

Andrew S. Marcaccio, Counsel  
PPL Services Corporation  
[AMarcaccio@pplweb.com](mailto:AMarcaccio@pplweb.com)

280 Melrose Street  
Providence, RI 02907  
Phone 401-784-4263



June 24, 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 PUC Set 3**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”), enclosed please find the Company’s responses to the Public Utilities Commission’s (“PUC’s”) 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,

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

Andrew S. Marcaccio

Enclosures

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

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 24-06-EE  
In Re: System Reliability Proposal For  
Electric Demand Response 2024-2026 Connected Solutions  
Responses to the Commission's Third Set of Data Requests  
Issued on June 21, 2024

---

PUC 3-1

Request:

Please provide a table that shows the following for each pathway by year:

Name of pathway; Cost of the pathway for that year; Savings or loss (\$); Estimated net savings or loss (\$); totals for each year and the three-year totals

The witnesses sponsoring this table should be able to testify to the source of the costs and the math in the table, but not the source of the benefits.

Response:

Please refer to Tables 1 and 2, below, for the annual and three-year total costs, benefits, and net (benefits minus costs) for each pathway.

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 24-06-EE  
In Re: System Reliability Proposal For  
Electric Demand Response 2024-2026 Connected Solutions  
Responses to the Commission’s Third Set of Data Requests  
Issued on June 21, 2024

PUC 3-1, page 2

**Table 1: Breakdown by Pathway**

	(a)	(b)	(c)	(d) = (c) – (b)
(1)		<b>Costs</b>	<b>Benefits</b>	<b>Net</b>
(2)	<b>RSB BYOT Pathway</b>			
(3)	<b>2024</b>	\$1,035,034	\$2,633,712	\$1,598,678
(4)	<b>2025</b>	\$1,262,219	\$3,413,205	\$2,150,986
(5)	<b>2026</b>	\$1,454,570	\$4,229,483	\$2,774,912
(6)	<b>3-Year Total</b>	\$3,751,824	\$10,276,401	\$6,524,577
(7)	<b>RSB Battery Pathway</b>			
(8)	<b>2024</b>	\$2,340,308	\$1,387,042	-\$953,266
(9)	<b>2025</b>	\$2,232,843	\$1,508,475	-\$724,368
(10)	<b>2026</b>	\$2,349,081	\$1,802,879	-\$546,203
(11)	<b>3-Year Total</b>	\$6,922,231	\$4,698,395	-\$2,223,836
(12)	<b>RSB EVDR Pathway</b>			
(13)	<b>2024</b>	\$43,442	\$42,048	-\$1,394.7
(14)	<b>2025</b>	\$83,923	\$108,128	\$24,204.7
(15)	<b>2026</b>	\$132,287	\$199,880	\$67,592.7
(16)	<b>3-Year Total</b>	\$259,653	\$350,056	\$90,402.7
(17)	<b>C&amp;I Daily Dispatch Pathway</b>			
(18)	<b>2024</b>	\$5,017,635	\$4,234,826	-\$782,809
(19)	<b>2025</b>	\$5,161,085	\$4,791,645	-\$369,439
(20)	<b>2026</b>	\$5,657,934	\$5,412,976	-\$244,957
(21)	<b>3-Year Total</b>	\$15,836,653	\$14,439,447	-\$1,397,206
(22)	<b>C&amp;I Targeted Dispatch Pathway</b>			
(23)	<b>2024</b>	\$629,496	\$3,400,494	\$2,770,997
(24)	<b>2025</b>	\$667,773	\$3,672,719	\$3,004,946
(25)	<b>2026</b>	\$708,281	\$3,960,370	\$3,252,089
(26)	<b>3-Year Total</b>	\$2,005,550	\$11,033,583	\$9,028,032

Prepared by or under the supervision of:  
Allison Archambault, Lado Kurdgelashvili, and Jessica Reno

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 24-06-EE  
In Re: System Reliability Proposal For  
Electric Demand Response 2024-2026 Connected Solutions  
Responses to the Commission’s Third Set of Data Requests  
Issued on June 21, 2024

---

PUC 3-1, page 3

**Table 2: Annual Totals**

	(a)	(b)	(c)	(d) = (c) – (b)
		<b>Costs</b>	<b>Benefits</b>	<b>Net</b>
(1)	<b>2024</b>	\$9,065,915	\$11,698,121	\$2,632,206
(2)	<b>2025</b>	\$9,407,842	\$13,494,172	\$4,086,330
(3)	<b>2026</b>	\$10,302,154	\$15,605,588	\$5,303,434
(4)	<b>3-Year Total</b>	\$28,775,911	\$40,797,881	\$12,021,970

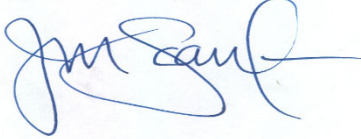
Please note that figures do not include the proposed performance incentive or the regulatory allocation to the Energy Efficiency and Resource Management Council or Rhode Island Office of Energy Resources. The Company’s response to PUC 2-6 further disaggregates the costs and benefits in each pathway and includes the proposed performance incentive or the regulatory allocation.

Please note that in the Company’s original cost estimates, some budget items were not separated by program pathway, but rather by program track. To separate the year-over-year program costs by pathway, the total cost per year for these budget items were weighted by kW saved by each pathway in each respective ConnectedSolutions track.

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 24, 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 6/10/2024**

<b>Name/Address</b>	<b>E-mail Distribution List</b>	<b>Phone</b>
<b>The Narragansett Electric Company d/b/a Rhode Island Energy</b>  Andrew S. Marcaccio, Esq. Celia B. O’Brien, Esq. 280 Melrose St. Providence, RI 02907	<a href="mailto:AMarcaccio@pplweb.com">AMarcaccio@pplweb.com;</a>	401-784-4263
	<a href="mailto:JHutchinson@pplweb.com">JHutchinson@pplweb.com;</a>	
	<a href="mailto:COBrien@pplweb.com">COBrien@pplweb.com;</a>	
	<a href="mailto:JScanlon@pplweb.com">JScanlon@pplweb.com;</a>	
	<a href="mailto:ARArchambault@RIEnergy.com">ARArchambault@RIEnergy.com;</a>	
	<a href="mailto:SBriggs@pplweb.com">SBriggs@pplweb.com;</a>	
	<a href="mailto:KRCastro@RIEnergy.com">KRCastro@RIEnergy.com;</a>	
	<a href="mailto:RConstable@RIEnergy.com">RConstable@RIEnergy.com;</a>	
	<a href="mailto:BSFeldman@RIEnergy.com">BSFeldman@RIEnergy.com;</a>	
	<a href="mailto:KWGauntner@pplweb.com">KWGauntner@pplweb.com;</a>	
	<a href="mailto:CAGill@RIEnergy.com">CAGill@RIEnergy.com;</a>	
	<a href="mailto:RLGolding@RIEnergy.com">RLGolding@RIEnergy.com;</a>	
	<a href="mailto:LKurdgelashvili@pplweb.com">LKurdgelashvili@pplweb.com;</a>	
	<a href="mailto:DMMoreira@RIEnergy.com">DMMoreira@RIEnergy.com;</a>	
<a href="mailto:JEReno@rienergy.com">JEReno@rienergy.com;</a>		
<a href="mailto:BESchuster@RIEnergy.com">BESchuster@RIEnergy.com;</a>		
<b>Division of Public Utilities and Carriers</b>  Margaret L. Hogan, Esq.	<a href="mailto:Margaret.L.Hogan@dpuc.ri.gov">Margaret.L.Hogan@dpuc.ri.gov;</a>	401-784-2120
	<a href="mailto:Christy.hetherington@dpuc.ri.gov">Christy.hetherington@dpuc.ri.gov;</a>	
	<a href="mailto:john.bell@dpuc.ri.gov">john.bell@dpuc.ri.gov;</a>	
	<a href="mailto:Joel.munoz@dpuc.ri.gov">Joel.munoz@dpuc.ri.gov;</a>	
	<a href="mailto:Ellen.golde@dpuc.ri.gov">Ellen.golde@dpuc.ri.gov;</a>	
	<a href="mailto:Paul.Roberti@dpuc.ri.gov">Paul.Roberti@dpuc.ri.gov;</a>	

<p>Gregory L. Booth, PLLC 14460 Falls of Neuse Rd. Suite 149-110 Raleigh, NC 27614</p>	<p><a href="mailto:gboothpe@gmail.com">gboothpe@gmail.com</a>; <a href="mailto:wfwatson924@gmail.com">wfwatson924@gmail.com</a>; <a href="mailto:robin.blanton@ieee.org">robin.blanton@ieee.org</a>; <a href="mailto:lkushner33@gmail.com">lkushner33@gmail.com</a>;</p>	
<p><b>Office of Energy Resources (OER)</b> Albert Vitali, Esq. Dept. of Administration Division of Legal Services One Capitol Hill, 4<sup>th</sup> Floor Providence, RI 02908</p>	<p><a href="mailto:Albert.Vitali@doa.ri.gov">Albert.Vitali@doa.ri.gov</a>; <a href="mailto:Nancy.Russolino@doa.ri.gov">Nancy.Russolino@doa.ri.gov</a>; <a href="mailto:Christopher.Kearns@energy.ri.gov">Christopher.Kearns@energy.ri.gov</a>; <a href="mailto:Steven.Chybowski@energy.ri.gov">Steven.Chybowski@energy.ri.gov</a>; <a href="mailto:William.Owen@energy.ri.gov">William.Owen@energy.ri.gov</a>; <a href="mailto:Nathan.Cleveland@energy.ri.gov">Nathan.Cleveland@energy.ri.gov</a>; <a href="mailto:Shauna.Beland@energy.ri.gov">Shauna.Beland@energy.ri.gov</a>; <a href="mailto:Karen.Bradbury@energy.ri.gov">Karen.Bradbury@energy.ri.gov</a>;</p>	401-222-8880
<p><b>Energy Efficiency &amp; Resource Mgmt. Council (EEMRC)</b> Seth H. Handy, Esq. HANDY LAW, LLC 42 Weybosset Street Providence, RI 02903</p>	<p><a href="mailto:seth@handylawllc.com">seth@handylawllc.com</a>; <a href="mailto:helen@handylawllc.com">helen@handylawllc.com</a>; <a href="mailto:conor@handylawllc.com">conor@handylawllc.com</a>;</p>	401-626-4839
<p><b>RI Attorney General (RIAG)</b> Nick Vaz, Esq. 150 South Main St. Providence, RI 02903</p>	<p><a href="mailto:nvaz@riag.ri.gov">nvaz@riag.ri.gov</a>; <a href="mailto:mbedell@riag.ri.gov">mbedell@riag.ri.gov</a>;</p>	401-274-4400 x 2297
<p><b>Enerwise Global Technologies, LLC d/b/a CPower (CPower)</b> Jonathan Bell, Esq. David C. Fixles Greenberg Traurig LLP One International Place, 20th Floor Boston, Massachusetts 02110  Nancy Chafetz, Sr. Director, Regulatory Affairs CPower</p>	<p><a href="mailto:bellj@gtlaw.com">bellj@gtlaw.com</a>; <a href="mailto:fixlerd@gtlaw.com">fixlerd@gtlaw.com</a>; <a href="mailto:Nancy.Chafetz@CPowerEnergy.com">Nancy.Chafetz@CPowerEnergy.com</a>;</p>	617-310-6038
<p><b>Original &amp; 9 copies file w/:</b> Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888</p>	<p><a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a>; <a href="mailto:Cynthia.wilsonfrias@puc.ri.gov">Cynthia.wilsonfrias@puc.ri.gov</a>; <a href="mailto:John.Harrington@puc.ri.gov">John.Harrington@puc.ri.gov</a>; <a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov</a>; <a href="mailto:Todd.bianco@puc.ri.gov">Todd.bianco@puc.ri.gov</a> ; <a href="mailto:Theodore.Smith.CTR@puc.ri.gov">Theodore.Smith.CTR@puc.ri.gov</a>;</p>	401-780-2107
<p>Larry Chretien</p>	<p><a href="mailto:Larry@massenergy.org">Larry@massenergy.org</a>;</p>	
<p>Emily Koo, Director, Acadia Ctr</p>	<p><a href="mailto:EKoo@acadiacenter.org">EKoo@acadiacenter.org</a>;</p>	

Matt Sullivan, Green Development LCC	<a href="mailto:ms@green-ri.com">ms@green-ri.com</a> ;	
Hannah Morini, Green Dev.	<a href="mailto:hm@green-ri.com">hm@green-ri.com</a> ;	
Krysti Shallenberger	<a href="mailto:krysti.shallenberger@sunrun.com">krysti.shallenberger@sunrun.com</a> ;	
Blake Elder	<a href="mailto:belder@eq-research.com">belder@eq-research.com</a> ;	
Dana Goodman	<a href="mailto:dana@nec-solar.com">dana@nec-solar.com</a> ;	
Doug Sabetti	<a href="mailto:doug@newportsolarri.com">doug@newportsolarri.com</a> ;	
Stuart Flanagan	<a href="mailto:sflanagan@nptre.com">sflanagan@nptre.com</a> ;	
Molly Esau	<a href="mailto:mesau@nptre.com">mesau@nptre.com</a> ;	
Eoin Walsh	<a href="mailto:ewalsh@nptre.com">ewalsh@nptre.com</a> ;	
Alycia Goody, Esq., NECEC	<a href="mailto:agoody@necec.org">agoody@necec.org</a> ;	