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Rhode Island Energy™
a PPL company

June 14, 2024

VIA ELECTRONIC MAIL

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

RE: Docket No. 24-06-EE – The Narragansett Electric Company's d/b/a Rhode Island Energy's System Reliability Procurement Investment Proposal for Electric Demand Response 2024-2026 – ConnectedSolutions
Responses to Division Data Requests – Set 3

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 Division of Public Utilities and Carriers' ("Division") Third Set of Data Requests in the above-referenced matter.

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

Sincerely,

Andrew S. Marcaccio

Enclosures

cc: Docket No. 24-06-EE Service List

Division 3-1

Request:

Regarding response to DIV 2-2, Attachment DIV 2-2, please expand the table to include FY 2024 budget and forecast. For each year, provide the actual capital spend by year to implement load related projects. Exclude spend related to Asset Condition and Contingency Loading. Provide the method or assumptions used to estimate the incremental amount for load related projects if the overall project is designed to also address Asset Condition and/or Contingency Loading.

Response:

Attachment DIV 3-1 includes a table including the FY 2024 budget and forecast. There were no projects solely driven by Asset Condition or Contingency Loading so no projects have been excluded. Projects selected to address comprehensive system issues cannot be separated into incremental components for each driver. Therefore, there is no method or assumptions used to estimate the incremental amount for load related projects if the overall project is designed to also address Asset Condition and/or Contingency Loading. For example, the Warren Substation project establishes two new feeders out of the Warren Substation. The Attachment to Division 2-2 notes this project has loading, contingency loading, and asset condition drivers. There is no ability to lessen the scope to only address the asset condition issues or loading issues or contingency issues. It is not possible to install the feeders at a shorter distance, install one feeder, or install different equipment while still addressing the system needs.

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)
	Project	**Primary Driver**	**Secondary Driver**	**FY2019 Budget**	**FY2019 Actual**	**FY2020 Budget**	**FY2020 Actuals**	**FY2021 Budget**	**FY2021 Actuals**	**FY2022 Budget**	**FY2022 Actuals**	**FY2023 Budget**	**FY2023 Actuals**	**FY2024 Budget**	**FY2024 Actuals**
1	Admiral Street Rebuild & Expansion	Asset Condition	Loading/Contingency Loading	$ 1,404,730	$ 16,868	$ 3,070,000	$ 1,922,212	$ 4,240,000	$ 2,656,637	$ 8,353,353	$ 7,453,290	$ 19,586,940	$ 9,203,758	$ 23,639,500	$ 24,276,329
2	Aqudnck Island Projects	Loading/Contingency Loading												$ -	$ 87,531
3	Aquidneck Island Substations	Loading/Contingency Loading	Asset Condition	$ 90,000	$ 84,574	$ 805,000	$ 285,989	$ 610,000	$ 100,638	$ 720,000	$ 291,372	$ 730,350	$ 1,453,203	$ 1,038,000	$ 1,386,958
4	Central Falls Sub Relief	Loading/Contingency Loading		$ -	$ 81,272	$ -				$ -	$ -	$ -	$ -	$ -	$ -
5	Chase Hill Substation	Loading/Contingency Loading		$ 3,899,920	$ 2,517,337	$ -	$ 1,148,572	$ -	$ 156,714	$ -	$ -	$ -	$ -	$ -	$ -
6	COVID Loading	Loading/Contingency Loading							$ 264,414	$ 2,000,000	$ 915,501	$ -	$ 877,220	$ -	$ 16,381
7	Dunnells Park Substation	Asset Condition	Loading/Contingency Loading	$ 2,699,800	$ 2,312,503	$ 6,250,000	$ 4,427,043	$ 10,080,000	$ 12,951,379	$ 2,082,000	$ 2,924,619	$ 223,220	$ 787,405	$ 66,000	$ 412,333
8	East Providence Substation	Loading/Contingency Loading	Asset Condition	$ 400,000	$ 240,285	$ 1,280,000	$ 410,505	$ 1,550,000	$ 240,370	$ 731,282	$ 277,624	$ 2,494,900	$ 461,017	$ 1,330,000	$ 905,943
9	Jepson Substation	Loading/Contingency Loading		$ 9,284,000	$ 8,518,293	$ 9,300,000	$ 7,841,576	$ 6,895,000	$ 3,839,683	$ 674,251	$ 419,778	$ -	$ (213,397)	$ -	$ -
10	Kilvert Street New Feeder	Loading/Contingency Loading		$ -	$ (12,607)	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
11	Load Relief Blanket	Loading/Contingency Loading		$ 307,000	$ 158,901	$ 265,000	$ 331,858	$ 180,000	$ 95,686	$ 335,000	$ 198,828	$ 230,000	$ 269,881	$ 240,000	$ 2,169,777
12	Minor Scope Projects - CRIW	Loading												$ 270,000	$ 151,941
13	New Lafayette Substation	Loading/Contingency Loading	Asset Condition	$ -	$ -	$ -	$ 25,148	$ 390,000	$ 933,233	$ 1,857,000	$ 2,277,711	$ 2,913,900	$ 982,833	$ 500,000	$ 257,413
14	New Londan Ave Substation	Loading/Contingency Loading		$ 6,416,320	$ 8,101,805	$ 150,000	$ 245,599	$ -	$ 57,172	$ -	$ -	$ -	$ -	$ -	$ -
15	Newport Substation	Loading/Contingency Loading		$ 12,160,000	$ 15,359,802	$ 3,950,000	$ 9,565,902	$ 5,980,000	$ 5,250,371	$ 5,040,144	$ 2,737,350	$ -	$ 173,254	$ -	$ -
16	NWRI Common Items	Loading												$ 434,997	$ 478,734
17	Other Area Study Projects - SCW	Loading/Contingency Loading												$ 266,004	$ 103,501
18	ProvStudy Ph2	Asset Condition	Loading/Contingency Loading											$ 674,500	$ 127,905
19	Quonset Substation Expansion	Loading/Contingency Loading		$ 1,287,850	$ 856,670	$ -	$ 742,384	$ -	$ 188,279	$ -	$ (678)	$ -	$ -	$ -	$ -
20	Shippee Ave Voltage Conversion	Loading/Contingency Loading							$ 56,598	$ -	$ 49,720	$ -	$ 10,565	$ -	$ 58,794
21	Tiverton Substation	Loading/Contingency Loading/Volt												$ 108,999	$ 215,121
22	Transformer Upgrades	Loading/Contingency Loading		$ 550,000	$ 314,043	$ 600,000	$ 691,559	$ 650,000	$ 579,834	$ 700,000	$ 875,824	$ 1,500,000	$ 1,048,180	$ 1,500,000	$ 1,620,341
23	Warren Substation	Loading/Contingency Loading	Asset Condition	$ 450,100	$ 33,753	$ 600,000	$ 302,170	$ 465,000	$ 184,222	$ 621,099	$ 184,930	$ 1,824,480	$ 372,276	$ 1,969,000	$ 2,518,214
24	Weaver Hill Rd Substation	Loading/Voltage/Reliability												$ 1,506,997	$ 592,714
25	Grand Total			$ 38,949,720	$ 38,583,500	$ 26,270,000	$ 27,940,517	$ 31,040,000	$ 27,555,229	$ 23,114,129	$ 18,605,869	$ 29,503,790	$ 15,426,195	$ 33,543,997	$ 35,379,928

Division 3-2

Request:

Regarding response to DIV 2-3, Attachment DIV 2-3, for each year provide the forecasted capital spend to implement load related projects. Exclude spend related to Asset Condition and Contingency Loading. Provide the method or assumptions used to estimate the incremental amount for load related projects if the overall project is designed to also address Asset Condition and/or Contingency Loading.

Response:

Projects selected to address comprehensive system issues cannot be separated into incremental components for each driver. Also see the response to Division 3-1.

Division 3-3
EV Off-Peak Charging Program

Request:

When did the Company initially launch an off-peak charging program? Is the program currently active in 2024?

Response:

The Company initially launched the Off-Peak Charging Rebate Pilot program, branded "SmartCharge RI," in June 2019. The program successfully concluded in Rate Year 4 ("RY4") on August 31, 2022. The program is currently not active.

Division 3-4
EV Off-Peak Charging Program

Request:

Please confirm that off-peak rebates apply to the summer months (June through September) and non-summer months (October through May) for each year of the program.

Response:

Confirmed. The Off-Peak Charging Rebate Pilot, "SmartCharge RI," rewarded participating customers for every kWh charged during the identified off-peak hours during the summer months (June through September) and non-summer months (October through May) for each year of the program.

Division 3-5
EV Off-Peak Charging Program

Request:

For each year since launched, provide the following for Company's off-peak charging program:

a. Number of participants enrolled

b. The pricing structure offered to participants during off-peak hours for summer and non-summer months.

c. Total rewards dispersed

d. Estimated kWh shifted between on-peak and off-peak, and a description of how that estimate was developed.

e. Program costs broken by key categories (devices, systems, internal administration, external administration, etc.)

Response:

a. Please see the table below indicating the number of participants enrolled for each year of the program, "SmartCharge RI."

Year	Number of Participants
2019 (June – December)	276[1]
2020	354[2]
2021	322[3]
2022	277[4]

* *The enrollment figures reflect devices that were activated, installed, and had at least one charging event. Initial approved applications totaled 514 vehicles as of 12/19/2019; however, a number of those applicants were dropped out of the program for various reasons, including but not limited to: (1) not installing their device; (2) not recording an active charge, or; (3) vehicle being sold or lease expiring.*

** *The Off-Peak Charging Rebate program ended all activity on August 31, 2022.*

[1] Source: ERS RY1 Evaluation Report, sec. 4.1.4 "Program Results".
[2] Source: ERS RY2 Evaluation Report, sec. 4.1.2. Table 4-15 "Program Summary Statistics".
[3] Source: DNV RY3 Evaluation Report, sec 4.1.1. Table 4-1 "Program Summary Statistics".
[4] Source: DNV RY4 Evaluation Report, sec 3.1.1.1 "Data Cleaning and Quality Control".

Prepared by or under the supervision of: Allison Archambault

Division 3-5, page 2
EV Off-Peak Charging Program

b. The off-peak charging pricing structure during off-peak hours (9:00 PM – 1:00 PM the following day) included a per-kWh incentive of $0.06 during the summer (June through September) and a per-kWh incentive of $0.04/kWh all other non-summer months (October through May). The pricing structure remained the same throughout all program years. Participants also receive $50 annually for signing up.

c. The total rewards dispersed to participants during the Off-Peak Charging Rebate Pilot, "SmartCharge RI," was $112,029.32.

d. The independent program evaluation firm, DNV (formerly ERS), estimated that the Off-Peak Charging Rebate Pilot, "SmartCharge RI," resulted in a total shift of between 208,276 and 328,306 kWh from on-peak to off-peak times using a regression analysis.[5]

e. Please reference the below table for program costs by key categories.

Total SCRI Program Admin Costs	
Categories	**$**
Setup Fee	$39,000.00
Device Licenses	$319,564.00
Vendor Program Management	$202,800.00
Internal Program Management	$391,131.05
Participant Rewards	$112,029.32
Shipping	$2,392.00
Program Marketing	$55,234.56

[5] Source: DNV Rate Year 4 Final Report sec 4.1.1 "Program Statistics".

Division 3-6
EV Off-Peak Charging Program

Request:

Compare and contrast the current and enhanced off-peak charging programs indicating program changes. Include a description of devices issued to or used by participants to measure charging times and how charging behavior is captured by the Company.

Response:

There are no current or enhanced off-peak charging programs to compare and contrast.

The Company's prior Off-Peak Charging Rebate Pilot branded "SmartCharge RI," used a device that plugged into an EV's ODB-II. The Company's proposed EVDR Pathway in the ConnectedSolutions program will rely on vehicle telematics and/or EV Chargers to curtail charging; the Company is not proposing to measure charging times or behavior.

Division 3-7
EV Off-Peak Charging Program

Request:

For the enhanced off-peak charging program, please provide proposed costs broken down by key categories (devices, systems, internal administration, external administration, etc.), estimated enrollment, and estimated kWh shifted for each year from 2024-2026. Identify any additional investments that are incremental to those previously required to support the program.

Response:

Please refer to the Company's response to Division 3-13 for the proposed costs broken down by key categories and estimated kWh sifted for each year from 2024-2026 for the Electric Vehicle Demand Response ("EVDR") Pathway of ConnectedSolutions. Please refer to the Company's response to Division 3-5 for the same information for its Off-Peak Charging Rebate Pilot, branded "SmartCharge RI."

The Company is not proposing an enhanced off-peak charging program through its System Reliability Procurement ("SRP") Investment Proposal under consideration in Docket 24-06-EE.

For clarity, the Company offered its Off-Peak Charging Rebate Pilot, branded "SmartCharge RI," from 2019-2022. Through Docket 24-06-EE, the Company is proposing to add the EVDR Pathway to its electric demand response program, branded "ConnectedSolutions."

The former program, SmartCharge RI,[1] offered a performance-based cash incentive for charging during a pre-defined off-peak period year-round. In its current proposal for the EVDR Pathway, the Company proposes to offer an upfront cash incentive for enrolling in the EVDR Pathway and an annual participation incentive for remaining enrolled in the EVDR Pathway; the EVDR Pathway requests participants to curtail charging during 30-60 peak events June through September.

[1] The Company reserves its ability to propose a second phase of SmartCharge RI, subject to appropriate regulatory review at that time.

Division 3-8
EV Off-Peak Charging Program

Request:

Explain how the Company currently validates that an EV which is charging off-peak is also connected to RI Energy's electric system?

Response:

The Company does not currently have an active Off-Peak Charging Rebate Pilot or Program (please refer to the Company's response to Division 3-3).

Previously, participants in the Off-Peak Charging Rebate Pilot, branded "SmartCharge RI," had a device that was connected to their vehicle via the ODB-II port. This device recorded 15-min. interval charging data when actively charging. This data geolocated the vehicle against a list of service territory zip codes and marked the charge as either in territory or out of territory.

For the EVDR Pathway proposed in ConnectedSolutions, participants with enrolled in the EVDR Pathway using an eligible electric vehicle only receive signals to curtail charging during peak events when the vehicle is charging at the participant's home location, which must be within Rhode Island Energy's electric service territory to qualify to participate in ConnectedSolutions.

Division 3-9
EV Off-Peak Charging Program

Request:

Describe any previous system or process investments that have been made in order to implement the Company's off-peak charging program (such as metering and billing modifications, etc). Provide the cost and year of investment. Provide which of these investments will be utilized under the Company's proposed expanded off-peak charging programs. Indicate any investments that will be utilized for the Company's proposed EVDR program. Indicate if any investments will no longer be utilized beginning June 1, 2024.

Response:

There were no previous system or process investments that have been made in order to implement the Company's Off-Peak Charging Rebate Pilot ("Pilot"); all previous costs that would fall into this category were contained to services procured for Pilot implementation in 2019-2022.

As such, there were no investments made that are now available for the Company to use for its proposed EVDR Pathway in ConnectedSolutions, nor are any such investments proposed. To implement the EVDR Pathway, the Company proposes to contract with an implementation vendor to utilize the vendor's software. There are no modifications to metering or billing required for the proposed EVDR Pathway.

Division 3-10
EV Demand Response (EVDR)

Request:

The Company explains that the ConnectedSolutions EVDR pathway takes an actively managed charging approach, which actively manages EV loads by remotely curtailing charging hours. (pp 26-27) Confirm that the program design provides RIE full control over EV charging allowing remote curtailing during specified periods (active) as opposed to providing a price signal for participants to reduce charging at specified periods (passive). If RIE has full control, will customers be able to opt out? When RIE adopts time-varying rates, will customers participating in active control be able to achieve additional savings through off-peak rates offered by TOU rates?

Response:

The statement, "the program design provides RIE full control over EV charging allowing remote curtailing during specified periods (active) as opposed to providing a price signal for participants to reduce charging at specified periods (passive)" is partially correct. The statement is correct that the Company is proposing an active program whereby the Company's implementation vendor will curtail EV charging during peak periods. The statement is incorrect that the Company will have full control for two reasons. First, the Company will contract with an implementation vendor; the Company will not directly control or communicate with electric vehicles or charging infrastructure. Second, the implementation vendor will only have partial control; participants will be able to override curtailment signals to charge their vehicles during peak periods at their discretion.

In response to the question, "will customers be able to opt-out": Customers opt in to participate in the EVDR Pathway. Participants may override – or opt out of participating – signals for any or all peak events and for any or all portions of peak events.

In response to the question, "when RIE adopts time-varying rates, will customers participating in active control be able to achieve additional savings through off-peak rates offered by TOU rates?": The instant proposal extends through 2026, which is prior to the completion of advanced metering deployment and prior to potential implementation of time-varying, or TOU, rates.

Please refer to the Company's response to PUC 2-44.

Division 3-11
EV Demand Response (EVDR)

Request:

Explain the methodology and technology that RIE will use to remotely curtail EV charging including whether control will be accomplished through the vehicle's onboard telematics, connected chargers, or some combination. Will electric meter data be utilized, and if so, how? Will customers be required to install a networked connected charger? Will curtailment occur only when charging at a specific location (home, for instance) or at other/public chargers?

Response:

The Company will use our implementation vendor's platform to remotely curtail EV charging. Participants provide the Company's implementation vendor with limited access to curtail charging during peak event times by sending control signals to the internet-connected EV and EV chargers. The implementation vendor's platform can connect to both onboard vehicle telematics and connected chargers (please refer to the Company's response to Division 3-16 for list of approved devices). Customers will not be required to install a networked connected charger to be eligible to participate in the EVDR Pathway. Curtailment through the EVDR Pathway will occur at the location of the EV Charger for participants enrolled with connected chargers, and at the participant's account service address for participants enrolled with onboard telematics.

Division 3-12
EV Demand Response (EVDR)

Request:

Is the Company proposing to reduce the rate of charging (throttle), limit charging to zero percent during curtailment periods, or both? How will the Company determine the curtailment strategy for each participant?

Response:

The Company is proposing to limit charging to zero percent during curtailment periods (referred to as "peak events"). The Company is proposing the same curtailment strategy for each participant.

Division 3-13
EV Demand Response (EVDR)

Request:

For the EVDR pathway, describe all infrastructure, software, systems, etc. required to implement and administer the program. Provide the anticipated start-up investments with costs and also ongoing costs by key categories, for each year from 2024-2026.

Response:

To implement the EVDR Pathway specifically, the Company will contract with an implementation vendor to leverage the implementation vendor's suite of software.[1,2] This software will support all aspects of program administration, including remote curtailment, enrollment, incentive processing, reporting, and marketing. Because the Company is not proposing to own this software, there are no start-up costs. The costs incurred only include ongoing costs, which may be either fixed annual costs to the implementation vendor or volumetric costs based on number of devices enrolled (i.e., an incremental incentive processing fee per device if the number of enrolled devices exceeds 1,250 devices).

Key Category	**Description**	**Start-up Costs**	**Ongoing Costs**
Infrastructure	Physical equipment	$0	2024: $0 2025: $0 2026: $0
Software	Agreement with implementation vendor to use their software platform	$0	2024: $26,000 2025: $53,700 2026: $92,500
Systems	Internal business systems	$0	2024: $0 2025: $0 2026: $0

[1] The Company will also use other enterprise systems for its internal management and administration (e.g., HCM for employee timekeeping); these systems are not specific to the EVDR pathway and costs for these enterprise systems are not included in the SRP Investment Proposal budget.

[2] The Company does not propose any infrastructure investments through its SRP Investment Proposal; infrastructure is not required to implement the EVDR pathway as proposed.

Division 3-14
EV Demand Response (EVDR)

Request:

How will the Company determine when EVDR curtailment will occur? How many hours are in a curtailment period? How many times will curtailments occur per year, by season? Can the Company curtail multiple times per day? Are there both a minimum and maximum number of hours and number of curtailment events each season and/or year?

Response:

The Company will determine when EVDR curtailment will occur based on when the Company decides to call a peak event. Peak events are called to coincide with either the ISO-NE (Independent System Operator of New England) peak hour and/or with the highest daily peaks in July and August. Events will only be called in June and September if the annual peak is forecasted to be in those months. Events will be called in July and August to try to mitigate the highest 40 daily peaks in those months. The Company collaborates with utilities across New England in determining whether/when to call a peak event.

Peak events last two or three hours. Curtailment periods last the duration of the peak event by default, though a participant can override the curtailment at any time.

The Company will not call more than 60 peak events per season (June through September). The Company will not call any peak events in October through May. Curtailments occur during all peak events by default, though a participant can choose to override curtailment at any time.

The Company will not call more than one peak event per day, so curtailment will not occur more than once per day.

The Company intends to call approximately 30 peak events per year and a maximum of 60 peak events per year. If only 30 peak events are called and each peak event lasts the minimum of two hours, curtailment would occur by default for 60 hours in aggregate per year. However, participants may choose to override curtailment at any time. Theoretically, a participant may curtail for zero hours in a year, though the Company anticipates this outcome to be unlikely. If 60 peak events are called and each peak event lasts the maximum of three hours, curtailment would occur by default for 180 hours in aggregate per year.

Division 3-15
EV Demand Response (EVDR)

Request:

Will the Company allow fleet enrollment?

Response:

Yes, the Company will allow fleet enrollment if the customer with the fleet meets the following eligibility requirements.

- Must be a Rhode Island Energy residential or small business electric customers. Participants must be in rate classes A-16, A-60, or C-06; customers in other rate classes are ineligible to participate. Customers in the C-06 rate class may participate in either the Residential and Small Business (RSB) track or the Commercial and Industrial (C&I) track, but they may not participate in both tracks at the same time or switch to a different track midseason.

- Have an approved EV or EV Charger at their residence or place of business (please refer to the Company's responses to PUC 2-1 and Division 3-16 for a list of approved EVs and EV Chargers and more information). If the participant is participating with an approved EV charger, the EV Charger must be installed and activated with internet wi-fi connectivity.

- Participant agrees to allow Rhode Island Energy to curtail charging during peak energy events.

Division 3-16
EV Demand Response (EVDR)

Request:

Will all makes and models of EVs be eligible? If not, please explain.

Response:

Please refer to the Company's response to 2-1, specifically cell 2b in the table embedded in the Company's response.

To participate in the EVDR Pathway, the customer needs to have an EV or EV Charger supported by the program. Please see the table below with the approved EV and EV Chargers:

Provider	**Approved Electric Vehicle or EV Charger**
Tesla	All 2014+ EV models
ChargePoint	CPH50; CPH25; CPH18 - All sub models of the CPH50 are eligible
Emporia	Emporia Smart EV Charger – EMEVSE1(white); EMEVSE1-B (black)
EvoCharge	iEVSE Home 32; iEVSE Home 40; EvoCharge Home 50

If a customer's vehicle make and model is not on the approved list above, the customer can still participate in the EVDR Pathway through a qualified EV charger on the approved list above. Conversely, if a customer purchases and installs a qualified EV charger on the approved list above, the list of vehicles above does not apply.

Some vehicle manufacturers require a subscription to utilize the telematics capabilities of the vehicle. Customers should be aware of these fees before enrolling in the EVDR Pathway.

Approved EV and EV Chargers supported by the program may expand. When a new EV or EV Charger is added, the program guide and the Company's website will be updated accordingly.

Division 3-17
EV Demand Response (EVDR)

Request:

What are the requirements for residential customer participation? Is the pathway available to customers in multi-unit dwellings?

Response:

Eligibility Requirements:

- Must be a Rhode Island Energy residential or small business electric customer. Participants must be in rate classes A-16, A-60, or C-06; customers in other rate classes are ineligible to participate.

- Have an approved EV or EV Charger at their residence or place of business (please refer to the Company's responses to PUC 2-1 and Division 3-16 for a list of approved EVs and EV Chargers and more information). If the participant is participating with an approved EV charger, the EV Charger must be installed and activated with internet wi-fi connectivity.

- Participant agrees to allow Rhode Island Energy to curtail charging during peak energy events.

Customers who live in multi-unit dwellings are eligible to participate in the EVDR Pathway; the same eligibility requirements above apply to potential participants who live in multi-unit dwellings.[1]

[1] The Company recommends that if customers who live in a multi-unit dwelling are participating with an EV Charger, that EV Charger should be dedicated to only those participants.

Division 3-18
EV Demand Response (EVDR)

Request:

Will customers with two EVs at one premise be able to separately enroll in each or both programs (off-peak charging and EVDR)?

Response:

No. Customers are not able to enroll in both the Off-Peak Charging Rebate Pilot and the EVDR Pathway because the Off-Peak Charging Rebate Pilot is not an active program.

Division 3-19
EV Demand Response (EVDR)

Request:

How did the Company derive the $50 upfront enrollment and $20/season participation incentives? How do the Company's program structure and incentives compare to EV demand response programs offered by other regional utilities?

Response:

The Company derived the $50 upfront enrollment and $20/season participation incentive based on two former and current programs in the region. Both Eversource and MA National Grid report similar incentive structures, and both offerings provided both one-time enrollment and ongoing participant incentives to eligible customers. The Company does not claim to know all details of these programs but includes summaries of the incentive structures below.

MA National Grid previously offered an EV ConnectedSolutions Program. Participants received a $50 rebate for enrollment and a $20 annual bill credit. Customers that received National Grid's off-peak charging rebate were not eligible for the program.

Eversource offer(s/ed) an EV ConnectedSolutions Program through their Managed Charging "Off-Peak Rewards" Program.[1] Participants in the Managed Charging program are encouraged to charge their EVs during off-peak hours and participate in peak demand events. Participants may earn up to $200 per program year in rewards, broken down as follows:

- Earn rewards up to $120 per program year for charging during off-peak hours
- Earn up to $80 per program year for not opting out of peak demand events.
  - From June to September, as long as a participant doesn't opt out of a peak demand event, they'll earn $20 per month.

[1] Effective June 8, 2024, pause on program until the Public Utilities Regulatory Authority (PURA) establishes a secure funding mechanism to administer program.

Division 3-20
EV Demand Response (EVDR)

Request:

Will the Company or a third party administer EVDR?

Response:

The Company serves as the Program Administrator, providing strategic direction and management of ConnectedSolutions and the EVDR Pathway. The Company uses a third-party solution provider that offers a software-as-a-service to implement day-to-day program operations. See Bates (pdf page 89) for the details on the Implementation Vendor's role.

Division 3-21
EV Demand Response (EVDR)

Request:

What is the BCA for the EVDR pathway? Discuss the alternative methods the Company considered when developing the EVDR pathway and explain how the Company concluded that its proposed offering is the most cost-effective approach. Provide all workpapers, assumptions and resources utilized in this analysis.

Response:

Please refer to Tables 7-a through 9-a in the Company's response to PUC 2-6 for benefit-cost ratios for the EVDR Pathway, broken down by first-time participants and subsequent participants, for each year 2024 through 2026. The Company only considered the levels of upfront incentive and participation in developing the EVDR Pathway. The Company did not consider "alternative methods" because those methods would not constitute demand response.

For example, please refer to the Company's response to Division 3-7 for an explanation of the key differences between the Company's prior Off-Peak Charging Rebate Pilot (2019-2022) and the proposed EVDR Pathway.

Division 3-22
AMF

Request:

How is AMF deployment, scheduled over the next three to four years, considered in each of the Company's ConnectedSolutions offerings?

Response:

The Company did not factor in the deployment of AMF in its proposal for 2024-2026 because AMF deployment will not be complete until after the 2026 peak season. The Company will factor in AMF to any subsequent proposal for 2027 and beyond.

Division 3-23
AMF

Request:

The Company's states in its AMF business case that investment in next-generation meter technology will enable DER monitoring and management and specifically that "The AMF supports electrification of transportation because it enables time variable rate ("TVR") and critical peak pricing ("CPP") structures to incentivize customers to shift EV charging to off-peak/lower cost periods thereby helping alleviate grid strain." (AMF Business Case, page 53).

a. How will system-wide deployment of AMF enhance or enable the Company's off-peak charging program?

b. What impact will the change from AMR to AMF meters have on the off-peak charging program? Will AMF deployment require modifications to, or displace any systems or processes relied upon to offer and administer the enhanced off-peak charging program? Explain.

c. Has the Company considered offering a time varying rate to encourage off-peak charging, which can be offered with the new AMF meters? Why or why not?

d. How will system-wide deployment of AMF enhance or enable the Company's proposed EVDR pathway?

e. What impact will the change from AMR to AMF meters have on the EVDR pathway? Will AMF deployment require modifications to, or displace any systems or processes relied upon to offer and administer the proposed EVDR pathway? Explain.

f. How will the Company leverage disaggregated load data, made available through AMF at each customer premise, within the EVDR program?

Response:

Please refer to the Company's responses to Division 3-7 and Division 3-22.

Division 3-24

Request:

The Company proposes to launch proposed ConnectedSolutions programs June 1, 2024 and well in advance of AMF deployment which is scheduled over the next three to four years. Has the Company considered deferring new or modified ConnectedSolutions pathways, and specifically enhanced off-peak charging and EVDR, until AMF is deployed in order to leverage the benefits of AMF? Why or why not?

Response:

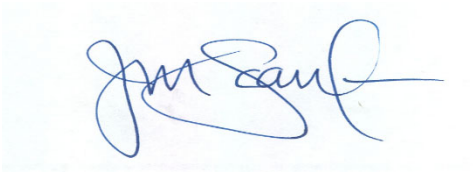
The Company has considered that AMF deployment will not be complete until following the 2026 peak season (please see the Company's response to Division 3-22).

The Company has considered the value of the new and modified ConnectedSolutions pathways in the interim year 2024-2026 and has determined that its proposal to offer the new and modified pathways will provide more value to customers than deferring the new and modified pathways.

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

June 14, 2024
Date

Docket No. 24-06-EE – Rhode Island Energy System Reliability Procurement ("SRP") Investment Proposal for Electric Demand Response 2024-2026 – ConnectedSolutions
Service list 5/29/2024

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