

LETICIA C. PIMENTEL

One Financial Plaza, 14th Floor  
Providence, RI 02903-2485  
Main (401) 709-3300  
Fax (401) 709-3378  
lpimentel@rc.com  
Direct (401) 709-3337

Also admitted in Massachusetts

June 12, 2024

**VIA HAND DELIVERY & ELECTRONIC MAIL**

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

**RE: Docket No. 24-17-EL – 2024 Residential Assistance Recovery Filing  
Responses to Division Data Requests –DIV Set 1**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”), I have enclosed the Company’s responses to the Division of Public Utilities and Carriers’ First Set of Data Requests in the above-referenced docket.

Thank you for your attention to this matter. If you have any questions, please contact me at (401) 709-3337.

Very truly yours,



Leticia C. Pimentel

Enclosure

cc: Docket 24-17-EL Service List

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate were 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.

Heidi J. Seddon

June 12, 2024

Date

**Docket No. 24-17-EL – Rhode Island Energy – 2024 Residential Assistance Recovery Filing Service List updated 5/15/2024**

<b>Name/Address</b>	<b>E-mail Distribution</b>	<b>Phone</b>
The Narragansett Electric Company <b>d/b/a Rhode Island Energy</b> Leticia Pimentel, Esq. Robinson & Cole LLP One Financial Plaza, 14th Floor Providence, RI 02903	<a href="mailto:LPimentel@rc.com">LPimentel@rc.com;</a>	401-709-3337
	<a href="mailto:HSeddon@rc.com">HSeddon@rc.com;</a>	
	<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:SBriggs@pplweb.com">SBriggs@pplweb.com;</a>	
<b>Division of Public Utilities and Carriers</b>  Gregory S. Schultz, Esq. Dept. Of Attorney General 150 South Main St. Providence, RI 02903	<a href="mailto:gschultz@riag.ri.gov">gschultz@riag.ri.gov;</a>	
	<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:Ellen.golde@dpuc.ri.gov">Ellen.golde@dpuc.ri.gov;</a>	
	<a href="mailto:Machaela.Seaton@dpuc.ri.gov">Machaela.Seaton@dpuc.ri.gov;</a>	
	<a href="mailto:Margaret.L.Hogan@dpuc.ri.gov">Margaret.L.Hogan@dpuc.ri.gov;</a>	
	<a href="mailto:Al.mancini@dpuc.ri.gov">Al.mancini@dpuc.ri.gov;</a>	
<b>File an original &amp; 5 copies w/:</b> Luly E. Massaro, Commission Clerk <b>Public Utilities Commission</b> 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov;</a>	401-780-2017
	<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:John.harrington@puc.ri.gov">John.harrington@puc.ri.gov;</a>	
	<a href="mailto:Cynthia.WilsonFrias@puc.ri.gov">Cynthia.WilsonFrias@puc.ri.gov;</a>	
	<a href="mailto:Christopher.Caramello@puc.ri.gov">Christopher.Caramello@puc.ri.gov;</a>	
Chris Kearns RI Office of Energy Resources	<a href="mailto:Nicholas.ucci@energy.ri.gov">Nicholas.ucci@energy.ri.gov;</a>	401-574-9119
	<a href="mailto:Christopher.Kearns@energy.ri.gov">Christopher.Kearns@energy.ri.gov;</a>	
Frederick Sneesby, Dept. of Human Services	<a href="mailto:Frederick.sneesby@dhs.ri.gov">Frederick.sneesby@dhs.ri.gov;</a>	
Camilo Viveiros The George Wiley Center	<a href="mailto:camiloviveiros@gmail.com">camiloviveiros@gmail.com;</a>	401-728-5555
	<a href="mailto:georgewileycenterri@gmail.com">georgewileycenterri@gmail.com;</a>	

Jennifer Wood, Esq. Center for Justice	<a href="mailto:jwood@centerforjustice.org">jwood@centerforjustice.org</a> ;	401-941-1101
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Division 1-1

Request:

Referring to Schedule NECO-3, Page 2, what was the driver of the decrease of 6,489 in the number of customers receiving the 25% discount between November and January 2024?

Response:

Per the Company's tariff for Low Income Rate (A-60) Retail Delivery Service, R.I.P.U.C. No. 2225: "It is the responsibility of the customer to annually certify, by forms provided by the Company, the continued compliance with the foregoing provisions."

The decrease in the number of customers receiving the 25% discount between November 2023 and January 2024 is largely due to customers who received service via R.I.P.U.C. No. 2225 in 2023 reverting to service via the Company's tariff for Basic Residential Rate (A-16) Retail Delivery Service, R.I.P.U.C. No. 2224, in 2024 as a result of not completing the annual certification process described above.

Division 1-2

Request:

Referring to Schedule NECO-3, Page 2, what was the driver of the approximately 10% decrease in the number of customers receiving the 30% discount that occurred in December 2023? Also, please provide the reason for the subsequent increase in January 2024 of approximately 10%.

Response:

Per the Company's tariff for Low Income Rate (A-60) Retail Delivery Service, R.I.P.U.C. No. 2225: "It is the responsibility of the customer to annually certify, by forms provided by the Company, the continued compliance with the foregoing provisions."

The decrease in the number of customers receiving the 30% discount in December 2023 is largely due to customers who received service via R.I.P.U.C. No. 2225 prior to December 2023 reverting to service via the Company's tariff for Basic Residential Rate (A-16) Retail Delivery Service, R.I.P.U.C. No. 2224, in December 2023 as a result of not completing the annual certification process described above. The subsequent increase of customers in January 2024 reflects the enrollment of qualified accounts.

Division 1-3

Request:

According to NECO-3, Page 2, Line 37, the average number of customers on the A-60 rate for the 12-months ending April 2024 was 36,320. The average for the period January through April 2024 was 31,999. Does the Company expect the number of customers on the A-60 rate to remain at the lower level for the upcoming 12-month period? Please explain why or why not. If it remains at a lower level, what would the impact be on the projected low income discount (NECO-3, Page 1, Line 26)?

Response:

No. Please refer to page 1 of Attachment DIV 1-3 which provides historical monthly customer counts for A-60 customers for the period September 2018 through April 2024. Page 2 of the attachment also compares the following for each Residential Assistance Recovery Filing for the past 5 years:

1. The actual average monthly A-60 customer count for the period January through April preceding the forecast period (July through June) for which the total low-income discount is calculated in the filing.
2. The actual average monthly A-60 customer count for the 12-month period ending April preceding the forecast period (July through June) for which the total low-income discount is calculated in the filing.<sup>1</sup>
3. The forecast average monthly A-60 customer count for the forecast period (July through June) for which the total low-income discount is calculated in the filing.
4. The actual average monthly A-60 customer count for the forecast period (July through June) for which the total low-income discount is calculated in the filing.

In Docket Nos. 4950, 5156, 5259, and 23-17-EL, the Company's forecast for the forecast period (July through June) for which the total low-income discount is calculated in the filing had the lowest variance relative to actual customer counts for that same period. Although the average monthly A-60 customer count for the period January through April 2024 is approximately 12% lower than the average monthly A-60 customer count for the 12-months ending April 2024, the Company does not have any reasonable basis from which to assume that this pattern will hold over the forecast period July 2024 through June 2025. Based on the prior 5 filings, the relatively most reliable indicator of actual average monthly A-60 customer counts for the upcoming forecast period is the Company's forecast.

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<sup>1</sup> With respect to Docket No. 4950, the eight-month period ending April 2019 is used. The program was not in effect prior to September 2018.

Division 1-3, Page 2

In the instant proceeding, the Company's forecast equates to an average monthly A-60 customer count of 36,295.<sup>2</sup> A forecast average monthly A-60 customer count of 31,999, utilizing an assumed forecast average use per customer of approximately 562 kWh,<sup>3</sup> would equate to forecast kWh billing determinants equal to 215,959,712. The Company estimates that, all else equal, the total low-income discount for the period July 2024 through June 2025 using these alternative billing determinants would be approximately \$16.4M, as compared to the Company's original estimate of \$18.6M. Please see page 3 of Attachment DIV 1-3.

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<sup>2</sup> Calculated as the forecasted July 2024 – June 2025 customer count of 435,537 divided by 12.

<sup>3</sup> Calculated as the forecasted July 2024 – June 2025 kWh of 244,951,624 divided by the forecasted July 2024 – June 2025 customer count of 435,537.

**Rate A-60: Historical Customer Counts**

(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
Month-Year	Source	25% Discount	30% Discount	Total	Month-Over-Month Change	Month-Over-Month Change (%)	12-Month Rolling Average
(1)	Sep-18	33,530	117	33,647			
(2)	Oct-18	32,732	229	32,961	(686)	-2%	
(3)	Nov-18	31,120	801	31,921	(1,040)	-3%	
(4)	Dec-18	29,039	1,537	30,576	(1,345)	-4%	
(5)	Jan-19	29,134	1,940	31,074	498	2%	
(6)	Feb-19	30,705	2,245	32,950	1,876	6%	
(7)	Mar-19	26,329	2,138	28,467	(4,483)	-14%	
(8)	Apr-19	31,168	2,666	33,834	5,367	19%	
(9)	May-19	28,946	2,837	31,783	(2,051)	-6%	
(10)	Jun-19	28,946	3,079	32,025	242	1%	
(11)	Jul-19	28,946	2,730	31,676	(349)	-1%	
(12)	Aug-19	31,066	3,373	34,439	2,763	9%	32,113
(13)	Sep-19	29,906	3,540	33,446	(993)	-3%	32,096
(14)	Oct-19	29,818	3,792	33,610	164	0%	32,150
(15)	Nov-19	29,024	3,773	32,797	(813)	-2%	32,223
(16)	Dec-19	27,406	3,671	31,077	(1,720)	-5%	32,265
(17)	Jan-20	27,505	4,006	31,511	434	1%	32,301
(18)	Feb-20	27,869	4,032	31,901	390	1%	32,214
(19)	Mar-20	28,415	4,111	32,526	625	2%	32,552
(20)	Apr-20	28,931	4,329	33,260	734	2%	32,504
(21)	May-20	29,793	4,648	34,441	1,181	4%	32,726
(22)	Jun-20	29,573	4,548	34,121	(320)	-1%	32,900
(23)	Jul-20	28,539	4,282	32,821	(1,300)	-4%	32,996
(24)	Aug-20	29,713	4,934	34,647	1,826	6%	33,013
(25)	Sep-20	27,396	4,793	32,189	(2,458)	-7%	32,908
(26)	Oct-20	27,245	4,776	32,021	(168)	-1%	32,776
(27)	Nov-20	26,534	4,757	31,291	(730)	-2%	32,651
(28)	Dec-20	25,057	4,415	29,472	(1,819)	-6%	32,517
(29)	Jan-21	26,450	4,766	31,216	1,744	6%	32,492
(30)	Feb-21	27,641	4,828	32,469	1,253	4%	32,540
(31)	Mar-21	27,147	4,745	31,892	(577)	-2%	32,487
(32)	Apr-21	27,208	4,952	32,160	268	1%	32,395
(33)	May-21	27,506	5,036	32,542	382	1%	32,237
(34)	Jun-21	27,397	5,145	32,542	-	0%	32,105
(35)	Jul-21	29,879	5,031	34,910	2,368	7%	32,279
(36)	Aug-21	31,210	5,234	36,444	1,534	4%	32,429
(37)	Sep-21	29,646	4,820	34,466	(1,978)	-5%	32,619
(38)	Oct-21	30,731	5,122	35,853	1,387	4%	32,938
(39)	Nov-21	31,014	5,093	36,107	254	1%	33,339
(40)	Dec-21	29,970	4,884	34,854	(1,253)	-3%	33,788
(41)	Jan-22	30,723	5,015	35,738	884	3%	34,165
(42)	Feb-22	30,908	5,061	35,969	231	1%	34,456
(43)	Mar-22	30,903	5,077	35,980	11	0%	34,797
(44)	Apr-22	32,799	5,262	38,061	2,081	6%	35,289
(45)	May-22	32,817	5,046	37,863	(198)	-1%	35,732
(46)	Jun-22	32,663	4,971	37,634	(229)	-1%	36,157
(47)	Jul-22	34,118	5,253	39,371	1,737	5%	36,528
(48)	Aug-22	33,346	5,216	38,562	(809)	-2%	36,705
(49)	Sep-22	33,483	5,192	38,675	113	0%	37,056
(50)	Oct-22	32,491	5,208	37,699	(976)	-3%	37,209
(51)	Nov-22	32,521	5,379	37,900	201	1%	37,359
(52)	Dec-22	30,479	5,049	35,528	(2,372)	-6%	37,415
(53)	Jan-23	33,188	5,525	38,713	3,185	9%	37,663
(54)	Feb-23	33,086	5,754	38,840	127	0%	37,902
(55)	Mar-23	32,643	5,461	38,104	(736)	-2%	38,079
(56)	Apr-23	33,150	5,457	38,607	503	1%	38,125
(57)	May-23	35,586	4,488	40,074	1,467	4%	38,309
(58)	Jun-23	34,440	5,679	40,119	45	0%	38,516
(59)	Jul-23	33,236	5,492	38,728	(1,391)	-3%	38,462
(60)	Aug-23	32,779	5,316	38,095	(633)	-2%	38,424
(61)	Sep-23	34,074	5,377	39,451	1,356	4%	38,488
(62)	Oct-23	33,461	5,418	38,879	(572)	-1%	38,587
(63)	Nov-23	33,122	5,475	38,597	(282)	-1%	38,645
(64)	Dec-23	28,928	4,975	33,903	(4,694)	-12%	38,509
(65)	Jan-24	26,633	5,516	32,149	(1,754)	-5%	37,962
(66)	Feb-24	26,113	5,433	31,546	(603)	-2%	37,354
(67)	Mar-24	26,126	5,639	31,765	219	1%	36,826
(68)	Apr-24	26,651	5,883	32,534	769	2%	36,320
(69)	May-24	26,569	5,859	32,428	(106)	0%	35,683



**Rate A-60: Comparison of Customer Counts by Filing**  
\*Lowest Variance Relative to Actuals for Forecast Period

	(A)	(B)	(C)
		Total Monthly Average	% Variance to Actual
<b>Docket No. 4950 (Forecast Period: July 2019 - June 2020)</b>			
(69)	Average: January to April 2019	31,581	-4.01%
(70)	Average: 8-Months Ending April 2019	31,929	-2.95%
(71)	Average: July 2019 to June 2020 (Forecast)	32,507	-1.20%*
(72)	Average: July 2019 to June 2020 (Actual)	32,900	
<b>Docket No. 5031 (Forecast Period: July 2020 - June 2021)</b>			
(73)	Average: January to April 2020	32,300	0.61%*
(74)	Average: 12-Months Ending April 2020	32,504	1.24%
(75)	Average: July 2020 to June 2021 (Forecast)	33,462	4.23%
(76)	Average: July 2020 to June 2021 (Actual)	32,105	
<b>Docket No. 5156 (Forecast Period: July 2021 - June 2022)</b>			
(77)	Average: January to April 2021	31,934	-11.68%
(78)	Average: 12-Months Ending April 2021	32,395	-10.40%
(79)	Average: July 2021 to June 2022 (Forecast)	32,454	-10.24%*
(80)	Average: July 2021 to June 2022 (Actual)	36,157	
<b>Docket No. 5259 (Forecast Period: July 2022 - June 2023)</b>			
(81)	Average: January to April 2022	36,437	-5.40%
(82)	Average: 12-Months Ending April 2022	35,289	-8.38%*
(83)	Average: July 2022 to June 2023 (Forecast)	36,797	-4.46%*
(84)	Average: July 2022 to June 2023 (Actual)	38,516	
<b>Docket No. 23-17-EL (Forecast Period: July 2023 - June 2024)</b>			
(85)	Average: January to April 2023	38,566	9.32%
(87)	Average: 12-Months Ending April 2023	38,125	8.06%
(86)	Average: July 2023 to June 2024 (Forecast)	36,224	2.68%*
(88)	Average: July 2023 to May 2024 (Actual)	35,280	

**Notes:**

- (71) Docket No. 4950, Schedule REP-3, Page 1 of 2, Column (a), Line (3) divided by 12.
- (75) Docket No. 5031, Schedule ASC-3, Page 1 of 2, Column (a), Line (3) divided by 12.
- (79) Docket No. 5156, Schedule DEG-3, Page 1 of 2, Column (a), Line (3) divided by 12.
- (83) Docket No. 5259, Schedule NECO-3, Page 1 of 4, Column (a), Line (3) divided by 12.
- (86) Docket No. 23-17-EL, Schedule NECO-3, Page 1 of 2, Column (a), Line (3) divided by 12.

(1) July 2024 - June 2025 A-60 Forecast (Customer Count)	435,537	
(2) July 2024 - June 2025 A-60 Forecast (kWh)	244,951,625	
(3) July 2024 - June 2025 A-60 Forecast (Winter kWh)	119,297,019	
(4) July 2024 - June 2025 A-60 Forecast (Summer kWh)	125,654,606	
(5) July 2024 - June 2025 A-60 Forecast (Average Use Per Customer)	562	= (2) ÷ (1)
(6) Division 1-3: Assumed July 2024 - June 2025 A-60 Forecast (Monthly Customer Count)	31,999	
(7) Division 1-3: Assumed July 2024 - June 2025 A-60 Forecast (Annual Customer Count)	383,988	= (6) x 12
(8) Division 1-3: Assumed July 2024 - June 2025 A-60 Forecast (kWh)	215,959,712	= (5) x (7)
(9) Division 1-3: Assumed July 2024 - June 2025 A-60 Forecast (Winter kWh)	105,177,297	= [(3) ÷ (2)] x (8)
(10) Division 1-3: Assumed July 2024 - June 2025 A-60 Forecast (Summer kWh)	110,782,415	= (8) - (9)

	Rate A-60 <u>Units</u> (a)	Rate A-60 <u>Rates</u> (b)	<u>Charges</u> (c)
(11) Customer Charge	383,988	\$6.00	\$2,303,928
(12) RE Growth Factor	383,988	\$4.02	\$1,543,632
(13) LIHEAP Enhancement Surcharge	383,988	\$0.79	\$303,351
(14) Distribution kWh Charge	215,959,712	\$0.04580	\$9,890,955
(15) ISR CapEx Factor	215,959,712	\$0.00709	\$1,531,154
(16) ISR CapEx Reconciliation Factor	215,959,712	(\$0.00151)	(\$326,099)
(17) ISR O&M Factor	215,959,712	\$0.00227	\$490,229
(18) ISR O&M Reconciliation Factor	215,959,712	\$0.00016	\$34,554
(19) Pension/PBOP Factor	215,959,712	(\$0.00394)	(\$850,881)
(20) Revenue Decoupling Mechanism Adjustment Factor	215,959,712	\$0.00076	\$164,129
(21) Storm Fund Replenishment Factor	215,959,712	\$0.00788	\$1,701,763
(22) Arrears Management Adjustment Factor	215,959,712	\$0.00009	\$19,436
(23) Low Income Discount Recovery Factor	215,959,712	\$0.00000	\$0
(24) Performance Incentive Factor	215,959,712	\$0.00000	\$0
(25) Last Resort Service Adjustment Factor	215,959,712	\$0.00000	<u>\$0</u>
(26) Subtotal Distribution Energy Charge			\$12,655,239
(27) Transmission Charge	215,959,712	\$0.04161	\$8,986,084
(28) Transition Charge	215,959,712	\$0.00000	\$0
(29) Energy Efficiency Program Charge	215,959,712	\$0.01169	\$2,524,569
(30) Renewable Energy Distribution Charge	215,959,712	\$0.02233	<u>\$4,822,380</u>
(31) Total Delivery Service Charges			\$33,139,182
(32) Winter Commodity Charge	105,177,297	\$0.17741	\$18,659,504
(33) Summer Commodity Charge	<u>110,782,415</u>	\$0.10377	<u>\$11,495,891</u>
(34) Total Commodity Charges	215,959,712		\$30,155,396
(35) Total			\$63,294,578
<b>(36) Low Income Discount</b>		<b>25.9%</b>	<b>\$16,393,296</b>

- (a) Company forecast as adjusted per Division 1-3 assumptions
- (b) All lines except (12) per R.I.P.U.C. 2095, Effective April 1, 2024
- (c) Column (a) x Column (b)

- (1) Docket No. 24-17-EL, Schedule NECO-3, Page 1, Column (a), Line (1)
- (2) Docket No. 24-17-EL, Schedule NECO-3, Page 1, Column (a), Line (4)
- (3) Docket No. 24-17-EL, Schedule NECO-3, Page 1, Column (a), Line (22)
- (4) Docket No. 24-17-EL, Schedule NECO-3, Page 1, Column (a), Line (23)
- (6) Assumed per Division 1-3

- (22) Docket No. 24-17-EL, Schedule NECO-1, Page 1, Line (5)
- (23) A-60 customers are exempt from Low Income Discount Recovery Factor
- (26) Sum of Lines (14) through (25)
- (31) Sum of Lines (11) through (13) + Line (26) + Lines (27) through (30)
- (32) R.I.P.U.C. Tariff 2096, Effective October 1, 2023
- (33) R.I.P.U.C. Tariff 2096, Effective April 1, 2024
- (34) Line (32) + Line (33)
- (35) Line (31) + Line (34)
- (36)(b) Docket No. 24-17-EL, Schedule NECO-3, Page 2, Section 3, Line (37), Column (d)
- (36)(c) Line (35) x Line (35)(b)