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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. 23-49-NG – The Narragansett Electric Company d/b/a
Rhode Island Energy’s Proposed FY 2025 Gas Infrastructure, Safety, and
Reliability Plan
Responses to PUC Data Requests – Set 8**

Dear Ms. Massaro:

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

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".

Jennifer Brooks Hutchinson

Enclosure

cc: Docket No. 23-49-NG Service List

PUC 8-1

Request:

What is the rate accounting treatment that the Company is proposing for the decommissioning of the LNG site on the Newport Navy Yard? Please explain why the Company believes that the costs associated with the decommissioning are appropriate for recovery through the ISR as opposed to being included in the Company's next rate case or in the annual Distribution Adjustment Clause filing for the year in which the costs are incurred.

Response:

The Company has proposed to include the costs to decommission the existing assets of the LNG site on the Newport Navy Yard in the FY2025 Gas ISR recovery mechanism as cost of removal. The FY2025 Gas ISR Plan budget includes \$0.771 million for this work, which will all be recorded as cost of removal.

The ISR is the appropriate recovery mechanism because Rhode Island Energy's Gas Tariff No. 101, Section 3, Distribution Adjustment Clause ("DAC"), Section 3.2.2 Infrastructure, Safety and Reliability Factor provides for the recovery of the Cumulative Revenue Requirements, which reflects the Adjusted Cumulative Non-Growth Capital Investment plus the associated retirements, cost of removal, accumulated depreciation, and accumulated deferred taxes, and together with all accumulated Gas ISR investments will be eligible for inclusion in rate base recovery through new base distribution rates set in the next general rate case. Additionally, as part of its annual DAC filing, the Company will include an annual reconciliation of the actual ISR revenue requirements to the actual billed revenue for the approved ISR Factor for the prior fiscal year with the over- or under-recovery to be included as part of the DAC mechanism. Currently, there is no other mechanism in the annual DAC filing that is appropriate for this cost recovery.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 23-49-NG
In Re: Proposed FY 2025 Gas Infrastructure, Safety and Reliability Plan
Responses to the Commission's Eighth Set of Data Requests
Issued on February 6, 2024

PUC 8-2

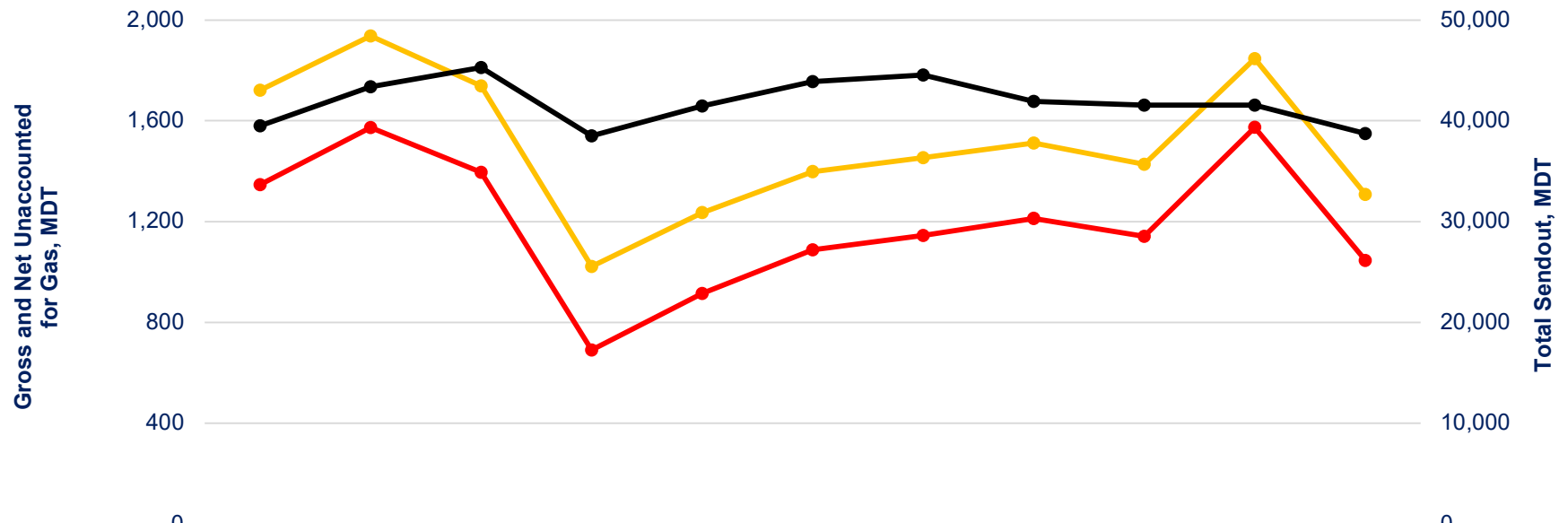
Request:

In the response to Division 2-18, the Company was not able to explain the increasing trends for unaccounted for gas. The response indicates that the Company is conducting a review and will supplement the response “to the extent that its data review reveals the cause(s) of the increasing unaccounted for gas trends.” If the Company does not supplement the response by no later than five business days prior to the evidentiary hearings, please provide an explanation why it was not possible to do so and provide the Company’s opinion as to the likely causes, based on the information then available.

Response:

The annual net unaccounted for gas calculations have been completed and the results have dropped from 3.79% in 2022 to 2.70% for 2023, a reduction of 28.8%. Please see Attachments PUC 8-2-1 and PUC 8-2-2 for the tables and graphs of the updated data.

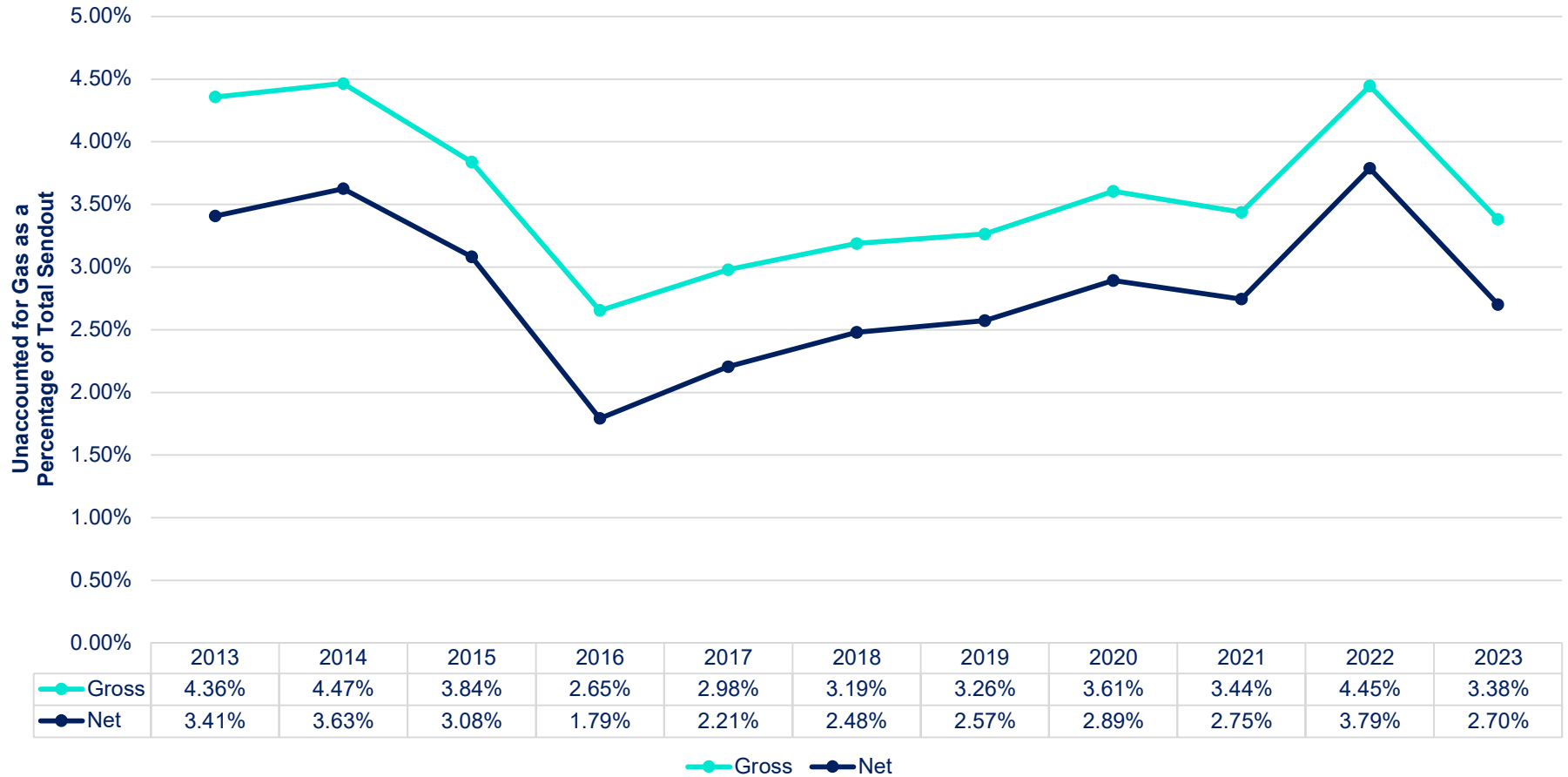
Attachment PUC 8-2-1 Total Sendout, Gross Unaccounted for Gas, and Net Unaccounted for Gas (MDT)



	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Gross Unaccounted for Gas (MDT)	1,721	1,937	1,738	1,022	1,236	1,399	1,454	1,512	1,428	1,847	1,308
Net Unaccounted for Gas (MDT)	1,346	1,573	1,395	690	915	1,088	1,146	1,213	1,141	1,574	1,046
Total Sendout (MDT)	39,493	43,381	45,288	38,515	41,489	43,889	44,552	41,940	41,559	41,551	38,734

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

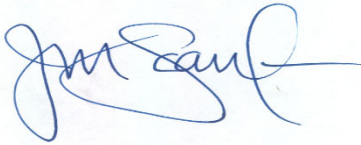
Attachment PUC 8-2-2
Gross and Net Unaccounted for Gas as a Percentage of Total Sendout



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

February 20, 2024
Date

Docket No. 23-49-NG- RI Energy's Gas Infrastructure, Safety and Reliability (ISR) Plan 2025 - Service List 1/23/2024

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