 1:
64(a) * 5=12 + (Sch 6-G, P2, L30 - L41 + P3, L5(d) - P5, L4(d)
- Sch 5-G, P1, L1(e) - L1(g)) * 7=12000
64(k) 64(i)*63(j)
65(i) = - Rate Case, Docket 4770, Compliance, Revised Rebuttal
Att. 1: Sch 11-G, P5, L3(c)+L3(i)+L7(e)+L7(i)+L3(l)+L7(l)*
65(i)*63(j)
66(i) Line 66(e) - Page 2 of 35, Line 15(c)=1000
66(i)*61(i)
66(i)*61(i)
67(i) Line 67(e) - Page 5 of 35, Line 15(d)=1000
67(i)*61(i)
68(i) Line 68(e) - Page 8 of 35, Line 15(c)=1000
68(i)*61(i)
69(i) Line 69(e) - Page 12 of 35, Line 15(c)=1000
69(i)*61(i)

Line Notes

70(i) 57(j)
70(k) =70(i)*61(i)
71(k) sum of 64(k) through 70(k)
72(b) Page 18 of 35, Line 4(a)=1000
73(b) - Page 18 of 35, Line 5(a)=1000
74(b) - Page 18 of 35, Line 14(a)=1000
75(b) Page 18 of 35, Line 7(a)=1000
76(b) Sum of Lines 72(b) through 75(b)
78(b) 59(j)
80(a) 25(i)
81(a) 78(b)
81(b) 80(a)-81(a)
82(b) 81(b)
83(a) 64(i)
83(c) 83(a)*82(b)
84(a) 65(i)
84(c) 84(a)*82(b)
85(a) Line 66(i) - (Page 2 of 35, Line 15(f) through (h))=1000
85(c) =85(a)*80(a)
86(a) Line 67(i) - (Page 5 of 35, Line 15(e) through (g))=1000
86(c) =86(a)*80(a)
87(a) Line 68(i) - (Page 8 of 35, Line 15(d) through (f))=1000
87(c) =87(a)*80(a)
88(a) Line 69(i) - (Page 12 of 35, Line 15(c) through (e))=1000
88(c) =88(a)*80(a)
89(a) (Line 70(i) - (Page 15 of 35, Line 15(b) through (d))=1000
89(c) =89(a)*80(a)
90(a) =76(b)
90(c) =90(a)*80(a)
93(c) sum of 83(c) through 90(c)

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2025 Gas ISR Revenue Requirement Plan
Calculation of Weighted Average Cost of Capital

Line No.

Weighted Average Cost of Capital as approved in RIPUC Docket No. 4323 at 35% income tax rate effective
April 1, 2013

	(a)	(b)	(c)	(d)	(e)
	Ratio	Rate	Weighted Rate	Taxes	Return
Long Term Debt	49.95%	5.70%	2.85%		2.85%
Short Term Debt	0.76%	0.80%	0.01%		0.01%
Preferred Stock	0.15%	4.50%	0.01%		0.01%
Common Equity	49.14%	9.50%	4.67%	2.51%	7.18%
	100.00%		7.54%	2.51%	10.05%

9

(d) - Column (c) x 35% divided by (1 - 35%)

11

12

Weighted Average Cost of Capital as approved in RIPUC Docket No. 4323 at 21% income tax rate effective
January 1, 2018

	(a)	(b)	(c)	(d)	(e)
	Ratio	Rate	Weighted Rate	Taxes	Return
Long Term Debt	49.95%	5.70%	2.85%		2.85%
Short Term Debt	0.76%	0.80%	0.01%		0.01%
Preferred Stock	0.15%	4.50%	0.01%		0.01%
Common Equity	49.14%	9.50%	4.67%	1.24%	5.91%
	100.00%		7.54%	1.24%	8.78%

20

(d) - Column (c) x 21% divided by (1 - 21%)

22

Weighted Average Cost of Capital as approved in RIPUC Docket No. 4770 effective September 1, 2018

	(a)	(b)	(c)	(d)	(e)
	Ratio	Rate	Weighted Rate	Taxes	Return
Long Term Debt	48.35%	4.98%	2.41%		2.41%
Short Term Debt	0.60%	1.76%	0.01%		0.01%
Preferred Stock	0.10%	4.50%	0.00%		0.00%
Common Equity	50.95%	9.28%	4.73%	1.26%	5.99%
	100.00%		7.15%	1.26%	8.41%

30

(d) - Column (c) x 21% divided by (1 - 21%)

31

32

FY18 Blended Rate $\text{Line 8(e)} \times 75\% + \text{Line 20(e)} \times 25\%$ 9.73%

34

FY19 Blended Rate $\text{Line 20} \times 5 \div 12 + \text{Line 30} \times 7 \div 12$ 8.56%

35

Section 4

Rate Design

Proposed FY 2025 Gas Infrastructure,
Safety, and Reliability (“ISR”) Plan

12-Month Gas ISR Plan
April 2024 – March 2025

Section 4: Rate Design

For purposes of rate design, the revenue requirement associated with total net capital investment is allocated to rate classes based upon the most recent rate base allocator approved in the Amended Settlement Agreement in Docket No. 4770. For each rate class, the allocated revenue requirement is divided by the plan year (12-month period) forecasted therm deliveries to arrive at a per-therm factor unique to each rate class.

The proposed rate design and associated estimated typical bill impacts are provided in Section 4. The estimated bill impact of the Gas ISR Plan for the average Residential Heating customer, using 845 therms annually, would be an annual increase of \$48.28, or 2.9 percent from current bills.

Fiscal Year 2025 (12- Month) Revenue Requirement	Rate Class	Rate Base Allocator (%)	Allocation to Rate Class (\$)	Throughput (dth)	ISR Factor (dth)	ISR Factor (therm)	Uncollectible %	ISR Factor (therm)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
(1) \$74,096,163	Residential Total	66.59%	\$49,340,635	20,296,095	\$2.4310	\$0.2431	1.91%	\$0.2478
(2)	Small	8.04%	\$5,957,331	2,441,335	\$2.4401	\$0.2440	1.91%	\$0.2487
(3)	Medium	12.23%	\$9,061,961	5,733,716	\$1.5804	\$0.1580	1.91%	\$0.1610
(4)	Large LL	5.57%	\$4,127,156	2,818,841	\$1.4641	\$0.1464	1.91%	\$0.1492
(5)	Large HL	2.25%	\$1,667,164	1,219,611	\$1.3669	\$0.1366	1.91%	\$0.1392
(6)	XL-LL	0.97%	\$718,733	1,243,318	\$0.5780	\$0.0578	1.91%	\$0.0589
(7)	XL-HL	4.35%	\$3,223,183	5,806,680	\$0.5550	\$0.0555	1.91%	\$0.0565
(8)	Total	100.00%	\$74,096,163	39,559,595				
(9)								

(a) Line 1: Fiscal Year 2025 Revenue Requirement (Section 3 - Attachment 1, Page 1, Line 14, Column (b) plus Line 15, Column (b)):

Total Capital Investment Component of Revenue Requirement: \$ 77,354,638
Tax Hold Harmless Adjustment: \$ (3,258,476)
Total Net Capital Component of Revenue Requirement \$ 74,096,163

(c) Docket 4770, RI 2017 Rate Case, Compliance Attachment 14 (August 16, 2018), Schedule 2, Page 1 & 2, Line 15 (Rate Class divided by Total Company)

(d) Column (a) Line 1 * Column (c)

(e) Page 2, Column (m)

(f) Column (d) / Column (e), truncated to 4 decimal places

(g) Column (d) / (Column (e)*10), truncated to 4 decimal places

(h) Docket 4770, RI 2017 Rate Case, Compliance Attachment 2 (August 16, 2018), Schedule 22, Page 7, Line 15

(i) Column (g) / (1- Column (h)), truncated to 4 decimal places

Forecasted Throughput April 2024 - March 2025

	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Total
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
(1) Res-NH	32,187	19,181	15,066	11,411	9,821	9,916	11,756	19,364	28,991	36,373	39,590	35,202	268,859
(2) Res-H	2,337,175	909,680	696,307	428,774	410,811	422,538	555,876	1,205,908	2,644,530	3,533,690	3,946,163	2,935,785	20,027,236
(3) Small	273,437	119,396	64,181	53,839	42,906	41,461	54,301	134,790	292,388	429,522	516,898	418,215	2,441,335
(4) Medium	645,995	317,847	245,748	176,090	167,168	170,823	212,594	406,756	673,249	874,646	986,679	856,121	5,733,716
(5) Large LL	326,881	139,832	78,657	43,289	40,390	44,552	84,045	222,181	373,741	489,991	530,413	444,868	2,818,841
(6) Large HL	121,419	97,705	74,388	70,692	63,004	68,775	70,801	97,064	119,146	141,850	155,722	139,046	1,219,611
(7) X-Large LL	126,271	50,338	27,944	23,309	23,963	28,049	67,900	137,900	172,587	212,485	196,189	176,384	1,243,318
(8) X-Large HL	515,761	472,060	400,440	396,609	406,733	410,149	421,253	505,828	554,987	586,122	587,660	549,079	5,806,680
(9)	<u>4,379,125</u>	<u>2,126,038</u>	<u>1,602,731</u>	<u>1,204,013</u>	<u>1,164,796</u>	<u>1,196,263</u>	<u>1,478,526</u>	<u>2,729,792</u>	<u>4,859,619</u>	<u>6,304,679</u>	<u>6,959,313</u>	<u>5,554,699</u>	<u>39,559,595</u>

Source: Company Forecast

**Rhode Island Energy
Infrastructure, Safety, and Reliability (ISR) Filing
Bill Impact Analysis with Various Levels of Consumption:**

Residential Heating:

(1)	(2)	Annual	Proposed	Current	Difference	% Chg	GCR	Difference due to:				
								Consumption (Therms)	Rates	Rates	Difference	% Chg
(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)
		548	\$1,193.11	\$1,161.80	\$31.31	2.7%	\$0.00	\$0.00	\$30.37	\$0.00	\$0.00	\$0.94
		608	\$1,303.73	\$1,269.02	\$34.71	2.7%	\$0.00	\$0.00	\$33.67	\$0.00	\$0.00	\$1.04
		667	\$1,412.50	\$1,374.42	\$38.08	2.8%	\$0.00	\$0.00	\$36.94	\$0.00	\$0.00	\$1.14
		726	\$1,521.26	\$1,479.82	\$41.44	2.8%	\$0.00	\$0.00	\$40.20	\$0.00	\$0.00	\$1.24
		785	\$1,629.98	\$1,585.15	\$44.84	2.8%	\$0.00	\$0.00	\$43.49	\$0.00	\$0.00	\$1.35
		845	\$1,740.59	\$1,692.31	\$48.28	2.9%	\$0.00	\$0.00	\$46.83	\$0.00	\$0.00	\$1.45
		905	\$1,851.20	\$1,799.52	\$51.68	2.9%	\$0.00	\$0.00	\$50.13	\$0.00	\$0.00	\$1.55
		964	\$1,959.91	\$1,904.85	\$55.05	2.9%	\$0.00	\$0.00	\$53.40	\$0.00	\$0.00	\$1.65
		1,023	\$2,068.69	\$2,010.27	\$58.41	2.9%	\$0.00	\$0.00	\$56.66	\$0.00	\$0.00	\$1.75
		1,082	\$2,177.44	\$2,115.64	\$61.79	2.9%	\$0.00	\$0.00	\$59.94	\$0.00	\$0.00	\$1.85
		1,142	\$2,288.09	\$2,222.85	\$65.24	2.9%	\$0.00	\$0.00	\$63.28	\$0.00	\$0.00	\$1.96

Residential Heating Low Income:

(16)	(17)	Annual	Proposed	Current	Difference	% Chg	GCR	Low Income Discount	Difference due to:				
									Consumption (Therms)	Rates	Rates	Difference	% Chg
(18)	(19)	(20)	(21)	(22)	(23)	(24)	(25)	(26)	(27)	(28)	(29)	(30)	
		548	\$884.88	\$861.40	\$23.48	2.7%	\$0.00	(\$7.59)	\$0.00	\$30.37	\$0.00	\$0.70	
		608	\$966.74	\$940.71	\$26.03	2.8%	\$0.00	(\$8.42)	\$0.00	\$33.67	\$0.00	\$0.78	
		667	\$1,047.25	\$1,018.69	\$28.56	2.8%	\$0.00	(\$9.23)	\$0.00	\$36.94	\$0.00	\$0.86	
		726	\$1,127.76	\$1,096.68	\$31.08	2.8%	\$0.00	(\$10.05)	\$0.00	\$40.20	\$0.00	\$0.93	
		785	\$1,208.21	\$1,174.58	\$33.63	2.9%	\$0.00	(\$10.87)	\$0.00	\$43.49	\$0.00	\$1.01	
		845	\$1,290.09	\$1,253.88	\$36.21	2.9%	\$0.00	(\$11.71)	\$0.00	\$46.83	\$0.00	\$1.09	
		905	\$1,371.96	\$1,333.20	\$38.76	2.9%	\$0.00	(\$12.53)	\$0.00	\$50.13	\$0.00	\$1.16	
		964	\$1,452.41	\$1,411.12	\$41.29	2.9%	\$0.00	(\$13.35)	\$0.00	\$53.40	\$0.00	\$1.24	
		1,023	\$1,532.92	\$1,489.11	\$43.81	2.9%	\$0.00	(\$14.17)	\$0.00	\$56.66	\$0.00	\$1.31	
		1,082	\$1,613.42	\$1,567.08	\$46.35	3.0%	\$0.00	(\$14.99)	\$0.00	\$59.94	\$0.00	\$1.39	
		1,142	\$1,695.31	\$1,646.38	\$48.93	3.0%	\$0.00	(\$15.82)	\$0.00	\$63.28	\$0.00	\$1.47	

Note: Bill Impacts are based on rates approved and currently in effect as of November 1, 2023

**Rhode Island Energy
Infrastructure, Safety, and Reliability (ISR) Filing
Bill Impact Analysis with Various Levels of Consumption:**

Residential Non-Heating:

(31)	(32)	Annual Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	GCR	Difference due to:				
								DAC		EE	LIHEAP	GET
(33)	(34)						Base DAC	ISR				
(35)		144	\$446.32	\$438.08	\$8.24	1.9%	\$0.00	\$0.00	\$7.99	\$0.00	\$0.00	\$0.25
(36)		158	\$471.94	\$462.91	\$9.03	2.0%	\$0.00	\$0.00	\$8.76	\$0.00	\$0.00	\$0.27
(37)		172	\$497.53	\$487.73	\$9.80	2.0%	\$0.00	\$0.00	\$9.51	\$0.00	\$0.00	\$0.29
(38)		189	\$528.61	\$517.83	\$10.78	2.1%	\$0.00	\$0.00	\$10.46	\$0.00	\$0.00	\$0.32
(39)		202	\$552.41	\$540.88	\$11.54	2.1%	\$0.00	\$0.00	\$11.19	\$0.00	\$0.00	\$0.35
(40)		220	\$585.29	\$572.72	\$12.57	2.2%	\$0.00	\$0.00	\$12.19	\$0.00	\$0.00	\$0.38
(41)		238	\$618.26	\$604.66	\$13.60	2.2%	\$0.00	\$0.00	\$13.19	\$0.00	\$0.00	\$0.41
(42)		251	\$642.04	\$627.69	\$14.35	2.3%	\$0.00	\$0.00	\$13.92	\$0.00	\$0.00	\$0.43
(43)		268	\$673.11	\$657.79	\$15.32	2.3%	\$0.00	\$0.00	\$14.86	\$0.00	\$0.00	\$0.46
(44)		282	\$698.69	\$682.60	\$16.09	2.4%	\$0.00	\$0.00	\$15.61	\$0.00	\$0.00	\$0.48
(45)		297	\$726.12	\$709.17	\$16.95	2.4%	\$0.00	\$0.00	\$16.44	\$0.00	\$0.00	\$0.51

Residential Non-Heating Low Income:

(46)	(47)	Annual Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	GCR	Low Income Discount	Difference due to:				
									DAC		EE	LIHEAP	GET
(48)	(49)						Base DAC	ISR					
(50)		144	\$332.12	\$325.95	\$6.18	1.9%	\$0.00	(\$2.00)	\$0.00	\$7.99	\$0.00	\$0.00	\$0.19
(51)		158	\$351.08	\$344.30	\$6.77	2.0%	\$0.00	(\$2.19)	\$0.00	\$8.76	\$0.00	\$0.00	\$0.20
(52)		172	\$370.00	\$362.65	\$7.35	2.0%	\$0.00	(\$2.38)	\$0.00	\$9.51	\$0.00	\$0.00	\$0.22
(53)		189	\$393.02	\$384.93	\$8.09	2.1%	\$0.00	(\$2.61)	\$0.00	\$10.46	\$0.00	\$0.00	\$0.24
(54)		202	\$410.63	\$401.98	\$8.65	2.2%	\$0.00	(\$2.80)	\$0.00	\$11.19	\$0.00	\$0.00	\$0.26
(55)		220	\$434.97	\$425.54	\$9.43	2.2%	\$0.00	(\$3.05)	\$0.00	\$12.19	\$0.00	\$0.00	\$0.28
(56)		238	\$459.36	\$449.17	\$10.20	2.3%	\$0.00	(\$3.30)	\$0.00	\$13.19	\$0.00	\$0.00	\$0.31
(57)		251	\$476.96	\$466.20	\$10.76	2.3%	\$0.00	(\$3.48)	\$0.00	\$13.92	\$0.00	\$0.00	\$0.32
(58)		268	\$499.96	\$488.47	\$11.49	2.4%	\$0.00	(\$3.72)	\$0.00	\$14.86	\$0.00	\$0.00	\$0.34
(59)		282	\$518.88	\$506.81	\$12.07	2.4%	\$0.00	(\$3.90)	\$0.00	\$15.61	\$0.00	\$0.00	\$0.36
(60)		297	\$539.21	\$526.50	\$12.71	2.4%	\$0.00	(\$4.11)	\$0.00	\$16.44	\$0.00	\$0.00	\$0.38

Note: Bill Impacts are based on rates approved and currently in effect as of November 1, 2023

**Rhode Island Energy
Infrastructure, Safety, and Reliability (ISR) Filing
Bill Impact Analysis with Various Levels of Consumption:**

C & I Small:

	Annual Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	GCR	Difference due to:				
							Base DAC	ISR	EE	LIHEAP	GET
(61)											
(62)											
(63)											
(64)											
(65)	830	\$1,743.97	\$1,693.75	\$50.23	3.0%	\$0.00	\$0.00	\$48.72	\$0.00	\$0.00	\$1.51
(66)	919	\$1,896.75	\$1,841.11	\$55.64	3.0%	\$0.00	\$0.00	\$53.97	\$0.00	\$0.00	\$1.67
(67)	1,010	\$2,052.95	\$1,991.82	\$61.12	3.1%	\$0.00	\$0.00	\$59.29	\$0.00	\$0.00	\$1.83
(68)	1,099	\$2,205.73	\$2,139.22	\$66.51	3.1%	\$0.00	\$0.00	\$64.51	\$0.00	\$0.00	\$2.00
(69)	1,187	\$2,356.87	\$2,285.04	\$71.84	3.1%	\$0.00	\$0.00	\$69.68	\$0.00	\$0.00	\$2.16
(70)	1,277	\$2,511.34	\$2,434.05	\$77.29	3.2%	\$0.00	\$0.00	\$74.97	\$0.00	\$0.00	\$2.32
(71)	1,367	\$2,665.75	\$2,583.03	\$82.71	3.2%	\$0.00	\$0.00	\$80.23	\$0.00	\$0.00	\$2.48
(72)	1,456	\$2,818.58	\$2,730.46	\$88.11	3.2%	\$0.00	\$0.00	\$85.47	\$0.00	\$0.00	\$2.64
(73)	1,544	\$2,969.69	\$2,876.27	\$93.42	3.2%	\$0.00	\$0.00	\$90.62	\$0.00	\$0.00	\$2.80
(74)	1,635	\$3,125.93	\$3,026.98	\$98.95	3.3%	\$0.00	\$0.00	\$95.98	\$0.00	\$0.00	\$2.97
(75)	1,725	\$3,280.38	\$3,175.99	\$104.39	3.3%	\$0.00	\$0.00	\$101.26	\$0.00	\$0.00	\$3.13

C & I Medium:

	Annual Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	GCR	Difference due to:				
							Base DAC	ISR	EE	LIHEAP	GET
(76)											
(77)											
(78)											
(79)											
(80)	6,907	\$11,256.64	\$10,998.15	\$258.48	2.4%	\$0.00	\$0.00	\$250.73	\$0.00	\$0.00	\$7.75
(81)	7,650	\$12,353.53	\$12,067.26	\$286.27	2.4%	\$0.00	\$0.00	\$277.68	\$0.00	\$0.00	\$8.59
(82)	8,391	\$13,446.99	\$13,132.96	\$314.03	2.4%	\$0.00	\$0.00	\$304.61	\$0.00	\$0.00	\$9.42
(83)	9,136	\$14,546.63	\$14,204.76	\$341.88	2.4%	\$0.00	\$0.00	\$331.62	\$0.00	\$0.00	\$10.26
(84)	9,880	\$15,644.92	\$15,275.15	\$369.77	2.4%	\$0.00	\$0.00	\$358.68	\$0.00	\$0.00	\$11.09
(85)	10,623	\$16,741.79	\$16,344.24	\$397.55	2.4%	\$0.00	\$0.00	\$385.62	\$0.00	\$0.00	\$11.93
(86)	11,366	\$17,838.64	\$17,413.30	\$425.34	2.4%	\$0.00	\$0.00	\$412.58	\$0.00	\$0.00	\$12.76
(87)	12,111	\$18,938.28	\$18,485.05	\$453.23	2.5%	\$0.00	\$0.00	\$439.63	\$0.00	\$0.00	\$13.60
(88)	12,855	\$20,036.61	\$19,555.53	\$481.08	2.5%	\$0.00	\$0.00	\$466.65	\$0.00	\$0.00	\$14.43
(89)	13,596	\$21,130.08	\$20,621.28	\$508.79	2.5%	\$0.00	\$0.00	\$493.53	\$0.00	\$0.00	\$15.26
(90)	14,340	\$22,228.31	\$21,691.67	\$536.64	2.5%	\$0.00	\$0.00	\$520.54	\$0.00	\$0.00	\$16.10

Note: Bill Impacts are based on rates approved and currently in effect as of November 1, 2023

**Rhode Island Energy
Infrastructure, Safety, and Reliability (ISR) Filing
Bill Impact Analysis with Various Levels of Consumption:**

C & ILLF Large:

(91)	(92)	Annual	Proposed	Current	Difference	% Chg	GCR	Difference due to:													
								Consumption (Therms)	Rates	Rates	Difference	% Chg	Base DAC	ISR	EE	LIHEAP	GET				
(93)	(94)																				
(95)		37,587	\$54,576.13	\$53,200.52	\$1,375.61	2.6%	\$0.00	\$0.00	\$1,334.34	\$0.00	\$0.00	\$41.27									
(96)		41,634	\$60,184.55	\$58,660.81	\$1,523.74	2.6%	\$0.00	\$0.00	\$1,478.03	\$0.00	\$0.00	\$45.71									
(97)		45,683	\$65,796.17	\$64,124.29	\$1,671.88	2.6%	\$0.00	\$0.00	\$1,621.72	\$0.00	\$0.00	\$50.16									
(98)		49,731	\$71,406.51	\$69,586.46	\$1,820.05	2.6%	\$0.00	\$0.00	\$1,765.45	\$0.00	\$0.00	\$54.60									
(99)		53,777	\$77,013.69	\$75,045.57	\$1,968.12	2.6%	\$0.00	\$0.00	\$1,909.08	\$0.00	\$0.00	\$59.04									
(100)		57,825	\$82,624.02	\$80,507.75	\$2,116.27	2.6%	\$0.00	\$0.00	\$2,052.78	\$0.00	\$0.00	\$63.49									
(101)		61,873	\$88,234.41	\$85,970.00	\$2,264.41	2.6%	\$0.00	\$0.00	\$2,196.48	\$0.00	\$0.00	\$67.93									
(102)		65,920	\$93,842.78	\$91,430.26	\$2,412.52	2.6%	\$0.00	\$0.00	\$2,340.14	\$0.00	\$0.00	\$72.38									
(103)		69,967	\$99,451.85	\$96,891.25	\$2,560.61	2.6%	\$0.00	\$0.00	\$2,483.79	\$0.00	\$0.00	\$76.82									
(104)		74,016	\$105,063.50	\$102,354.64	\$2,708.87	2.6%	\$0.00	\$0.00	\$2,627.60	\$0.00	\$0.00	\$81.27									
(105)		78,063	\$110,671.93	\$107,814.96	\$2,856.97	2.6%	\$0.00	\$0.00	\$2,771.26	\$0.00	\$0.00	\$85.71									

C & IHLF Large:

(106)	(107)	Annual	Proposed	Current	Difference	% Chg	GCR	Difference due to:													
								Consumption (Therms)	Rates	Rates	Difference	% Chg	Base DAC	ISR	EE	LIHEAP	GET				
(108)	(109)																				
(110)		41,956	\$53,066.11	\$51,249.48	\$1,816.63	3.5%	\$0.00	\$0.00	\$1,762.13	\$0.00	\$0.00	\$54.50									
(111)		46,471	\$58,509.61	\$56,497.44	\$2,012.16	3.6%	\$0.00	\$0.00	\$1,951.80	\$0.00	\$0.00	\$60.36									
(112)		50,991	\$63,958.54	\$61,750.67	\$2,207.87	3.6%	\$0.00	\$0.00	\$2,141.63	\$0.00	\$0.00	\$66.24									
(113)		55,507	\$69,403.11	\$66,999.71	\$2,403.40	3.6%	\$0.00	\$0.00	\$2,331.30	\$0.00	\$0.00	\$72.10									
(114)		60,028	\$74,853.25	\$72,254.09	\$2,599.16	3.6%	\$0.00	\$0.00	\$2,521.19	\$0.00	\$0.00	\$77.97									
(115)		64,545	\$80,298.90	\$77,504.15	\$2,794.75	3.6%	\$0.00	\$0.00	\$2,710.91	\$0.00	\$0.00	\$83.84									
(116)		69,062	\$85,744.55	\$82,754.25	\$2,990.30	3.6%	\$0.00	\$0.00	\$2,900.59	\$0.00	\$0.00	\$89.71									
(117)		73,583	\$91,194.73	\$88,008.66	\$3,186.06	3.6%	\$0.00	\$0.00	\$3,090.48	\$0.00	\$0.00	\$95.58									
(118)		78,099	\$96,639.30	\$93,257.67	\$3,381.63	3.6%	\$0.00	\$0.00	\$3,280.18	\$0.00	\$0.00	\$101.45									
(119)		82,619	\$102,088.26	\$98,510.96	\$3,577.30	3.6%	\$0.00	\$0.00	\$3,469.98	\$0.00	\$0.00	\$107.32									
(120)		87,137	\$107,536.00	\$103,763.04	\$3,772.96	3.6%	\$0.00	\$0.00	\$3,659.77	\$0.00	\$0.00	\$113.19									

Note: Bill Impacts are based on rates approved and currently in effect as of November 1, 2023

**Rhode Island Energy
Infrastructure, Safety, and Reliability (ISR) Filing
Bill Impact Analysis with Various Levels of Consumption:**

C & ILLF Extra-Large:

(121)	(122)	Annual Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	GCR	Difference due to:				
								DAC			EE	LIHEAP
(123)	(124)						Base DAC	ISR				
(125)		233,835	\$250,986.48	\$247,587.44	\$3,399.04	1.4%	\$0.00	\$0.00	\$3,297.07	\$0.00	\$0.00	\$101.97
(126)		259,019	\$277,350.22	\$273,585.11	\$3,765.11	1.4%	\$0.00	\$0.00	\$3,652.16	\$0.00	\$0.00	\$112.95
(127)		284,197	\$303,708.28	\$299,577.15	\$4,131.12	1.4%	\$0.00	\$0.00	\$4,007.19	\$0.00	\$0.00	\$123.93
(128)		309,381	\$330,071.99	\$325,574.80	\$4,497.19	1.4%	\$0.00	\$0.00	\$4,362.27	\$0.00	\$0.00	\$134.92
(129)		334,562	\$356,432.89	\$351,569.68	\$4,863.21	1.4%	\$0.00	\$0.00	\$4,717.31	\$0.00	\$0.00	\$145.90
(130)		359,745	\$382,795.68	\$377,566.40	\$5,229.28	1.4%	\$0.00	\$0.00	\$5,072.40	\$0.00	\$0.00	\$156.88
(131)		384,928	\$409,158.46	\$403,563.12	\$5,595.34	1.4%	\$0.00	\$0.00	\$5,427.48	\$0.00	\$0.00	\$167.86
(132)		410,110	\$435,520.27	\$429,558.89	\$5,961.37	1.4%	\$0.00	\$0.00	\$5,782.53	\$0.00	\$0.00	\$178.84
(133)		435,293	\$461,883.07	\$455,555.62	\$6,327.44	1.4%	\$0.00	\$0.00	\$6,137.62	\$0.00	\$0.00	\$189.82
(134)		460,471	\$488,241.16	\$481,547.72	\$6,693.44	1.4%	\$0.00	\$0.00	\$6,492.64	\$0.00	\$0.00	\$200.80
(135)		485,655	\$514,604.87	\$507,545.32	\$7,059.55	1.4%	\$0.00	\$0.00	\$6,847.76	\$0.00	\$0.00	\$211.79

C & IHLF Extra-Large:

(136)	(137)	Annual Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	GCR	Difference due to:				
								DAC			EE	LIHEAP
(138)	(139)						Base DAC	ISR				
(140)		486,528	\$475,961.43	\$469,842.23	\$6,119.20	1.3%	\$0.00	\$0.00	\$5,935.62	\$0.00	\$0.00	\$183.58
(141)		538,924	\$526,552.63	\$519,774.39	\$6,778.24	1.3%	\$0.00	\$0.00	\$6,574.89	\$0.00	\$0.00	\$203.35
(142)		591,320	\$577,142.93	\$569,705.71	\$7,437.22	1.3%	\$0.00	\$0.00	\$7,214.10	\$0.00	\$0.00	\$223.12
(143)		643,718	\$627,735.79	\$619,639.57	\$8,096.23	1.3%	\$0.00	\$0.00	\$7,853.34	\$0.00	\$0.00	\$242.89
(144)		696,109	\$678,321.68	\$669,566.51	\$8,755.18	1.3%	\$0.00	\$0.00	\$8,492.52	\$0.00	\$0.00	\$262.66
(145)		748,506	\$728,913.71	\$719,499.50	\$9,414.21	1.3%	\$0.00	\$0.00	\$9,131.78	\$0.00	\$0.00	\$282.43
(146)		800,903	\$779,505.67	\$769,432.44	\$10,073.24	1.3%	\$0.00	\$0.00	\$9,771.04	\$0.00	\$0.00	\$302.20
(147)		853,294	\$830,091.59	\$819,359.44	\$10,732.14	1.3%	\$0.00	\$0.00	\$10,410.18	\$0.00	\$0.00	\$321.96
(148)		905,692	\$880,684.47	\$869,293.30	\$11,391.18	1.3%	\$0.00	\$0.00	\$11,049.44	\$0.00	\$0.00	\$341.74
(149)		958,088	\$931,274.80	\$919,224.60	\$12,050.20	1.3%	\$0.00	\$0.00	\$11,688.69	\$0.00	\$0.00	\$361.51
(150)		1,010,485	\$981,866.78	\$969,157.57	\$12,709.21	1.3%	\$0.00	\$0.00	\$12,327.93	\$0.00	\$0.00	\$381.28

Note: Bill Impacts are based on rates approved and currently in effect as of November 1, 2023

**Rhode Island Energy
Infrastructure, Safety, and Reliability (ISR) Filing
Bill Impact Analysis with Various Levels of Consumption:**

Residential Heating:

	Annual Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	GCR	Difference due to:					
							DAC					
							Base DAC	ISR	EE	LIHEAP	GET	
(1)												
(2)												
(3)												
(4)												
(5)	548	\$1,214.03	\$1,161.80	\$52.24	4.5%	\$0.00	\$0.00	\$50.67	\$0.00	\$0.00	\$1.57	
(6)	608	\$1,326.94	\$1,269.02	\$57.92	4.6%	\$0.00	\$0.00	\$56.18	\$0.00	\$0.00	\$1.74	
(7)	667	\$1,437.96	\$1,374.42	\$63.54	4.6%	\$0.00	\$0.00	\$61.63	\$0.00	\$0.00	\$1.91	
(8)	726	\$1,548.97	\$1,479.82	\$69.14	4.7%	\$0.00	\$0.00	\$67.07	\$0.00	\$0.00	\$2.07	
(9)	785	\$1,659.93	\$1,585.15	\$74.78	4.7%	\$0.00	\$0.00	\$72.54	\$0.00	\$0.00	\$2.24	
(10)	845	\$1,772.81	\$1,692.31	\$80.49	4.8%	\$0.00	\$0.00	\$78.08	\$0.00	\$0.00	\$2.41	
(11)	905	\$1,885.71	\$1,799.52	\$86.20	4.8%	\$0.00	\$0.00	\$83.61	\$0.00	\$0.00	\$2.59	
(12)	964	\$1,996.69	\$1,904.85	\$91.84	4.8%	\$0.00	\$0.00	\$89.08	\$0.00	\$0.00	\$2.76	
(13)	1,023	\$2,107.70	\$2,010.27	\$97.42	4.8%	\$0.00	\$0.00	\$94.50	\$0.00	\$0.00	\$2.92	
(14)	1,082	\$2,218.69	\$2,115.64	\$103.05	4.9%	\$0.00	\$0.00	\$99.96	\$0.00	\$0.00	\$3.09	
(15)	1,142	\$2,331.62	\$2,222.85	\$108.77	4.9%	\$0.00	\$0.00	\$105.51	\$0.00	\$0.00	\$3.26	

Residential Heating Low Income:

	Annual Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	GCR	Difference due to:					
							Low Income Discount	DAC				
							Base DAC	ISR	EE	LIHEAP	GET	
(16)												
(17)												
(18)												
(19)												
(20)	548	\$900.57	\$861.40	\$39.18	4.5%	\$0.00	(\$12.67)	\$0.00	\$50.67	\$0.00	\$0.00	\$1.18
(21)	608	\$984.15	\$940.71	\$43.44	4.6%	\$0.00	(\$14.05)	\$0.00	\$56.18	\$0.00	\$0.00	\$1.30
(22)	667	\$1,066.34	\$1,018.69	\$47.65	4.7%	\$0.00	(\$15.41)	\$0.00	\$61.63	\$0.00	\$0.00	\$1.43
(23)	726	\$1,148.53	\$1,096.68	\$51.86	4.7%	\$0.00	(\$16.77)	\$0.00	\$67.07	\$0.00	\$0.00	\$1.56
(24)	785	\$1,230.67	\$1,174.58	\$56.09	4.8%	\$0.00	(\$18.13)	\$0.00	\$72.54	\$0.00	\$0.00	\$1.68
(25)	845	\$1,314.25	\$1,253.88	\$60.37	4.8%	\$0.00	(\$19.52)	\$0.00	\$78.08	\$0.00	\$0.00	\$1.81
(26)	905	\$1,397.85	\$1,333.20	\$64.65	4.8%	\$0.00	(\$20.90)	\$0.00	\$83.61	\$0.00	\$0.00	\$1.94
(27)	964	\$1,480.00	\$1,411.12	\$68.88	4.9%	\$0.00	(\$22.27)	\$0.00	\$89.08	\$0.00	\$0.00	\$2.07
(28)	1,023	\$1,562.18	\$1,489.11	\$73.07	4.9%	\$0.00	(\$23.63)	\$0.00	\$94.50	\$0.00	\$0.00	\$2.19
(29)	1,082	\$1,644.37	\$1,567.08	\$77.29	4.9%	\$0.00	(\$24.99)	\$0.00	\$99.96	\$0.00	\$0.00	\$2.32
(30)	1,142	\$1,727.96	\$1,646.38	\$81.58	5.0%	\$0.00	(\$26.38)	\$0.00	\$105.51	\$0.00	\$0.00	\$2.45

Note: Bill Impacts are based on rates approved and currently in effect as of November 1, 2023

**Rhode Island Energy
Infrastructure, Safety, and Reliability (ISR) Filing
Bill Impact Analysis with Various Levels of Consumption:**

Residential Non-Heating:

	Annual Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	GCR	Difference due to:					
							Base DAC	ISR	EE	LIHEAP	GET	
(31)												
(32)												
(33)												
(34)												
(35)	144	\$451.82	\$438.08	\$13.74	3.1%	\$0.00	\$0.00	\$13.33	\$0.00	\$0.00	\$0.00	\$0.41
(36)	158	\$477.95	\$462.91	\$15.04	3.2%	\$0.00	\$0.00	\$14.59	\$0.00	\$0.00	\$0.00	\$0.45
(37)	172	\$504.11	\$487.73	\$16.38	3.4%	\$0.00	\$0.00	\$15.89	\$0.00	\$0.00	\$0.00	\$0.49
(38)	189	\$535.83	\$517.83	\$18.00	3.5%	\$0.00	\$0.00	\$17.46	\$0.00	\$0.00	\$0.00	\$0.54
(39)	202	\$560.11	\$540.88	\$19.24	3.6%	\$0.00	\$0.00	\$18.66	\$0.00	\$0.00	\$0.00	\$0.58
(40)	220	\$593.68	\$572.72	\$20.96	3.7%	\$0.00	\$0.00	\$20.33	\$0.00	\$0.00	\$0.00	\$0.63
(41)	238	\$627.33	\$604.66	\$22.67	3.7%	\$0.00	\$0.00	\$21.99	\$0.00	\$0.00	\$0.00	\$0.68
(42)	251	\$651.61	\$627.69	\$23.92	3.8%	\$0.00	\$0.00	\$23.20	\$0.00	\$0.00	\$0.00	\$0.72
(43)	268	\$683.33	\$657.79	\$25.54	3.9%	\$0.00	\$0.00	\$24.77	\$0.00	\$0.00	\$0.00	\$0.77
(44)	282	\$709.44	\$682.60	\$26.85	3.9%	\$0.00	\$0.00	\$26.04	\$0.00	\$0.00	\$0.00	\$0.81
(45)	297	\$737.47	\$709.17	\$28.30	4.0%	\$0.00	\$0.00	\$27.45	\$0.00	\$0.00	\$0.00	\$0.85

Residential Non-Heating Low Income:

	Annual Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	GCR	Difference due to:					
							Low Income Discount	Base DAC	ISR	EE	LIHEAP	GET
(46)												
(47)												
(48)												
(49)												
(50)	144	\$336.25	\$325.95	\$10.31	3.2%	\$0.00	(\$3.33)	\$0.00	\$13.33	\$0.00	\$0.00	\$0.31
(51)	158	\$355.59	\$344.30	\$11.28	3.3%	\$0.00	(\$3.65)	\$0.00	\$14.59	\$0.00	\$0.00	\$0.34
(52)	172	\$374.93	\$362.65	\$12.29	3.4%	\$0.00	(\$3.97)	\$0.00	\$15.89	\$0.00	\$0.00	\$0.37
(53)	189	\$398.43	\$384.93	\$13.50	3.5%	\$0.00	(\$4.37)	\$0.00	\$17.46	\$0.00	\$0.00	\$0.41
(54)	202	\$416.40	\$401.98	\$14.43	3.6%	\$0.00	(\$4.66)	\$0.00	\$18.66	\$0.00	\$0.00	\$0.43
(55)	220	\$441.26	\$425.54	\$15.72	3.7%	\$0.00	(\$5.08)	\$0.00	\$20.33	\$0.00	\$0.00	\$0.47
(56)	238	\$466.17	\$449.17	\$17.00	3.8%	\$0.00	(\$5.50)	\$0.00	\$21.99	\$0.00	\$0.00	\$0.51
(57)	251	\$484.14	\$466.20	\$17.94	3.8%	\$0.00	(\$5.80)	\$0.00	\$23.20	\$0.00	\$0.00	\$0.54
(58)	268	\$507.62	\$488.47	\$19.15	3.9%	\$0.00	(\$6.19)	\$0.00	\$24.77	\$0.00	\$0.00	\$0.57
(59)	282	\$526.95	\$506.81	\$20.13	4.0%	\$0.00	(\$6.51)	\$0.00	\$26.04	\$0.00	\$0.00	\$0.60
(60)	297	\$547.72	\$526.50	\$21.22	4.0%	\$0.00	(\$6.86)	\$0.00	\$27.45	\$0.00	\$0.00	\$0.64

Note: Bill Impacts are based on rates approved and currently in effect as of November 1, 2023

**Rhode Island Energy
Infrastructure, Safety, and Reliability (ISR) Filing
Bill Impact Analysis with Various Levels of Consumption:**

C & I Small:

	Annual Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	GCR	Difference due to:				
							DAC			EE	LIHEAP
							Base DAC	ISR	EE	LIHEAP	GET
(61)											
(62)											
(63)											
(64)											
(65)	830	\$1,775.78	\$1,693.75	\$82.03	4.8%	\$0.00	\$0.00	\$79.57	\$0.00	\$0.00	\$2.46
(66)	919	\$1,931.97	\$1,841.11	\$90.86	4.9%	\$0.00	\$0.00	\$88.13	\$0.00	\$0.00	\$2.73
(67)	1,010	\$2,091.68	\$1,991.82	\$99.86	5.0%	\$0.00	\$0.00	\$96.86	\$0.00	\$0.00	\$3.00
(68)	1,099	\$2,247.88	\$2,139.22	\$108.66	5.1%	\$0.00	\$0.00	\$105.40	\$0.00	\$0.00	\$3.26
(69)	1,187	\$2,402.39	\$2,285.04	\$117.35	5.1%	\$0.00	\$0.00	\$113.83	\$0.00	\$0.00	\$3.52
(70)	1,277	\$2,560.29	\$2,434.05	\$126.25	5.2%	\$0.00	\$0.00	\$122.46	\$0.00	\$0.00	\$3.79
(71)	1,367	\$2,718.18	\$2,583.03	\$135.14	5.2%	\$0.00	\$0.00	\$131.09	\$0.00	\$0.00	\$4.05
(72)	1,456	\$2,874.39	\$2,730.46	\$143.93	5.3%	\$0.00	\$0.00	\$139.61	\$0.00	\$0.00	\$4.32
(73)	1,544	\$3,028.92	\$2,876.27	\$152.65	5.3%	\$0.00	\$0.00	\$148.07	\$0.00	\$0.00	\$4.58
(74)	1,635	\$3,188.64	\$3,026.98	\$161.66	5.3%	\$0.00	\$0.00	\$156.81	\$0.00	\$0.00	\$4.85
(75)	1,725	\$3,346.56	\$3,175.99	\$170.57	5.4%	\$0.00	\$0.00	\$165.45	\$0.00	\$0.00	\$5.12

C & I Medium:

	Annual Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	GCR	Difference due to:				
							DAC			EE	LIHEAP
							Base DAC	ISR	EE	LIHEAP	GET
(76)											
(77)											
(78)											
(79)											
(80)	6,907	\$11,428.25	\$10,998.15	\$430.10	3.9%	\$0.00	\$0.00	\$417.20	\$0.00	\$0.00	\$12.90
(81)	7,650	\$12,543.60	\$12,067.26	\$476.34	3.9%	\$0.00	\$0.00	\$462.05	\$0.00	\$0.00	\$14.29
(82)	8,391	\$13,655.49	\$13,132.96	\$522.53	4.0%	\$0.00	\$0.00	\$506.85	\$0.00	\$0.00	\$15.68
(83)	9,136	\$14,773.63	\$14,204.76	\$568.88	4.0%	\$0.00	\$0.00	\$551.81	\$0.00	\$0.00	\$17.07
(84)	9,880	\$15,890.38	\$15,275.15	\$615.23	4.0%	\$0.00	\$0.00	\$596.77	\$0.00	\$0.00	\$18.46
(85)	10,623	\$17,005.69	\$16,344.24	\$661.45	4.0%	\$0.00	\$0.00	\$641.61	\$0.00	\$0.00	\$19.84
(86)	11,366	\$18,121.04	\$17,413.30	\$707.74	4.1%	\$0.00	\$0.00	\$686.51	\$0.00	\$0.00	\$21.23
(87)	12,111	\$19,239.18	\$18,485.05	\$754.12	4.1%	\$0.00	\$0.00	\$731.50	\$0.00	\$0.00	\$22.62
(88)	12,855	\$20,355.97	\$19,555.53	\$800.44	4.1%	\$0.00	\$0.00	\$776.43	\$0.00	\$0.00	\$24.01
(89)	13,596	\$21,467.84	\$20,621.28	\$846.56	4.1%	\$0.00	\$0.00	\$821.16	\$0.00	\$0.00	\$25.40
(90)	14,340	\$22,584.59	\$21,691.67	\$892.92	4.1%	\$0.00	\$0.00	\$866.13	\$0.00	\$0.00	\$26.79

Note: Bill Impacts are based on rates approved and currently in effect as of November 1, 2023

**Rhode Island Energy
Infrastructure, Safety, and Reliability (ISR) Filing
Bill Impact Analysis with Various Levels of Consumption:**

C & ILLF Large:

(91)	(92)	Annual Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	GCR	Difference due to:				
								DAC		EE	LIHEAP	GET
(93)	(94)						Base DAC	ISR				
(95)		37,587	\$55,440.23	\$53,200.52	\$2,239.71	4.2%	\$0.00	\$0.00	\$2,172.52	\$0.00	\$0.00	\$67.19
(96)		41,634	\$61,141.68	\$58,660.81	\$2,480.88	4.2%	\$0.00	\$0.00	\$2,406.45	\$0.00	\$0.00	\$74.43
(97)		45,683	\$66,846.39	\$64,124.29	\$2,722.10	4.2%	\$0.00	\$0.00	\$2,640.44	\$0.00	\$0.00	\$81.66
(98)		49,731	\$72,549.80	\$69,586.46	\$2,963.34	4.3%	\$0.00	\$0.00	\$2,874.44	\$0.00	\$0.00	\$88.90
(99)		53,777	\$78,250.00	\$75,045.57	\$3,204.43	4.3%	\$0.00	\$0.00	\$3,108.30	\$0.00	\$0.00	\$96.13
(100)		57,825	\$83,953.39	\$80,507.75	\$3,445.64	4.3%	\$0.00	\$0.00	\$3,342.27	\$0.00	\$0.00	\$103.37
(101)		61,873	\$89,656.85	\$85,970.00	\$3,686.86	4.3%	\$0.00	\$0.00	\$3,576.25	\$0.00	\$0.00	\$110.61
(102)		65,920	\$95,358.28	\$91,430.26	\$3,928.02	4.3%	\$0.00	\$0.00	\$3,810.18	\$0.00	\$0.00	\$117.84
(103)		69,967	\$101,060.37	\$96,891.25	\$4,169.12	4.3%	\$0.00	\$0.00	\$4,044.05	\$0.00	\$0.00	\$125.07
(104)		74,016	\$106,765.09	\$102,354.64	\$4,410.45	4.3%	\$0.00	\$0.00	\$4,278.14	\$0.00	\$0.00	\$132.31
(105)		78,063	\$112,466.54	\$107,814.96	\$4,651.59	4.3%	\$0.00	\$0.00	\$4,512.04	\$0.00	\$0.00	\$139.55

C & IHLF Large:

(106)	(107)	Annual Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	GCR	Difference due to:				
								DAC		EE	LIHEAP	GET
(108)	(109)						Base DAC	ISR				
(110)		41,956	\$53,970.11	\$51,249.48	\$2,720.63	5.3%	\$0.00	\$0.00	\$2,639.01	\$0.00	\$0.00	\$81.62
(111)		46,471	\$59,510.88	\$56,497.44	\$3,013.43	5.3%	\$0.00	\$0.00	\$2,923.03	\$0.00	\$0.00	\$90.40
(112)		50,991	\$65,057.19	\$61,750.67	\$3,306.52	5.4%	\$0.00	\$0.00	\$3,207.32	\$0.00	\$0.00	\$99.20
(113)		55,507	\$70,599.09	\$66,999.71	\$3,599.38	5.4%	\$0.00	\$0.00	\$3,491.40	\$0.00	\$0.00	\$107.98
(114)		60,028	\$76,146.62	\$72,254.09	\$3,892.54	5.4%	\$0.00	\$0.00	\$3,775.76	\$0.00	\$0.00	\$116.78
(115)		64,545	\$81,689.61	\$77,504.15	\$4,185.46	5.4%	\$0.00	\$0.00	\$4,059.90	\$0.00	\$0.00	\$125.56
(116)		69,062	\$87,232.60	\$82,754.25	\$4,478.35	5.4%	\$0.00	\$0.00	\$4,344.00	\$0.00	\$0.00	\$134.35
(117)		73,583	\$92,780.18	\$88,008.66	\$4,771.52	5.4%	\$0.00	\$0.00	\$4,628.37	\$0.00	\$0.00	\$143.15
(118)		78,099	\$98,322.06	\$93,257.67	\$5,064.39	5.4%	\$0.00	\$0.00	\$4,912.46	\$0.00	\$0.00	\$151.93
(119)		82,619	\$103,868.41	\$98,510.96	\$5,357.45	5.4%	\$0.00	\$0.00	\$5,196.73	\$0.00	\$0.00	\$160.72
(120)		87,137	\$109,413.48	\$103,763.04	\$5,650.44	5.4%	\$0.00	\$0.00	\$5,480.93	\$0.00	\$0.00	\$169.51

Note: Bill Impacts are based on rates approved and currently in effect as of November 1, 2023

**Rhode Island Energy
Infrastructure, Safety, and Reliability (ISR) Filing
Bill Impact Analysis with Various Levels of Consumption:**

C & ILLF Extra-Large:

	Annual Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	GCR	Difference due to:				
							DAC		EE	LIHEAP	GET
							Base DAC	ISR			
(121)											
(122)											
(123)											
(124)											
(125)	233,835	\$253,083.75	\$247,587.44	\$5,496.31	2.2%	\$0.00	\$0.00	\$5,331.42	\$0.00	\$0.00	\$164.89
(126)	259,019	\$279,673.39	\$273,585.11	\$6,088.28	2.2%	\$0.00	\$0.00	\$5,905.63	\$0.00	\$0.00	\$182.65
(127)	284,197	\$306,257.26	\$299,577.15	\$6,680.10	2.2%	\$0.00	\$0.00	\$6,479.70	\$0.00	\$0.00	\$200.40
(128)	309,381	\$332,846.85	\$325,574.80	\$7,272.05	2.2%	\$0.00	\$0.00	\$7,053.89	\$0.00	\$0.00	\$218.16
(129)	334,562	\$359,433.60	\$351,569.68	\$7,863.92	2.2%	\$0.00	\$0.00	\$7,628.00	\$0.00	\$0.00	\$235.92
(130)	359,745	\$386,022.25	\$377,566.40	\$8,455.86	2.2%	\$0.00	\$0.00	\$8,202.18	\$0.00	\$0.00	\$253.68
(131)	384,928	\$412,610.90	\$403,563.12	\$9,047.78	2.2%	\$0.00	\$0.00	\$8,776.35	\$0.00	\$0.00	\$271.43
(132)	410,110	\$439,198.60	\$429,558.89	\$9,639.70	2.2%	\$0.00	\$0.00	\$9,350.51	\$0.00	\$0.00	\$289.19
(133)	435,293	\$465,787.22	\$455,555.62	\$10,231.60	2.2%	\$0.00	\$0.00	\$9,924.65	\$0.00	\$0.00	\$306.95
(134)	460,471	\$492,371.16	\$481,547.72	\$10,823.44	2.2%	\$0.00	\$0.00	\$10,498.74	\$0.00	\$0.00	\$324.70
(135)	485,655	\$518,960.72	\$507,545.32	\$11,415.40	2.2%	\$0.00	\$0.00	\$11,072.94	\$0.00	\$0.00	\$342.46

C & IHLF Extra-Large:

	Annual Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	GCR	Difference due to:				
							DAC		EE	LIHEAP	GET
							Base DAC	ISR			
(136)											
(137)											
(138)											
(139)											
(140)	486,528	\$480,224.85	\$469,842.23	\$10,382.62	2.2%	\$0.00	\$0.00	\$10,071.14	\$0.00	\$0.00	\$311.48
(141)	538,924	\$531,275.18	\$519,774.39	\$11,500.78	2.2%	\$0.00	\$0.00	\$11,155.76	\$0.00	\$0.00	\$345.02
(142)	591,320	\$582,324.64	\$569,705.71	\$12,618.93	2.2%	\$0.00	\$0.00	\$12,240.36	\$0.00	\$0.00	\$378.57
(143)	643,718	\$633,376.67	\$619,639.57	\$13,737.10	2.2%	\$0.00	\$0.00	\$13,324.99	\$0.00	\$0.00	\$412.11
(144)	696,109	\$684,421.62	\$669,566.51	\$14,855.11	2.2%	\$0.00	\$0.00	\$14,409.46	\$0.00	\$0.00	\$445.65
(145)	748,506	\$735,472.81	\$719,499.50	\$15,973.31	2.2%	\$0.00	\$0.00	\$15,494.11	\$0.00	\$0.00	\$479.20
(146)	800,903	\$786,523.91	\$769,432.44	\$17,091.47	2.2%	\$0.00	\$0.00	\$16,578.73	\$0.00	\$0.00	\$512.74
(147)	853,294	\$837,568.94	\$819,359.44	\$18,209.49	2.2%	\$0.00	\$0.00	\$17,663.21	\$0.00	\$0.00	\$546.28
(148)	905,692	\$888,621.00	\$869,293.30	\$19,327.70	2.2%	\$0.00	\$0.00	\$18,747.87	\$0.00	\$0.00	\$579.83
(149)	958,088	\$939,670.44	\$919,224.60	\$20,445.84	2.2%	\$0.00	\$0.00	\$19,832.46	\$0.00	\$0.00	\$613.38
(150)	1,010,485	\$990,721.55	\$969,157.57	\$21,563.98	2.2%	\$0.00	\$0.00	\$20,917.06	\$0.00	\$0.00	\$646.92

Note: Bill Impacts are based on rates approved and currently in effect as of November 1, 2023

JOINT PRE-FILED DIRECT TESTIMONY

OF

STEPHANIE A. BRIGGS

JEFFREY D. OLIVEIRA

AND

NATALIE HAWK

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1 **I. Introduction**

2 **Stephanie A. Briggs**

3 **Q. Please state your full name and business address.**

4 A. My name is Stephanie A. Briggs, and my business address is 280 Melrose Street,
5 Providence, Rhode Island 02907.

6

7 **Q. Please state your position and your responsibilities within that position.**

8 A. I am employed by PPL Services Corporation (“Services Corporation”) as a Senior
9 Manager of Revenue and Rates. The Services Corporation provides administrative,
10 management and support services to PPL Corporation (“PPL”) and its subsidiary
11 companies, including The Narragansett Electric Company d/b/a Rhode Island Energy
12 (“Rhode Island Energy” or the “Company”). My current duties include responsibility for
13 revenue requirement and rates calculations for the Company.

14

15 **Q. Please describe your education and professional experience.**

16 A. In 2000, I received a Bachelor of Arts degree in Accounting from Bryant College. In
17 2004, I joined National Grid USA Service Company, Inc. (“National Grid Service
18 Company”) as a Senior Analyst in the Accounting Department. In this position, I was
19 responsible for supporting the books and records of one of National Grid USA’s
20 (“National Grid”) New York affiliates. In 2009, I joined National Grid Service
21 Company’s Regulatory Accounting Group. In 2011, I was promoted to Lead Specialist

1 for Revenue Requirements supporting New York. In 2017, I was promoted to Director of
2 Revenue Requirements for New York. In July 2020, I became Director of Revenue
3 Requirements for New England. On May 25, 2022, PPL Rhode Island Holdings, LLC
4 (“PPL Rhode Island”), a wholly owned indirect subsidiary of PPL, acquired 100 percent
5 of the outstanding shares of common stock of the Company from National Grid (the
6 “Acquisition”), at which time I began working in my current position.

7
8 **Q. Have you previously filed testimony or testified before the Rhode Island Public**
9 **Utilities Commission (“PUC”)?**

10 A. Yes. I provided pre-filed direct testimony in numerous dockets including the Company’s
11 2022 Annual Retail Rate Filing, Docket No. 5234, the Company’s 2021 Performance
12 Incentive Mechanism Factor Filing, as part of Docket No. 4770, the Fiscal Year 2022
13 Electric Infrastructure, Safety and Reliability Plan Annual Reconciliation Filing,
14 Docket No. 5098, the Company’s 2022 Distribution Adjustment Charge Filing,
15 Docket No. 22-13-NG, the Company’s Advanced Metering Functionality Business Case,
16 Docket No. 22-49-EL, the Company’s Fiscal Year 2024 Electric Infrastructure, Safety,
17 and Reliability Plan, Docket No. 22-53-EL, Fiscal Year 2024 Gas Infrastructure, Safety,
18 and Reliability Plan, Docket No. 22-54-NG, the Company’s 2023 Electric Revenue
19 Decoupling Mechanism Reconciliation Filing, Docket No. 23-16-EL, the Company’s
20 2023 Residential Assistance Recovery filing, Docket No. 23-17-EL, the Company’s 2023
21 Distribution Adjustment Charge Filing, Docket No. 23-23-NG, and most recently in the

1 Company's Petition for Acceleration Due to Distribution Generation Project in Docket
2 Nos. 23-37-EL and 23-38-EL. I also have testified before the Massachusetts Department
3 of Public Utilities and New York Public Service Commission on behalf of the
4 Company's former affiliates as a revenue requirement witness in various proceedings.

5
6 **Jeffrey D. Oliveira**

7 **Q. Please state your full name and business address.**

8 A. My name is Jeffrey D. Oliveira, and my business address is 280 Melrose Street,
9 Providence, Rhode Island 02907.

10
11 **Q. Please state your position and your responsibilities within that position.**

12 A. I am employed by the Services Corporation as a Regulatory Programs Specialist. My
13 current duties include leading the revenue requirement analyses and modeling that
14 support regulatory filings, regulatory strategies, and rate cases for the Company.

15
16 **Q. Please describe your education and professional experience,**

17 A. In 2000, I earned an associate degree in Business Administration from Bristol
18 Community College in Fall River, Massachusetts. I was employed by National Grid
19 Service Company and its predecessor companies from 1999-2022. From 1999 through
20 2000, I was employed by Fall River Gas Company as a Staff Accountant. In 2001, after
21 Fall River Gas Company merged with Southern Union Company, I continued as a Staff

1 Accountant with increased responsibilities. In August of 2006, the Company acquired
2 the Rhode Island gas distribution assets of Southern Union Company at which time I
3 joined National Grid Service Company as a Senior Accounting Analyst. In January
4 2009, I became a Senior Revenue Requirement Analyst in National Grid Service
5 Company's Strategy and Regulation Department. In July 2011, I was promoted to Lead
6 Revenue Requirement Analyst in the New England Revenue Requirements group of the
7 New England Regulatory Department of National Grid Service Company. Upon closing
8 of the Acquisition, I began working in my current position.

9
10 **Q. Yes. I have testified before the Commission on numerous occasions, including the**
11 **Fiscal Year 2024 Electrical Infrastructure, Safety, and Reliability Plan, Docket No.**
12 **22-53-EL and the Fiscal Year 2024 Gas Infrastructure, Safety, and Reliability Plan,**
13 **Docket No. 22-54-NG.**

14
15 **Natalie Hawk**

16 **Q. Please state your full name and business address.**

17 A. My name is Natalie Hawk, and my business address is 2 North Ninth Street, Allentown,
18 Pennsylvania, 18101.

1 **Q. Please state your position and your responsibilities within that position.**

2 A. I am employed by the Services Corporation as the Director of tax accounting and
3 reporting. My current responsibilities are to oversee the accounting and reporting of
4 income taxes under U.S. Generally Accepted Accounting Principles and the Federal
5 Energy Regulatory Commission Uniform System of Accounts and support regulatory rate
6 filings from a tax perspective.

7
8 **Q. Please describe your education and professional experience.**

9 A. In 1992, I received a Bachelor of Science in Business Administration degree with a major
10 in Accounting from Kutztown University. In 1998, I received a Master's in Business
11 Administration degree from Lehigh University. In 1993, I started my career as a first-
12 year Accountant in the Accounting Department at Metropolitan Edison Company, a
13 wholly owned subsidiary of GPU, Inc. GPU is a public utility holding company based in
14 New Jersey that was acquired by First Energy in 2001. I held various accounting roles in
15 Accounting Operations, the Tax Department and Plant Accounting. In 2001, I accepted a
16 position at Services Corporation as an Accounting Analyst in the Tax Department. My
17 responsibilities included accounting for income and non-income taxes, and I later became
18 involved in financial tax reporting for SEC and regulatory purposes, preparing tax
19 information and providing guidance on tax matters for rate cases, formula rates and other
20 rate mechanisms. I was promoted to Team Leader in 2004, 1st-level Manager in 2011,
21 2nd-level Manager in 2015 and to my current position as Tax Director in 2021.

1 **Q. Have you previously filed testimony or testified before the PUC or regulatory bodies**
2 **in other jurisdictions?**

3 A. Yes, I have testified before the PUC in support of the Company’s filings in several
4 proceedings as follows: FY2024 Gas Infrastructure, Safety and Reliability Plan Filing,
5 Docket No. 22-54-NG, FY2024 Electric Infrastructure, Safety and Reliability Plan Filing,
6 Docket No. 22-53-EL, FY2023 Gas Infrastructure, Safety and Reliability Plan
7 Reconciliation Filing in Docket No. 5210 and FY2023 Electric Infrastructure, Safety and
8 Reliability Plan Reconciliation Filing in Docket No. 5209.

9
10 **II. Purpose of Joint Testimony**

11 **Q. What is the purpose of your joint testimony?**

12 A. The purpose of this joint testimony is to sponsor Section 3 of the proposed fiscal year
13 (“FY”) 2025 Gas ISR Plan (“Gas ISR Plan” or “Plan”), which covers the period April 1,
14 2024 through March 31, 2025. Section 3, Attachment 1 describes the calculation of the
15 Company’s revenue requirement for the twelve-month period from April 1, 2024 through
16 March 31, 2025 (“FY2025”). The revenue requirement is based on the 12-month Gas
17 ISR Plan capital investment described in the joint pre-filed direct testimony of Company
18 Witnesses Nathan Kocon, Phil LaFond and Laeyeng Hunt. We also describe the impact
19 of the sale of the Company to PPL Rhode Island¹ on the FY2025 revenue requirement.
20 The Company’s FY2023 Gas ISR Plan for the period April 1, 2022 through March 31,

¹ PPL Rhode Island is a wholly owned indirect subsidiary of PPL Corporation.

1 2023 approved in Docket No. 5210 is referenced in this section as “FY 2023-NG.”

2 Section 3, Attachment 3 represents the revenue requirement under the scenario that
3 paving costs of \$12 million are treated as O&M rather than capital investments in the
4 revenue requirement calculation.

5
6 **III. Gas ISR Plan Revenue Requirement**

7 **Q. Please summarize the revenue requirement for the Company’s FY2025 Gas ISR**
8 **Plan on Attachment 1.**

9 A. As shown in Attachment 1, Page 1, Column (b), the Company’s FY2025 Gas ISR Plan
10 revenue requirement totals \$77,354,638 or an incremental \$15,472,475 over the amount
11 currently being billed for the Gas ISR Plan. The Plan’s revenue requirement consists of
12 the following elements: (1) the revenue requirement of \$6,875,828 comprised of the
13 Company’s return, taxes and depreciation expense associated with FY2025 proposed
14 non-growth ISR incremental capital investment in gas utility infrastructure of
15 \$164,812,000, as calculated on Attachment 1, Page 24; (2) the FY2025 revenue
16 requirement on incremental non-growth ISR capital investment for FY2018 through
17 FY2024 totaling \$56,441,363; (3) FY2025 property tax expense of \$14,037,447, as
18 shown on Attachment 1 at Page 33, in accordance with the property tax recovery
19 mechanism included in the Amended Settlement Agreement in Docket No. 4323 and
20 continued under the Amended Settlement Agreement in Docket No. 4770; and (4) a
21 reduction to the revenue requirement of \$3,258,476 for the FY2025 Hold Harmless

1 adjustment. Importantly, the incremental capital investment for the FY2025 ISR revenue
2 requirement excludes capital investment embedded in base distribution rates in Docket
3 No. 4770 for FY2018 through FY2025. Incremental non-growth capital investment for
4 this purpose is intended to represent the net change in net plant for non-growth
5 infrastructure investments during the relevant fiscal year and is defined as capital
6 additions plus cost of removal, less annual depreciation expense ultimately embedded in
7 the Company's base distribution rates (excluding depreciation expense attributable to
8 general plant, which is not eligible for inclusion in the Gas ISR Plan).

9
10 **Q. Did the Company calculate the FY2025 Gas ISR Plan revenue requirement on**
11 **Attachment 1 in the same fashion as calculated in the previous ISR factor**
12 **submissions?**

13 A. Yes. Per the PUC's Order in the FY2022 Gas ISR Plan, Docket No. 5099 and the
14 resulting revisions to the Company's Gas tariff, RIPUC NG-GAS No. 101 at Section 3,
15 Schedule A, Sheets 4 and 5, the definition of ISR capital investment changed from "non-
16 growth capital spending" to "non-growth capital investment recorded as in service"
17 effective April 1, 2021. The Company has since reflected the impact of this change in its
18 FY2021, FY2022 and FY2023 ISR Gas reconciliations, FY2024 Gas ISR Plan and now
19 its FY2025 Gas ISR Plan revenue requirements. For the FY2021 transition year, the
20 vintage year FY2021 ISR Plan capital investment is calculated as the difference between
21 FY2021 ISR Plan actual capital spending and the cumulative ISR Plan capital spending

1 included in the Construction Work in Progress (“CWIP”) balance as of March 31, 2021.

2 The FY2025 ISR vintage year ISR capital investments reflect the ISR Plan capital
3 investment projected to be in-service in the respective vintage year.

4
5 **Q. Please explain the increase of FY2025 Gas ISR Plan revenue requirement on
6 Attachment 1 over the amount currently being billed for Gas ISR Plan.**

7 A. As mentioned above, the Company’s FY2025 Gas ISR Plan revenue requirement is
8 \$15,472,475 higher than the FY2024 Gas ISR Plan revenue requirement. Of the total
9 \$77,354,638 FY2025 capital revenue requirement, \$56,441,363 in capital investment
10 revenue requirement and \$10,708,197 in property tax recovery adjustment are associated
11 with incremental non-growth ISR Plan capital investment for FY2018 through FY2024,
12 which the PUC has approved in previous Gas ISR Plan or reconciliation filings. The
13 increase in the FY2025 revenue requirement compared to the approved FY2024 Plan
14 revenue requirement on that same investment totals \$4,139,103 and is caused by the net
15 impact of increase related to the half-year convention applied in the year of service in the
16 FY2024 plan, the higher estimated property tax rate in FY2024 compared to the
17 estimated FY2024 property tax rate, an increase to vintage rate base affected by the sale
18 as described below and actual FY 2023-NG capital investments placed in service. The
19 FY2025 revenue requirement on vintage year FY2024 incremental non-growth ISR
20 capital investment increased by \$5,931,563 from the FY2024 revenue requirement on the
21 same investment. The movement in the property tax recovery adjustment related to prior

1 years' investment as well as rate base embedded in current distribution rates is an
2 increase of \$14,474. The FY2025 proposed incremental non-growth ISR capital
3 investment and the resulting increase in property tax expense due to that incremental
4 investment accounts for \$10,205,078 of the FY2025 revenue requirement over the
5 FY2024 revenue requirement. Lastly, the total FY2025 revenue requirement was
6 reduced for the tax hold harmless adjustment of \$3,258,476.

7
8 **Q. What are the impacts of the sale of the Company to PPL Rhode Island on the Gas**
9 **ISR Plan revenue requirement calculations?**

10 A. As indicated above, on May 25, 2022, PPL Rhode Island, a wholly owned indirect
11 subsidiary of PPL, acquired 100 percent of the outstanding shares of common stock of
12 Company from National Grid. The Acquisition was treated as an asset acquisition for tax
13 purposes under Internal Revenue Code (IRC) §338(h)(10) ("the §338 election"), which
14 resulted in the recognition of all book and tax timing differences and the reversal of the
15 related deferred tax assets and liabilities in FY2023. In addition, the Company utilized
16 all its available Net Operating Losses ("NOL") to offset taxable income generated from
17 the sale, which resulted in the reversal of all NOL-related deferred tax assets in FY2023.
18 The reversal of all deferred tax assets and liabilities, including NOL deferred tax assets,
19 reduced net deferred tax liabilities which increased the ISR rate base in the vintage
20 revenue requirement calculations by \$38,745,253 for FY2025, as shown on Section 3,
21 Attachment 2, Line 15. Consequently, the increase in rate base ultimately increases the

1 return on rate base recoverable through the ISR mechanism. The impact to the Gas ISR
2 Plan revenue requirement is an increase of approximately \$3,258,476 in FY2025 as
3 shown on Section 3, Attachment 1, Page 1, Line 15 and shown in detail on Section 3,
4 Attachment 2.

5
6 **Q. How does the Company propose to address the above increases to the revenue**
7 **requirements on the FY2025 Gas ISR Plan revenue requirement as a result of the**
8 **Acquisition?**

9 A. As part of the transaction approval proceeding before the Division of Public Utilities and
10 Carriers in Docket No. D-21-09, PPL committed to hold harmless Rhode Island
11 customers from any changes to Accumulated Deferred Income Taxes (“ADIT”) as a
12 result of the Acquisition.² The Company is proposing to reduce the FY2025 revenue
13 requirement by the calculated hold harmless amount as shown on Section 3, Attachment
14 1, Page 1, Line 15. Because of the §338 election, PPL generated tax-deductible goodwill,
15 which creates cash tax benefits to the Company. These cash tax benefits will be shared
16 with the customer in the form of revenue credits to offset the increase in revenue
17 requirement from the increase in rate base because of the elimination of deferred taxes
18 from the Acquisition. Under National Grid ownership, the Company generally filed its
19 federal income tax return in December for its most recently completed fiscal year, and
20 that timing has required the Company in past ISR Plan dockets to file revised Gas ISR

² See Report and Order, Docket No. D-21-09 at 257, commitment #16 (February 23, 2023).

1 Plan revenue requirements reflecting the actual tax deductions or NOL generated or
2 utilized as submitted in its tax return. The Company revised the revenue requirement in
3 this filing to reflect the actual tax repairs deductibility percentages, tax losses on
4 retirements and NOL utilization on vintage FY2023 ISR Plan capital investment. These
5 updates were per the Company's April through May 2022 results in National Grid's short
6 period FY2023 federal income tax return and the Company's June through December
7 results in PPL's short period calendar year 2022 federal income tax return. The actual tax
8 repairs deductibility percentages and tax losses on retirements for the Company's January
9 through March 2023 period within vintage FY2023 ISR Plan capital investment will not
10 be updated until PPL files its calendar year 2023 tax return in October of 2024

11
12 **Q. Please describe any changes to the presentation of the revenue requirements**
13 **calculations because of the Acquisition.**

14 A. Because of the §338 election, the Acquisition resulted in the reversal of book and tax
15 timing differences and the related deferred taxes. In addition, tax depreciation starts over
16 on a new tax basis equal to net book value on the date of the Acquisition. To reflect these
17 impacts of the Acquisition, the calculations of the FY2023 rate base and revenue
18 requirement for the vintage plan years FY2018 through FY 2023-NG were separated into
19 two columns in Section 3, Attachment 1, Pages 2,5,8,12,15 and 18. The first FY2023
20 column labeled as "NG, 4/1/22-5/24/22", reflects the 55 days of National Grid ownership
21 during FY2023. The second FY2023 column labeled as "PPL, 5/25/22-3/31/23" reflects

1 the period from acquisition date through March 31, 2023, which represents the first year
2 (i.e., 10-month period) under PPL's ownership where the deferred taxes under National
3 Grid's ownership are reversed and the tax basis becomes equal to net book basis, causing
4 the book and tax timing difference and tax depreciation to start over. Because PPL files a
5 tax return on a calendar year basis, the period January 1 through March 31, 2023,
6 represents a portion of PPL's 2023 tax return. Consequently, the second FY2023 column
7 in the FY2023 year representing PPL's ownership period will not be final until PPL files
8 its calendar year 2023 tax return in October of 2024, at which time the 2023 calendar
9 year results will be allocated to the January 1 through March 31, 2023 period to finalize
10 the tax deductions for the FY2023 year.

11
12 **Q. Did the Company perform an analysis of the impact on the proposed FY2025 Gas**
13 **ISR Revenue Requirement if the Commission were to order final restoration paving**
14 **costs to be recovered through the Gas ISR as O&M expense rather than capital**
15 **expenditures?**

16 A. Yes. As shown on Section 3, Attachment 3, the Company calculated the FY2025 Gas
17 ISR revenue requirement under the scenario that \$12 million of final restoration paving
18 costs were treated in the revenue requirement calculation as O&M expense rather than
19 capital investments, as currently treated. This resulted in a total Gas ISR revenue
20 requirement of \$85,183,144 as shown on Attachment 3, Page 1, Line 16, which would be
21 an increase over the FY2024 revenue requirement of \$26,559,456.

22

1 IV. Conclusion

2 Q. Does this conclude your testimony?

3 A. Yes.

DIRECT TESTIMONY

OF

TYLER G. SHIELDS

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1 **I. Introduction**

2 **Q. Please state your names and business address.**

3 A. My name is Tyler G. Shields, and my business address is 280 Melrose Street, Providence,
4 Rhode Island 02907.

5

6 **Q. By whom are you employed and in what capacity?**

7 A. I am employed by the PPL Services Corporation (“Services Corporation”) as a Rates and
8 Regulatory Specialist. The Services Corporation provides administrative, management,
9 and support services to PPL Corporation (“PPL”) and its subsidiary companies, including
10 The Narragansett Electric Company (the “Company”). My current duties include
11 revenue requirement and rates analyses and regulatory filings, regulatory strategies, and
12 reconciliations for the Company.

13

14 **Q. Please describe your educational background and training.**

15 A. I earned a Bachelor of Arts in Economics from the University of Connecticut in 2013.

16

17 **Q. Please describe your professional experience.**

18 A In March 2015, I began my career as a pricing analyst at Granite Telecommunications in
19 Quincy, Massachusetts. In February 2017, I was promoted to product pricing team lead.
20 My responsibilities included auditing customer accounts and maintaining the pricing and
21 billing databases to ensure accuracy. In January 2021, I was hired by Charles Stark

1 Draper Laboratory as a Program Analyst, creating pricing proposals for prospective
2 clients, and validating financial data for key stakeholders on a weekly basis. In
3 November 2022, I was hired by the Services Corporation and have been performing my
4 current role since that time.

5
6 **Q. Have you previously testified before the PUC or any other regulatory commissions?**

7 A. Yes. I provided pre-filed direct testimony in the Company’s Fiscal Year 2023 Electric
8 Revenue Decoupling Mechanism Reconciliation Filing in Docket No. 23-16-EL, the
9 Company’s Gas RDM Reconciliation filing in Docket No. 23-23-NG, the Company’s
10 Distribution Adjustment Charge filing in Docket No. 23-23-NG, and the Company’s
11 FY2023 Electric Infrastructure, Safety and Reliability (“ISR”) Plan Annual
12 Reconciliation Filing in Docket No. 5209.

13
14 **Q. What is the purpose of your testimony?**

15 A. The purpose of my testimony is to sponsor Section 4 of the Fiscal Year (“FY”) 2025 Gas
16 ISR Plan (“Gas ISR Plan” or “Plan”), which describes the calculation of the proposed
17 FY2025 ISR factors and the customer bill impacts of the proposed ISR factors.

18

1 **II. Rate Design**

2 **Q. Please summarize the rate design used to develop the ISR factors presented as part**
3 **of this filing.**

4 A. Like the revenue requirement, the proposed Gas ISR Plan rate design for FY2025 is
5 based on the revenue requirement of cumulative incremental capital investment in excess
6 of capital investment that has been reflected in rate base in the Company's most recent
7 general rate case in Docket No. 4770 and property tax expense as described in Section 3
8 of the ISR Plan. The Company has allocated the revenue requirement associated with the
9 capital investment to each rate class based on the rate base allocator approved by the
10 PUC in the Amended Settlement Agreement in Docket No. 4770.¹ The billing
11 determinants used in the Company's proposed rate design are for the twelve month
12 period April 2024 through March 2025 and come from the throughput forecast utilized in
13 the Company's 2023-24 Gas Cost Recovery filing in Docket No. 23-23-NG. The
14 forecasted throughput is compiled by rate class and summarized as set forth in Section 4,
15 Attachment 1, Page 2 of the proposed Gas ISR Plan. As shown in Section 4, Attachment
16 1, Page 1, the Company divided the allocated rate class revenue requirement, as
17 multiplied by the rate base allocator, by the forecasted throughput for each rate class to
18 develop separate ISR factors per rate class on a per-therm basis. The Company then

¹ In Docket No. 5099, the PUC approved the Company's proposal to combine the allocated revenue requirements for the Residential Heating and Residential Non-Heating rate classes, thereby deriving one ISR factor applicable to all residential customers, until the Company's next Rate Case filing.

1 adjusted each rate class’s ISR factor to reflect the 1.91 percent uncollectible factor from
2 the Amended Settlement Agreement in Docket No. 4770.

3

4 **III. ISR Factors**

5 **Q. What are the ISR factors proposed by the Company?**

6 A. The ISR factors proposed by the Company are shown in the table below and in the Gas
7 ISR Plan at Section 4, Attachment 1.

8

9

Table 3-1 FY2025 ISR factors per rate class

Rate Class	ISR Rate (\$/therm)
Residential	\$0.2478
Small C&I	\$0.2487
Medium C&I	\$0.1610
Large Low Load	\$0.1492
Large High Load	\$0.1392
XL-Low Load	\$0.0589
XL-High Load	\$0.0565

10 *Rates include uncollectible allowance.

11 The same factors noted above for Residential Heating and Residential Non-Heating
12 customers would also apply to each of the Low-Income rate classes.

13

1 **IV. Bill Impacts**

2 **Q. What is the impact of the proposed ISR factors on customers' bills?**

3 A. For the average Residential Heating customer using 845 therms annually, the proposed
4 FY2025 ISR factors result in an annual bill increase of \$48.28 or 2.9 percent,² as shown
5 in the proposed Gas ISR Plan at Section 4, Attachment 2. The annual impact of the
6 proposed ISR factors for all rate classes is set forth in Section 4, Attachment 2 of the
7 Plan.

8

9 **V. Paving**

10 **Q. Has the Company performed an analysis if the Commission were to order that**
11 **paving costs associated with Gas ISR investments are recovered through the Gas**
12 **ISR Plan as operations and maintenance (“O&M”) rather than capital as it is**
13 **currently being recovered?**

14

15 A. Yes, the Company calculated the revenue requirement for a scenario in which \$12 million
16 of paving costs are categorized as O&M rather than capital as shown on Section 3,
17 Attachment 3. The results of this analysis resulted in a CapEx Revenue Requirement of
18 \$76,441,620, and an O&M Revenue Requirement of \$12,000,000, which is a bill impact
19 for the average Residential Heating customer using 845 therms annually of an annual bill
20 increase of \$80.49 or 4.8 percent.

21

² The bill impact includes the Rhode Island Gross Earnings Tax of three percent.

1 VI. Conclusion

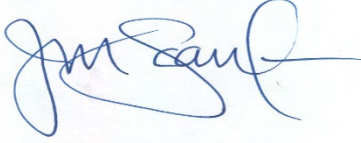
2 Q. Does this conclude your testimony?

3 A. Yes.

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 21, 2023
Date

Docket No. 23-49-NG- RI Energy’s Gas Infrastructure, Safety and Reliability (ISR) Plan 2025 - Service List 12//19/2023

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