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February 20, 2024

**VIA ELECTRONIC MAIL**

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

**RE: Docket No. 23-48-EL – The Narragansett Electric Company d/b/a  
Rhode Island Energy’s Proposed FY 2025 Electric Infrastructure, Safety, and  
Reliability Plan  
Responses to PUC Data Requests – Set 7**

Dear Ms. Massaro:

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

Thank you for your attention to this transmittal. If you have any questions or concerns, please do not hesitate to contact me at 401-784-4263.

Sincerely,

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

Andrew S. Marcaccio

Enclosures

cc: Docket No. 23-48-EL Service List

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 23-48-EL  
In Re: Proposed FY 2025 Electric Infrastructure, Safety and Reliability Plan  
Responses to the Commission's Seventh Set of Data Requests  
Issued on February 6, 2024

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PUC 7-1

Request:

Please provide a schedule showing how the AFUDC amount of \$788,260 shown on Attachment PUC 3-4-1 was calculated and determined.

Response:

The AMF project incurs AFUDC (Allowance for Funds Used During Construction) on the software costs balances up until the applicable project goes into service. AFUDC ceases in the month after the applicable project goes into service. AFUDC is applied to all projects on the operating companies having construction work in progress ("CWIP") balances and where the construction period is greater than 30 days, including the buildout of software assets. On the other hand, costs for equipment purchases (such as meters) are excluded from AFUDC as there is no construction/development involved. AFUDC rates are estimates based on the rates at one point in time. AFUDC rates are calculated monthly based on CWIP balances, as well as debt outstanding and interest rates received from the Company's Treasury department.

Please see Attachment PUC 7-1 for an estimate of the AFUDC based on projected balances and estimated rates.

Estimate of AFUDC (calculation)

	Jan to Dec 23	January-24	February-24	March-24	April-24	May-24	June-24	July-24	August-24	September-24	October-24	November-24	December-24	January-25	February-25	March-25	Total
Estimate of Balance to which AFUDC is applied	\$1,215,642	\$338,790	\$1,044,365	\$838,790	\$359,915	\$390,079	\$3,212,380	\$390,079	\$965,079	\$1,865,079	\$390,079	\$390,079	\$2,055,775	\$144,624	\$744,624	\$244,624	
Balances YTD	\$1,215,642	\$1,554,432	\$2,598,796	\$3,437,586	\$3,797,501	\$4,187,580	\$7,399,959	\$7,790,038	\$8,755,116	\$10,620,195	\$11,010,273	\$11,400,352	\$13,456,127	\$13,600,751	\$14,345,375	\$14,589,999	
Balance *ADFUDC Debt		\$2,266.87	\$3,789.90	\$5,013.14	\$5,538.01	\$6,106.87	\$10,791.58	\$11,360.45	\$12,767.85	\$15,487.75	\$16,056.61	\$16,625.48	\$19,623.47	\$19,834.38	\$20,920.29	\$21,277.03	
Balance * AFUDC Equity		\$7,241.06	\$12,106.05	\$16,013.41	\$17,690.01	\$19,507.13	\$34,471.45	\$36,288.57	\$40,784.22	\$49,472.37	\$51,289.49	\$53,106.60	\$62,683.08	\$63,356.79	\$66,825.49	\$67,965.03	
Estimate of AFUDC	\$2,000.00	\$9,507.93	\$15,895.95	\$21,026.55	\$23,228.02	\$25,614.00	\$45,263.03	\$47,649.01	\$53,552.07	\$64,960.12	\$67,346.10	\$69,732.08	\$82,306.55	\$83,191.17	\$87,745.78	\$89,242.06	\$788,260.43

Business Units	Rate Type	12/2023
RI Companies	AFUDC Debt	0.00145833
RI Companies	AFUDC Equity	0.00465833

PUC 7-2

Request:

Please provide a description of the internal PPL labor associated with “PPL PMO Oversight (IT) – AMF Implementation PMO” shown on Attachment PUC 3-4-1. Please provide a schedule showing how the forecasted cost of \$1.4 million was determined and explain why it is less than the same line item shown in Attachment PUC 7-10-2 in Docket 22-49-EL.

Response:

The internal PPL labor associated with “PPL PMO Oversight (IT) – AMF Implementation PMO” shown on Attachment PUC 3-4-1 consists of the costs of the PPL IT team to provide direct oversight of the system integrator and all the software integration supporting AMF implementation. Costs include five fully dedicated PPL IT staff including an AMF IT Manager and four IT System Specialists. This same line item shown in Attachment PUC 7-10-2 in Docket 22-49-EL for \$2.8 million is the estimated amount to be spent over the entire implementation period and was assumed to be incurred during April 2025 through March 2026 for purposes of the illustrative revenue requirement in Docket 22-49-EL. To arrive at the forecasted cost of \$1.4 million for ISR Fiscal Year 2025, the Company divided the total cost of \$2.8 million evenly across the period January 2024 through June 2026 to arrive at an estimated monthly cost of \$93,335/month. The Company then multiplied this monthly amount by the number of months that would be included in the ISR Fiscal Year 2025 filing (i.e., 15 months, which includes three months prior to the start of ISR Fiscal Year 2025) for approximately \$1.4 million.

In Re: Proposed FY 2025 Electric Infrastructure, Safety and Reliability Plan  
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PUC 7-3

Request:

For each of the line items shown in "Network Costs" on Attachment PUC 3-4-2 that are associated with plant or equipment that is installed in the Company's service area in FY 2025, please describe generally where the plant and equipment will be located.

Response:

Network deployment in April 2024 to March 2025 will be targeting the Westerly, Middletown, and North Kingstown sectors. Radio frequency (RF) routers and Network Gateways (collectors) will be installed on existing distribution system assets. Larger multi-antenna Network Gateways would generally be located at or near substations or dedicated distribution-type poles.

Please see the Company's response to PUC 5-9, which provided the cities and towns, along with the corresponding sector, in which the AMF network will be deployed in ISR FY 2025.

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PUC 7-4

Request:

For each of the line items shown in "Meter Costs" on Attachment PUC 3-4-3 that are associated with meters or other equipment being installed in the Company's service area in FY 2025, please describe where in the service area that the meters will be located.

Response:

The meters that will be installed in ISR FY 2025 will be in the AMF program's defined Sector of Westerly, which is comprised of the towns of Westerly, Charlestown, South Kingstown, Narragansett, Hopkinton, and Richmond. Based on a January 2025 meter deployment start date, approximately 50% of the Westerly AMF Sector would be deployed. Weekly deployment activities will be directed by the installation vendor, with Rhode Island Energy oversight, and could be completed in any town within the deployment sector.

PUC 7-5

Request:

For each of the line items in Attachments 3-4-1, 3-4-2, and 3-4-3 that relate to “milestone achievement” payments in FY 2025, please provide a description of the services and the criteria used to determine how and when the milestone is achieved that triggers a payment in FY 2025. To the extent there is an estimate in the applicable Attachment, please describe how the estimate was determined.

Response:

**AMF Intangible software costs in FY2025**

Milestone achievement payments for TCS System Integrator Services related to line items described as: Data Lake – SI Vendor, Deployment Work Management – SI Vendor, SI Vendor – Head End, Middleware – SI Vendor, SI Vendor – Cybersecurity, and SI Vendor-MDMS.

- Below are the milestone achievements that will trigger payment:  
Completion of PI9; Acceptance of Deliverable/Scope items 22 and 23 - Program Increment 9 (PI) Acceptance Criteria & Program Increment 9 Completion Report Final build and integrated test for functions as described under Milestone 1, Release 3.
- Release 2- Ready for AMF Meter Deployment
- Completion of PI10; Acceptance of Deliverable/Scope items 26 and 27- Program Increment 10 (PI) Acceptance Criteria & Program Increment 10 Completion Report Design and initial build for functions described under Milestone 17, Release 4
- Completion PI11; Acceptance of Deliverable/Scope items 28 and 29 - Program Increment 11 (PI) Acceptance Criteria & Program Increment 11 Completion Report

**Meter Deployment Milestones in FY2025**

- The Meter Services milestones include business deliverables for the completion and approval of an integrated project plan, safety, and quality assurance plan in order to trigger a payment. The costs provided were calculated by estimating the percentage of support required for project management, cross docks, and call center support in the FY2025 timeframe.

**Network Installation Milestones in FY2025**

- The network costs associated with the description of ‘Project Management Oversight’ pertain to milestone payments provided upon the completion of an integrated project plan, safety, and quality assurance plan. The line item that is described as ‘Site Engineering’, pertains to the milestone achievement for completion of all field surveys where pole installations will be performed as part of network device installations.

The Narragansett Electric Company

d/b/a Rhode Island Energy

RIPUC Docket No. 23-48-EL

In Re: Proposed FY 2025 Electric Infrastructure, Safety and Reliability Plan

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- The remaining line items, labeled as gateway, routers, and transformer installations in the network costs breakdown include milestone payments after the successful installations of poles and field area network devices in the Westerly AMF defined sector. A portion of the milestone payment is also tied to the completion of testing of network devices.



PUC 7-6

Request:

Please explain the nature of the service and objective of the service related to the line item shown in Attachment PUC 3-4-3 identified as “pre-sweeps for deployment.”

Response:

Pre-sweeps are the first activity in the meter deployment process constituting a detailed physical review and gathering of customer premise meter information in advance of the AMF meter installations. Pre-sweeps proactively collect information to identify issues in order to make the meter installation as efficient and effective as possible. Issues may include meter obstructions, meter base repairs, and other safety, power quality, and electrical issues that need to be resolved and/or repaired prior to new meter installation and activation. (Docket No. 22-49-EL, Advanced Metering Functionality Business Case and Attachments (“AMF Business Case”), Book 2, at Bates page 89)

The objective of these activities is to document potential meter installation issues and to update Rhode Island Energy’s customer service database with information in advance of meter installations. (Docket No, 22-49-EL, AMF Business Case, Book 2 at Bates page 107)

PUC 7-7

Request:

Of the meters included in the counts shown on PUC 3-1, please indicate how many of the meters will be used and are needed during the "Solution Validation Phase" to successfully complete that testing phase. Please also describe how the "Solution Validation Phase" will be carried out, including a general description of the activities that take place during that phase. Please also indicate what metric the Company will be using to determine that the validation phase is successful.

Response:

The Solution Validation Phase consists of approximately 20,000 AMF meters and the related network hardware. Validation begins with the first meter installed and continues with a gradual ramp-up. The purpose of the Solution Validation phase will be to implement the processes and tools planned for full deployment with a limited meter population and slower deployment rate, as well as to further optimize the RF mesh network. Installing a limited number of meters during this phase will allow for fine-tuning of the meter and communications network following the field testing of equipment and systems. Solution Validation will begin only in a sector where pre-sweep verifications have been completed. Solution Validation will allow the Deployment team to perform end-to-end testing of Network and Meter communications and validate that back-office Systems and processes are working as anticipated ahead of Full Meter Deployment. Solution Validation testing will include Network and Meter communications, Systems validations including Head End, Meter Data Management System, and Billing.

The goal of Solution Validation is to test the new AMF solution from end to end to ensure the entire system is working as designed, prior to full deployment of electric meters. Prior to starting full deployment of electric meters, the go/no-go decision will be made by the AMF Program Leadership Team after performing an assessment of the systems' operational performance, downstream systems processing, and any open issues.

Solution Validation will not be limited to a single metric. The Solution Validation assessment will include a checklist of operational metrics applied to the individual AMF technology elements. These metrics will not only be used to test and verify functionality specific to each element, but also to verify that the integrated processes are working together for the entire AMF technical solution. A summary of operational metrics includes, but is not limited to, the following:

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- Verify communication and receipt of meter data in the Head End System (HES) through the RF Mesh network equipment.
- Verify completion of meter exchange work orders, data accuracy, and billing processes in the Customer Service System (CSS).
- Verify receipt of meter data in the Meter Data Management System (MDMS) from the Head End System (HES) for VEE (validation, estimation, editing) interval data processing.
- Verify meter data transfer from MDMS to CSS, Customer Portal, Supplier Portal, and Settlement applications.

PUC 7-8

Request:

Please explain the timing of the completion of the “customer portal” referenced on Attachment PUC 3-4-1 and the extent to which the Company expects customers to be using the customer portal in FY 2025.

Response:

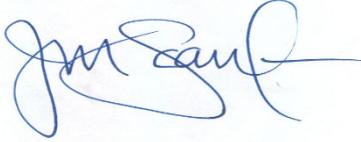
The Customer Portal is planned to be available to customers with AMF meters installed at the end of Solution Validation. After Solution Validation, the Customer Portal will be available to Rhode Island Energy customers once their AMF meter has been installed. By the end of March 2025, which coincides with the end of Solution Validation, the Company anticipates having approximately 20,000 customers with AMF meters and the availability to access the Customer Portal.

The initial release of the Customer Portal will display the prior day's interval usage data. Near Real Time Data Access will become available in a later functionality release expected around the end of September 2025.

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.



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Joanne M. Scanlon

February 20, 2024  
Date

**Docket No. 23-48-EL – RI Energy’s Electric ISR Plan FY 2025  
Service List as of 1/25/2024**

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