

Rhode Island Energy

The Narragansett Electric Company

FY 2024 Electric Infrastructure,
Safety and Reliability Plan

Annual Reconciliation

August 1, 2024

Docket No. 22-53-EL

Submitted to:
Rhode Island Public Utilities Commission

Submitted by:



Rhode Island Energy™

a PPL company

August 1, 2024

VIA ELECTRONIC MAIL AND HAND DELIVERY

Stephanie De La Rosa, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

**RE: Docket No. 22-53-EL - FY 2024 Electric Infrastructure, Safety, and Reliability Plan
Reconciliation Filing**

Dear Ms. De La Rosa:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”), enclosed, please see the Company’s Annual Reconciliation for the Fiscal Year (“FY”) 2024¹ Electric Infrastructure, Safety, and Reliability (“ISR”) Plan (this “Filing” or “Reconciliation Filing”). This Filing is being submitted to the Public Utilities Commission (“PUC”) in accordance with R.I. Gen. Laws § 39-1-27.7.1(c) and Sections (I)(B) and (IV) of the Infrastructure, Safety, And Reliability Provision, R.I.P.U.C. No. 2255 (the “ISR Provision”).

This Filing consists of the following documents:

- **Pre-Filed Direct Testimony of Nicole A. Gooding** – The testimony of Ms. Gooding presents the Filing in relation to the FY 2024 Electric ISR Plan which was approved by the PUC in this docket. Attachment NAG-1, which is attached to Ms. Gooding’s testimony, includes an Executive Summary, FY 2024 Plant in Service Additions, FY 2024 Capital Spending Summary, FY 2024 Capital Spending by Key Driver Category, FY 2024 Vegetation Management (“VM”), FY 2024 Other Operations and Maintenance (“O&M”), and Reliability Performance. See below for summary:

Item	Target/Budget	Actual
Plant in Service Additions	\$89.0M	\$97.3M
Cost of Removal Spending	\$15.7M	\$9.3M
Capital Spending	\$112.3M	\$124.7M
O&M Spending	\$15.1M	\$14.9M

¹ FY 2024 was April 1, 2023 through March 31, 2024.

In addition, Attachment NAG-1 includes the results of a review of distributed generation (“DG”) projects undertaken by the Company. See below for summary of the results:

Item	Amount
Plant in Service between FY 2013 and FY 2022 as initially in rate base prior to the Company’s review.	\$11.8M
Plant in Service removed through the FY 2023 Reconciliation Filing while the Company conducted its review.	\$10.6M (out of \$11.8M)
Remaining Plant in Service between FY 2013 and FY 2022	\$1.2M
Additional Plant in Service consisting of plant placed back into service from the \$10.6M as well as new plant for FY 2024	\$1.0M
Total Plant in Service FY 2013 through FY 2024	\$2.2M

- **Pre-Filed Direct Testimony of Jeffrey D. Oliveira** – The testimony of Mr. Oliveira describes the calculation of the revenue requirement. The revenue requirement (including tax related adjustments as described in Ms. Hawk’s testimony) totals \$54,282,082. This is a decrease of \$1,135,976 from the projected FY 2024 Electric ISR revenue requirement of \$55,418,057, previously approved by the PUC in this docket.
- **Pre-Filed Direct Testimony of Natalie Hawk** – The testimony of Ms. Hawk describes tax related adjustments to the revenue requirement including the income tax components of the FY 2024 revenue requirement, FY 2024 tax updates used to calculate accumulated deferred income taxes (“ADIT”), FY 2023 tax updates which resulted in a “true-up” to the revenue requirement, and the hold harmless adjustments.
- **Pre-Filed Direct Testimony of Tyler G. Shields** – The testimony of Mr. Shields presents the proposed CapEx and O&M Reconciling Factors, as those terms are defined in the ISR Provision, resulting from the reconciliation of actual costs and revenue associated with the FY 2024 ISR Plan. The impact of the proposed CapEx Reconciling Factor of \$0.00020 per kWh and the proposed O&M Reconciling Factor of \$0.00010 per kWh on a typical residential customer receiving Last Resort Service and using 500 kWh per month is an increase of \$0.86, or approximately 0.6%, from \$137.54 to \$138.40.

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

Sincerely,



Andrew S. Marcaccio

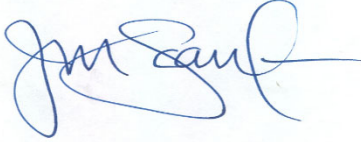
Enclosures

cc: Docket No. 22-53-EL Service List

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

August 1, 2024

Date

Docket No. 22-53-EL – RI Energy’s Electric ISR Plan FY 2024
Service List as of 9/13/2023

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**THE NARRAGANSETT ELECTRIC COMPANY
d/b/a RHODE ISLAND ENERGY
RIPUC DOCKET NO. 22-53-EL
FY 2024 ELECTRIC INFRASTRUCTURE, SAFETY, AND RELIABILITY PLAN
ANNUAL RECONCILIATION FILING
WITNESS: NICOLE A. GOODING**

PRE-FILED DIRECT TESTIMONY

OF

NICOLE A. GOODING

August 1, 2024

THE NARRAGANSETT ELECTRIC COMPANY
d/b/a RHODE ISLAND ENERGY
RIPUC DOCKET NO. 22-53-EL
FY 2024 ELECTRIC INFRASTRUCTURE, SAFETY, AND RELIABILITY PLAN
ANNUAL RECONCILIATION FILING
WITNESS: NICOLE A. GOODING

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I. Introduction and Qualifications

Q. Ms. Gooding, please state your name and business address.

A. My name is Nicole A. Gooding. My business address is 280 Melrose Street, Providence Rhode Island 02907.

Q. Ms. Gooding, by whom are you employed and in what position?

A. I am employed by The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company” or “Rhode Island Energy”) as ISR Manager. In my position, I am responsible for the filing and reporting of electric infrastructure, safety, and reliability (“ISR”) plans, as well as the electric distribution five-year investment plan.

Q. Ms. Gooding, please describe your educational background and professional experience.

A. In 2017, I graduated from the University of South Carolina with a Bachelor of Science degree in International Business, Finance and Risk Management. In June 2017, I joined National Grid USA Service Company, Inc. (“NGSC”) as an Associate Project Manager in the Gas Complex Capital Delivery department, progressing to a Project Manager in October 2018. I managed the execution of liquefied natural gas (“LNG”), regulator station and leak-prone pipe projects in Rhode Island and Massachusetts. In 2021, I moved to Goulston & Storrs as a Project Management Organization (“PMO”) Specialist, working on implementing project management practices and policies across the business. I completed

1 my Master of Business Administration degree in December 2021 from the College of
2 William and Mary and Project Management Professional (“PMP”) Certification in
3 June 2022. I joined Rhode Island Energy in July of 2022 and assumed my role as ISR
4 Manager.

5
6 **Q. Have you previously testified before the Rhode Island Public Utilities Commission**
7 **(PUC)?**

8 A. Yes. I have previously testified before the PUC in support of the Company’s Fiscal Year
9 (“FY”) 2024 Electric Infrastructure, Safety and Reliability Plan in Docket 22-53-EL, the
10 FY 2023 Electric Infrastructure, Safety and Reliability Plan Annual Reconciliation in
11 Docket 5209, and the Tiverton and Weaver Hill Petitions for Acceleration Due to DG
12 Project in Dockets 23-37-EL and 23-38-EL, respectively.

13
14 **II. Purpose of Testimony**

15 **Q. What is the purpose of your testimony?**

16 A. The purpose of my testimony is to present the Company’s FY 2024 Annual
17 Reconciliation filing related to the Electric ISR Plan approved by the PUC in this docket.
18 This filing provides the actual plant in service for discretionary and non-discretionary
19 capital investment and associated cost of removal (“COR”), the actual vegetation
20 management (“VM”) operation and maintenance (“O&M”) expenses, and the

1 actual inspection and maintenance (“I&M”) program and other O&M expenses for the
2 period April 1, 2023, to March 31, 2024. As described in Mr. Jeffrey Oliveira’s
3 testimony in this filing, the plant in service investment and the O&M expenses are used
4 to calculate the FY 2024 Electric ISR Plan revenue requirement. As explained in Mr.
5 Tyler Shields’ testimony in this filing, the annual capital investment revenue requirement
6 on the actual cumulative ISR capital investment and the actual O&M expense incurred is
7 then reconciled against the actual revenue billed during FY 2024. Specific details by
8 category for the FY 2024 Electric ISR Plan plant additions, associated COR, and actual
9 capital spending are included in Attachment NAG-1, which is attached to this testimony.
10

11 **III. Plant In Service and Cost of Removal**

12 **Q. Please provide an overview of the plant in service and cost of removal for FY 2024.**

13 **A.** As shown in Table 2 of Attachment NAG-1, in FY 2024, plant additions of \$97.3 million
14 were placed in service. This amount was \$8.3 million over the target of \$89.0 million.
15 Non-Discretionary plant additions totaling \$45.5 million were placed in service, which
16 was \$1.4 million over the target of \$44.0 million. Actual plant additions related to
17 transformer purchases were significantly higher than target. Discretionary plant
18 additions totaling \$51.8 million were placed in service, which was \$6.9 million over the
19 planned amount of \$45.0 million. Assets associated with the Dyer Street Substation
20 distribution line project went into service in FY 2024. These assets were expected to go
21 into service in FY 2023, therefore, no additions were targeted in FY 2024.

As shown in Table 3 of Attachment NAG-1, the associated cost of removal was \$9.3 million, which was \$6.4 million lower than the FY 2024 target of \$15.7 million. The primary drivers of the lower removal costs were the deferral of removal work at the Pawtucket #1 Substation, part of the Southeast Substation project, and Admiral Street Substation, part of the Providence Study Phase 1B project. These totals resulted in an Electric ISR Plan investment of \$106.6 million, which was \$1.9 million over the Company's target of \$104.7 million. Additional details on these variances are included in Section I of Attachment NAG-1.

IV. Capital Spending

Q. Please summarize the Company's actual capital spending for FY 2024 for the Electric ISR Plan.

A. As shown in Table 4 of Attachment NAG-1, capital spending was \$124.7 million. This amount was \$12.4 million over the annual approved budget of \$112.3 million.

Non-discretionary capital spending was \$56.1 million, which was \$13.4 million over the annual approved budget of \$42.7 million.

For FY 2024, capital spending in the Discretionary sub-category (excluding large projects) was \$37.6 million, which was \$4.3 million under the annual approved budget of \$41.9 million.

1 In FY 2024, the Southeast Substation, Dyer Street Substation, Providence Study, East
2 Providence Substation, and Warren Substation projects were reported on separately from
3 other Asset Condition and System Capacity & Performance projects. Capital spending
4 was \$31.0 million, which was \$3.3 million over the annual approved budget of \$27.7
5 million.

6
7 The key drivers and variances by category are discussed in detail in Section III of
8 Attachment NAG-1.

9
10 **Q. Is the Budgetary Framework, approved as part of the FY 2025 ISR Filing in Docket**
11 **No. 23-48-EL, applicable to this FY 2024 ISR reconciliation?**

12 A. No. It is the Company's understanding that FY 2025 will be the first ISR year subject to
13 the newly approved Budgetary Framework. The Company did not manage the FY 2024
14 budget with the framework that was approved as part of the FY 2025 ISR Filing. The
15 Company worked to manage within its discretionary budget. For example, the Company
16 did not complete the budgeted amount of underground cable work because the same
17 resources were needed to work on the Dyer Street Substation distribution line project.
18 While the Company made shifts like this throughout the year within the discretionary
19 portfolio, the Company did not decelerate discretionary work with the intention of
20 offsetting overruns in non-discretionary spending.

1 **Q. Please provide an update related to the Dyer Street Substation project and**
2 **treatment of pre-construction costs.**

3 A. In FY 2023, assets associated with the substation portion of the project were placed into
4 service. In FY 2024, assets associated with the distribution line portion of the project
5 were placed into service. Demolition of the existing Dyer Street Substation will begin
6 once final permits are received. During FY 2023, the Company wrote off \$0.9 million of
7 the Dyer Street Substation project costs related to the preconstruction costs for the DC
8 building. Once the entire project is complete, the Company will again review all costs to
9 ensure spending related to the refurbishment of the DC building is not included in ISR
10 rate base and revenue requirements.

11
12 **Q. Please summarize the activity during the first year of the Company’s CEMI program.**

13 A. The Company identified the following feeders for the FY 2024 CEMI program: 112W44,
14 127W40, 34F1, 54F1, 63F6, 68F1, and 155F8. Work on these feeders was completed
15 within the budget of \$1.2 million. Detailed information regarding the work completed is
16 in Attachment NAG-1, Section VIII, Customers Experiencing Multiple Interruptions
17 (CEMI) Reporting. Performance should be evaluated after a suitable number of years,
18 typically five or more. However, the Company will begin monitoring and reporting on
19 specific feeder performance after three years to provide early insight into the CEMI
20 program.

1 **Q. Please summarize the Nasonville Damage/Failure work and its relationship to the**
2 **discretionary project.**

3 A. The scope of work associated with the August 2022 metal clad switchgear damage at
4 Nasonville Substation is included in non-discretionary spending. The failed switchgear
5 will be replaced with an open-air straight bus #1 that will include a main breaker,
6 capacitor breaker, and three feeder breakers.

7
8 The Nasonville Substation discretionary project includes the expansion of the substation
9 with a new four breaker bus as recommended in the Northwest Rhode Island Area Study.
10 The substation expansion will be open-air design, with a new transformer due to be
11 delivered in December 2024.

12
13 **Q. Please provide the status of the Westerly #2 spare transformer.**

14 A. The spare transformer was received in June 2024. It was set on a concrete foundation at
15 the Kent County Substation, tested, and is available for use.

16
17 **Q. Please explain the spending associated with Transformers.**

18 A. During FY 2024, the Company spent \$10.9 million on the purchase of transformers,
19 capacitors, and voltage regulators. Over the last five years, half of the Company's overhead
20 transformer purchases have seen price increases ranging from 17% to 240%.

1 **Q. Please provide an explanation for the Non-Infrastructure capital spending credit**
2 **balance of \$(1.1) million.**

3 A. The credit balance in the Non-Infrastructure spending rationale was driven by
4 undistributed FY 2023 capital overheads in FY 2024. Capital overheads represent the
5 indirect costs incurred to construct capital assets that cannot reasonably be attributed to a
6 single asset. On a monthly basis, these costs are distributed using an overhead rate to
7 capital projects monthly. In FY 2023, capital overheads were not fully distributed. In
8 FY 2024, the FY 2023 undistributed capital overheads and the FY 2024 capital overheads
9 were fully distributed to capital projects.

10
11 **Q. Please provide an update on supply chain issues.**

12 A. The Company still continues to experience supply chain constraints and increased lead
13 times. The Company is taking these delivery schedules into consideration and ordering
14 these materials earlier in the process than previously done to work to ensure that our need
15 dates are met.

16
17 **Q. Please provide an update on the Petitions for Acceleration Due to DG Project under**
18 **Dockets 23-37 EL and 23-38 EL.**

19 A. Briefs are currently pending in these dockets, scheduled to be filed during August 2024.
20 No capital spending, removal or plant additions related to the Accelerated System

1 Modifications or System Improvements subject to either Docket No. 23-37-EL or Docket
2 No. 23-38-EL have been included in this reconciliation filing.

3
4 **Q. Did the Company include any Advanced Metering Functionality (“AMF”) costs in**
5 **the FY 2024 Annual Reconciliation?**

6 A. Yes, the Company included \$1.4 million of capital spending related to AMF in this filing.
7 No assets were placed in service during the year and there are no rate impacts associated
8 with AMF in-service to date.

9
10 **V. O&M Spending**

11 **Q. Please summarize the Company’s actual O&M spending for the FY 2024 Electric**
12 **ISR Plan.**

13 A. Total O&M spending was \$14.9 million as compared to a budget of \$15.1 million. As
14 shown in Table 11 of Attachment NAG-1, for FY 2024, the Company’s vegetation
15 management O&M spending was \$13.8 million, which was under-budget by
16 \$0.2 million.

17
18 In addition, as shown in Table 12, the Company’s Other O&M spending related to the
19 I&M program and Volt/VAR Optimization and Conservations Voltage Reduction
20 (“VVO/CVR”) programs was \$1.1 million, which was essentially on the approved

O&M budget of \$1.2 million. Detailed information regarding the work completed is discussed in Attachment NAG-1 in Section IV and Section V, respectively.

VI. Reliability Performance

Q. Please summarize the results of the Company’s reliability performance for CY 2023.

A. Section VI of Attachment NAG-1 includes the Company’s Reliability Performance for calendar year 2023 (CY 2023). The Company met both its System Average Interruption Frequency Index (SAIFI) and System Average Interruption Duration Index (SAIDI) performance metrics in CY 2023, with SAIFI of 0.769 against a target of 1.05, and SAIDI of 52.62 minutes, against a target of 71.9 minutes. The Company’s annual service quality targets are measured excluding major event days.¹

VII. Review of Distributed Generation (“DG”) Projects

Q. Please provide an update on the Company’s review of DG projects.

A. As stated in the March 9, 2022, hearing, the Company undertook a review of DG projects including the allocation of capital contributions to projects by cost type, the identification of cost variance drivers, and the processes that support these items. The Company has completed this review and is implementing process changes based on the findings.

¹ A Major Event Day (MED) is defined as a day on which the daily system SAIDI exceeds a MED threshold value (6.27 minutes for CY 2023). For purposes of calculating daily system SAIDI, any interruption that spans multiple calendar days is accrued to the day on which the interruption began. Statistically, days having a daily system SAIDI greater than the MED are days on which the energy delivery system experiences stress beyond that normally expected, such as during severe weather.

1 In total, the Company reviewed \$13.7 million in plant additions from FY 2013 through
2 FY 2024 and determined that \$2.2 million will remain in rate base. Customers were
3 credited for the amount previously included in rate base in the FY 2023 Annual
4 Reconciliation Filing. Please see Section IX of Attachment NAG-1 for more
5 information.

6
7 **Q. Please explain why the Company undertook this review.**

8 A. During the discovery process in Docket No. 5209 (which reviewed the Company's
9 FY 2023 ISR Plan), the Company was asked by the PUC to provide a schedule
10 demonstrating how costs associated with a DG project are included in rate base, using
11 the Company's Final Accounting methodology submitted in a separate docket,
12 Docket No. 5206 (See Docket No. 5209, Company responses to PUC 2-7 and PUC-2-7
13 Supplemental). After reviewing the results of the PUC's question, the Company's
14 witness, in her role as a sponsor of the FY 2023 ISR, determined that a review of the
15 Company's historical accounting of costs in rate base associated with DG projects was
16 warranted. The Company's witness determined that such a review was warranted based
17 on what appeared to be anomalous data on the Company's books associated with DG
18 customer contributions by cost type (e.g., capital, cost of removal and operating and
19 maintenance expenses) and how such customer contributions were accounted for. In
20 PUC 2-7 Supplemental, the actuals for the substation section were less than the estimate
21 in total; however, the way the CIAC was allocated, there showed a debit in both removal

1 and expense costs and a credit in capital and income tax. This example caused the
2 Company to question if the CIAC was correctly allocated and undertake this review of
3 DG projects.

4
5 **Q. Why does the Company include any costs associated with DG interconnections in**
6 **rate base?**

7 A. Per the terms of the Company's interconnection tariff, DG customers are responsible for
8 paying for the costs of system modifications on the Company's system necessary to
9 interconnect their projects. The Company includes an estimate of such system
10 modification costs in the DG customer's impact study results and the interconnection
11 service agreement ("ISA"). Such costs are typically initial design costs with a probability
12 of accuracy of plus or minus 25 percent. Such estimated costs are subject to further
13 refinement by the Company after the customer executes an ISA and the Company
14 performs more detailed design work associated with the customer's DG project. Per the
15 Company's interconnection tariff, the DG customer is responsible for paying those
16 estimated costs, but only up to 10 percent of such estimated costs. Although I am not a
17 lawyer, my understanding is that, ultimately, to the extent that the Company incurs costs
18 associated with interconnecting a DG project that are not recovered from the DG
19 customer, the Company is allowed by Rhode Island law to recover the difference between
20 its actual costs associated with the interconnection and the amount of costs paid by the
21 DG customer for that interconnection, as long as the original estimate for the system

1 modifications necessary to interconnect the DG customer's project were provided in good
2 faith and interconnection was implemented prudently by the Company.

3
4 **Q. Please explain what the Company reviewed.**

5 A. The Company reviewed DG project cost reconciliations by cost type and how project
6 contributions by DG customers were classified and accounted for from FY 2013 through
7 FY 2024, when the first plant additions for DG projects were included in the ISR.

8
9 **Q. What types of costs associated with DG interconnections were included in ISR rate
10 base during the FY 2013- FY 2024 period?**

11 A. Plant additions and cost of removal were included in ISR rate base.

12
13 **Q. What process did the Company follow to review whether the Company had
14 properly included such costs in rate base during this period?**

15 A. Please see the Review Process outlined in Section IX of Attachment NAG-1.

16
17 **Q. What was the total amount of plant additions associated with DG interconnections
18 included by the Company in rate base during the FY 2013 - FY 2024 period?**

19 A. As noted above and in Section IX of Attachment NAG-1, the Company included
20 approximately \$11.8 million in plant additions in rate base from FY 2013 through FY

2022. In FY 2023 and FY 2024, the Company has had \$1.9 million of plant additions, but these were not included in rate base due to the ongoing review.

Q. Based on the Company's review, how much of these costs were removed from rate base for this FY 2024 ISR reconciliation filing?

A. The Company removed \$10.6 million from FY 2018 through FY 2022 rate base associated with the Company's review during the FY 2023 Annual Reconciliation Filing, leaving \$1.2 million in rate base as of March 31, 2023. The Company added approximately \$1.0 million to rate base associated with the continued review in the past year, resulting in approximately \$2.2 million in rate base for purposes of calculating the Company's ISR revenue requirement in the FY 2024 Annual Reconciliation.

Q. What were the reasons why the Company determined \$10.6 million previously included in rate base should be removed?

A. In the first review which was completed before the FY 2023 Annual Reconciliation Filing, the Company found that costs should be removed from rate base due to: (1) refunds being issued to DG customers after final reconciliation of project costs; and (2) incorrect allocation of customer contributions to capital, expense and removal. Because of the amount that fell into these two categories in the first round of the review, the Company removed plant additions for those projects and the remaining that were not part of the first review set, totaling \$10.6 million. When the Company completed the full

1 review, the Company found that while the costs projects may have not fallen into (1) or
2 (2) listed above, there was not enough information to justify them being put back into rate
3 base. The Company determined that \$1.2 million in costs should remain in rate base
4 associated with: (1) costs that were incurred by the Company that were higher than the
5 Company's good faith estimate of costs but could not be collected from the DG customer;
6 or (2) system improvements that were completed by the Company as part of the scope of
7 work associated with a DG project.

8
9 **Q. Is the Company adjusting its proposed 2024 ISR factor to reflect the FY 2023 and**
10 **FY 2024 rate base adjustments described above?**

11 A. The Company reduced the revenue requirement in the FY 2023 Annual Reconciliation
12 revenue requirement for the removal of the \$10.6 million from rate base. Customers were
13 credited, or made whole, from the amounts previously included in rate base and revenue
14 requirement for FY 2018 through FY 2023. As discussed in the testimony of Mr.
15 Oliveira, the FY 2024 Annual Reconciliation revenue requirement reflects the reductions
16 made in the FY 2023 reconciled revenue requirement as well as an adjustment to the FY
17 2024 revenue requirement for the conclusions made in the past year.

18
19 **Q. Is the Company implementing process changes to minimize the changes of these**
20 **accounting anomalies from occurring in the future?**

21 A. Yes. Please see the process improvements listed in Section IX of Attachment NAG-1.

- 1 **Q.** Does this conclude your testimony?
- 2 **A.** Yes.

**THE NARRAGANSETT ELECTRIC COMPANY
d/b/a RHODE ISLAND ENERGY
RIPUC DOCKET NO. 22-53-EL
FY 2024 ELECTRIC INFRASTRUCTURE, SAFETY, AND RELIABILITY PLAN
ANNUAL RECONCILIATION FILING
WITNESS: NICOLE A. GOODING
ATTACHMENT**

List of Attachments

Attachment NAG-1	FY 2024 Electric Infrastructure, Safety and Reliability Plan Annual Reconciliation Filing
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Fiscal Year 2024 Electric Infrastructure, Safety, and Reliability Plan Annual Reconciliation Filing

EXECUTIVE SUMMARY

In accordance with its tariff, RIPUC No. 2199, Sheets 1-5, The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”) submits this Annual Reconciliation Filing for the period April 1, 2023, through March 31, 2024 (“ISR Plan Fiscal Year 2024” or “FY 2024”) for the Electric Infrastructure, Safety, and Reliability Plan approved by the Rhode Island Public Utilities Commission (“PUC”) in Docket No. 22-53-EL. This filing provides the actual capital spending and operation and maintenance (“O&M”) spending for the ISR Plan Fiscal Year 2024. In addition, actual Plant in Service and Cost of Removal spending are compared to targets for discretionary and non-discretionary categories. Finally, this filing includes a summary of the Company’s reliability performance for the calendar year (“CY”) ending December 31, 2023. Table 1 summarizes the FY 2024 Plan.

Table 1
FY 2024 ISR Plan Activity

	(a)	(b)	(c)
	Target / Budget	Actuals	Variance Over / (Under)
<i>in millions \$</i>			
1 Plant in Service Additions - Non-discretionary	\$44.0	\$45.5	\$1.4
2 Plant in Service Additions - Discretionary	45.0	51.8	6.9
3 Plant in Service Additions	\$89.0	\$97.3	\$8.3
4 Cost of Removal Spending - Non-discretionary	\$4.4	\$4.7	\$0.3
5 Cost of Removal Spending - Discretionary	11.2	4.5	(6.7)
6 Cost of Removal Spending	\$15.7	\$9.3	(\$6.4)
7 Capital Spending - Non-discretionary	\$42.7	\$56.1	\$13.4
8 Capital Spending - Discretionary	69.6	68.6	(1.0)
9 Capital Spending	\$112.3	\$124.7	\$12.4
10 Vegetation Management Spending	\$14.0	\$13.8	(\$0.2)
11 I&M and Other O&M Spending	1.2	1.1	(0.0)
12 O&M Spending	\$15.1	\$14.9	(\$0.2)

This filing includes testimony from Mr. Oliveira, Ms. Hawk and Mr. Shields. Mr. Oliveira's testimony describes the calculation of the revenue requirement based on the capital plant-in-service and the total annual actual VM and O&M expenses for the year. His testimony also includes a description of the revenue requirement model and attachments that support the final revenue requirement. Ms. Hawk's testimony describes an upward adjustment totaling \$1,609,761 that was made for the tax hold harmless impact on ISR rate base.¹ As shown in Mr. Oliveira's testimony, for the ISR Plan Fiscal Year 2024 filing, the Company has an updated revenue requirement of \$53.4 million.

Mr. Shields' testimony provides a description of the reconciliation of the final actual FY 2024 revenue requirement against revenue billed in support of that revenue requirement, the proposed factors resulting from the reconciliation, and the bill impacts of those proposed factors. The impact of the proposed CapEx Reconciling Factor and the proposed O&M Reconciling Factor on a typical residential customer receiving Last Resort Service and using 500 kWhs per month is an increase of \$0.86, or approximately 0.6 % from \$137.54 to \$138.40.

I. ISR Plan Fiscal Year 2024 Plant in Service Additions

As shown in Table 2 below, plant additions of \$97.3 million were placed in service, \$8.3 million over the target amount of \$89.0 million. Non-discretionary plant additions of \$45.5 million were placed in service, \$1.4 million over the target of \$44.0 million. Actual plant additions related to transformer purchases were significantly higher than target. Discretionary plant additions of \$51.8 million were placed in service, \$6.9 million over the planned amount of \$45.0 million. Assets associated with the Dyer Street Substation distribution line project went into service in FY 2024. These assets were expected to go into service in FY 2023, therefore, no additions were targeted in FY 2024.

¹ On May 25, 2022, PPL Rhode Island Holdings, LLC, a wholly owned indirect subsidiary of PPL Corporation ("PPL"), acquired 100 percent of the outstanding shares of common stock of the Company from National Grid USA (the "Acquisition"). As part of the transaction approval proceeding before the Division of Public Utilities and Carriers in Docket No. D-21-09, PPL committed to hold harmless Rhode Island customers from any changes to Accumulated Deferred Income Taxes ("ADIT") as a result of the Acquisition.

Table 2
Plant Additions by Category

	(a)	(b)	(c)
	Target	Actuals	Variance Over / (Under)
1 Customer Request/Public Requirement	\$27,742,000	\$33,285,160	\$5,543,160
2 Damage Failure	16,303,000	12,201,839	(4,101,161)
3 <i>Non-Discretionary subtotal</i>	<i>44,045,000</i>	<i>45,486,999</i>	<i>1,441,999</i>
4 Asset Condition	32,720,000	38,805,567	6,085,567
5 Non-Infrastructure	1,213,000	83,704	(1,129,296)
6 System Capacity & Performance	11,048,000	12,947,538	1,899,538
7 <i>Discretionary subtotal</i>	<i>44,981,000</i>	<i>51,836,809</i>	<i>6,855,809</i>
8 Total Plant Additions	\$89,026,000	\$97,323,808	\$8,297,808

The variances shown in Table 2 reflect the timing of when plant is placed into service. In general, once equipment is energized and placed into service to support electric load, capital costs are transferred from FERC Account 107 (Construction Work in Progress or CWIP) to FERC Account 106 (Plant in Service), which is when capital work becomes used and useful in the service of customers. This can differ by the type of plant and facility. For example, electric distribution line equipment normally is placed in service closer to the time it is installed because it is typically energized at that time and begins to support electric load, and therefore, is used and useful in the service of customers. Because electric distribution line equipment is typically energized as it is installed, a relatively significant amount of plant is placed into service as work progresses. In contrast, substation construction typically involves multi-year projects. Because substation construction typically is completed in one or more phases as part of a multi-year process, the assets will be placed in service once all work in a phase is completed.

Table 3 provides the Cost of Removal for 2024, which was \$9.3 million, \$6.4 million under the forecast of \$15.7 million. Non-discretionary Cost of Removal was \$4.7 million, which was \$0.3 million over the budgeted amount of \$4.4 million. Discretionary Cost of Removal totaled \$4.6 million, which was \$6.7 million under the budgeted amount of \$11.2 million, primarily caused by the deferral of removal work at the Pawtucket 1 Substation, part of the Southeast Substation project, and Admiral Street Substation, part of the Providence Study Phase 1B project.

Table 3
Cost of Removal by Category

	(a)	(b)	(c)
	Budget	Actuals	Variance Over / (Under)
1 Customer Request/Public Requirement	\$2,314,000	\$2,574,326	\$260,326
2 Damage Failure	2,116,580	2,142,994	26,414
3 <i>Non-Discretionary subtotal</i>	<i>4,430,580</i>	<i>4,717,320</i>	<i>286,740</i>
4 Asset Condition	9,892,554	3,067,034	(6,825,520)
5 Non-Infrastructure	20,000	16,424	(3,576)
6 System Capacity & Performance	1,315,513	1,466,470	150,957
7 <i>Discretionary subtotal</i>	<i>11,228,067</i>	<i>4,549,928</i>	<i>(6,678,139)</i>
8 Total Cost of Removal	\$15,658,647	\$9,267,248	(\$6,391,399)

II. ISR Plan Fiscal Year 2024 Capital Spending Summary

As shown in Table 4 below, capital spending totaled \$124.7 million, which was \$12.4 million over the budget of \$112.3 million. Spending in each of the categories is discussed in more detail below.

Table 4
Capital Spending by Category

	(a)	(b)	(c)
	Budget	Actuals	Variance Over / (Under)
1 Customer Request/Public Requirement	\$27,514,000	\$35,305,834	\$7,791,834
2 Damage Failure	15,192,300	20,810,664	5,618,364
3 <i>Non-Discretionary subtotal</i>	<i>42,706,300</i>	<i>56,116,498</i>	<i>13,410,198</i>
4 Asset Condition	23,345,530	23,875,632	530,102
5 Non-Infrastructure	1,700,000	(1,082,494)	(2,782,494)
6 System Capacity & Performance	16,897,992	14,849,781	(2,048,211)
7 <i>Discretionary subtotal (excl. Large Projects)</i>	<i>41,943,522</i>	<i>37,642,919</i>	<i>(4,300,603)</i>
8 Large Projects Tracked Separately	27,679,000	30,966,023	3,287,023
9 <i>Discretionary subtotal</i>	<i>69,622,522</i>	<i>68,608,942</i>	<i>(1,013,580)</i>
10 Total Capital Spending	\$112,328,822	\$124,725,439	\$12,396,618

III. ISR Plan Fiscal Year 2024 Capital Spending by Key Driver Category

e. Non-Discretionary Spending

a. Customer Request/Public Requirement

Capital spending for FY 2024 in the Customer Request/Public Requirement category was \$35.3 million, which was \$7.8 million over the budget of \$27.5 million. The major drivers of this variance are:

- Spending on Third-Party Attachment projects was in a credit position as of March 31, 2024 due to the collection of customer advances for projects that will be completed in FY 2025. Costs incurred in FY 2025 will reduce customer advances.

- Spending activity, net of Distributed Generation (“DG”) customer contributions, in the DG category was \$2.5 million. As stated during the March 9, 2022 hearing, the Company undertook a review of DG projects. The Company reviewed \$13.7 million in plant additions from FY 2013 through FY 2024 and determined that \$2.2 million will remain in rate base. Please see Section IX for the DG Review Report.
- Capital spending related to meters, including the purchase of meters and work performed under the meter blanket project, totaled \$1.5 million, \$1.1 million under budget. As the Company transitions to AMF meters, it is anticipated that spending under these projects will continue to decrease.
- Capital spending on New Business work was \$18.1 million, \$1.8 million over budget. Capital spending for New Business - Residential projects, both blanket and specific project work, was \$0.1 million over budget. Capital spending for New Business – Commercial projects was \$1.7 million over budget due to emerging customer work that exceeded the reserves established in the budget.
- Public Requirements capital spending was \$1.7 million, \$0.5 million over budget. Spending under the blanket project was \$0.4 million under budget. Billing for two RI Department of Transportation projects was delayed, contributing to the year’s overspending. Billing for these projects is anticipated to take place in FY 2025. Billing for joint-owned pole work was \$0.9 million under budget.
- Capital spending for transformers, voltage regulators, and capacitors totaled \$10.9 million at year end. Supply chain challenges continue to impact pricing and availability of transformers and related equipment. These include extended lead times, demand exceeding capacity, raw material shortages, and logistical constraints. The Company has sought alternate sources of supply, continued to place proactive orders to mitigate future supply gaps, and increased inventory levels to support work plans and respond to emergencies.

Detailed budget and actual spending by budget classification for the Customer Request/Public Requirement category is shown in [Table 5](#) below.

Table 5
Customer Request/Public Requirement Capital Spending

	(a)	(b)	(c)	(d)
	Budget Classification	Budget	Actuals	Variance Over / (Under)
1	Third-party Attachments	\$280,000	(\$323,987)	(\$603,987)
2	Distributed Generation	1,000,000	2,513,810	1,513,810
3	Land and Land Rights	500,000	388,872	(111,128)
4	Meters & Related Work	2,605,000	1,536,504	(1,068,496)
5	New Business – Commercial	9,093,000	10,814,991	1,721,991
6	New Business – Residential	7,212,000	7,325,715	113,715
7	Outdoor Lighting	575,000	389,586	(185,414)
8	Public & Regulatory Requirement	1,249,000	1,737,993	488,993
9	Transformers & Related Equipment	5,000,000	10,921,860	5,921,860
10	Strategic DER Investments	0	490	490
11	Customer Request / Public Requirement Spending	\$27,514,000	\$35,305,834	\$7,791,834

b. Damage/Failure

Capital spending in the Damage/Failure category was \$20.8 million, which was \$5.6 million over the budget of \$15.2 million. This variance was driven by the following:

- Spending in the Overhead Line and Substation Damage/Failure Blanket projects was \$11.6 million, \$0.7 million over budget. Capital spending on overhead line failure-related work was \$0.6 million over budget. The Substation Blanket project, which was essentially on budget, includes costs associated with the Apponaug Substation and Sprague Street transformer failures as described in more detail below.
- During FY 2022, the Westerly #2 transformer failed, and a spare transformer was installed. Due to delays in delivery of the spare transformer, minimal spending took place in FY 2024. The spare transformer was delivered in June 2024.

- In August 2022, the Nasonville Substation metal clad switchgear was damaged beyond repair due to a bus fault. Removal of the failed equipment, final engineering, and the first phase of civil construction was completed in May 2024. Underground distribution line scope and substation design changes have contributed to the increased costs. Capital spending in FY 2024 was \$4.2 million.
- In 2022, the Hopkins Hill #2 transformer was taken out of service because of gassing. A mobile transformer has been installed. It is expected that the transformer teardown, visual inspection, and final report will be completed by January 2026. The first installment payment for the new transformer will be made in the first quarter of FY 2025 and the transformer is expected to be received in FY 2026.
- In July 2023, the transformer at Apponaug Substation failed. A spare transformer was used to replace the failed unit. A controlled teardown of the failed unit was performed. The inspection revealed arcing damage believed to have been caused by a lightning strike. Capital spending of \$119,000 has taken place during FY 2024 and is included in the Substation Damage/Failure Blanket project.
- In May 2023, the #2 transformer at Sprague Street Substation failed. Costs associated with the immediate repair/replacement are included in the Substation Blanket project. The T3 transformer at Olneyville Substation was moved to replace the #2 Transformer at Sprague Street. The Company will not be ordering a spare transformer for either substation as both substations will be retired within the next six years.
- Actual capital spending related to storms and weather-related events was \$4.8 million, \$2.8 million over budget for the year. This amount includes capital spending \$1.0 million for the storm on December 18, 2023. Additional information on this storm is included Attachment 2 - CY 2023 Electric Service Quality Report.

Detailed budget and actual spending for the Damage/Failure category is shown in Table 6 below.

Table 6
Damage/Failure Capital Spending

	(a)	(b)	(c)	(d)
	Budget Classification	Budget	Actuals	Variance Over / (Under)
1	Damage/Failure Blanket Projects	\$10,940,000	\$11,633,028	693,028
2	Nasonville Substation Failure	1,092,300	4,198,412	3,106,112
3	Other Failed Assets	231,000	195,336	(35,664)
4	Reserves for Failed Assets	979,000	0	(979,000)
5	Storms and Weather Events	1,950,000	4,783,888	2,833,888
6	Damage / Failure Spending	\$15,192,300	\$20,810,664	\$5,618,364

f. Discretionary Spending

a. Asset Condition (without Separately Tracked Large Projects)

Capital spending in the Asset Condition category excluding Separately Tracked Large Projects was \$23.9 million, which was \$0.5 million over the budget of \$23.3 million. The following projects and programs were included in this category of spending:

- Capital spending for the Underground Cable Replacement program was \$4.5 million, \$1.0 million under budget due to prioritizing the completion of the Dyer Street Substation distribution underground line work. Both projects relied on similar constrained material and crew resources.
- Capital spending for the URD program was \$6.9 million. Although the majority of the program's workplan was completed by December, work continued on one project to avoid outages in an area that was known to have a high frequency of cable faults and no backup cable. This resulted in a program overspend of \$0.6 million in FY 2024.
- Capital spending on inspection and maintenance work ("I&M") was \$0.4 million, under budget due to a re-prioritization of the discretionary portfolio.

- Capital spending for the Franklin Square Breaker project totaled \$1.4 million. All breakers at the Franklin Square Substation have been replaced and the project is in the closeout phase.
- The project to replace 18 reclosers, approved in the FY 2024 Plan, was completed. Capital spending totaled \$1.2 million and all reclosers are in service as of March 31, 2024.
- The 3763 Pole Replacement project was completed and placed into service in March 2024. Capital spending was \$1.6 million, \$0.8 million over budget. This project was originally budgeted in FY 2023 when material constraints resulted in the deferral of the project to FY 2024.
- In November and December 2023, the Company allocated costs associated with area studies that had accumulated in the Preliminary Survey and Investigation (“PS&I”) project totaling \$1.9 million. The costs were reclassified to the capital projects coming out of the area studies and appear in those projects as additional capital spending in FY 2024. The spending took place in previous years and FY 2024 activity was simply an allocation of accumulated costs. Capital projects in the Asset Condition category received \$0.8 million of the allocation while the PS&I project, a project in the System Capacity & Performance spending rationale, received a \$0.8 million credit. The net FY 2024 Discretionary portfolio impact is zero. Most of these projects did not have an FY 2024 budget. For additional details, please see the table included in Section (c) of this report.

b. Asset Condition – Separately Tracked Large Projects

During FY 2024, capital spending on the Southeast Substation, Dyer Street Substation and Providence Area projects in the Asset Condition category was \$27.4 million, \$3.7 million under the budget of \$23.7 million.

- Capital spending on the Dyer Street Substation project totaled \$2.7 million in FY 2024. The distribution line portion of the project was placed into service in February 2024. Building demolition of the existing Dyer Street Substation will begin in FY 2025 pending receipt of final permits. The total project cost forecast increased due to supply chain delays, unanticipated underground obstructions and a collapsed duct bank resulting in scope increases.

- The Company is now reporting all the Providence Study work as one project as all components are being managed collectively. The Providence Study Phase 2 project involves converting and retiring the 4.16kV load from the Geneva, Olneyville, and Rochambeau Avenue substations to 12.47kV operation. Although budgeted to begin construction in FY 2024, the resources for this project were shifted to complete the distribution line portion of the Knightsville project to accommodate the City's request. Civil work on the substation portion of Knightsville began.
- Capital spending on the Southeast Substation project totaled \$0.4 million during FY 2024. The Dunnell Park substation portion of this project is complete. The majority of the assets associated with the distribution line project are in service. Building demolition was pushed from January 2024 due to material and outage delays. This project is scheduled to be substantially completed in by the end of FY 2025.

For additional information on the large project variances, please see Attachment G to the Company's FY 2024 Electric Infrastructure, Safety, and Reliability Plan quarterly report for the fourth quarter period ending March 31, 2024 (Docket No. 22-53-EL) filed with the PUC on May 15, 2024. A copy of this report is provided as Attachment 1.

Budget and actual spending for the Asset Condition category is shown in Table 7 below.

Table 7
Asset Condition Capital Spending

	(a)	(b)	(c)	(d)
	Budget Classification	Budget	Actuals	Variance Over / (Under)
1	Large Projects:			
2	Dyer Street Substation	\$0	\$2,725,300	\$2,725,300
3	Providence LT Study - Phase 1A	0	200,318	200,318
5	Providence LT Study - Phase 1B	13,941,000	14,229,249	288,249
6	Providence LT Study - Phase 2,3 and 4	10,373,000	9,974,666	(398,334)
7	Southeast Substation	66,000	412,333	346,333
8	Other:			
9	Underground Cable Rplcmnt Program	5,500,000	4,531,350	(968,650)
10	URD Cable Replacement Program	6,275,530	6,896,618	621,088
11	Blanket Projects	5,220,000	4,827,201	(392,799)
12	I&M Program	3,000,000	403,144	(2,596,856)
13	Substation Breaker & Recloser Rplcmnts	1,737,000	2,577,260	840,260
14	3763 Pole Replacements	783,000	1,565,494	782,494
15	ACNW Vault Vent Blowers	600,000	713,481	113,481
16	Other Area Study Projects	0	666,697	666,697
17	Other Programs and Projects	230,000	1,694,386	1,464,386
18	Asset Condition Spending	\$47,725,530	\$51,417,498	\$3,691,968

c. Non-Infrastructure

The Non-Infrastructure spending rationale shows a capital spending credit of \$1.1 million in FY 2024. The credit is driven by the Capital Overheads project which was not fully distributed to capital projects in the previous year. The FY 2023 unallocated Capital Overhead project balance and all FY 2024 charges to the Capital Overheads project were fully distributed to capital projects in FY 2024.

Minimal spending took place on the Copper to Fiber Conversion project or in the General Equipment and Telecom projects.

Detailed budget and actual spending for the Non-Infrastructure category is shown in Table 8 below.

**Table 8
Non-Infrastructure Capital Spending**

	(a)	(b)	(c)	(d)
	Budget Classification	Budget	Actuals	Variance Over / (Under)
1	Corporate Overheads	\$0	(\$1,142,027)	(\$1,142,027)
2	General Equipment	400,000	45,589	(354,411)
3	Telecommunications	300,000	1,278	(298,722)
4	Copper to Fiber Conversions	1,000,000	12,666	(987,334)
5	Non-Infrastructure Spending	\$1,700,000	(\$1,082,494)	(\$2,782,494)

d. System Capacity & Performance (without Separately Tracked Large Projects)

Capital spending for FY 2024 for the System Capacity and Performance category was \$14.9 million, which was \$2.0 million under the FY 2024 budget of \$16.9 million. This variance was driven primarily by the following projects:

- The Kingston Substation Improvement project was completed and placed into service during FY 2024. Capital spending during the year totaled \$1.1 million against the budget of \$1.0 million.
- Capital spending on the New Lafayette Substation project was under budget for the year. The construction start date has been delayed due to transmission outage coordination issues.
- Capital spending for the Nasonville Substation project was \$2.6 million in FY 2024. Initial payments for the transformer, substation's civil work, and distribution line design took place during the year. In addition, area study costs of \$0.4 million were distributed to this project from a Preliminary Survey & Investigation project. These costs are described in more detail below.
- Delays associated with the Weaver Hill Substation have resulted in an underspend of \$0.9 million during FY 2024.
- The 3V0 and EMS/RTU Program work was deferred resulting in an underspend of \$1.5 million.
- Capital spending on the CEMI-4 project totaled \$1.2 million. Work to fix reliability issues for customers experiencing significantly poorer service than system or circuit averages took place on multiple circuits. The majority of the work was completed and was in service as of March 31, 2024. Please see Section XIII for the additional CEMI reporting required as part of the FY 2025 ISR Order.
- In FY 2024, capital spending on the System Capacity & Performance Blanket projects was over budget by \$3.7 million. Work was driven by system needs identified in annual capacity and reliability reviews as well as area studies. The Company has reprioritized work to reduce outage exposure and address reliability and load issues while still focusing on delivering the discretionary portfolio on budget.

- Delays associated with Area Study project work resulted in \$2.1 million underspending. A portion of this work was completed under blankets.
- During FY 2024, the Company distributed \$1.9 million of costs associated with area studies that had accumulated in the Preliminary Survey and Investigation (PS&I) project. The costs were reclassified to the capital projects resulting from the area studies and appear as additional capital spending during FY 2024. The spending took place in previous years and FY 2024 activity was simply an allocation of accumulated costs. The net capital spend in FY 2024 is zero as all area studies were completed in previous years. Capital projects in the Asset Condition category received \$0.8 million of the allocation. These projects did not have FY 2024 budgets. System Capacity and Performance projects, including the Nasonville Substation project noted above, received \$1.1 million of the allocation.

The table below shows the projects that received charges during FY 2024.

Allocation of Preliminary Survey & Investigation (PS&I) Costs \$000's	
<u>Asset Condition Projects:</u>	
Tiverton Substation	\$60
Centredale Substation	134
Apponaug Substation	27
Central Falls 4KV Conversion	120
Crossman 4KV Conversion	120
Hospital Substation Replacement	98
Kingston Substation Replacement	96
Valley Farnum 23kv conversion	120
Total Asset Condition Allocation	773
<u>System Capacity & Performance Projects:</u>	
Tiverton D Line	22
Weaver Hill Substation	334
Nasonville Substation	406
Coventry	111
Kenyon	101
Staples #112	120
Warren Substation	8
Total System Cap & Perf Allocation	1,101
Total PS&I Allocated	\$1,874

e. **System Capacity & Performance - Separately Tracked Large Projects**

- During FY 2024, capital spending on the East Providence Substation project totaled \$0.9 million, under budget by \$0.4 million. Final engineering and procurement occurred during the year. The lead time associated with the purchase of the substation transformer was the primary driver of the FY 2024 underspend. An updated study grade estimate of \$22.1 million was issued at the end of March 2024. This included an updated in-service date (2027 versus 2022), inflation, and bids received on the transformer and other similar metal-clad switchgears. The construction grade estimate for the substation will be complete in June 2025. Distribution line work was aligned with the substation and walked out of FY 2024. This walkout was offset by the Warren Substation distribution line work that was walked into FY 2024.
- During FY 2024, capital spending for the Warren Substation project was \$2.5 million for both distribution line and substation work against a budget of \$2.0 million. Distribution line work is ongoing. Engineering and procurement are ongoing for the substation and construction will begin in FY 2026. Overspending of the FY 2024 budget was due to revisions made to project execution plans. Warren Substation's distribution line work was walked into the FY 2024 Plan and offset by the East Providence Substation's line work which was walked out of the FY 2024 Plan.

For additional information, please see Attachment G to the Company's FY 2024 Electric Infrastructure, Safety, and Reliability Plan quarterly report for the fourth quarter period ending March 31, 2024 (Docket 22-53-EL) filed with the PUC on May 15, 2024. A copy of this report is attached as Attachment 1.

Budget and actual spending for the System Capacity & Performance category is shown in Table 9 below.

Table 9
System Capacity & Performance Capital Spending

	(a)	(b)	(c)	(d)
	Budget Classification	Budget	Actuals	Variance Over / (Under)
1	Large Projects:			
2	East Providence Substation	1,330,000	905,943	(424,057)
3	Warren Substation	1,969,000	2,518,214	549,214
4	Other Projects and Programs:			
5	Aquidneck Island	\$1,038,000	\$1,405,419	\$367,419
6	New Lafayette Substation	750,000	258,961	(491,039)
7	Nasonville Substation	1,912,000	2,585,488	673,488
8	Tiverton Substation	108,999	215,121	106,122
9	Weaver Hill Road Substation	1,506,997	592,714	(914,283)
10	3V0	1,095,000	222,630	(872,370)
11	EMS/RTU	658,000	(15,212)	(673,212)
12	Overloaded Transformer Replmt	1,500,000	1,620,341	120,341
13	Blanket Projects	2,490,000	6,166,313	3,676,313
14	CEMI 4 Program	1,230,000	1,211,863	(18,137)
15	VVO	0	291,511	291,511
16	Other Area Study Projects	4,067,996	1,939,086	(2,128,910)
17	PS&I	100,000	(1,859,648)	(1,959,648)
18	Other	441,000	215,195	(225,805)
19	System Capacity & Performance Spending	\$20,196,992	\$18,273,938	(\$1,923,054)

f. Advanced Metering Functionality (AMF)

In Docket No. 22-49-EL, the Company filed its Advanced Metering Functionality (“AMF”) Business Case, with the Commission on November 18, 2022. In its Order dated September 27, 2023, the Commission authorized the Company to seek recovery of capital investments through the ISR as discretionary investments capped at \$153 million. Capital spending incurred prior to the ISR Fiscal Year 2025 filing is eligible for recovery. Capital spending associated with the deployment of its AMF program totaled \$1.4 million in FY 2024 and shown in Table 10 below. No assets were placed in service during the year and there are no rate impacts associated with AMF in-service to date.

Table 10
AMF

	(a)	(b)	(c)	(d)
	Budget Classification	Budget	Actuals	Variance Over / (Under)
1	Meter Costs	\$0	\$16,980	\$16,980
2	Network Costs	0	31,356	31,356
3	System Costs	0	1,368,008	1,368,008
4	Program Costs	0	17,701	17,701
5	Capital Spending - AMF	\$0	\$1,434,045	\$1,434,045

IV. Vegetation Management

In FY 2024, the Company completed 100% of its work plan, 1,225 miles of distribution cycle pruning, at a cost of \$13.8 million. Table 11 below provides the spending components.

Table 11
Vegetation Management O&M Spending

	(a)	(b)	(c)
	Budget	Actuals	Variance Over / (Under)
1 Cycle Pruning (Base)	\$9,960,000	\$10,063,082	\$103,082
2 Hazard Tree	625,000	621,973	(3,027)
3 Sub-T (on & off road)	540,000	281,609	(258,391)
4 Police/Flagger Details	860,000	935,329	75,329
5 Pockets of Poor Performance	120,000	67,213	(52,787)
6 Risk Reduction - Extra	290,000	533,782	243,782
7 Core Crew (all other activities)	1,555,000	1,282,245	(272,755)
8 Total VM O&M Spending	\$13,950,000	\$13,785,233	(\$164,767)

V. Other O&M

For FY 2024, the Company completed 100% of its annual overhead structure inspection goal with an associated spend of \$0.5 million. Table 12 below provides the spending components in the Other O&M category.

Table 12
Other O&M Spending

	(a)	(b)	(c)
	Budget	Actuals	Variance Over / (Under)
1 Opex Related to Capex	\$400,000	\$180,943	(\$219,057)
2 Repair & Inspections Related Costs	338,000	708,453	370,453
3 System Planning & Protection Coordination Study	25,000	0	(25,000)
4 VVO/CVR Program	400,000	255,000	(145,000)
5 Total I&M and Other O&M Spending	\$1,163,000	\$1,144,396	(\$18,604)

For additional information about the I&M program, please see the Company’s FY 2024 Electric Infrastructure, Safety, and Reliability Plan quarterly report for the fourth quarter period ending March 31, 2024 (Docket No. 22-53-EL) filed with the PUC on May 15, 2024. A copy of this report is attached as Attachment 1.

VI. Reliability Performance

The Company met both its System Average Interruption Frequency Index (“SAIFI”) and System Average Interruption Duration Index (“SAIDI”) performance metrics in CY 2023, with SAIFI of 0.769 against a target of 1.05, and SAIDI of 52.62 minutes, against a target of 71.9 minutes. For additional information on reliability and major event days, please refer to the 2023 Service Quality Report filed under Docket No. 3628 on May 1, 2024. A copy is included in this report as Attachment 2.

VII. FY 2025 Five Year Budget with Details and FY 2024 Actuals

In Docket No. 23-48-EL, the Company provided a five year budget plan with a forecast for FY 2024 spending as Attachment 3, Bates pages 84-86.

The five year budget plan with actual FY 2024 spending is shown in the attached.

FY 2025 Five-Year Budget with Details and FY 2024 Actuals
\$000's

Line Number	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)	(p)
			Docket 22-53-EL		5 Year Investment Plan - Capital Spending					Major Project - Details						
	Spending Rationale	Category	FY 2024 Budget	FY 2024 Actuals	FY 2025	FY 2026	FY 2027	FY 2028	FY 2029	Major Project - Current Puase	Current Sanction - CAPEX only	Initial Estimate - CAPEX only	Date of Last Sanction	Est'd Constr Start	Est'd Constr End	Capital Spending turougu FY 2023
1	<u>Non-Discretionary</u>															
2	Customer Request /															
3	Public Requirement	New Business - Commercial	9,093	10,815	9,366	9,647	9,937	10,235	10,542							
4		New Business - Residential	7,212	7,326	7,428	7,651	7,880	8,117	8,361							
5		Public Requirements	1,249	1,738	3,140	3,234	3,331	3,431	3,531							
6		Transformers and Related Equipment	5,000	10,922	8,000	8,000	8,000	8,000	8,000							
7		Meters and Meter Work	2,605	1,537	2,533	430	100	100	100							
8		Distributed Generation	1,000	2,514	1,000	1,000	1,000	1,000	1,000							
9		Third Party Attachments	280	(324)	288	297	306	315	324							
10		Land and Land Rights	500	389	515	530	546	562	579							
11		Outdoor Lighting	575	390	592	610	628	647	666							
12	Total Customer Request/Public Requirement		27,514	35,305	32,862	31,399	31,728	32,407	33,103							
13	Damage / Failure	Damage /Failure	10,940	11,633	11,268	11,606	11,954	12,313	12,682							
14		Reserves	979	-	1,008	1,038	1,070	1,102	1,135							
15		Failed Assets	1,323	4,394	2,537	1,972	-	-	-							
16		Storms	1,950	4,784	3,000	3,000	3,000	3,000	3,000							
17	Total Damage/Failure		15,192	20,811	17,813	17,616	16,024	16,415	16,817							
18	Total Non-Discretionary		42,706	56,116	50,675	49,015	47,752	48,822	49,921							

Line Number	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)	(p)
	Spending RationaleCategory		Docket 22-53-EL		5 Year Investment Plan - Capital Spending					Major Project - Details						
			FY 2024 Budget	FY 2024 Actuals	FY 2025	FY 2026	FY 2027	FY 2028	FY 2029	Major Project - Current Puase	Current Sanction - CAPEX only	Initial Estimate - CAPEX only	Date of Last Sanction	Est'd Constr Start	Est'd Constr End	Capital Spending turuogu FY 2023
1	Discretionary															
2	Asset Condition Separately															
3	Tracked Major	Dyer Street Substation	-	2,725	15	-	-	-	-	Construction	\$10,658	\$10,842	Apr-21	Sep-21	FY 2025	\$14,651
4		Admiral St 12 KV Substation	-	-	5,513	2,500	-	-	-	Construction	\$12,831	\$12,831	Aug-21	Sep-21	FY 2026	\$2,731
5		Providence Area LT Study Projects (Ph 1A,1B,2,4)	24,314	24,404	-	-	-	-	-	--	--	--	--	--	--	--
6		Kingston Equipment Replacement	-	-	400	3,361	8,403	1,681	2,961	Study Phase	--	\$16,805	--	Oct-25	FY 2029	\$0
7		Phillipsdale Substation D Sub	-	-	100	5,728	7,240	1,448	324	Study Phase	--	\$6,025	--	Oct-25	FY 2029	\$0
8		Apponaug Substation	-	-	150	1,120	1,980	1,750	700	Study Phase	\$5,700	\$3,800	Jul-23	FY 2026	FY 2029	\$0
9		Hospital #146 Equipment Replacement	-	-	320	2,064	2,680	296	-	Study Phase	\$5,360	\$5,359	Dec-23	FY 2026	FY 2028	\$0
10		Merton #51 Equipment Replacement	-	-	-	816	2,449	4,082	816	Study Phase	--	\$8,164	--	FY 2027	FY 2029	\$0
11		Southeast Substation	66	412	-	-	-	-	-	Construction	\$11,244	\$9,000	Jun-19	Oct-19	FY 2025	\$15,198
12		Auburn 115/12.4kV Substation (D-Sub)	-	-	-	-	832	1,663	4,989	Study Phase	--	\$6,590	--	FY 2028	FY 2029	\$0
13	Subtotal - Separately Track Major Projects		24,380	27,542	6,498	15,589	23,583	10,919	9,790							
14	Other	Underground Cable Replacement	5,500	4,531	5,500	6,000	6,000	6,000	6,500							
15		URD Cable Replacement	6,276	6,897	5,000	5,411	5,723	5,823	5,500							
16		Blanket Projects	5,220	4,827	6,177	6,338	6,504	6,676	6,850							
17		I&M	3,000	403	1,530	1,530	1,530	1,530	1,530							
18		Substation Spare Transformers	-	-	540	2,480	7,436	8,186	6,825							
19		Substation Breakers & Reclosers	437	1,416	196	440	-	-	-							
20		Other Area Study Projects - BSVS	-	1,150	781	1,556	2,457	2,280	1,156							
21		Other Area Study Projects - CRIE	-	27	50	75	35	293	315							
22		Other Area Study Projects - CRIW	-	-	1,883	6,317	10,196	3,730	390							
23		Other Area Study Projects - East Bay	-	-	100	505	570	570	190							
24		Other Area Study Projects - Newport	-	197	446	1,189	802	-	-							
25		Other Area Study Projects - NWRI	-	137	500	3,007	2,725	1,432	250							
26		Other Area Study Projects - Providence	-	-	492	5,396	6,575	4,630	4,630							
27		Other Area Study Projects - SCW	-	-	-	-	-	1,029	2,297							
28		Tiverton Substation	-	61	75	393	786	786	393							
29		Providence Area LT Supply & Distrib Study	-	-	20,382	10,580	7,064	-	-							
30		Reserve	-	-	-	1,000	1,000	1,000	1,000							
31		Batteries / Chargers	230	55	195	387	319	100	-							
32		Recloser Replacements	1,300	1,161	-	-	-	-	-							
33		UG Improvements and Other	1,383	3,013	700	565	-	-	-							
34	Subtotal - Other Projects and Programs		23,346	23,876	44,547	53,169	59,722	44,065	37,826							
35	Total Asset Condition		47,726	51,417	51,045	68,758	83,305	54,984	47,617							
36	Non-Infrastructure															
37		General Equip & Telecom Blanket	700	47	712	724	737	750	764							
38		Capital Overheads	-	(1,142)												
39		Verizon Copper to Fiber	1,000	13	180	75	-	-	-							
40	Total Non-Infrastructure		1,700	(1,082)	892	799	737	750	764							

Line Number	(a)		(b)		(c)		(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)	(p)
	Spending Rationale		Category		Docket 22-53-EL		5 Year Investment Plan - Capital Spending					Major Project - Details							
					FY 2024 Budget	FY 2024 Actuals	FY 2025	FY 2026	FY 2027	FY 2028	FY 2029	Major Project - Current Puase	Current Sanction - CAPEX only	Initial Estimate - CAPEX only	Date of Last Sanction	Est'd Constr Start	Est'd Constr End	Capital Spending turougu FY 2023	
1	System Capacity & Performance Separately																		
2	Tracked Major	East Providence Substation (D Sub + D Line)	1,330	906	-	-	-	-	-										
3		East Providence Substation (D Sub)	-	-	2,685	2,309	2,952	-	-				Preliminary Eng'g	\$6,000	\$6,000	Feb-17	Apr-24	Oct-26	\$892
4		Warren Substation (D Sub + D Line)	1,969	2,518	-	-	-	-	-				--	--	--	--	--	--	--
5		Chase Hill Second Half of Station	-	-	-	1,006	2,012	1,006	1,006				Study Phase	--	\$5,030	--	FY 2027	FY 2029	\$0
6		Nasonville #127 Sub (D-Sub)	-	-	3,566	3,100	489	-	-				Study Phase	\$10,786	\$13,325	Jul-23	FY 2026	FY 2027	\$0
7	Subtotal - Separately Track Major Projects		3,299	3,424	6,251	6,415	5,453	1,006	1,006										
8	Other	Aquidneck Island	1,038	1,405	-	-	-	-	-										
9		New Lafayette Substation	750	259	910	5,886	151	-	-										
10		Warren Substation	-	-	1,800	2,943	747	111	-										
11		Nasonville Substation (D Sub + D Line)	1,912	2,585	-	-	-	-	-										
12		East Providence Substation (D Line)	-	-	3,600	2,700	2,051	-	-										
13		Weaver Hill Road Substation	1,507	593	1,105	3,054	3,475	2,496	1,229										
14		3V0	1,095	223	186	540	-	-	-										
15		EMS/RTU	658	(15)	135	1,147	2,350	750	-										
16		Overloaded Transformer Replcmts	1,500	1,620	1,500	1,500	1,500	1,500	1,500										
17		Blanket Projects	2,490	6,166	2,605	2,725	2,851	2,983	3,072										
18		Other Area Study Projects - BSVS	400	127	680	681	968	-	-										
19		Other Area Study Projects - CRIW	1,371	794	1,441	1,125	1,125	675	-										
20		Other Area Study Projects - East Bay	-	-	84	378	378	-	-										
21		Other Area Study Projects - Newport	-	-	793	976	461	-	-										
22		Other Area Study Projects - NWRI	1,933	914	108	128	-	-	-										
23		Other Area Study Projects - SCE	-	-	1,684	6,404	333	-	-										
24		Other Area Study Projects - SCW	364	104	927	4,101	3,909	2,576	1,147										
25		Tiverton D-Line	109	215	328	656	656	328	440										
26		Reserve	-	-	-	1,000	1,000	1,000	1,000										
27		CEMI-4	1,230	1,212	1,230	1,230	1,230	1,230	-										
28		ADMS/DERMS Advanced	-	-	-	-	3,159	1,568	-										
29		DER Monitor/Manage	-	-	-	-	2,288	4,043	-										
30		Electromech Relay Upgrades	-	-	1,234	603	1,267	2,513	1,263										
31		Fiber Network	-	-	200	-	-	-	-										
32		VVO - Smart Capacitors and Regulators	-	292	400	8,439	6,701	6,701	6,701										
33		Mobile Substation	-	-	1,278	3,834	7,668	-	-										
34		Other projects and programs	541	(1,644)	478	100	100	100	100										
35	Subtotal - Other Projects and Programs		16,898	14,850	22,706	50,150	44,369	28,575	16,452										
36	Total System Capacity & Performance		20,197	18,274	28,957	56,565	49,822	29,581	17,458										

Line Number	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)	(p)		
	Spending Rationale		Category		Docket 22-53-EL		5 Year Investment Plan - Capital Spending					Major Project - Details						
					FY 2024 Budget	FY 2024 Actuals	FY 2025	FY 2026	FY 2027	FY 2028	FY 2029	Major Project - Current Puase	Current Sanction - CAPEX only	Initial Estimate - CAPEX only	Date of Last Sanction	Est'd Constr Start	Est'd Constr End	Capital Spending turougu FY 2023
1	Total Discretionary excluding AMF		69,623	68,609	80,894	126,122	133,864	85,315	65,839									
2	Advanced Metering Functionality																	
3		Meter Costs	-	17	28,725	61,795	4,212	-	-									
4		Network Costs	-	31	4,479	8,374	1,985	-	-									
5		System Costs	-	1,368	11,487	13,280	7,597	-	-									
6		Program Costs	-	18	3,502	3,502	1,751	-	-									
7	Total AMF		-	1,434	48,192	86,950	15,544	-	-									
8	Total Discretionary including AMF		69,623	70,043	129,086	213,073	149,408	85,315	65,839									
9	Total Capital Spending including AMF		112,329	126,159	179,761	262,088	197,160	134,137	115,759									
10	Total Capital Spending excluding AMF		112,329	124,725	131,569	175,137	181,616	134,137	115,759									
				-														
11	O&M Spend																	
12		Vegetation Management	13,950	13,785	13,075													
13		I&M - Opex Related to Capex	400	181	200													
14		I&M - Inspections & Repairs Related Costs	338	708	500													
15		System Planning & Protection Coordination Study	25	-	-													
16		VVO/CRV	400	255	365													
17	Total O&M		15,113	14,930	14,140													

VIII. Customers Experiencing Multiple Interruptions (CEMI) Reporting

In its Report and Order dated December 31, 2023, the Commission directed the Company to include in its FY 2024 Electric ISR Reconciliation Filing and future ISR Plan and Reconciliation filings certain information about work performed on CEMI-4 feeders selected for inclusion in the FY 2024 ISR Plan. This information is shown in the attached.

FY 2024 CEMI 4 Feeder Information											
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)
Line Number	<u>Feeder Selected</u>	<u>Rolling 12 Month CEMI n</u>	<u>Highest CEMI Count in the previous rolling 12 months</u>	<u>Why was the feeder prioritized over another with a similar CEMI?</u>	<u>What was the problem identified?</u>	<u>Alternative solutions identified?</u>	<u>Work Performed</u>	<u>CAPEX \$</u>	<u>Why did the Company choose the solution implemented?</u>	<u>Funded Elsewhere (Y or N)</u>	<u>If Yes, where and how will benefits be tracked?</u>
1	112W44	8	9	Note 1	Note 2	Note 3	Install 1 recloser, 3 cutout mounted reclosers, small sections of reconductoring and animal guards	\$155,871	Note 4	N	Note 5
2	127W40	7	9	Note 1	Note 2	Note 3	Install 2 reclosers, 3 cutout mounted reclosers, and replace 1 pole.	\$274,219	Note 4	N	Note 5
3	155F8	10	10	Note 1	Note 2	Note 3	Install 1 cutout mounted recloser, 1 set of line fuses, and insulators	\$16,022	Note 4	N	Note 5
4	34F1	8	8	Note 1	Note 2	Note 3	Install 2 reclosers	\$97,496	Note 4	N	Note 5
5	54F1	11	11	Note 1	Note 2	Note 3	Install 7 cutout mounted reclosers, 6 sets of line fuses, and various deteriorated pole replacements	\$254,690	Note 4	N	Note 5
6	63F6	9	8	Note 1	Note 2	Note 3	Install 7 cutout mounted reclosers and small sections of reconductoring	\$148,365	Note 4	N	Note 5
7	68F1	13	8	Note 1	Note 2	Note 3	Install 2 reclosers, 4 cutout mounted reclosers, and 1 loadbreak	\$143,492	Note 4	N	Note 5

Note 1 Feeders were prioritized based on a combined ranking that includes the current year CEMI and the number of CEMI-4 customers on the feeder in the previous three years. The program also considers input from the operations department as well as other pending capital projects.

Note 2 The leading causes of outages that contribute to high CEMI numbers are trees, animal contact, lighting, motor vehicle accidents, and deteriorated equipment. These are common to the problems that contribute to circuit and system reliability statistics, except major storm events are included .

Note 3 Due to the specific locational and cause characteristics of the events, a typical alternative analysis was not considered warranted. Instead, the solutions are based on common field engineering knowledge, and the advancement of lowest cost solutions. For example, if events indicate an animal contract issue, an alternative analysis is not warranted to provide confidence that the low cost of installing animal guards is the best solution.

Note 4 The Company chose the solutions based on reviewing the outage trends that contributed to customer outages, considering the lowest cost solutions first. In most cases more than one solution was recommended.

Note 5 If a solution was identified during CEMI analysis that is related to another program, the team would determine whether the recommended work is planned to be complete in the existing programs (i.e. Vegetation Management). If it is not in the other program's plan, it would be completed under the CEMI program. Program benefits will be tracked by reviewing the Company's overall CEMI-4 performance and the CEMI performance of circuits in the program annually.

IX. Distribution Generation Report

1) Overview

This report summarizes the results of the distributed generation (“DG”) projects review undertaken by the Company as stated in the FY 2023 ISR Hearing on March 9, 2022 and the process improvements implemented. In addition, this report complies with the directives issued by the Public Utilities Commission most recently from the Open Meeting that occurred on March 28, 2024 for Docket No. 23-48 EL, the FY 2025 Annual Electric ISR Plan. The directive stated that the Company should include in the FY 2024 Annual Reconciliation filing its review of the allocation of customer contributions to the proper cost categories all distributed generation projects for which the customer contribution did not cover the full cost of the project; the reasons why; and the impact on rate base and the associated revenue requirement.

Between FY 2013 and FY 2022, the Company included plant additions of \$11.8 million in rate base. The Company began a review of these projects and removed \$10.6 million of plant additions in the FY 2023 Annual Reconciliation Filing, leaving \$1.2 million in rate base. Customers were credited for the amount previously included in rate base in the FY 2023 Annual Reconciliation Filing. As of FY 2024, an additional \$1.0 million has been added, totaling \$2.2 million.

2) Review Process

Initial Review: The Company began the review by selecting a sample of projects for review based off largest plant additions from FY 2013 through FY 2021, totaling approximately \$4.8 million. The Company completed an in depth look at each project, reviewing information including the Impact Study, Interconnection Service Agreement (“ISA”), Final Accounting Report, and construction notes along with detailed actuals including Contributions in Aid of Construction (“CIAC”) payments.

The Company categorized the findings into four scenarios with the following resulting actions:

#	Finding	Resulting Action
1	Refund was issued to the customer	Plant Additions removed from revenue requirement and expensed.
2	CIAC was incorrectly allocated.	
3	System Improvement was completed as part of the scope of work.	Plant Additions remain in revenue requirement.
4	Actual costs exceeded the estimate and could not be collected from the customer due to the timing of the cost increases and notification requirements outlined in R.I.P.U.C. No. 2258 (the “Tariff”). ²	

For the last finding in the table above, the Tariff does not include language that expressly allows or expressly prohibits the Company from collecting from all ratepayers costs associated with projects where the actual costs exceeded the estimate and the difference could not be collected from the customer.

The interconnection statute, however, provides that “[t]he estimate may be relied upon by the applicant for purposes of determining the expected cost of interconnection, but the distribution company may not be held liable or responsible if the actual costs exceed the estimate as long as the estimate was provided in good faith and the interconnection was implemented prudently by the electric distribution company.” See R.I. Gen. Laws § 39-26.3-2 (definition of an Impact Study).

² See Exhibit I of the Tariff (Interconnection Service Agreement), Page 101, Section 5.1 entitled Cost or Fee Adjustment Procedures which provides that: “The Company will, in writing, advise the Interconnecting Customer in advance of any expected cost increase for work to be performed up to a total amount of increase of 10% only. Any such changes to the Company’s costs for the work shall be subject to the Interconnecting Customer’s consent. The Interconnecting Customer shall, within thirty (30) days of the Company’s notice of increase, authorize such increase and make payment in the amount up to the 10% increase cap, or the Company will suspend the work and the corresponding agreement will terminate.”

Accordingly, as long as the Company's estimate was made in good faith and the interconnection was implemented prudently, the Company is not responsible for System Modification costs that exceed the cost cap for the Interconnecting Customer.

Per the Tariff, the Company has the ability to advise the Interconnecting Customer of expected cost increases for work to be performed but only up to a total increase amount of 10%. For increases up to 10%, the Interconnecting Customer must be provided with written advance notice of the expected cost increase. Typically, cost increases are not expected in advance of performing the work, making it practically impossible for the Company to provide advance written notification and solicit an Interconnecting Customer's consent prior to work being performed.

Accordingly, there are projects where the actual costs exceed the estimate and the difference was not collected from the Interconnecting Customer either because of the 10% limit or because the Company could not provide the Interconnecting Customer with written advance notice due to the timing of when the work was performed.

When taking into account both R.I. Gen. Laws § 39-26.3-2 and the above-referenced Tariff provisions, it is appropriate to recover the difference from distribution customers.

The initial review led to \$1.2 million remaining in service and was reported on during FY 2023 Annual Reconciliation Filing. The remaining projects were expensed.

Full Review: Due to the results from the initial set, the Company decided to review all of the remaining DG plant additions from FY 2013 through FY 2022. All plant additions, besides the \$1.2 million, were removed from rate base in the FY 2023 Annual Reconciliation Filing and reviewed during FY 2024. No plant additions from FY 2023 were included in the FY 2023 Annual Reconciliation Filing.

The full review concluded that in total, \$2.2 million should be included in rate base. This included 10 different projects. Two projects included system improvements and the remainder were related to higher spending than the CIAC collected. These projects were included in the FY 2024 Annual Reconciliation Revenue Requirement calculation.

In total, the Company has expensed \$5.3 million to date related to completed projects. These projects either had refunded the customer, CIACs incorrectly applied or did not have sufficient information to be placed back into service.

This review also found that a significant portion of projects with plant balances were included in the revenue requirement but had not been reconciled yet. These balances will not be put into service until the projects are reconciled and confirmed to be system improvements or true overspends which occurred during construction.

3) **Process Changes**

The Company has reflected on lessons learned and process improvements that will be implemented as new projects are created and reconciliations continue. These include, but are not limited to:

- Plant additions were included for projects in ISR Reconciliation Filings that had not been completed or reconciled. Plant additions for DG projects are now not put into service or included in ISR rate base until project reconciliations are complete and explanations are documented.
- Multiple projects that were reviewed found that CIACs were allocated to the incorrect projects or were applied to the wrong cost type (i.e. Opex instead of Capex). Actuals will be reviewed by the project team monthly to ensure CIACs are being recorded appropriately.
- It was difficult to understand why projects overspent the estimated amount, primarily due to lack of documentation. There will be cadenced meetings between Engineering, Project Management, Customer Energy Integration, Finance and Regulatory teams to communicate project status, explain cost variances and update project forecasts. A portfolio tracker will also be created to document these updates.
- Project setup in the Company's internal systems did not seem to be uniform. Some projects had multiple work orders for a particular scope while others only had one work order. This led to work orders being missing from the reconciliation process. The process to set up projects needs to be uniform to ensure all of the work is being captured in reconciliations.
- The Company's engineering team continually reviews costs at the end of projects to improve project estimates, however, estimating templates are not easy to compare with the actuals to understand what categories of spend had variances. Estimating templates need to be updated so that actuals can be easily comparable at reconciliation.

Attachment 1

Quarterly Report for the Fourth Quarter Period Ending March 31, 2024

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May 15, 2024

VIA ELECTRONIC MAIL AND HAND DELIVERY

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

**RE: Docket No. 22-53-EL – FY2024 Electric Infrastructure, Safety, and Reliability Plan
Quarterly Update – Fourth Quarter Ending March 31, 2024**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy, I have enclosed an electronic version of the Company's fiscal year (FY) 2024 Electric Infrastructure, Safety, and Reliability (ISR) Plan quarterly update for the fourth quarter ending March 31, 2024. Pursuant to the provisions of the approved FY 2018 Electric ISR Plan, the Company committed to providing quarterly updates on the progress of its Electric ISR program to the Rhode Island Public Utilities Commission and the Rhode Island Division of Public Utilities and Carriers.

Thank you for your attention to this matter. 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

Enclosure

cc: Docket 22-53-EL Service List

**Electric Infrastructure, Safety, and Reliability Plan
ISR Plan Fiscal Year 2024 – Fourth Quarter Update
For the Fiscal Year Ending March 31, 2024**

EXECUTIVE SUMMARY

As shown in Attachment A, The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”) spent \$124.7 million for capital projects against a budget of \$112.3 million during the ISR Plan Fiscal Year 2024 (April 1, 2023 through March 31, 2024, or “FY 2024”) for its electric infrastructure, safety, and reliability (“ISR”) plan. Non-Discretionary spending was \$56.1 million, \$13.4 million over budget. Discretionary spending, including the separately tracked large projects, was \$68.6 million, \$1.0 million under budget. For FY 2024, capital spending was over budget due to non-discretionary spending related to transformers purchases and failed assets. Spending in each of these categories is addressed in more detail below.

I. FY 2024 Capital Spending by Key Driver Category

1. Non-Discretionary Spending

a. Customer Request/Public Requirement

During FY 2024, capital spending in the Customer Request/Public Requirement category was \$35.3 million, which was \$7.8 million over the budget of \$27.5 million.

The major drivers were:

- Spending on Third-Party Attachment projects was in a credit position as of March 31, 2024 due to the collection of customer advances for projects that will be completed in FY 2025.
- Distributed Generation (“DG”) capital spending activity, net of DG customer contributions, was \$2.5 million in FY 2024. Charges that were incurred in the last quarter of the fiscal year are under review, and if necessary, adjustments will be made in the Annual Reconciliation filing. The Company continues to review and reconcile DG projects and is anticipating that capital spending will continue to be reduced by customer advances during the reconciliation process. The Company is finalizing a report to be included in the FY 2024 Annual Reconciliation outlining the review of all distributed generation projects for which the customer contribution did not cover the full cost of the project; the reasons why; and the impact on rate base and the associated revenue requirement.
- Capital spending on New Business work was \$18.1 million, \$1.8 million over budget. New Business Residential capital spending, both blanket and specific project work, was \$0.1 million over budget. New Business Commercial capital spending was \$1.7 million over budget due to emerging customer work that exceeded the reserves established in the budget.
- Public Requirements capital spending was \$1.7 million, \$0.5 million over budget. Spending under the blanket project was \$0.4 million under budget. Billing for RI Department of Transportation was delayed, contributing to the year’s over spend. Billing for these projects is anticipated to take place in FY 2025. Joint-owned pole billing was \$0.9 million under budget.
- Capital spending related to meters, including the purchase of meters and work performed under the meter blanket project, totaled \$1.5 million, \$0.9 million under budget. As the Company transitions to AMF meters, it is anticipated that spending under these projects will continue to decrease. The Landline Meter

Replacement project, budgeted for \$0.1 million in FY 2024, was cancelled. Detailed meter and instrument purchases are shown in Attachment H to this report.

- Capital spending for transformers, voltage regulators, and capacitors totaled \$10.9 million at year end. Supply chain challenges continue to impact pricing and availability of transformers and related equipment. These include extended lead times, demand exceeding capacity, raw material shortages, and logistical constraints. During 2023, the Company sought alternate sources of supply, continued to place proactive orders to mitigate future supply gaps, and increased inventory levels to support work plans and respond to emergencies.

b. Damage/Failure

During FY 2024, capital spending in the Damage/Failure category was \$20.8 million, which was \$5.6 million over the \$15.2 million budget. The major drivers were:

- Spending in the Overhead Line and Substation Damage/Failure Blanket projects was \$11.6 million, \$0.7 million over budget. Capital spending on overhead line failure-related work was \$0.6 million over budget. The Substation Blanket project, which was essentially on budget, includes costs associated with the Apponaug Substation and Sprague Street transformer failures as described in more detail below.
- Actual capital spending related to storms and weather-related events was \$4.8 million, \$2.8 million over budget for the year. This amount includes capital spending of \$0.9 million for the weather event on September 13, 2023 and \$1.0 million for the storm on December 18, 2023.
- During ISR Plan Year 2022, the Westerly #2 transformer failed, and a spare transformer was installed. Due to delays in delivery of the spare transformer, minimal spending took place in FY 2024. Delivery of the spare transformer is scheduled for June 2024.
- In August 2022, the Nasonville Substation metal clad switchgear was damaged beyond repair due to a bus fault. Removal of the failed equipment has been completed. Final engineering and the first phase of civil construction will be completed in May 2024. Underground distribution line scope and substation design changes have contributed to the increased costs. Capital spending in FY 2024 was \$4.2 million.

- In 2022, the Hopkins Hill #2 transformer was taken out of service because of gassing. A mobile transformer has been installed. It is expected that the transformer teardown, visual inspection, and final report will be completed by January 2026. The first installment payment for the new transformer will be made in the first quarter of FY 2025 and the transformer is expected to be received in FY 2026.
- In July 2023, the transformer at Apponaug Substation failed. A spare transformer was used to replace the failed unit. A controlled teardown of the failed unit was performed. The inspection revealed arcing damage believed to have been caused by a lightning strike. Capital spending of \$119,000 has taken place during FY 2024 and is included in the Substation Damage/Failure Blanket project.
- In May 2023, the #2 transformer at Sprague Street Substation failed. Costs associated with the immediate repair/replacement are included in the Substation Blanket project. The T3 transformer at Olneyville Substation was moved to replace the #2 Transformer at Sprague Street.

2. **Discretionary Spending**

a. **Asset Condition (Without Separately Tracked Large Projects)**

During FY 2024, capital spending in the Asset Condition category (excluding separately tracked large projects) was \$23.9 million, \$0.5 million over the \$23.3 million budget. The major drivers in this category are as follows:

- Capital spending on inspection and maintenance work (“I&M”) was \$0.4 million, under budget due to a re-prioritization of the discretionary portfolio.
- Capital spending for the Underground Cable Replacement program was \$4.5 million, \$1.0 million under budget due to prioritizing the completion of the Dyer Street Substation distribution underground line work. Both projects relied on similar constrained material and crew resources.
- Capital spending for the URD program was \$6.9 million. Although the majority of the program’s workplan was completed by December, work continued on one project to avoid outages in an area that was known to have a high frequency of cable faults and no backup cable. This resulted in an overall program overspend of \$0.6 million in FY 2024.
- Capital spending for the Franklin Square Breaker project totaled \$1.4 million. All breakers at the Franklin Square Substation have been replaced.

- After delays in 2023, the 3763 Pole Replacement project was completed and placed into service in March 2024. Capital spending was \$1.6 million, \$0.8 million over budget. This project was originally budgeted in FY 2023 when material constraints resulted in the deferral of the project to FY 2024.
- The project to replace 18 reclosers, approved in the FY 2024 Plan, was completed. Capital spending totaled \$1.2 million and all reclosers are in service as of March 31, 2024.
- In November and December 2023, the Company allocated costs associated with area studies that had accumulated in the Preliminary Survey and Investigation (“PS&I”) project totaling \$1.9 million. The costs were reclassified to the capital projects coming out of the area studies and appear in those projects as additional capital spending in FY 2024. The spending took place in previous years and FY 2024 activity was simply an allocation of accumulated costs. Capital projects in the Asset Condition category received \$0.8 million of the allocation while the PS&I project, a project in the System Capacity & Performance spending rationale, received a \$0.8 million credit. The net FY 2024 Discretionary portfolio impact is zero. Most of these projects did not have an FY 2024 budget. For additional details, please see the table included in Section (c) of this report.

b. Non-Infrastructure

In Attachment A – Capital Spending by Spending Rationale, the Non-infrastructure spending rationale shows a capital spending credit of \$1.1 million in FY 2024. The credit is driven by the Capital Overheads project which was under-allocated in the previous year. The unallocated FY 2023 costs and all FY 2024 charges to the Capital Overheads project were fully distributed to capital projects in FY 2024.

Minimal spending took place on the Copper to Fiber Conversion project or in the General Equipment and Telecom projects.

c. System Capacity and Performance (Without Separately Tracked Large Projects)

During FY 2024, capital spending for the System Capacity and Performance category was \$14.9 million, \$2.0 million under the \$16.9 million budget. The major drivers in this category were as follows:

- The Kingston Substation Improvement project was completed and placed into service during FY 2024. Capital spending during the year totaled \$1.1 million against a budget of \$1.0 million.

- Capital spending on the New Lafayette Substation project was under budget for the year. The construction start date has been delayed due to transmission outage coordination issues.
- Capital spending on the CEMI-4 project totaled \$1.2 million. Work to fix reliability issues for customers experiencing significantly poorer service than system or circuit averages took place on multiple circuits. The majority of the work was completed and was in service as of March 31, 2024.
- Delays associated with the Weaver Hill Substation have resulted in an underspend of \$0.9 million for FY 2024. Planned work has been deferred until FY 2025 for portfolio management purposes.
- Capital spending for the Nasonville Substation project (D Sub and D Line) was \$2.6 million during FY 2024. Initial payments for the transformer, substation's civil work, and distribution line design took place during the year. In addition, area study costs of \$0.4 million were distributed to this project from a Preliminary Survey & Investigation project. These costs are described in more detail below. For FY 2025 ISR budgetary and reporting purposes, the Nasonville Substation D Sub project (#CRI3027) has been identified as a Separately Tracked Major Project. The Nasonville Substation D Line project (#CRI3028) will continue to be classified as a System Capacity & Performance project for budgetary and reporting purposes.
- In FY 2024, capital spending on the System Capacity & Performance Blanket projects were over budget by \$3.7 million. Work was driven by annual capacity and reliability reviews as well as area studies. The Company has reprioritized work to reduce outage exposure and address reliability and load issues while still focusing on delivering the discretionary portfolio on budget. The Company continues to review all work to ensure it is appropriately categorized.
- During FY 2024, the Company distributed \$1.9 million of costs associated with area studies that had accumulated in the Preliminary Survey and Investigation (PS&I) project. The costs were reclassified to the capital projects coming out of the area studies and appear as additional capital spending during FY 2024. The spending took place in previous years and FY 2024 activity was simply an allocation of accumulated costs. The net capital spend in FY 2024 is zero as all area studies were completed in previous years. Capital projects in the Asset Condition category received \$0.8 million of the allocation. These projects did not have FY 2024 budgets. System Capacity and Performance projects, including the Nasonville Substation project noted above, received \$1.1 million of the allocation.

The table below shows the projects that received charges during FY 2024:

Allocation of Preliminary Survey & Investigation (PS&I) Costs \$000's	
<u>Asset Condition Projects:</u>	
Tiverton Substation	\$60
Centredale Substation	134
Apponaug Substation	27
Central Falls 4KV Conversion	120
Crossman 4KV Conversion	120
Hospital Substation Replacement	98
Kingston Substation Replacement	96
Valley Farnum 23kv conversion	120
Total Asset Condition Allocation	773
<u>System Capacity & Performance Projects:</u>	
Tiverton D Line	22
Weaver Hill Substation	334
Nasonville Substation	406
Coventry	111
Kenyon	101
Staples #112	120
Warren Substation	8
Total System Cap & Perf Allocation	1,101
Total PS&I Allocated	\$1,874

d. Advanced Metering Functionality (AMF)

The Company has included the capital spending associated with the deployment of its AMF program described in Docket No. 22-49-EL as a separate Discretionary category in its Proposed FY 2025 ISR Plan. Capital spending of \$1.4 million took place during FY 2024 in the following areas:

Fiscal Year Ending March 31, 2024	
	Actuals \$000's
Meter Costs	\$17
Network Costs	31
System Costs	1,368
Program Costs	18
Capital Spending - AMF	\$1,434

Actual capital spending was less than the amount forecasted in the Third Quarter ISR report due to a shift in the Transition Services Agreement (“TSA”) exit date from May 2024 to August 2024.

e. Separately Tracked Large Projects

During FY 2024, capital spending on the following Large Projects is tracked and reported separately: Southeast Substation, Dyer Street Substation, Providence Study projects, East Providence Substation, and Warren Substation. Each project is discussed in Attachment G.

f. Large Project Variances

The Company provides explanations for large projects¹ with variances that exceed +/- 10% of the Plan Year budget in quarterly reports. These projects represent \$9.0 million of the 2024 budget of \$112.3 million. This project information is provided in Attachment E.

g. New Distribution System Technology Update

The Quarterly Updates include an explanation of new technologies the Company is exploring to assist in distribution system planning, particularly as they relate to the integration of DERs or to provide additional visibility on the distribution system. The Company continues to increase its use of Python Scripting to improve automation in CYME as well as other computer programs. For example, the grid modernization analysis utilized Python scripts for electric vehicle, electric heat pump, and DG placement within the CYME models.

3. Investment Placed-in-Service

During FY 2024, \$97.2 million of plant additions were placed in service, which was over the Plan’s target of \$89.0 million primarily driven by additions related to the Dyer Street Substation distribution line project. Details by spending rationale are included in Attachment B.

4. Vegetation Management

During FY 2024, the Company completed 1,225 miles of distribution mileage cycle pruning. The planned feeders were adjusted during the year, slightly affecting the overall miles completed. The Company spent \$13.8 million during the year.

¹ Large projects are defined as projects exceeding \$1.0 million in total project cost.

The Company agreed to provide additional information on its vegetation management program that allows for the disaggregation of cycle pruning and the enhanced hazard tree management program. A plan to collect data was provided in a May 15, 2023 letter to the Public Utilities Commission.

Attachment C provides the O&M spending and the Off Cycle Risk Reduction removal counts by circuit, as well as the additional information noted in the paragraph above.

5. Inspection and Maintenance

I&M program costs for FY 2024 are shown in Attachment D. During this time, the Company identified one Level I deficiency. The Level I stray voltage deficiency was identified and repaired on August 3, 2023. When Level I deficiencies are identified, they are repaired immediately or within 30 days of the inspection.

The Company began its annual inspection of targeted overhead structures and elevated voltage testing on January 1, 2024 as inspections and elevated voltage testing now take place on a calendar year basis. The table below shows the number of units tested during this period.

Manual Elevated Voltage Testing				
Manual Elevated Voltage Testing	Total System Units Requiring Testing	Units Completed 1/1/24 thru 3/31/24	Units with Voltage Found (>1.0v)	Percent of Units Tested with Voltage (>1.0v)
Distribution Facilities	274,396	0	0	0.000%
Underground Facilities	12,438	0	0	0.000%
Street Lights and Signal Controls	4,929	0	0	0.000%

Attachment A

Capital Spending by Spending Rationale For the Fiscal Year Ending March 31, 2024 (\$000)

Fiscal Year Ending March 31, 2024			
	Budget	Actuals	Over Spend / (Under Spend)
Customer Request/Public Requirement	\$27,514	\$35,307	\$7,793
Damage Failure	15,192	20,811	5,618
<i>Non-Discretionary Spending</i>	42,706	56,118	13,412
Asset Condition	23,346	23,876	530
Non-Infrastructure	1,700	(1,083)	(2,783)
System Capacity & Performance	16,898	14,850	(2,048)
	41,944	37,643	(4,301)
Large Projects Separately Tracked	27,679	30,966	3,287
<i>Discretionary Spending</i>	69,623	68,609	(1,014)
Total Capital Spending	\$112,329	\$124,727	\$12,398

Attachment B

Plant Additions by Spending Rationale For the Fiscal Year Ending March 31, 2024 (\$000)

Fiscal Year Ending March 31, 2024			
	Target	Actuals	% of Target Placed In Service
Customer Request/Public Requirement	\$27,742	\$33,203	120%
Damage Failure	16,303	12,202	75%
<i>Subtotal Non-Discretionary</i>	<i>44,045</i>	<i>45,405</i>	<i>103%</i>
Asset Condition (w/Sep Tracked Large Projects)	32,720	38,806	119%
Non- Infrastructure	1,213	84	7%
System Cap & Perf (w/Sep Tracked Large Projects)	11,048	12,929	117%
<i>Subtotal Discretionary</i>	<i>44,981</i>	<i>51,819</i>	<i>115%</i>
Total Plant Additions	\$89,026	\$97,224	109%

Attachment C

Vegetation Management For the Fiscal Year Ending March 31, 2024 (\$000)

Vegetation Management O&M Spending

Fiscal Year Ending March 31, 2024			
	Budget	Actual Spending	% Spend
Cycle Pruning (base)	\$9,960	\$9,313	94%
Off Cycle Risk Reduction	625	561	90%
Sub - T (on & off road)	540	150	28%
Police/Flagger Details	860	931	108%
Pockets of Poor Performance	120	17	14%
Risk Reduction - on cycle	290	534	184%
Core Crew (all other activities)	1,555	872	56%
Expenditures not categorized yet	0	1,408	--
Total O&M Spending	\$13,950	\$13,785	99%

Attachment C

Vegetation Management Span and Tree Tracker For the Fiscal Year Ending March 31, 2024

FY24 Additional Work by Feeder						
Feeder	On Cycle Risk Reduction		On Cycle Extra clearance (Cycle trim spend)		SPANS TOTAL	TREES TOTAL
	Spans Worked	Trees Removed	Spans Worked	Trees Removed	995	2524
112W44	88	75		34	88	109
126W41	38	62			38	62
15F1			1		1	0
15F2			143	195	143	195
21F2				10	0	10
26W1	5	20			5	20
34F2			2	2	2	2
38F1	4	8			4	8
4F1			7		7	0
4F2			8		8	0
46F1	7	50	126	352	133	402
46F4				45	0	45
54F1	3	6	142	675.5	145	681.5
59F1		18		12	0	30
59F4	19	6			19	6
63F3			66	95	66	95
63F4			7	6.5	7	6.5
63F5			3	4	3	4
63F6			115	519	115	519
69F1			15	8	15	8
88F3			196	321	196	321
TOTAL	164	245	831	2279	995	2524

Attachment C

Vegetation Management Span and Tree Tracker For the Fiscal Year Ending March 31, 2024

Total Off Cycle Hazard Trees removed by Feeder				TOTAL
Feeder	Trees Removed	Substation	District	478
127W41	4	Nasonville	Capital	
155F8	35	Chase Hill	Coastal	
23F4	22	Farnum Pike 23	Capital	
23F6	13	Farnum Pike	Capital	
26W1	24	Woonsocket 26	Capital	
26W3	8	Woonsocket	Capital	
34F1	106	Chopmist 34	Capital	
34F2	78	Chopmist	Capital	
34F3	34	Chopmist	Capital	
38F1	15	Putnam Pike 38	Capital	
38F5	10	Putnam Pike 38	Capital	
51F3	2	Bristol	Capital	
51F1	21	Bristol	Capital	
54F1	29	Coventry 54	Coastal	
59F1	1	Peacedale 59	Coastal	
63F3	7	Hopkins Hill 63	Coastal	
63F6	57	Hopkins Hill 63	Coastal	
68F1	43	Kenyon 68	Coastal	
68F4	8	Kenyon 68	Coastal	
TOTAL	478			

Off Cycle Ash Tree Removal Count FY24 (Sub-set of Total Off Cycle Hazard Trees Removed)				TOTAL
Feeder	Trees Removed	Substation	District	407
127W41	4	Nasonville	Capital	
155F8	35	Chase Hill	Coastal	
34F1	106	Chopmist	Capital	
34F2	78	Chopmist	Capital	
34F3	34	Chopmist	Capital	
38F1	14	Putnam Pike	Capital	
38F5	8	Putnam Pike	Capital	
45F2	28	West Greenville	Capital	
51F3	2	Bristol	Capital	
51F4	21	Bristol	Capital	
54F1	21	Coventry	Coastal	
63F3	1	Hopkins Hill	Coastal	
63F6	8	Hopkins Hill	Coastal	
68F1	43	Kenyon	Coastal	
68F4	4	Kenyon	Coastal	
TOTAL	407			

Attachment D

Inspection and Maintenance Program and Other O&M Spending For the Fiscal Year Ending March 31, 2024 (\$000)

Fiscal Year Ending March 31, 2024			
	Budget	Actuals	% Spend
Opex Related to Capex	\$400	\$332	83%
Inspections & Repair Related Costs	338	654	193%
System Planning & Protection Coordination Study	25	0	0%
VVO/CRV Program	400	255	64%
Total O&M Spending	\$1,163	\$1,241	

Attachment E

Project Variance Report For the Fiscal Year Ending March 31, 2024 (\$000)

Fiscal Year Ending March 31, 2024				
Project Description	Budget	Actuals	Over / (Under)	Variance Cause
Dyer Street Substation (at South Street)	\$0	\$2,725	\$2,725	See Attachment G for additional details.
East Providence Substation	\$1,330	\$906	(\$424)	See Attachment G for additional details.
Warren Substation	\$1,969	\$2,518	\$549	See Attachment G for additional details.
Franklin Sq Breaker Replacement	\$437	\$1,362	\$925	Work carried over from previous year.
Weaver Hill Road Substation	\$1,507	\$593	(\$914)	Delays and deferred to FY 2025.
Nasonville Substation	\$1,912	\$2,585	\$673	Over budget due to allocation of area study costs/PS&I reclassification.
Nasonville Damage/Failure Project	\$1,092	\$4,198	\$3,106	Civil construction bids higher than originally estimated, UG D Line scope and design changes required.
3763 Pole Replacements	\$783	\$1,565	\$782	Deferred from FY 2023.
	\$9,030	\$16,454	\$7,423	

Attachment F

Damage/Failure Detail by Work Type For the Fiscal Year Ending March 31, 2024 (\$000)

Fiscal Year Ending March 31, 2024						
Description	D Line Blanket	Property Damage	D Sub Blanket	Specifics	Storms	Total
Apponaug Transformer Fail	\$0	\$0	\$119	\$0	\$0	\$119
Hopkins Hill Transformer Failure	0	0	0	185	0	185
Monthly Confirming Work	6,681	0	0	0	0	6,681
Nasonville Failure	0	0	0	4,198	0	4,198
OH Electric Distribution	2,382	0	0	0	0	2,382
Other	30	0	214	(5)	0	240
Property Damage	0	1,021	0	0	0	1,021
Sprague St Transformer Fail	0	0	364	0	0	364
Storms	0	0	0	0	4,784	4,784
Streetlighting	17	0	0	0	0	17
UG Electric Distribution	805	0	0	0	0	805
Westerly Spare Transformors	0	0	0	15	0	15
Total	\$9,915	\$1,021	\$698	\$4,394	\$4,784	\$20,811

Please see the Excel file attached to this quarterly report with additional details on Damage/Failure capital spending.

Attachment G

Separately Tracked Large Projects For the Fiscal Year Ending March 31, 2024

Southeast Substation

Predates Existing Area Study Process
Current Status – Design and Execute

	Actuals & Current Forecast		ISR Plan Budget	
		Total Project Cost		Total Project Cost
	FY 2024 Actuals	Forecast	2024 Budget	Forecast
Southeast Substation Project	\$412	\$24,170	\$66	\$23,703

Capital spending totaled \$0.4 million during FY 2024. The Dunnell Park substation portion of this project is complete. The majority of the assets associated with the distribution line project are in service. Building demolition was pushed from January 2024 due to material delays. The engineering for the Pawtucket #1 Substation project is complete and building demolition will begin during the Summer of 2024.

The Southeast Substation project, excluding the related distribution line projects, will continue to be shown on Attachment G as a “Separately Tracked Major Project” in FY 2025 and will be outside the “soft budget cap”.

Dyer Street Substation at South Street

Predates Existing Area Study Process
Current Status – Design and Execute

	(\$ 000's)	Actuals & Current Forecast		ISR Plan Budget	
		FY 2024 Actuals	Total Project Cost Forecast	2024 Budget	Total Project Cost Forecast
Dyer Street Substation Project		\$2,725	\$24,281	\$0	\$21,641

Capital spending totaled \$2.7 million in FY 2024. The distribution line portion of the project was placed into service in February 2024. Building demolition of the existing Dyer Street Substation is expected to begin during the Summer of 2024 pending receipt of final permits.

- The total project cost forecast increased due to:
- Supply chain delays adding a year to the project schedule.
 - Scope increases due to underground obstructions and a collapsed duct bank.

The Dyer Street Substation project, excluding the Distribution Line project, will continue to be shown on Attachment G as a “Separately Tracked Major Project” in FY 2025 and will be outside the “soft budget cap”.

Providence Study – Phase 1B, 2 & 4

Providence Area Study Implementation Plan 2016 – 2030 (May 2017)

Current Status – Final Engineering/Design and Execute

(\$ 000's)	Actuals & Current Forecast		ISR Plan Budget	
	FY 2024 Actuals	Total Project Cost Forecast	2024 Budget	Total Project Cost Forecast
Total Providence Study	\$24,204	\$90,775	\$24,314	\$90,753

The Company is now reporting all the Providence Study work as one project as all components are being managed collectively. Please note, the Admiral Street Substation project, excluding the related distribution line projects, will continue to be shown on Attachment G as a “Separately Tracked Major Project” in FY 2025 and will be outside the “soft budget cap”.

The Providence Study Phase 2 – Geneva, Olneyville, Rochambeau 4 KV Conversion project involves converting and retiring the 4.16kV load from the Geneva, Olneyville, and Rochambeau Avenue substations for 12.47kV operation. This project was budgeted to begin construction in FY 2024, but resources were shifted to complete the line portion of the Knightsville project to accommodate the City’s request. Civil work on the substation portion of Knightsville began.

East Providence Substation

East Bay Area Study (August 2015)
Current Status – Design & Execute

(\$ 000's)	Actuals & Current Forecast		ISR Plan Budget	
	FY 2024 Actuals	Total Project Cost Forecast	2024 Budget	Total Project Cost Forecast
East Providence Substation	\$906	\$22,119	\$1,330	\$17,555

During FY 2024, capital spending totaled \$0.9 million. Final engineering and procurement occurred. An updated study grade estimate of \$22.1 million was issued at the end of March 2024. This included an updated in-service date (2027 versus 2022), inflation, and bids received on the transformer and other similar metal-clad switchgears. The construction grade estimate for the substation will be complete in June 2025. The driver for the FY 2024 underspend was due to revisions made to project execution plan caused by the approximately one year increase in substation transformer lead time. Distribution line work was walked out of FY 2024 and offset by the Warren Substation distribution line work walked into FY 2024.

The East Providence Substation project, excluding the related distribution line projects, will continue to be shown on Attachment G as a “Separately Tracked Major Project” in FY 2025 and will be outside the “soft budget cap”.

Warren Substation

East Bay Area Study (August 2015)

Current Status – Design & Execute

(\$ 000's)	Actuals & Current Forecast		ISR Plan Budget	
	FY 2024 Actuals	Total Project Cost Forecast	2024 Budget	Total Project Cost Forecast
Warren Substation	\$2,518	\$10,171	\$1,969	\$10,171

During FY 2024, capital spending was \$2.5 million for both distribution line and substation work against a budget of \$2.0 million. Distribution line work is ongoing. Engineering and procurement are ongoing for the substation and construction will begin in January 2026. The driver for the FY 2024 overspend was due to revisions made to project execution plans. Warren Substation's distribution line work was walked into the FY 2024 Plan and offset by the East Providence Substation's line work which was walked out of the FY 2024 Plan.

The Warren Substation project will no longer be shown on Attachment G as a "Separately Tracked Major Project" in FY 2025 and will be included in the "soft budget cap". However, the Company anticipates that when the substation portion of the project is re-estimated, it may exceed the \$5 million threshold.

Tiverton

Tiverton Area Study 33F6

In the Tiverton area, the DG application for the installation of a new feeder, 33F6, has been approved and the project is progressing. This generation site went into service in late 2023. The Tiverton Area Study (September 2021) identified the need to extend the proposed 33F6 circuit to the south for thermal (capacity) limits, contingency response capability, and voltage issues. The Study included a cash flow showing the circuit extension to be in-service in 2028. The Company filed a Petition for Acceleration Due to Distributed Generation Project under Docket 23-37 EL.

This project is not considered a “Separately Tracked Major Project” in FY 2025 and will not be in Attachment G of future ISR Plan quarterly reports.

Attachment H

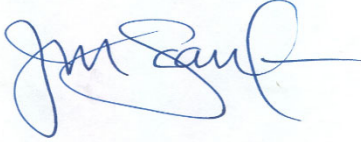
Meter Purchases For the Fiscal Year Ending March 31, 2024

Quantity of Meters Purchased		
Type	Description	Quantity
METER	CENTRON - 2S 240V CL200	20,700
METER	CENTRON - 16S CL320	360
INSTRUMENT TRANSFORMER	CUR OUTDOOR 70/1 8.4KV	17
INSTRUMENT TRANSFORMER	CUR OUTDOOR 175/1	7
INSTRUMENT TRANSFORMER	CUR OUTDOOR 300/1	4
INSTRUMENT TRANSFORMER	CUR OUTDOOR 15KV	10
INSTRUMENT TRANSFORMER	CUR OUTDOOR 5/5 15KV	11
INSTRUMENT TRANSFORMER	CUR OUTDOOR 50/5 15KV	9
INSTRUMENT TRANSFORMER	CUR OUTDOOR 75/5 15KV	30
INSTRUMENT TRANSFORMER	CUR OUTDOOR 100/5 15KV	12
INSTRUMENT TRANSFORMER	CUR OUTDOOR 300/5 15KV	12
INSTRUMENT TRANSFORMER	200:5 BASE BUSHINGS	10
INSTRUMENT TRANSFORMER	300:5 BASE BUSHINGS	64
INSTRUMENT TRANSFORMER	400:5 BASE BUSHINGS	240
INSTRUMENT TRANSFORMER	1200:5 BASE BUSHINGS	90
INSTRUMENT TRANSFORMER	2000:5 BASE BUSHINGS	48
INSTRUMENT TRANSFORMER	3000:5 BASE BUSHINGS	48
INSTRUMENT TRANSFORMER	200:5 CAP	210
	TOTAL	21,882

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

May 15, 2024
Date

Docket No. 22-53-EL – RI Energy’s Electric ISR Plan FY 2024
Service List as of 4/6/2023

Name/Address	E-mail Distribution	Phone
The Narragansett Electric Company d/b/a Rhode Island Energy Andrew Marcaccio, Esq. 280 Melrose St. Providence, RI 02907 Adam S. Ramos, Esq. Hinckley Allen 100 Westminster Street, Suite 1500 Providence, RI 02903-2319 Stephanie Briggs Patricia C. Easterly Susan M. Toronto Alan LaBarre Ryan Constable Kathy Castro Jeffrey Oliveira	amarcaccio@pplweb.com ;	401-784-4263
	cobrien@pplweb.com ;	
	jscanlon@pplweb.com ;	
	aramos@hinckleyallen.com ;	
	sbriggs@pplweb.com ;	
	NABegnal@RIEnergy.com ;	
	smtoronto@RIEnergy.com ;	
	ATLaBarre@RIEnergy.com ;	
	rconstable@RIEnergy.com ;	
	krcastro@RIEnergy.com ;	
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	mbedell@riag.ri.gov ;	
File an original & five (5) copies w/: Luly E. Massaro, Commission Clerk Cynthia Wilson-Frias, Esq. Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov ;	401-780-2107
	Cynthia.WilsonFrias@puc.ri.gov ;	
	Todd.bianco@puc.ri.gov ;	
	Alan.nault@puc.ri.gov ;	
	Emma.rodvien@puc.ri.gov ;	
Matt Sullivan, Green Development LLC	ms@green-ri.com ;	

Attachment 2

2023 Electric Service Quality Report

Andrew S. Marcaccio, Counsel
PPL Services Corporation
AMarcaccio@pplweb.com

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



May 1, 2024

VIA ELECTRONIC MAIL

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

RE: Docket 3628 – 2023 Service Quality Report (Electric Operations)

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”), enclosed, please find an electronic version of the Company’s Annual Service Quality Report which assesses the quality of the Company’s electric operations for the performance period of January 1, 2023 through December 31, 2023 (the “2023 Service Quality Report” or “Report”). As indicated in the Report, the Company’s performance for both reliability and customer service was within acceptable regulatory levels and, as a result, the Company did not incur a penalty.

The 2023 Service Quality Report stems from the Company’s electric Service Quality Plan (the “SQ Plan”) as approved by the Public Utilities Commission (the “PUC” or “Commission”) through Order Nos. 18294, 19020, and 22456.¹ The purpose of the SQ Plan is to ensure that customers receive a reasonable level of service. To this end, the SQ Plan establishes performance standards for service reliability, which includes the categories of interruption frequency and interruption duration, and for customer service, which includes the categories of customer contact and telephone calls answered. For each category, a benchmark or range representing a regulatory acceptable performance is set forth. If the Company’s performance falls below the acceptable range in any of the four categories, a penalty is assessed. The Company cannot earn a monetary award for exceeding expectations; however, it can accrue offsets for good performance in one category which may be used to offset a penalty incurred in the other categories. For additional details on the SQ Plan, please see Attachment 1 of the Settlement Agreement.²

¹ Through Order No. 18294, the PUC approved a Settlement Agreement between the Company and the Division of Public Utilities and Carriers (Division) which incorporated the SQ Plan to be effective January 1, 2005 (the Settlement Agreement). The SQ Plan also includes amendments made in 2007 (Order No. 19020) and 2016 (Order No. 22456).

² See [http://www.ripuc.ri.gov/eventsactions/docket/3628-NEC-Ord18294\(7-12-05\).pdf](http://www.ripuc.ri.gov/eventsactions/docket/3628-NEC-Ord18294(7-12-05).pdf)

Luly E. Massaro, Commission Clerk
Docket No. 3628 – 2023 Electric Annual Service Quality Report
May 1, 2024
Page 2 of 2

For 2023, the Company did not incur a penalty. Specifically, the Company's performance fell within an acceptable regulatory range for each of the four categories, meaning there were no penalties assessed. For a summary of the results, please see Section 2 of the Report.

In addition, the Report: (1) References quarterly reports filed by the Company that detail the worst performing circuits; (2) References monthly reports filed by the Company that detail trouble/non-outages; (3) Calculates the Company's annual meter reading performance; and (4) Identifies Major Event Days. In accordance with the SQ Plan, Major Event Days are not factored into the Company's performance under this Report and are separately analyzed and reported. For additional details on these items, please see Section 3 of the Report.

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 3628 Service List

The Narragansett Electric Company
d/b/a Rhode Island Energy

2023 Service Quality Report

May 1, 2024

Submitted to:
Rhode Island Public Utilities Commission
RIPUC Docket No. 3628

Submitted by:



Rhode Island Energy™
a PPL company

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SECTION 1: RELIABILITY AND CUSTOMER SERVICE PERFORMANCE STANDARDS

Interruption Frequency and Duration

Under the Service Quality Plan, an interruption is defined as the loss of electric service to more than one customer for more than one minute. The interruption duration is defined as the period of time, measured in minutes, from the initial notification of the interruption event to the time when service has been restored to the customers. Interruptions are tracked using System Average Interruption Frequency Index (SAIFI) and System Average Interruption Duration Index (SAIDI). SAIFI is calculated by dividing the total number of customers interrupted by the total number of customers served. SAIFI measures the number of times per year the average customer experienced an interruption. This is an average, so in any given year some customers will experience no interruptions, and some will experience several interruptions. SAIDI measures the length of interruption time that the average customer experienced for the year. It is calculated by dividing the total customer minutes of interruption by the total number of customers served. Certain events are defined as Major Event Days and are excluded from the calculation of reliability performance standards for penalty and offset assessment. There was one Major Event Day that occurred during 2023. The Major Event Day was December 18.

<u>2023 Total Frequency Standard</u>		<u>2023 Frequency (SAIFI) Results</u>	
<u>Frequency of Interruptions</u> <u>per Customer</u>	<u>(Penalty)/Offset</u>	<u>Frequency of</u> <u>Interruptions per</u> <u>Customer</u>	<u>Annual</u> <u>(Penalty)/Offset</u>
Greater than 1.18	(\$916,000)		
1.06-1.18	linear interpolation		
0.84-1.05	\$0		
0.75-0.83	linear interpolation	0.769	\$180,656
Less than 0.75	\$229,000		

<u>2023 Duration (SAIDI) Standard</u>		<u>2023 Duration (SAIDI) Results</u>	
<u>Duration of Interruptions</u> <u>(minutes)</u>	<u>(Penalty)/Offset</u>	<u>Duration of</u> <u>Interruptions</u> <u>(minutes)</u>	<u>Annual</u> <u>(Penalty)/Offset</u>
Greater than 89.9	(\$916,000)		
72.0-89.9	linear interpolation		
45.9-71.9	\$0	52.62	\$0
36.7-45.8	linear interpolation		
Less than 36.7	\$229,000		

CUSTOMER SERVICE PERFORMANCE STANDARDS

Customer Contact Survey

The customer contact survey results are based on responses from Rhode Island Energy electric customers from a survey performed by an independent third-party consultant, Praxis Research Partners. Praxis surveys a random sample of customers who have contacted Rhode Island Energy recently to determine their level of satisfaction with their most recent contact with the Company regarding any call reason. Survey results are based on a composite measure of two questions from Rhode Island Energy's internal contactor survey: (1) Overall, on a scale from 1 to 10, where 1 means "dissatisfied", and 10 means "satisfied", how satisfied are you with the services provided by Rhode Island Energy? (2) Overall, on a scale from 1 to 10, where 1 means "dissatisfied", and 10 means "satisfied", how satisfied are you with the quality of service provided by the telephone representative? The individual score for each question is the percentage of respondents who provided a rating of "8", "9", or "10" on a 10-point scale, where 1 means "dissatisfied", and 10 means "satisfied". The "percent satisfied" composite score is a simple arithmetic average of the satisfaction score from each question.

<u>2023 Customer Contact Standard</u>		<u>2023 Customer Contact Results</u>	
<u>Percent Satisfied</u>	<u>(Penalty)/Offset</u>	<u>Percent Satisfied</u>	<u>Annual (Penalty)/Offset</u>
Less than 74.4%	(\$184,000)		
74.4%-78.7%	linear interpolation		
78.8%-87.6%	\$0	81%	\$0
87.7%-92.0%	linear interpolation		
More than 92.0%	\$46,000		

Telephone Calls Answered Within 20 Seconds

The calls answered performance standard reflects the annual percentage of calls answered within 20 seconds, specifically for electric customers. “Calls answered” include calls answered by a customer service representative (CSR) and calls completed within the Voice Response Unit (VRU). The time to answer is measured once the customer selects to either speak with a CSR or use the VRU.

<u>2023 Calls Answered Standard</u>		<u>2023 Calls Answered Results</u>	
<u>% Answered Within 20</u>		<u>% Answered</u>	
<u>Seconds</u>	<u>(Penalty)/Offset</u>	<u>Within 20</u>	<u>Annual</u>
		<u>Seconds</u>	<u>(Penalty)/Offset</u>
Less than 53.5%	(\$184,000)		
53.5% - 65.7%	linear interpolation		
65.8% - 90.4%	\$0	85.44%	\$0
90.5% - 100.0%	linear interpolation, to maximum of \$46,000		

Rhode Island Energy
RIPUC Docket No. 3628
2023 Service Quality Plan Results
Section 2
Page 1

SECTION 2: CALCULATION OF PENALTY/OFFSET

Rhode Island Energy
2023 Results of Service Quality Plan
Calculation of Penalty/Offset

<u>Performance Standard</u>	<u>Potential Penalty</u> (a)	<u>Potential Offset</u> (b)	<u>2023 Results</u> (c)	<u>Maximum Penalty</u> (d)	<u>One Std Dev. Worse Than Mean</u> (e)	<u>Mean</u> (f)	<u>One Std Dev. Better Than Mean</u> (g)	<u>Maximum Offset</u> (h)	<u>Annual (Penalty)/ Offset</u> (i)
Reliability - Frequency	\$ 916,000	\$229,000	0.77	1.18	1.05	0.94	0.84	0.75	\$180,656
Reliability - Duration	\$ 916,000	\$229,000	52.6	89.9	71.9	57.5	45.9	36.7	\$0
Customer Service - Customer Contact Survey	\$ 184,000	\$ 46,000	81.0%	74.4%	78.8%	83.2%	87.6%	92.0%	\$0
Customer Service - Telephone Calls Answered	\$ 184,000	\$ 46,000	85.4%	53.5%	65.8%	78.1%	90.4%	100.0%	\$0
Total Penalty/Offset	\$2,200,000	\$550,000							\$180,656

Notes:

Columns (a), (b), and (d)-(h) are per the Amended Electric Service Quality Plan, RIPUC Docket No. 3628.

Column (c) represents the actual 2023 annual results for the performance standards listed in the first column.

Column (i) is calculated as follows:

- For Reliability Standards:

If Column (c) is between Column (g) and Column (e): \$0

If Column (c) is between Column (h) and Column (g): $[\text{Column (g)} - \text{Column (c)}] \div [\text{Column (g)} - \text{Column (h)}] \times \text{Column (b)}$

If Column (c) is between Column (e) and Column (d): $[\text{Column (c)} - \text{Column (e)}] \div [\text{Column (d)} - \text{Column (e)}] \times \text{Column (a)}$

If Column (c) is greater than Column (d): 100% of Column (a)

If Column (c) is less than Column (h): 100% of Column (b)

- For Customer Service Standards:

If Column (c) is between Column (e) and Column (g): \$0

If Column (c) is between Column (g) and Column (h): $[\text{Column (c)} - \text{Column (g)}] \div [\text{Column (e)} - \text{Column (d)}] \times \text{Column (b)}$

If Column (c) is between Column (d) and Column (e): $[\text{Column (e)} - \text{Column (c)}] \div [\text{Column (e)} - \text{Column (d)}] \times \text{Column (a)}$

If Column (c) is less than Column (d): 100% of Column (a)

If Column (c) is greater than Column (h): 100% of Column (b)

SECTION 3: ADDITIONAL REPORTING CRITERIA

Under the Company's Service Quality Plan, the following additional reporting criteria are required to be filed with the PUC.

1. **Reporting Requirement:** Each quarter, the Company will file a report of 5% of all circuits designated as worst performing on the basis of customer frequency.

Included in the report will be:

1. The circuit ID and location.
2. The number of customers served.
3. The towns served.
4. The number of events.
5. The average duration.
6. The total customer minutes.
7. A discussion of the cause or causes of events.
8. A discussion of the action plan for improvements including timing.

Results: The Company filed its first quarter 2023 feeder ranking results on May 10, 2023, the second quarter results on October 25, 2023, the third quarter results on November 15, 2023, and fourth quarter results on March 26, 2024.

2. **Reporting Requirement:** The Company will track and report monthly the number of calls it receives in the category of Trouble, Non-Outage. This includes inquiries about dim lights, low voltage, half-power, flickering lights, reduced TV picture size, high voltage, frequently burned-out bulbs, motor running problems, damaged appliances and equipment, computer operation problems, and other non-interruptions related inquiries.

Results: The Company filed the required Trouble, Non-Outage reports during 2023, with the final report for the 13 months ended December 2023 filed on January 24, 2024.

3. **Reporting Requirement:** The Company will report its annual meter reading performance as an average of monthly percentage of meters read.

Results: During 2023, the Company's annual meter reading performance (as an average of monthly percentage of meters read) was 98.98% compared to 98.88% in 2022, and 98.60% during 2021. The following table details the percentage of meters read per month for 2023, 2022 and 2021.

Monthly Percentage of Meters Read

	2023	2022	2021
January	98.92%	98.71%	98.59%
February	98.96%	98.71%	98.53%

	2023	2022	2021
March	98.93%	98.75%	98.63%
April	98.98%	98.90%	98.70%
May	99.04%	98.96%	98.70%
June	99.03%	98.95%	98.75%
July	99.00%	98.95%	98.66%
August	99.05%	99.12%	98.36%
September	99.03%	98.96%	98.83%
October	99.13%	98.76%	98.57%
November	99.14%	98.95%	98.18%
December	98.49%	98.87%	98.69%
YTD Average	98.98%	98.88%	98.60%

4. **Reporting Requirement:** For each event defined as a Major Event Day, the Company will prepare a report, which will be filed annually as part of the annual Service Quality filing, detailing the following information:

1. Start date/Time of event
2. Number/Location of crews on duty (both internal and external crews)
3. Number of crews assigned to restoration efforts
4. The first instance of mutual aid coordination
5. First contact with material suppliers
6. Inventory levels: pre-event/daily/post-event
7. Date/Time of request for external crews
8. Date/Time of external crew assignment
9. # of customers out of service by hour
10. Impacted area
11. Cause
12. Weather impact on restoration
13. Analysis of protective device operation
14. Summary of customers impacted

Results: IEEE Std. 1366-2012¹ identifies reliability performance during both day-to-day operations and Major Event Days. Major Event Days represent those few days during the year on which the energy delivery system experienced stresses beyond that normally expected, such as severe weather. A day is considered a Major Event Day if the daily SAIDI exceeds a threshold value, calculated using the IEEE methodology. For 2023 the T_{MED} value was 6.27 minutes of SAIDI (using IEEE Std. 1366-2012 methodology). There was one major storm day that exceeded this threshold in 2023. The storm occurred on December 18. The storm details are described below.

¹ RIPUC Order No 19020 refers to IEEE Std. 1366-2003. This standard has been superseded by IEEE Std. 1366-2012. The updated standard requires no changes for identifying Major Event Days or calculating thresholds.

December 18, 2023 Storm

1. Start date/Time of event:

The storm began on December 18, with scattered interruptions starting at 5:00 a.m. in the early morning of December 18. The peak was around 11:06 a.m. on December 18. The peak reached 27,998 customers interrupted.

2. Number/Location of crews on duty (both internal and external crews):

The Company secured a total of approximately 450 internal and external field crews to restore power to customers in Rhode Island, consisting of 222 external crews and 224 internal crews. The internal and external field crew numbers included transmission and distribution overhead line, forestry, substation, underground, wires down, and damage assessment personnel.

3. Number of crews assigned to restoration efforts:

At peak, the Company had the following crews performing restoration activities throughout the impacted areas in the State.

Crew Type

Internal Overhead Line - 35 crews
External Overhead Line - 99 crews
Internal Trouble Worker – 36 crews
Internal Wire Down - 54 crews
Internal Underground - 8 crews
Internal Substation - 20 crews
Contractor Forestry - 156 crews

4. The first instance of mutual aid coordination:

The Incident Commander for Rhode Island Energy did not request mutual assistance from companies in the North Atlantic Mutual Assistance Group (“NAMAG”) to support restoration for this event.

5. First contact with material suppliers:

The first contact with material suppliers was on December 17.

6. Inventory levels: pre-event/daily/post-event:

PLANT#	1107	1108	1115	1120	1101 Alloc.
LOCATION	LINCOLN	PROVIDENCE	NORTH KINGSTOWN	MIDDLETOWN	RI Allocated Inventory Balance @ NEDC
12/18/2023	-	\$1,198,256	-	\$230,034	-

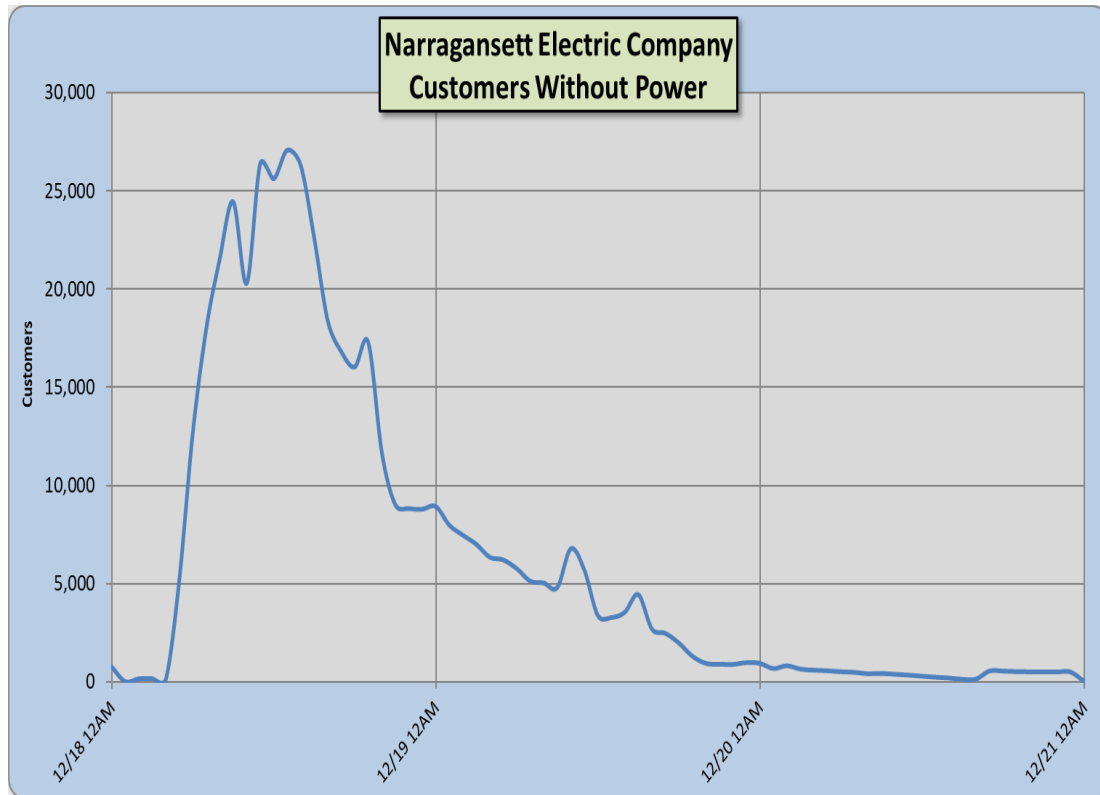
7. Date/Time of request for external crews:

Given the potential magnitude of the storm and forecast of hazardous winds, the Company secured crews in advance from its contractors of choice and other outside contractors to support restoration efforts for all its regional preparation for the storm, consistent with its Emergency Response Plan. The first request for external contractor crews was at 10:00 a.m. on December 18.

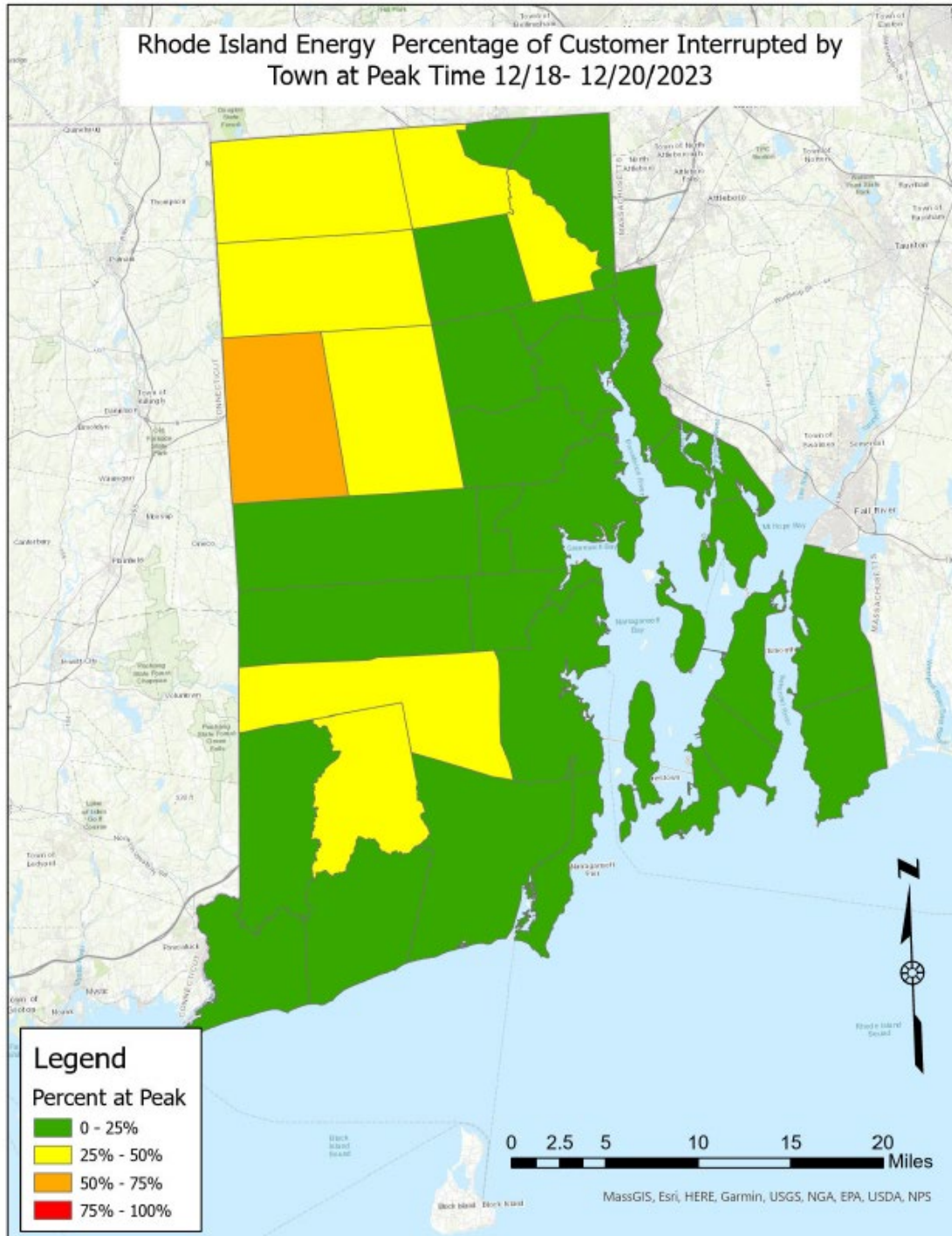
8. Date/Time of external crew assignment:

External crews were assigned to work around 10:00 am on December 18.

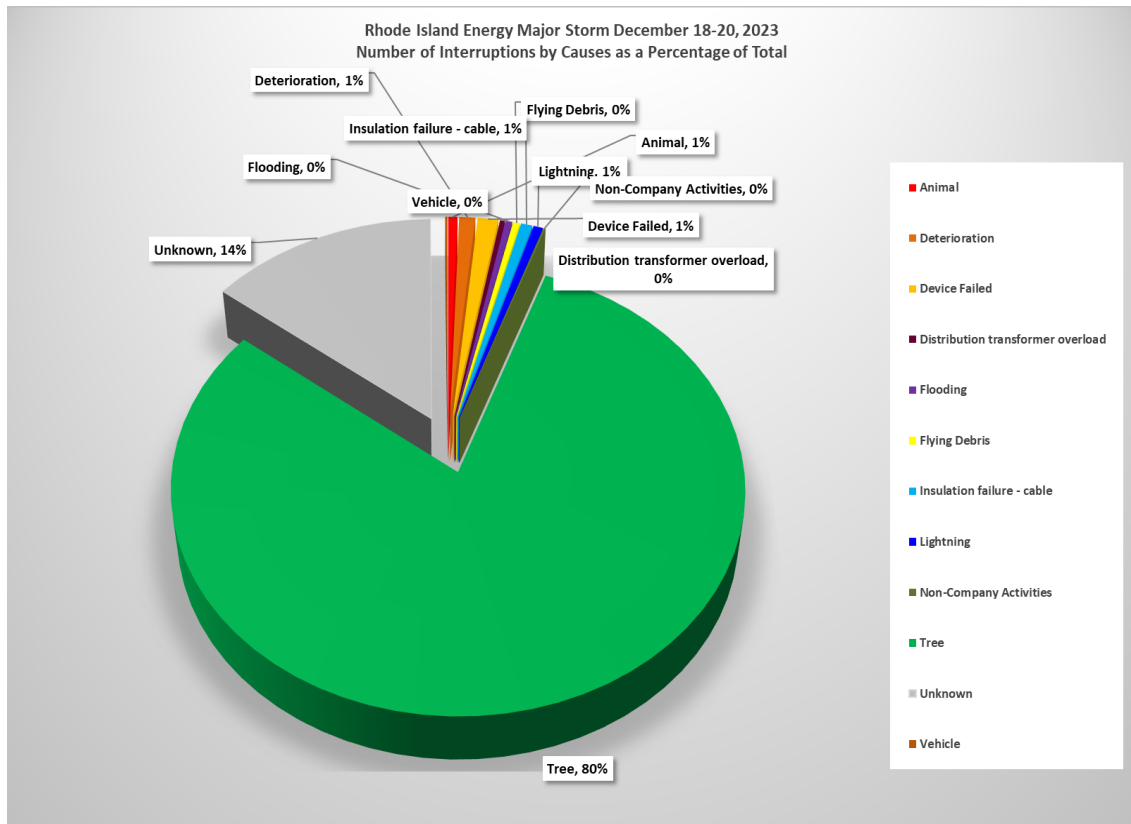
9. # of customers out of service by hour:



10. Impacted area:



11. Cause:



12. Weather impact on restoration:

The storm was a long duration weather event that resulted in moderate damage to the Company's electrical system. The Storm brought heavy rain and strong wind gusts to the state. Peak wind gusts were generally in the 55-65 mph range, with Providence experiencing a peak gust of 62 mph, with 1.6 inches of rain accumulated. The Towns of Foster and Glocester were affected most heavily with 100 percent of customers impacted by the event.

13. Analysis of protective device operation:

Rhode Island Energy maintains a wide array of protection and interrupting devices designed to separate faulted components from the electrical system while containing outages to the smallest area practicable. On the distribution system, those devices include fuse cutouts, reclosers, and circuit breakers of various designs. On the transmission system, interrupting devices include circuit breakers, air-break switches, and circuit switchers. Protection relays are used to detect the faults and operate the interrupting device(s) to isolate a faulted component(s).

For the distribution system, design standards exist that indicate how protection devices are to be deployed and coordinated with other devices. Distribution engineers evaluate such devices under normal and fault conditions. Where recent performance may indicate a need for improvement, Rhode Island Energy performs engineering studies and makes improvements. During a major storm like this event, outages in the distribution system may be far too extensive to assess the function and coordination of individual protection devices in detail, as the focus of storm response is on service restoration. A meaningful analysis would be difficult to perform unless there were specific indications of protection equipment mis-operation.

Protection standards, guides and practices also exist and are followed in the design of Rhode Island Energy's transmission system. Post-event analysis of all interruptions in the Rhode Island Energy Bulk Electric System (BES) is performed to confirm proper operation of protection systems. If an improper operation is identified, further analysis is conducted to identify the cause and to propose and implement a solution. In addition, Rhode Island Energy undertakes analysis of transmission and substation protection devices and coordination where there is evidence of mis-operation.

14. Summary of customers impacted:

December 18, 2023

On December 18, Rhode Island experienced 436 interruptions that affected 56,177 customers and 2,5619,476 customer minutes of interruption. On average these interruptions resulted in 0.11 SAIFI, 50.41 minutes of SAIDI. Since a SAIDI value of 50.41 minutes exceeded the threshold value of 6.27 minutes, December 18 is qualified as a Major Event Day under the IEEE methodology.

December 19, 2023

On December 19, Rhode Island experienced 18 interruptions that affected 5,063 customers and 482,284 customer minutes of interruption. On average these interruptions resulted in 0.01 SAIFI, 0.95 minutes of SAIDI. Since a SAIDI value of 0.95 minutes did not exceed the threshold value of 6.27 minutes, December 19 is not qualified as a Major Event Day under the IEEE methodology.

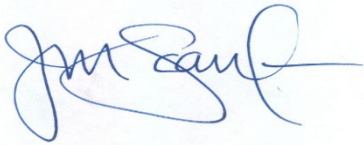
December 20, 2023

On December 20, the restoration was still ongoing, but the daily SAIDI value was very small and less than the threshold value of 6.27 minutes. December 20 is not qualified as a Major Event Day under the IEEE methodology.

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

May 1, 2024

Date

**Rhode Island Energy – Electric Service Quality Plan – Docket 3628 Service
List Updated 5/1/2024**

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PRE-FILED DIRECT TESTIMONY

OF

JEFFREY D. OLIVEIRA

August 1, 2024

THE NARRAGANSETT ELECTRIC COMPANY
d/b/a RHODE ISLAND ENERGY
RIPUC DOCKET NO. 22-53-EL
FY 2024 ELECTRIC INFRASTRUCTURE, SAFETY, AND RELIABILITY PLAN
ANNUAL RECONCILIATION FILING
WITNESS: JEFFREY D. OLIVEIRA

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I. Introduction

Q. Please state your full name and business address.

A. My name is Jeffrey D. Oliveira, and my business address is 280 Melrose Street,
Providence, Rhode Island 02907.

Q. By whom are you employed and in what position?

A. I am employed by the PPL Services Corporation as a Lead Rates and Regulatory
Specialist. My current duties include leading the revenue requirement analyses and
modeling that support regulatory filings, regulatory strategies, and rate cases for
The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”).

Q. Please describe your education and professional experience.

A. In 2000, I earned an associate degree in Business Administration from Bristol
Community College in Fall River, Massachusetts. I was employed by the National Grid
USA Service Company, Inc. (the “Service Company”) and its predecessor companies
from 1999-2022. From 1999 through 2000, I was employed by Fall River Gas Company
as a Staff Accountant. In 2001, after Fall River Gas Company merged with Southern
Union Company, I continued as a Staff Accountant with increased responsibilities.
In August of 2006, the Company acquired the Rhode Island operations of Southern Union
d/b/a New England Gas Company at which time I joined the Service Company as a
Senior Accounting Analyst. In January 2009, I became a Senior Revenue Requirement

Analyst in the Service Company’s Strategy and Regulation Department. In July 2011, I was promoted to Lead Revenue Requirement Analyst in the New England Revenue Requirements group of the New England Regulatory Department of the Service Company. On May 25, 2022, PPL Rhode Island Holdings, LLC, a wholly owned indirect subsidiary of PPL Corporation (“PPL”), acquired 100 percent of the outstanding shares of common stock of the Company from National Grid USA (“National Grid”) (the “Acquisition”). Upon closing of the Acquisition, I began working in my current position.

Q. Have you previously testified before the Rhode Island Public Utilities Commission (“PUC”)?

A. Yes. I filed pre-filed joint direct testimony with the PUC in support of the Company’s 2024 Electric Pension Adjustment Factor Filing in Docket No. 24-16-EL and have testified before the PUC in support of the Company’s filings in proceedings as follows: 2023 Electric Pension Adjustment Factor Filing in Docket No. 23-27-EL; 2023 Distribution Adjustment Charge Filing, Docket No. 23-23-NG; Fiscal Year (“FY”) 2023 Gas Infrastructure, Safety, and Reliability Plan Reconciliation Filing, Docket No. 5210; FY2023 Electric Infrastructure, Safety, and Reliability Plan Reconciliation Filing, Docket No. 5209; 2023 Renewable Energy Growth Factor Filing, Docket No. 22-04-REG; 2023 Annual Retail Rate Filing, Docket No. 23-03-EL; FY2024 Gas Infrastructure, Safety, and Reliability Plan, Docket No. 22-54-NG; FY2024 Electric Infrastructure, Safety, and Reliability Plan, Docket No. 22-53-EL;

2022 Distribution Adjustment Charge Filing, Docket No. 22-13-NG; 2022 Pension Adjustment Factor Filing, Docket No. 22-19-EL; 2022 Last Resort Service Rate Filing, Docket No. 4978; 2022 Renewable Energy Growth Factor Filing, Docket No. 22-04-REG; 2022 Annual Retail Rate Filing, Docket No. 5234; Joint Petition of the Company and the Rhode Island Division of Public Utilities and Carriers (“Division”) filed February 23, 2022, relating to the Storm Contingency Fund Replenishment, Docket No. 4686; 2021 Distribution Adjustment Charge Filing, Docket No. 5165; 2021 Pension Adjustment Factor Filing, Docket No. 5179; 2020 Distribution Adjustment Charge Filing, Docket No. 5040; 2020 Pension Adjustment Factor Filing, Docket No. 5054; 2019 Distribution Adjustment Charge Filing, Docket No. 4955; 2019 Pension Adjustment Factor Filing, Docket No. 4958; 2018 Distribution Adjustment Charge Filing, Docket No. 4846; 2018 Pension Adjustment Factor Filing, Docket No. 4855; and again in Docket No. 4686, in support of the Joint Proposal and Settlement submitted by the Company and the Division dated September 25, 2017, pertaining to the operation of the Storm Contingency Fund.

Q. What is the purpose of your testimony?

A. In this docket, the PUC approved a new Electric Infrastructure, Safety, and Reliability (“ISR”) factor, for effect on April 1, 2023. That factor was based on a projected FY 2024 Electric ISR revenue requirement of \$55,418,057 for the estimated operation and

1 maintenance (“O&M”) work associated with the Company’s vegetation management
2 (“VM”) and inspection and maintenance (“I&M”) programs for the Company’s FY
3 ended March 31, 2024, on the estimated ISR plant additions during the Company’s
4 FYs ended March 31, 2024 and 2023, and on the actual ISR additions during the
5 Company’s Fiscal Years ended March 31, 2018, 2019, 2020, 2021, and 2022 which
6 were incremental to the levels reflected in rate base in the Company’s last base rate case
7 (Docket No. 4770). On September 1, 2018, new distribution base rates as approved in
8 Docket No. 4770 became effective. The revenue requirements on actual ISR additions
9 made from FY 2012 through FY 2017 plus forecasted ISR additions for FY 2018,
10 FY 2019, and a portion of FY 2020 were included in these new base rates. Thus, the
11 purpose of my testimony is to present an updated FY 2024 Electric ISR revenue
12 requirement associated with actual FY 2024 O&M programs, the actual capital
13 investment levels for each of FY 2018 through FY 2024 incremental to the level of
14 investment assumed in Docket No. 4770, and actual tax deductibility percentages, tax
15 gains and losses on retirements and net operating loss (“NOL”) utilization for FY 2023,
16 an adjustment for the review of distributed generation (“DG”) projects that the Company
17 undertook, and a hold harmless adjustment credit.

18
19 The updated FY 2024 revenue requirement also includes an adjustment associated with
20 the property tax recovery formula that was approved in Docket No. 4323 and Docket No.
21 4770. As the vintage years FY 2012 through FY 2017 were rolled into the base rates

1 approved in Docket No. 4770 that became effective on September 1, 2018, the property
2 tax recovery adjustment covers only the months of September 2018 through March 31,
3 2024.

4
5 As shown on Attachment JDO-1, Page 1, at Line 21, the updated FY 2024 ISR revenue
6 requirement collectible through the Company's Electric ISR factor for the FY 2024
7 period, including updated tax deductibility adjustments to the FY 2023 revenue
8 requirement, totals \$54,282,082. This is a decrease of \$1,135,976 from the projected
9 FY 2024 Electric ISR revenue requirement of \$55,418,057, previously approved by the
10 PUC in this docket. This decrease is primarily attributable to (1) a net decrease in the
11 FY 2023 and FY 2024 revenue requirement on a lower level of capital investment;
12 (2) a net decrease to the FY 2018 through FY 2023 revenue requirements for the results
13 of the DG project review as described in the testimony of Ms. Gooding; and
14 (3) a decrease for the tax updates for FY 2023 taxes as described in the testimony of
15 Ms. Hawk. These decreases were partially offset by (1) an increase in the actual effective
16 FY 2024 property tax rate compared with the projected effective FY 2024 property tax
17 rate in the FY 2024 ISR Plan, and (2) an increase to the revenue requirement for the
18 updated FY 2023 and FY 2024 hold harmless adjustments as discussed in the testimony
19 of Ms. Hawk.

1 **Q. Does the updated FY 2024 revenue requirement in this filing include an impact of**
2 **the updated FY 2023 NOL utilization?**

3 A. Yes. The cumulative impact of the updated FY 2023 NOL utilization on the FY 2024
4 revenue requirement is addressed in the prefiled testimony of Ms. Hawk, as shown on
5 JDO-1, Page 26, Line 11.
6

7 **Q. Are there any schedules attached to your testimony?**

8 A. Yes, I am sponsoring the following attachment:

- 9 • Attachment JDO-1 Revenue Requirement Summary and Calculation
10 FY 2024 Electric Infrastructure, Safety, and Reliability
11 Plan Reconciliation
12

13 **II. Electric ISR FY2024 Revenue Requirement**

14 **Q. Did the Company calculate the updated FY 2024 ISR revenue requirement in the**
15 **same fashion as calculated in the previous ISR Factor submissions and the August**
16 **2023 ISR factor reconciliation?**

17 A. Yes, the Company calculated the updated FY 2024 Electric ISR Plan revenue
18 requirement in the same fashion as calculated in the previous Electric ISR Factor
19 submissions. Similar to the FY 2023 filing, the calculation incorporates the approved
20 weighted average cost of capital and depreciation rates from Docket No. 4770 and known
21 tax deductibility percentages, tax gains and losses on retirements and NOL utilization for
22 FY 2023.

1 The updated FY 2024 ISR revenue requirement presented in this reconciliation is nearly
2 identical to the calculated revenue requirement used to develop the approved ISR factors
3 that became effective April 1, 2023. A detailed description of the revenue requirement
4 calculation employed can be found in the revenue requirement testimony included in the
5 Company's FY 2024 ISR Plan Proposal filing in this docket. For brevity, I limit this
6 testimony to the following: (1) a description of the impact of Docket No. 4770 to the
7 Electric ISR revenue requirement, (2) a summary of the revenue requirement update
8 shown on Page 1 of Attachment JDO-1; and 3) a summary of the adjustment related to the
9 DG review.

10
11 **Q. Please summarize the change in the FY 2024 ISR revenue requirement proposed in**
12 **this reconciliation filing as compared to the FY 2024 revenue requirement effective**
13 **April 1, 2023, which was based on projected capital additions approved in the**
14 **FY 2023 and FY 2024 ISR Plans.**

15 A. As shown in Attachment JDO-1, Page 1, Line 21, column (c), the overall FY 2024
16 revenue requirement decrease is \$1,135,976, which is the net impact of: (1) a \$3.0
17 million decrease in the FY 2024 revenue requirement on vintage FY 2023 ISR capital
18 additions mainly driven by the actual FY 2023 capital additions compared to forecasted
19 FY 2023 additions and the reflection of the DG project review adjustment that was made
20 in the FY 2023 ISR revenue requirement reconciliation, in addition to the FY 2023
21 income tax deductibility update; (2) a \$0.5 million increase in the FY 2024 revenue

1 requirement on vintage FY 2024 ISR capital additions mainly caused by \$8.3 million
2 higher capital investment placed into service compared to the amount approved in the
3 FY 2024 Plan; (3) a \$2.4 million increase in the FY 2024 property tax recovery
4 adjustment mainly driven by the higher actual tax rate in FY 2024 compared to the
5 previous filed FY 2024 Plan; (4) a decrease of \$0.9 million due to the true-up of FY 2023
6 revenue requirement to reflect actual tax deductibility as described in Ms. Hawk's
7 testimony; (5) a decrease of \$0.7 million for the FY 2024 income tax deductibility update
8 from the FY 2024 Plan; (6) a net reduction to the FY 2024 revenue requirement of
9 \$0.8 million for FY 2018 through FY 2023 capital investments mainly related to the
10 DG project review and (7) a \$0.1 million decrease in O&M expense compared to the
11 approved FY 2024 plan. Additionally, the FY 2024 revenue requirement was increased
12 for the FY 2023 and FY 2024 tax hold harmless adjustment of \$1.6 million as described
13 in the testimony of Ms. Hawk.

14
15 **Q. Please describe the impact of the implementation of new base distribution rates that**
16 **were approved by the PUC in Docket No. 4770 and put into effect on September 1,**
17 **2018 on the FY 2023 ISR revenue requirement recoverable through the FY 2024**
18 **ISR factor.**

19 **A.** The ISR mechanism was established to allow the Company to recover outside of base
20 rates, costs of capital investment in electric distribution system infrastructure, safety and
21 reliability. When new base distribution rates are implemented, as was the case in

1 Docket No. 4770, the costs that are recovered and associated with pre-rate case ISR
2 capital investment cease to be recovered through a separate ISR factor. Instead, these
3 costs are recovered through base distribution rates, and the underlying ISR capital
4 investment becomes a component of base distribution rate base from that point forward.
5 In November 2017, the Company filed an application with the PUC seeking a change in
6 base distribution rates for its gas and electric distribution businesses. The proceeding
7 culminated with the Commission's approval of a settlement agreement with the Division
8 and numerous intervenors establishing new base distribution rates for the Company.
9 The Company's proposed rate base reflected projected capital investments through
10 August 31, 2019. In its base rate request, the Company proposed to maintain consistency
11 with the existing ISR mechanism for the FY 2019, FY 2020, FY 2021, and FY 2022
12 periods. Consequently, the forecast used to develop rate base in the first year of the
13 distribution rate case included actual capital investment through the test year ending
14 June 30, 2017, nine months of the ISR approved capital investment levels for vintage
15 FY 2018, 12 months of vintage FY 2019 investment and five months of vintage FY 2020
16 investment (using the FY 2018 ISR approved level of plant additions as a proxy for
17 FY 2018, FY 2019, and FY 2020). The FY 2022 revenue requirement for FY 2018
18 through FY 2022 ISR investments that are incremental to the estimated level of
19 investment assumed in base rates reflects a full year of revenue requirement as none of
20 these incremental investments are included in the Company's rate-base. These
21 incremental FY vintage amounts are to remain in the ISR recovery mechanism as

1 provided for in the terms of the Docket No. 4770 approved Settlement Agreement until a
2 future proceeding that rolls these amounts into base rates.

3
4 **Q. Does the updated FY 2024 revenue requirement reflect the calculation of the excess**
5 **deferred income tax amounts.**

6 A. Yes. The excess deferred income taxes are calculated on Line 27, Page 2, of Attachment
7 JDO-1. This calculation is further explained in the prefiled testimony of Ms. Hawk.

8
9 **Q. Are there any tax updates to the FY 2023 revenue requirement reflected in the FY**
10 **2024 Electric ISR Reconciliation?**

11 A. Yes. Please see the testimony of Ms. Hawk for a description of the tax updates reflected
12 in the FY 2024 Electric ISR revenue requirement.

13
14 **Q. Please summarize the updated FY 2024 Electric ISR revenue requirement.**

15 A. As shown on Page 1 of Attachment JDO-1, the Company's FY 2024 Electric ISR
16 Program revenue requirement includes two elements: (1) O&M expense associated with
17 the Company's VM activities and system inspection, feeder hardening, and potted
18 porcelain cutouts, as encompassed by the Company's I&M Program, and (2) the
19 Company's capital investment in electric utility infrastructure. The description of these
20 elements and the related amounts are supported by the direct testimony and supporting

1 attachments of Ms. Gooding. Line 4 reflects the actual FY 2024 revenue requirement
2 related to O&M expenses of \$14,929,779.

3
4 As shown on Page 1, at Line 15 of Attachment JDO-1, the FY 2024 revenue requirement
5 associated with the Company's actual capital investment totals \$39,026,367. As
6 previously noted, the total FY 2024 capital investment component of revenue
7 requirement includes (1) FY 2024 revenue requirement on vintages FY 2018 through
8 FY 2024 ISR capital investments above or below the level of capital investment reflected
9 in base distribution rates in Docket No. 4770; (2) the FY 2024 property tax recovery
10 mechanism component; and (3) the FY 2023 revenue requirement true-up for changes to
11 previously estimated tax depreciation expense and NOL position to align with the
12 Company's FY 2023 tax return. The total actual FY 2024 ISR Plan revenue requirement
13 for both O&M expenses and capital investment of \$53,956,146 is shown on Line 16.
14 Additionally, the FY 24 Revenue Requirement is adjusted for the FY 2023 and FY 2024
15 Hold Harmless adjustments on Lines 17 and 18, as further described in the testimony of
16 Ms. Hawk, and the DG project review adjustment on Line 20 for the impact on the
17 FY 2018 through 2023 revenue requirement. This results in a net FY 2024 Revenue
18 Requirement of \$54,282,082 on Line 21.

1 **Q. Please describe how the attachment to your testimony is structured.**

2 A. Page 1 of Attachment JDO-1 summarizes the individual components of the updated
3 FY 2024 ISR revenue requirement. Page 1, Column (a) reflects the approved FY 2024
4 Electric ISR Plan revenue requirement on projected VM and I&M program costs and
5 incremental ISR capital investment as well as the projected FY 2024 property tax
6 recovery adjustment. Page 1, Column (b) represents (1) the O&M components for
7 FY 2024; (2) FY 2024 ISR revenue requirements for incremental FY 2018 through
8 FY 2024 ISR investments – not included in the Company’s base rates in Docket No. 4770
9 – and as supported with detailed calculations on Attachment JDO-1, Pages 2, 5, 10, 13,
10 17, 20 and 23; (3) FY 2024 property tax adjustment on incremental capital not included
11 in the Company’s base rates in Docket No. 4770; (4) the reconciliation on Line 14 of the
12 approved FY 2023 ISR revenue requirement for vintage FY 2023 plant additions with the
13 actual vintage FY 2023 revenue requirement on those investments related to tax
14 deductibility updates; (5) the hold harmless adjustments related to the impacts of the
15 Acquisition; and (6) the DG project review adjustment. As discussed in Ms. Hawk’s
16 testimony, this reconciliation in item (4) is necessary because the actual level of tax
17 deductibility on FY 2023 investments was not known when the Company filed the FY
18 2023 ISR reconciliation and FY 2024 ISR Plan proposals. A detailed calculation of the
19 updated FY 2023 revenue requirement is presented on page 20 of Attachment JDO-1.

1 **Q. Has the Company provided support for the actual level of FY 2024 ISR-eligible**
2 **plant investments?**

3 A. Yes. The description of the FY 2024 Electric ISR program and the amount of the
4 incremental plant additions eligible for inclusion in the ISR mechanism are supported by
5 the direct testimony and supporting attachment of Ms. Gooding. The ultimate revenue
6 requirement on the ISR eligible plant additions equals the return on the investment
7 (i.e., average rate base at the weighted average cost of capital), plus depreciation expense
8 and property taxes associated with the investment. Incremental ISR eligible plant
9 additions for this purpose are intended to represent the net change in rate base for electric
10 infrastructure investments, since the establishment of the Company's ISR mechanism
11 effective April 1, 2011 and are defined as capital additions plus cost of removal, less
12 annual depreciation expense included in the Company's rates, net of depreciation expense
13 attributable to general plant. As discussed in the testimony of Ms. Gooding, the actual
14 ISR eligible plant additions for FY 2024 totals \$97.3 million associated with the
15 Company's FY 2024 ISR Plan (electric infrastructure investment net of general plant).

16
17 **Q. Please explain the distinction between non-discretionary and discretionary capital**
18 **spending as they relate to the revenue requirement calculation.**

19 A. For purposes of calculating the capital-related revenue requirement, investments in
20 electric infrastructure have been divided into two categories: (1) non-discretionary capital
21 investments, which principally represent the Company's commitment to meet statutory

1 and/or regulatory obligations; and (2) discretionary capital investments, which represent
2 all other electric infrastructure-related capital investment falling outside of the
3 specifically defined non-discretionary categories. The amount of discretionary
4 investment the Company is allowed to include in the revenue requirement calculation is
5 subject to certain limitations. The amount of discretionary capital investment the
6 Company uses in the revenue requirement must be no greater than the cumulative amount
7 of discretionary project spend as approved by the PUC in this proceeding. This means
8 that the discretionary investment is limited to the lesser of actual cumulative discretionary
9 capital additions or spending, or cumulative discretionary spending approved by the PUC
10 in this docket. For purposes of the FY 2024 revenue requirement, the lesser of these
11 items was actual discretionary capital additions of \$51,836,809, as shown on Attachment
12 JDO-1, Page 35, Line 13, column (a), of which \$51,836,809 was incremental to the
13 amount of discretionary capital additions assumed in base rates.
14

15 **Q. What is the updated revenue requirement associated with actual plant additions?**

16 A. The updated FY 2024 revenue requirement, associated with the Company's actual
17 FY 2018 through FY 2024 ISR eligible plant investments, totals \$53,956,146. This
18 amount includes the updated FY 2024 O&M components and revenue requirement on
19 FY 2018 through FY 2024 incremental ISR investments, inclusion of the property tax
20 recovery adjustment pursuant to the rate case settlement agreements in Docket No. 4323
21 and in Docket No. 4770, and the reconciliation of the approved FY 2023 ISR revenue

1 requirements on vintage FY 2023 investments with the actual FY 2023 income tax
2 deductibility on those investments.

3
4 **Q. Please describe any changes to the presentation of the revenue requirement**
5 **calculations in Attachment JDO-1 because of the Acquisition.**

6 A. To reflect the impacts of the Acquisition, as discussed in Ms. Hawk’s prefiled testimony,
7 the calculations of the FY 2023 rate base and revenue requirement for the vintage plan
8 years FY 2018 through FY 2023 were separated into two columns in Attachment
9 JDO-1, Pages 2, 5, 8, 13, 17 and 20. The first FY 2023 column labeled as
10 “NG, 4/1/22-5/24/2022”, reflects the 54 days of National Grid ownership during the
11 FY 2023 ISR. The second FY 2023 column labeled as “PPL, 5/25/22-3/31/23” reflects
12 the period from Acquisition date through March 31, 2023, which represents the 311 days
13 of PPL’s ownership.

14
15 **Q. Please describe the adjustment to increase the FY 2024 revenue requirement for the**
16 **DG project review.**

17 A. As described in the pre-filed testimony of Ms. Gooding, the Company decided in the
18 FY 2023 Electric ISR Plan Reconciliation to remove \$10.6 million of plant additions
19 associated with DG projects from the revenue requirement until a review of each project
20 is completed. That review was completed in FY 2024 and the FY 2024 revenue

1 requirement reflects an adjustment to increase the revenue requirement to reflect the
2 results of this final review on Attachment JDO-1, Page 1, Line 20.and Attachment
3 JDO-1, Page 36, Line 27.

4
5 **III. Conclusion**

6 **Q. Does this conclude your testimony?**

7 **A.** Yes, it does.

**THE NARRAGANSETT ELECTRIC COMPANY
d/b/a RHODE ISLAND ENERGY
RIPUC DOCKET NO. 22-53-EL
FY 2024 ELECTRIC INFRASTRUCTURE, SAFETY, AND RELIABILITY PLAN
ANNUAL RECONCILIATION FILING
WITNESS: JEFFREY D. OLIVEIRA
ATTACHMENT**

List of Attachments

Attachment JDO-1	Revenue Requirement Summary and Calculation FY 2024 Electric Infrastructure, Safety, and Reliability Plan Reconciliation
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The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2024 Electric Infrastructure, Safety, and Reliability (ISR) Plan Reconciliation
Annual Revenue Requirement Summary

Line No.		Approved Fiscal Year 2024 (a)	Actual Fiscal Year 2024 (b)	Variance Fiscal Year 2024 (c)=(b)-(a)
	Operation and Maintenance (O&M) Expenses:			
1	Current Year Vegetation Management (VM)	\$13,950,000	\$13,785,383	(\$164,617)
2	Current Year Inspection & Maintenance (I&M)	\$738,000	\$889,396	\$151,396
3	Current Year Other Programs	\$425,000	\$255,000	(\$170,000)
4	Total O&M Expense Component of Revenue Requirement	\$15,113,000	\$14,929,779	(\$183,221)
	Capital Investment:			
5	Actual 2024 Revenue Requirement on FY 2018 Incremental Capital included in ISR Rate Base	\$1,898,402	\$1,768,186	(\$130,216)
6	Actual 2024 Revenue Requirement on FY 2019 Incremental Capital included in ISR Rate Base	\$4,121,015	\$4,028,265	(\$92,750)
7	Actual 2024 Revenue Requirement on FY 2020 Incremental Capital included in ISR Rate Base	\$5,848,269	\$5,387,733	(\$460,536)
8	Actual 2024 Revenue Requirement on FY 2021 Incremental Capital included in ISR Rate Base	\$8,572,859	\$8,369,846	(\$203,013)
9	Actual 2024 Revenue Requirement on FY 2022 Incremental Capital included in ISR Rate Base	\$5,183,040	\$4,969,083	(\$213,957)
10	Actual 2024 Revenue Requirement on FY 2023 Incremental Capital included in ISR Rate Base	\$7,787,883	\$4,737,008	(\$3,050,875)
11	Actual 2024 Revenue Requirement on FY 2024 Incremental Capital included in ISR Rate Base	\$3,069,596	\$2,886,887	(\$182,709)
12	Subtotal	\$36,481,064	\$32,147,009	(\$4,334,055)
13	FY 2024 Property Tax Recovery Adjustment	\$5,403,526	\$7,788,501	\$2,384,975
14	True-Up for FY 2023 (Income Tax)		(\$909,143)	(\$909,143)
15	Total Capital Investment Component of Revenue Requirement	\$41,884,590	\$39,026,367	(\$2,858,223)
16	Total Fiscal Year Revenue Requirement	\$56,997,590	\$53,956,146	(\$3,041,444)
17	FY 2024 Tax Hold Harmless Adjustment per Attachment NH-1	(1,579,533)	(838,084)	\$741,449
18	FY 2023 Tax Hold Harmless True-Up Adjustment per Attachment NH-2		868,312	\$868,312
19	Total Net Revenue Requirement	\$55,418,057	\$53,986,375	(\$1,431,683)
20	Additional Adjustment for DG Project review (FY 18 - FY 23 revenue requirement)		\$295,707	\$295,707
21	Total Net Revenue Requirement with DG review adjustment	\$55,418,057	\$54,282,082	(\$1,135,976)
22	Incremental Fiscal Year Rate Adjustment		(\$1,135,976)	

Column/Line Notes:

Col (a) Docket No. 22-53-EL, FY 2024 Electric ISR Plan, Section 5 ; Attachment 1 (C), Page 1 of 35, Column (b)

Col (b)

- 1 Vegetation Management, Attachment NAG-1, Table 11
- 2 Other Operations and Maintenance, Attachment NAG-1, Table 12
- 3 Other Operations and Maintenance, Attachment NAG-1, Table 12
- 4 Sum of Lines 1 through 3
- 5 Page 2 of 36, Line 40 column (h)
- 6 Page 5 of 36, Line 42 column (g)
- 7 Page 10 of 36, Line 39 column (f)
- 8 Page 13 of 36, Line 40 column (e)
- 9 Page 17 of 36, Line 39 column (d)
- 10 Page 20 of 36, Line 39 column (c)
- 11 Page 23 of 36, Line 35 column (a)
- 12 Sum of Lines 5 through 11
- 13 Page 31 of 36, Line 91, Column (x) x 1,000
- 14 Page 20 of 36, Line 46, Column (a) & Column (b)
- 15 Sum of Lines 13 through 14
- 16 Line 4 + Line 15
- 17 Attachment NH-1, Page 1, Line 23, column (c)
- 18 Attachment NH-2, Page 1, Line 23, column (e)
- 19 Line 17 + Line 18
- 20 Page 33 of 36, Line 27, Column F, Represents additional adjustment in FY 2024
- 21 Line 19 + Line 20
- 22 Line 21 Col (b) - Line 21 Col (a)

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-53-EL
FY 2024 Electric Infrastructure, Safety
and Reliability Plan Reconciliation Filing
Attachment JDO-1
Page 2 of 36

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2024 Electric Infrastructure, Safety, and Reliability (ISR) Plan Reconciliation
Fiscal Year 2024 Revenue Requirement on FY 2018 Actual Incremental Capital Investment**

Line No.		Fiscal Year 2018 (a)	Fiscal Year 2019 (b)	Fiscal Year 2020 (c)	Fiscal Year 2021 (d)	Fiscal Year 2022 (e)	NG 4/1/22 - 5/24/2022 2023 (f)	PPL 5/25/22 - 3/31/23 2023 (g)	Fiscal Year 2024 (h)
Capital Investment Allowance									
1	Non-Discretionary Capital	\$2,269,710							
2	Discretionary Capital Lesser of Actual Cumulative Non-Discretionary Capital Additions or Spending, or Approved Spending	\$14,638,256							
3	Total Allowed Capital Included in Rate Base	Page 26 of 36, Line 4(a)	\$16,907,966	\$0	\$0	\$0	\$0	\$0	\$0
Depreciable Net Capital Included in Rate Base									
4	Total Allowed Capital Included in Rate Base in Current Year	Line 3	\$16,907,966	\$0	\$0	\$0	\$0	\$0	\$0
5	Retirements	Page 26 of 36, Line 10, Col (a)	(\$5,245,072)	\$0	\$0	\$0	\$0	\$0	\$0
6	Net Depreciable Capital Included in Rate Base	Year 1 = Line 4 - Line 5; then = Prior Year Line 6	\$22,153,038	\$22,153,038	\$22,153,038	\$22,153,038	\$22,153,038	\$22,153,038	\$22,153,038
Change in Net Capital Included in Rate Base									
7	Capital Included in Rate Base	Line 3	\$16,907,966	\$0	\$0	\$0	\$0	\$0	\$0
8	Depreciation Expense		\$0	\$0	\$0	\$0	\$0	\$0	\$0
9	Incremental Capital Amount	Year 1 = Line 7 - Line 8; then = Prior Year Line 9	\$16,907,966	\$16,907,966	\$16,907,966	\$16,907,966	\$16,907,966	\$16,907,966	\$16,907,966
10	Cost of Removal	Page 26 of 36, Line 7, Col (a)	\$1,693,009	\$0	\$0	\$0	\$0	\$0	\$0
11	Total Net Plant in Service	Year 1 = Line 9 + Line 10; then = Prior year	\$18,600,975	\$18,600,975	\$18,600,975	\$18,600,975	\$18,600,975	\$18,600,975	\$18,600,975
Deferred Tax Calculation:									
12	Composite Book Depreciation Rate	1/	3.40%	3.26%	3.16%	3.16%	3.16%	3.16%	3.16%
13	Number of days	2/					54	311	
14	Proration Percentage	2/					14.79%	85.21%	
15	Vintage Year Tax Depreciation:								
16	Tax Depreciation and Year 1 Basis Adjustments	Year 1 = Page 3 of 36, Line 29; then = Page 3 of 36, Column (e)	\$13,351,493	\$541,905	\$501,219	\$463,685	\$428,855	\$58,694	\$510,206
17	Cumulative Tax Depreciation-NG	Year 1 = Line 16; then = Prior Year Line 17 + Current Year Line 16	\$13,351,493	\$13,893,398	\$14,394,616	\$14,858,302	\$15,287,156	\$15,345,850	
18	Cumulative Tax Depreciation-PPL	Year 1 = Line 16; then = Prior Year Line 18 + Current Year Line 16						\$510,206	\$1,492,387
19	Book Depreciation	Year 1 = Line 6 * Line 12 * 50%; then = Line 6 * Line 12	\$376,602	\$722,189	\$700,036	\$700,036	\$700,036	\$103,567	\$596,469
20	Cumulative Book Depreciation	Year 1 = Line 19; then = Prior Year Line 20 + Current Year Line 19	\$376,602	\$1,098,791	\$1,798,827	\$2,498,863	\$3,198,899	\$3,302,466	\$3,898,935
21	Cumulative Book / Tax Timer	Columns (a) through (f): Line 17 - Line 20, Then Line 18 - Line 20	\$12,974,891	\$12,794,607	\$12,595,790	\$12,359,439	\$12,088,258	\$12,043,384	(\$3,388,728)
22	Less: Cumulative Book Depreciation at Acquisition	Line 20 Column (f)						\$3,302,466	\$3,302,466
23	Cumulative Book / Tax Timer - PPL	Line 21 + Line 22						(\$86,263)	\$195,882
24	Effective Tax Rate	Columns (a) through (f): Line 21 * Line 24, Then Line 23 * Line 24	21.00%	21.00%	21.00%	21.00%	21.00%	21.00%	21.00%
25	Deferred Tax Reserve	Year 1 = Page 26 of 36, Line 15, Col (a); then = Prior Year Line 26	\$2,724,727	\$2,686,868	\$2,645,116	\$2,595,482	\$2,538,534	\$2,529,111	(\$18,115)
26	Less: FY 2018 Federal NOL (Generation) / Utilization	Year 1 = (Line 18 * 31.55% blended FY18 tax rate) - Line 20, then = Year 1 Sum of Lines 25 through 27	(\$2,998,499)	(\$2,998,499)	(\$2,998,499)	(\$2,998,499)	(\$2,998,499)		\$0
27	Excess Deferred Tax		\$1,368,851	\$1,368,851	\$1,368,851	\$1,368,851	\$1,368,851	\$1,368,851	\$1,368,851
28	Net Deferred Tax Reserve before Proration Adjustment		\$1,095,080	\$1,057,220	\$1,015,468	\$965,835	\$908,887	\$899,463	\$1,350,736
Rate Base Calculation:									
29	Cumulative Incremental Capital Included in Rate Base	Line 11	\$18,600,975	\$18,600,975	\$18,600,975	\$18,600,975	\$18,600,975	\$18,600,975	\$18,600,975
30	Accumulated Depreciation	-Line 20	(\$376,602)	(\$1,098,791)	(\$1,798,827)	(\$2,498,863)	(\$3,198,899)	(\$3,302,466)	(\$3,898,935)
31	Deferred Tax Reserve	-Line 28	(\$1,095,080)	(\$1,057,220)	(\$1,015,468)	(\$965,835)	(\$908,887)	(\$899,463)	(\$1,350,736)
32	Year End Rate Base before Deferred Tax Proration	Sum of Lines 29 through 31	\$17,129,294	\$16,444,964	\$15,786,680	\$15,136,278	\$14,493,190	\$14,399,046	\$13,351,305
Revenue Requirement Calculation:									
33	Average Rate Base before Deferred Tax Proration Adjustment	Year 1 and 2 = 0; then Average of (Prior + Current Year Line 32)	\$8,564,647	\$16,787,129	\$16,115,822	\$15,461,479	\$14,814,734	\$13,922,247	\$13,922,247
34	Proration Adjustment	Page 4 of 36, Line 41			(\$1,792)	(\$2,130)	(\$2,444)	(\$1,182)	(\$1,182)
35	Average ISR Rate Base after Deferred Tax Proration	Line 33 + Line 34	\$8,564,647	\$16,787,129	\$16,114,030	\$15,459,348	\$14,812,289	\$13,921,065	\$13,921,065
36	Pre-Tax ROR	Page 34 of 36, Line 35	8.23%	8.23%	8.23%	8.23%	8.23%	8.23%	8.23%
37	Proration	Line 14					14.79%	85.21%	
38	Return and Taxes	Cols (a) through (e) and (h): L 35 * L 36;	\$704,870	\$1,381,581	\$1,326,185	\$1,272,304	\$1,219,051	\$169,501	\$976,202
39	Book Depreciation	Cols (f) through (g): L 35 * L 36 * L 37 Line 19	\$376,602	\$722,189	\$700,036	\$700,036	\$700,036	\$103,567	\$596,469
40	Annual Revenue Requirement	Line 38 + Line 39	\$1,081,472	\$2,103,770	\$2,026,221	\$1,972,340	\$1,919,087	\$273,068	\$1,572,671

1/ 3.4%, Composite Book Depreciation Rate approved per RIPUC Docket No. 4323, in effect until Aug 31, 2018

3.16%, Composite Book Depreciation Rate for ISR plant, approved per RIPUC Docket No. 4770, effective on Sep 1, 2018, per Page 12 of 18

FY 19 Composite Book Depreciation Rate = 3.4% x 5/12 + 3.16% x 7/12

2/ Columns (f) and (g) represent the 12 months within fiscal year 2023, but activity is separated to accommodate the impacts of the acquisition as described in note 3.

3/ National Grid and PPL Corporation ("PPL") elected to treat PPL's acquisition of The Narragansett Electric Company ("NECO") from National Grid on May 25, 2022 as an asset sale for U.S. federal income tax purposes under Internal Revenue Code Section 338(h)(10). As a result of this election, PPL was deemed to acquire the assets of NECO at fair market value (essentially equivalent to book value) for tax purposes. The resulting "step-up" in tax basis eliminates most book/tax timing differences and the related accumulated net deferred income tax liabilities as of the acquisition date, at which time PPL will reset the book/tax timing difference as if PPL purchased a new asset in the year of acquisition and will begin depreciating the new tax basis. Book cost, book accumulated depreciation and book depreciation continue as if the acquisition never took place.

4/ The Federal Income Tax rate changed from 35% to 21% on January 1, 2018 per the Tax Cuts and Jobs Act of 2017

5/ Columns (f) and (g) takes the average of the "Year End Rate Base before Deferred Tax Proration" at the beginning of the fiscal year on Line 32, Column (e) and the end of the fiscal year on Line 32, Column (g). See note 2.

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2024 Electric Infrastructure, Safety, and Reliability (ISR) Plan Reconciliation
Calculation of Tax Depreciation and Repairs Deduction on FY 2018 Incremental Capital Investments**

Line No.			Fiscal Year 2018 (a)	(b)	(c)	(d)	(e)	(f)
	<u>Capital Repairs Deduction</u>							
1	Plant Additions	Page 2 of 36, Line 3	\$16,907,966					
2	Capital Repairs Deduction Rate	Per Tax Department	1/ 9.00%					
3	Capital Repairs Deduction	Line 1 * Line 2	\$1,521,717					
4								
5	<u>Bonus Depreciation</u>							
6	Plant Additions	Line 1	\$16,907,966					
7	Less Capital Repairs Deduction	- Line 3	(\$1,521,717)					
8	Plant Additions Net of Capital Repairs Deduction	Line 6 + Line 7	\$15,386,249					
9	Percent of Plant Eligible for Bonus Depreciation	Per Tax Department	100.00%					
10	Plant Eligible for Bonus Depreciation	Line 8 * Line 9	\$15,386,249					
11	Bonus depreciation 100% category	100% * 16.38%	2/ 16.38%					
12	Bonus depreciation 50% category	50% * 34.28%	2/ 17.14%					
13	Bonus depreciation 40% category	40% * 44.23%	2/ 17.69%					
14	Bonus depreciation 0% category	0% * 5.11%	2/ 0.00%					
15	Total Bonus Depreciation Rate	Line 11 + Line 12 + Line 13 + Line 14	51.21%					
16	Bonus Depreciation	Line 10 * Line 15	\$7,879,606					
17								
18	<u>Remaining Tax Depreciation</u>							
19	Plant Additions	Line 1	\$16,907,966					
20	Less Capital Repairs Deduction	Line 3	\$1,521,717					
21	Less Bonus Depreciation	Line 16	\$7,879,606					
22	Remaining Plant Additions Subject to 20 YR MACRS Tax Depreciation	Line 19 - Line 20 - Line 21	\$7,506,643					
23	20 YR MACRS Tax Depreciation Rates	Per IRS Publication 946	3.750%					
24	Remaining Tax Depreciation	Line 22 * Line 23	\$281,499					
25								
26	FY18 Loss incurred due to retirements	Per Tax Department	3/ \$1,975,662					
27	Cost of Removal	Page 2 of 36, Line 10	\$1,693,009					
28								
29	Total Tax Depreciation and Repairs Deduction	Sum of Lines 3, 16, 24, 26, and 27	\$13,351,493					
30								
31								
32								
33								
34								
35								
36								
37								
38								
39								
40								

20 Year MACRS Depreciation				
NG MACRS basis:	Line 22, Column (a)	\$7,506,643		
Fiscal Year	Prorated	MACRS	Annual	Cumulative
FY Mar-2018	3.750%		\$281,499	\$13,351,493
FY Mar-2019	7.219%		\$541,905	\$13,893,397
FY Mar-2020	6.677%		\$501,219	\$14,394,616
FY Mar-2021	6.177%		\$463,685	\$14,858,301
FY Mar-2022	5.713%		\$428,855	\$15,287,156
FY Mar-2023 (Apr-May 2022)	5.285%	0.782%	\$58,694	\$15,345,850
PPL Acquisition - May 25, 2022				
Book Cost	Line 1, Column (a)		\$16,907,966	
Cumulative Book Depreciation	- Page 2 of 36, Line 20, Col (f)		(\$3,302,466)	
PPL MACRS basis:	Line 14(e) + Line 15(e)		\$13,605,501	
Mar-2023 (Jun-Mar 2023)	3.750%		\$510,206	\$510,206
Mar 2024	7.219%		\$982,181	\$1,492,387
Mar 2025	6.677%		\$908,439	\$2,400,827
Mar 2026	6.177%		\$840,412	\$3,241,238
Mar 2027	5.713%		\$777,282	\$4,018,521
Mar 2028	5.285%		\$719,051	\$4,737,571
Mar 2029	4.888%		\$665,037	\$5,402,608
Mar 2030	4.522%		\$615,241	\$6,017,849
Mar 2031	4.462%		\$607,077	\$6,624,926
Mar 2032	4.461%		\$606,941	\$7,231,868
Mar 2033	4.462%		\$607,077	\$7,838,945
Mar 2034	4.461%		\$606,941	\$8,445,887
Mar 2035	4.462%		\$607,077	\$9,052,964
Mar 2036	4.461%		\$606,941	\$9,659,905
Mar 2037	4.462%		\$607,077	\$10,266,983
Mar 2038	4.461%		\$606,941	\$10,873,924
Mar 2039	4.462%		\$607,077	\$11,481,002
Mar 2040	4.461%		\$606,941	\$12,087,943
Mar 2041	4.462%		\$607,077	\$12,695,020
Mar 2042	4.461%		\$606,941	\$13,301,962
Mar 2043	2.231%		\$303,539	\$13,605,501
	92.78%		\$13,605,501	

1/ Capital Repairs percentage is based on the actual results of the FY 2018 tax return.
2/ Percent of Plant Eligible for Bonus Depreciation is the actual result of FY2018 tax return
3/ Actual Loss for FY2018
Column (d), Line 11 = MACRS Rate 5.285% / 365 days x 54 days

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2024 Electric Infrastructure, Safety, and Reliability (ISR) Plan Reconciliation
Calculation of Net Deferred Tax Reserve Proration on FY 2018 Incremental Capital Investment**

Line No.	Deferred Tax Subject to Proration		FY22 (a)	FY23 (b)	FY24 (c)	FY25 (d)	
1	Book Depreciation	See the corresponding Fiscal Year on Page 2 of 36, Line 19. Note there are 2 columns to sum for FY23.	\$700,036	\$700,036	\$700,036	\$700,036	
2	Bonus Depreciation		\$0	\$0	\$0	\$0	
3	Remaining MACRS Tax Depreciation	See the corresponding Fiscal Year on Page 2 of 36, Line 16. Note there are 2 columns to sum for FY23.	(\$428,855)	(\$568,900)	(\$982,181)	(\$908,439)	
4	FY18 tax (gain)/loss on retirements		\$0	\$0	\$0	\$0	
5	Cumulative Book / Tax Timer	Sum of Lines 1 through 4	\$271,181	\$131,136	(\$282,145)	(\$208,403)	
6	Effective Tax Rate		21.00%	21.00%	21.00%	21.00%	
7	Deferred Tax Reserve	Line 5 * Line 6	\$56,948	\$27,539	(\$59,250)	(\$43,765)	
Deferred Tax Not Subject to Proration							
8	Capital Repairs Deduction						
9	Cost of Removal						
10	Book/Tax Depreciation Timing Difference at 3/31/2017						
11	Cumulative Book / Tax Timer	Line 8 + Line 9 + Line 10	\$0	\$0	\$0	\$0	
12	Effective Tax Rate		21%	21%	21%	21%	
13	Deferred Tax Reserve	Line 11 × Line 12	\$0	\$0	\$0	\$0	
14	Total Deferred Tax Reserve	Line 7 + Line 13	\$56,948	\$27,539	(\$59,250)	(\$43,765)	
15	Net Operating Loss		\$0	\$0	\$0	\$0	
16	Net Deferred Tax Reserve	Line 14 + Line 15	\$56,948	\$27,539	(\$59,250)	(\$43,765)	
Allocation of FY 2018 Estimated Federal NOL							
17	Cumulative Book/Tax Timer Subject to Proration	Line 5	\$271,181	\$131,136	(\$282,145)	(\$208,403)	
18	Cumulative Book/Tax Timer Not Subject to Proration	Line 11	\$0	\$0	\$0	\$0	
19	Total Cumulative Book/Tax Timer	Line 17 + Line 18	\$271,181	\$131,136	(\$282,145)	(\$208,403)	
20	Total FY 2018 Federal NOL						
21	Allocated FY 2018 Federal NOL Not Subject to Proration	(Line 18 ÷ Line 19) × Line 20	\$0	\$0	\$0	\$0	
22	Allocated FY 2018 Federal NOL Subject to Proration	(Line 17 ÷ Line 19) × Line 20	\$0	\$0	\$0	\$0	
23	Effective Tax Rate		21%	21%	21%	21%	
24	Deferred Tax Benefit subject to proration	Line 22 × Line 23	\$0	\$0	\$0	\$0	
25	Net Deferred Tax Reserve subject to proration	Line 7 + Line 24	\$56,948	\$27,539	(\$59,250)	(\$43,765)	
		(e)	(f)	(g)	(h)	(i)	(j)
Proration Calculation							
		Number of Days in Month	Proration Percentage	FY22	FY23	FY24	FY25
26	April	30	91.78%	\$4,356	\$2,106	(\$4,532)	(\$3,347)
27	May	31	83.29%	\$3,953	\$1,911	(\$4,112)	(\$3,038)
28	June	30	75.07%	\$3,563	\$1,723	(\$3,707)	(\$2,738)
29	July	31	66.58%	\$3,159	\$1,528	(\$3,287)	(\$2,428)
30	August	31	58.08%	\$2,756	\$1,333	(\$2,868)	(\$2,118)
31	September	30	49.86%	\$2,366	\$1,144	(\$2,462)	(\$1,819)
32	October	31	41.37%	\$1,963	\$949	(\$2,043)	(\$1,509)
33	November	30	33.15%	\$1,573	\$761	(\$1,637)	(\$1,209)
34	December	31	24.66%	\$1,170	\$566	(\$1,217)	(\$899)
35	January	31	16.16%	\$767	\$371	(\$798)	(\$590)
36	February	28	8.49%	\$403	\$195	(\$419)	(\$310)
37	March	31	0.00%	\$0	\$0	\$0	\$0
38	Total	365		\$26,030	\$12,587	(\$22,550)	(\$16,657)
39	Deferred Tax Without Proration	Line 25	\$56,948	\$27,539	(\$59,250)	(\$43,765)	
40	Average Deferred Tax without Proration	Line 25 * 50%	\$28,474	\$13,769	(\$29,625)	(\$21,882)	
41	Proration Adjustment	Line 38 - Line 40	(\$2,444)	(\$1,182)	\$7,075	\$5,226	

Column Notes:

(f) Sum of remaining days in the year (Col (e)) ÷ 365
(g) through (j) Current Year Line 25 ÷ 12 × Current Month Col (f)

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-53-EL
FY 2024 Electric Infrastructure, Safety
and Reliability Plan Reconciliation Filing
Attachment JDO-1
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<p style="text-align: center;">The Narragansett Electric Company d/b/a Rhode Island Energy FY 2024 Electric Infrastructure, Safety, and Reliability (ISR) Plan Reconciliation Fiscal Year 2024 Revenue Requirement on FY 2019 Actual Incremental Capital Investment</p>									
Line No.			Fiscal Year 2019 (a)	Fiscal Year 2020 (b)	Fiscal Year 2021 (c)	Fiscal Year 2022 (d)	NG 4/1/22 - 5/24/22 2023 (e)	PPL 5/25/22 - 3/31/23 2023 (f)	Fiscal Year 2024 (g)
Capital Investment Allowance									
1	Non-Discretionary Capital		\$6,316,248						
2	Discretionary Capital Lesser of Actual Cumulative Non-Discretionary Capital Additions or Spending, or Approved Spending		\$25,486,776						
3	Total Allowed Capital Included in Rate Base (non-intangible)	Page 26 of 36, Line 4(b)	\$31,803,024	\$0	\$0	\$0	\$0	\$0	\$0
Depreciable Net Capital Included in Rate Base									
4	Total Allowed Capital Included in Rate Base in Current Year	Line 3, Column (a)	\$31,803,024	\$0	\$0	\$0	\$0	\$0	\$0
5	Retirements	Page 26 of 36, Line 10, Col (b)	(\$10,649,479)	\$0	\$0	\$0	\$0	\$0	\$0
6	Net Depreciable Capital Included in Rate Base	Year 1 = Line 4 - Line 5; Then = Prior Year Line 6	\$42,452,503	\$42,452,503	\$42,452,503	\$42,452,503	\$42,452,503	\$42,452,503	\$42,452,503
Change in Net Capital Included in Rate Base									
7	Capital Included in Rate Base	Line 3, Column (a)	\$31,803,024	\$0	\$0	\$0	\$0	\$0	\$0
8	Depreciation Expense		\$0	\$0	\$0	\$0	\$0	\$0	\$0
9	Incremental Capital Amount	Year 1 (a) = Line 7 - Line 8; Then = Prior Year Line 9	\$31,803,024	\$31,803,024	\$31,803,024	\$31,803,024	\$31,803,024	\$31,803,024	\$31,803,024
10	Cost of Removal	Page 26 of 36, Line 7, Col (b)	\$361,723						
11	Total Net Plant in Service	Year 1 = Line 9 + Line 10, Then = Prior year	\$32,164,747	\$32,164,747	\$32,164,747	\$32,164,747	\$32,164,747	\$32,164,747	\$32,164,747
Deferred Tax Calculation:									
12	Composite Book Depreciation Rate	As approved per RIPUC Docket No. 4323 and Docket No. 4770	1/	3.26%	3.16%	3.16%	3.16%	3.16%	3.16%
13	Number of days		2/				54	311	
14	Proration Percentage		2/				14.79%	85.21%	
15	Vintage Year Tax Depreciation:								
16	Tax Depreciation and Year 1 Basis Adjustments	Year 1 = Page 6 of 36, Line 28 Then = Page 6 of 36 Column (e)	\$9,891,758	\$1,779,269	\$1,645,682	\$1,522,447	\$208,319	\$1,008,303	\$1,941,051
17	Cumulative Tax Depreciation-NG	Year 1 = Line 16; then = Prior Year Line 17 + Current Year Line 16	3/	\$9,891,758	\$11,671,027	\$13,316,709	\$14,839,156	\$15,047,475	
18	Cumulative Tax Depreciation-PPL	Year 1 = Line 16; then = Prior Year Line 18 + Current Year Line 16	3/					\$1,008,303	\$2,949,354
19	Book Depreciation	Year 1 = Line 6 * Line 12 * 50%; Then = Line 6 * Line 12	2/	\$691,976	\$1,341,499	\$1,341,499	\$1,341,499	\$198,468	\$1,143,031
20	Cumulative Book Depreciation	Year 1 = Line 19; then = Prior Year Line 20 + Current Year Line 19		\$691,976	\$2,033,475	\$3,374,974	\$4,716,473	\$4,914,941	\$6,057,972
21	Cumulative Book / Tax Timer	Columns (a) through (e): Line 17 - Line 20, Then Line 18 - Line 20		\$9,199,782	\$9,637,552	\$9,941,735	\$10,122,683	\$10,132,534	(\$5,049,669)
22	Less: Cumulative Book Depreciation at Acquisition	Line 20 Column (e)	3/	\$991,622	\$991,622	\$991,622	\$991,622	\$991,622	\$4,914,941
23	Cumulative Book / Tax Timer - PPL	Line 21 + Line 22							(\$134,728)
24	Effective Tax Rate			21.00%	21.00%	21.00%	21.00%	21.00%	21.00%
25	Deferred Tax Reserve	Columns (a) through (e): Line 21 * Line 24, Then Line 23 * Line 24		\$1,931,954	\$2,023,886	\$2,087,764	\$2,125,763	\$2,127,832	(\$28,293)
26	Add: FY 2019 Federal NOL (Generation) / Utilization	Page 26 of 36, Line 15, Col (b)	3/	\$991,622	\$991,622	\$991,622	\$991,622	\$991,622	\$0
27	Net Deferred Tax Reserve before Proration Adjustment	Sum of Lines 25 through 26		\$2,923,576	\$3,015,508	\$3,079,386	\$3,117,385	\$3,119,454	(\$28,293)
Rate Base Calculation:									
28	Cumulative Incremental Capital Included in Rate Base	Line 11	\$32,164,747	\$32,164,747	\$32,164,747	\$32,164,747	\$32,164,747	\$32,164,747	\$32,164,747
29	Accumulated Depreciation	-Line 20	(\$691,976)	(\$2,033,475)	(\$3,374,974)	(\$4,716,473)	(\$4,914,941)	(\$6,057,972)	(\$7,399,471)
30	Deferred Tax Reserve	-Line 27	(\$2,923,576)	(\$3,015,508)	(\$3,079,386)	(\$3,117,385)	(\$3,119,454)	\$28,293	(\$97,613)
31	Year End Rate Base before Deferred Tax Proration	Sum of Lines 28 through 30		\$28,549,195	\$27,115,764	\$25,710,387	\$24,330,889	\$24,130,352	\$26,135,068
Revenue Requirement Calculation:									
32	Average Rate Base before Deferred Tax Proration Adjustment	Year 1 = Current Year Line 31 ÷ 2; Then = (Prior Year Line 31 + Current Year Line 31) ÷ 2	4/	\$14,274,598	\$27,832,480	\$26,413,076	\$25,020,638	\$25,232,978	\$25,232,978
33	Proration Adjustment	Page 7 of 36, Line 43		\$0	\$0	\$0	(\$514)	(\$955)	(\$955)
34	Average ISR Rate Base after Deferred Tax Proration	Line 32 + Line 33		\$14,274,598	\$27,832,480	\$26,413,076	\$25,020,124	\$25,232,023	\$25,408,484
35	Pre-Tax ROR	Page 34 of 36, Line 35		8.23%	8.23%	8.23%	8.23%	8.23%	8.23%
36	Proration Percentage	Line 14	2/				14.79%	85.21%	
37	Return and Taxes	Cols (a) through (d) and (g): L 34 * L 35;		\$1,174,799	\$2,290,613	\$2,173,796	\$2,059,156	\$307,222	\$1,769,373
38	Book Depreciation	Cols (e) and (f): L 34 * L 35 * L 36 Line 19	2/	\$691,976	\$1,341,499	\$1,341,499	\$1,341,499	\$198,468	\$1,143,031
39	Annual Revenue Requirement	Line 37 + Line 38		\$1,866,775	\$3,632,112	\$3,515,295	\$3,400,655	\$505,691	\$2,912,404
40	Revenue Requirement of Plant	Year 1 = Line 39*7/12, Then = Line 39		\$1,088,952	\$3,632,112	\$3,515,295	\$3,400,655	\$505,691	\$2,912,404
41	Revenue Requirement of Intangibl	Page 8 of 36, Line 34, Column (I) - (aa)		\$434,302	\$705,779	\$655,914	\$617,127	\$81,808	\$548,352
42	Revenue Requirement	Line 40 + Line 41		\$1,523,254	\$4,337,891	\$4,171,209	\$4,017,782	\$587,499	\$3,460,756

1/ 3.4%, Composite Book Depreciation Rate approved per RIPUC Docket No. 4323, in effect until Aug 31, 2018
3.16%, Composite Book Depreciation Rate for ISR plant, approved per RIPUC Docket No. 4770, effective on Sep 1, 2018
FY 19 Composite Book Depreciation Rate = 3.4% x 5 / 12 + 3.16% x 7 / 12

2/ Columns (e) and (f) represent the 12 months within fiscal year 2023, but activity is separated to accommodate the impacts of the acquisition as described in note 3.

3/ National Grid and PPL Corporation ("PPL") elected to treat PPL's acquisition of The Narragansett Electric Company ("NECO") from National Grid on May 25, 2022 as an asset sale for U.S. federal income tax purposes under Internal Revenue Code Section 338(h)(10). As a result of this election, PPL was deemed to acquire the assets of NECO at fair market value (essentially equivalent to book value) for tax purposes. The resulting "step-up" in tax basis eliminates most book/tax timing differences and the related accumulated net deferred income tax liabilities as of the acquisition date, at which time PPL will reset the book/tax timing difference as if PPL purchased a new asset in the year of acquisition and will begin depreciating the new tax basis. Book cost, book accumulated depreciation and book depreciation continue as if the acquisition never took place.

4/ Columns (e) and (f) takes the average of the "Year End Rate Base before Deferred Tax Proration" at the beginning of the fiscal year on Line 31, Column (d) and the end of the fiscal year on Line 31, Column (f). See note 2.

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2024 Electric Infrastructure, Safety, and Reliability (ISR) Plan Reconciliation
Calculation of Tax Depreciation and Repairs Deduction on FY 2019 Incremental Capital Investments

Line No.		Fiscal Year 2019 (a)	(b)	(c)	(d)	(e)	(f)
	<u>Capital Repairs Deduction</u>						
1	Plant Additions	Page 5 of 36, Line 3	\$31,803,024	20 Year MACRS Depreciation			
2	Capital Repairs Deduction Rate	Per Tax Department 1/	9.68%				
3	Capital Repairs Deduction	Line 1 * Line 2	\$3,078,557	MACRS basis:	Line 22, Column (a)	\$24,647,029	
4						Annual	Cumulative
5	<u>Bonus Depreciation</u>			Fiscal Year	Prorated	MACRS	Tax Depr
6	Plant Additions	Line 1	\$31,803,024	FY Mar-2019	3.750%	\$924,264	\$9,891,758
7	Plant Additions		\$0	FY Mar-2020	7.219%	\$1,779,269	\$11,671,027
8	Less Capital Repairs Deduction	Line 3	\$3,078,557	FY Mar-2021	6.677%	\$1,645,682	\$13,316,709
9	Plant Additions Net of Capital Repairs Deduction	Line 6 + Line 7 - Line 8	\$28,724,467	FY Mar-2022	6.177%	\$1,522,447	\$14,839,156
10	Percent of Plant Eligible for Bonus Depreciation	Per Tax Department	100.00%	FY Mar-2023 (Apr-May 2022)	5.713% 0.85%	\$208,319	\$15,047,475
11	Plant Eligible for Bonus Depreciation	Line 9 * Line 10	\$28,724,467	PPL Acquisition - May 25, 2022			
12	Bonus Depreciation Rate	1 * 11.65% * 30% 2/	3.50%	Book Cost	Line 1, Column (a)	\$31,803,024	
13	Bonus Depreciation Rate	1 * 26.75% * 40% 2/	10.70%	Cumulative Book Depreciation	- Page 5 of 36, Line 20, Col (e)	(\$4,914,941)	
14	Total Bonus Depreciation Rate	Line 12 + Line 13	14.20%	PPL MACRS basis:	Line 13(e) + Line 14(e)	\$26,888,082	
15	Bonus Depreciation	Line 11 * Line 14	\$4,077,438				
16							
17	<u>Remaining Tax Depreciation</u>			FY Mar-2023 (Jun-Mar 2023)	3.750%	\$1,008,303	\$1,008,303
18	Plant Additions	Line 1	\$31,803,024	Mar-2024	7.219%	\$1,941,051	\$2,949,354
19	Less Capital Repairs Deduction	Line 3	\$3,078,557	Mar-2025	6.677%	\$1,795,317	\$4,744,671
20	Less Bonus Depreciation	Line 15	\$4,077,438	Mar-2026	6.177%	\$1,660,877	\$6,405,548
	Remaining Plant Additions Subject to 20 YR MACRS Tax						
21	Depreciation	Line 18 - Line 19 - Line 20	\$24,647,029	Mar-2027	5.713%	\$1,536,116	\$7,941,664
22	20 YR MACRS Tax Depreciation Rates	Per IRS Publication 946	3.750%	Mar-2028	5.285%	\$1,421,035	\$9,362,699
23	Remaining Tax Depreciation	Line 21 * Line 22	\$924,264	Mar-2029	4.888%	\$1,314,289	\$10,676,989
24				Mar-2030	4.522%	\$1,215,879	\$11,892,868
25	FY19 (Gain)/Loss incurred due to retirements	Per Tax Department 3/	\$1,449,776	Mar-2031	4.462%	\$1,199,746	\$13,092,614
26	Cost of Removal	Page 5 of 36, Line 10	\$361,723	Mar-2032	4.461%	\$1,199,477	\$14,292,091
27				Mar-2033	4.462%	\$1,199,746	\$15,491,838
28	Total Tax Depreciation and Repairs Deduction	Sum of Lines 3, 15, 23, 25, and 26	\$9,891,758	Mar-2034	4.461%	\$1,199,477	\$16,691,315
29				Mar-2035	4.462%	\$1,199,746	\$17,891,061
30				Mar-2036	4.461%	\$1,199,477	\$19,090,539
31				Mar-2037	4.462%	\$1,199,746	\$20,290,285
32				Mar-2038	4.461%	\$1,199,477	\$21,489,762
33				Mar-2039	4.462%	\$1,199,746	\$22,689,508
34				Mar-2040	4.461%	\$1,199,477	\$23,888,986
35				Mar-2041	4.462%	\$1,199,746	\$25,088,732
36				Mar-2042	4.461%	\$1,199,477	\$26,288,209
37				Mar-2043	2.231%	\$599,873	\$26,888,082
38					100.000%	\$26,888,082	
39							

1/ Capital Repairs percentage is the actual result of FY 2019 tax return

2/ Percent of Plant Eligible for Bonus Depreciation is the actual result of FY 2019 tax return

3/ Actual Loss for FY 2019

Column (d), Line 10 = MACRS Rate 5.713% / 365 days x 54 days

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2024 Electric Infrastructure, Safety, and Reliability (ISR) Plan Reconciliation
Calculation of Net Deferred Tax Reserve Proration on FY 2019 Incremental Capital Investment**

Line No.	Deferred Tax Subject to Proration		FY22 (a)	FY23 (b)	FY24 (c)	FY25 (d)
1	Book Depreciation - Excl. Intangibles	See the corresponding Fiscal Year on Page 5 of 36, Line 19. Note there are 2 columns to sum for FY23.	\$1,341,499	\$1,341,499	\$1,341,499	\$1,341,499
2	Book Depreciation - Intangibles	See the corresponding Fiscal Year on Page 8 of 36, Line 21 - Line 20. Note there are 2 columns to sum for FY23.	\$494,375	\$494,375	\$494,375	\$494,375
3	Bonus Depreciation		\$0	\$0	\$0	\$0
4	Remaining MACRS Tax Depreciation - Excl. Intangibles	See the corresponding Fiscal Year on Page 5 of 36, Line 16. Note there are 2 columns to sum for FY23.	(\$1,522,447)	(\$1,216,622)	(\$1,941,051)	(\$1,795,317)
5	Remaining MACRS Tax Depreciation - Intangibles	See the corresponding Fiscal Year on Page 8 of 36, Line 18 - Line 17. Note there are 2 columns to sum for FY23.	(\$256,432)	(\$513,297)	(\$684,550)	(\$228,081)
6	FY 2019 tax (gain)/loss on retirements		\$0	\$0	\$0	\$0
7	Cumulative Book / Tax Timer	Sum of Lines 1 through 6	\$56,995	\$105,955	(\$789,726)	(\$187,524)
8	Effective Tax Rate		21.00%	21.00%	21.00%	21.00%
9	Deferred Tax Reserve	Line 7 * Line 8	\$11,969	\$22,250	(\$165,843)	(\$39,380)
Deferred Tax Not Subject to Proration						
10	Capital Repairs Deduction					
11	Cost of Removal					
12	Book/Tax Depreciation Timing Difference at 3/31/2018					
13	Cumulative Book / Tax Timer	Line 10 + Line 11 + Line 12	\$0	\$0	\$0	\$0
14	Effective Tax Rate		21%	21%	21%	21%
15	Deferred Tax Reserve	Line 13 x Line 14	\$0	\$0	\$0	\$0
16	Total Deferred Tax Reserve	Line 9 + Line 15	\$11,969	\$22,250	(\$165,843)	(\$39,380)
17	Net Operating Loss		\$0	\$0	\$0	\$0
18	Net Deferred Tax Reserve	Line 16 + Line 17	\$11,969	\$22,250	(\$165,843)	(\$39,380)
Allocation of FY 2019 Estimated Federal NOL						
19	Cumulative Book/Tax Timer Subject to Proration	Line 7	\$56,995	\$105,955	(\$789,726)	(\$187,524)
20	Cumulative Book/Tax Timer Not Subject to Proration	Line 13	\$0	\$0	\$0	\$0
21	Total Cumulative Book/Tax Timer	Line 19 + Line 20	\$56,995	\$105,955	(\$789,726)	(\$187,524)
22	Total FY 2019 Federal NOL		\$0	\$0	\$0	\$0
23	Allocated FY 2019 Federal NOL Not Subject to Proration	(Line 20 ÷ Line 21) x Line 22	\$0	\$0	\$0	\$0
24	Allocated FY 2019 Federal NOL Subject to Proration	(Line 19 ÷ Line 21) x Line 22	\$0	\$0	\$0	\$0
25	Effective Tax Rate		21%	21%	21%	21%
26	Deferred Tax Benefit subject to proration	Line 24 x Line 25	\$0	\$0	\$0	\$0
27	Net Deferred Tax Reserve subject to proration	Line 9 + Line 26	\$11,969	\$22,250	(\$165,843)	(\$39,380)
Proration Calculation						
	(e)	(f)	(g)	(h)	(i)	(j)
	Number of Days in Month	Proration Percentage	FY22	FY23	FY24	FY25
28	April 30	91.78%	\$915	\$1,702	(\$12,684)	(\$3,012)
29	May 31	83.29%	\$831	\$1,544	(\$11,511)	(\$2,733)
30	June 30	75.07%	\$749	\$1,392	(\$10,375)	(\$2,463)
31	July 31	66.58%	\$664	\$1,234	(\$9,201)	(\$2,185)
32	August 31	58.08%	\$579	\$1,077	(\$8,027)	(\$1,906)
33	September 30	49.86%	\$497	\$925	(\$6,891)	(\$1,636)
34	October 31	41.37%	\$413	\$767	(\$5,717)	(\$1,358)
35	November 30	33.15%	\$331	\$615	(\$4,581)	(\$1,088)
36	December 31	24.66%	\$246	\$457	(\$3,408)	(\$809)
37	January 31	16.16%	\$161	\$300	(\$2,234)	(\$530)
38	February 28	8.49%	\$85	\$157	(\$1,174)	(\$279)
39	March 31	0.00%	\$0	\$0	\$0	\$0
40	Total 365		\$5,471	\$10,170	(\$75,803)	(\$18,000)
41	Deferred Tax Without Proration	Line 27	\$11,969	\$22,250	(\$165,843)	(\$39,380)
42	Average Deferred Tax without Proration	Line 39 * 50%	\$5,984	\$11,125	(\$82,921)	(\$19,690)
43	Proration Adjustment	Line 40 - Line 42	(\$514)	(\$955)	\$7,118	\$1,690

Column Notes:

(f) Sum of remaining days in the year (Col (e)) ÷ 365
(g) through (j) Current Year Line 27 ÷ 12 x Current Month Col (f)

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2024 Electric Infrastructure, Safety, and Reliability (ISR) Plan Reconciliation
Fiscal Year 2024 Revenue Requirement on FY 2019 Intangible Investment**

Line No.	Reference	FY19 Total (c) = (a) + (b)	FY 20 Total (f) = (d) + (e)	FY 21 Total (i) = (g) + (h)	FY 22 Total (l) = (j) + (k)	FY Mar-2023 (Apr-May 2022) (o) = (m) + (n)	FY Mar-2023 (Jun 2022 -Mar 2023) (r) = (p) + (q)	FY 24 Total (u) = (s) + (t)	FY 25 Total (x) = (v) + (w)
<u>Capital Investment</u>									
1	Start of Rev. Req. Period	09/01/18	04/01/19	04/01/20	04/01/21	04/01/22	05/25/22	04/01/23	04/01/24
2	End of Rev. Req. Period	03/31/19	03/31/20	03/31/21	03/31/22	05/24/22	03/31/23	03/31/24	03/31/25
3	Investment Name	Per Company's Book							
4	Work Order	Per Company's Book							
5	Total Spend	\$3,460,626	\$3,460,626	\$3,460,626	\$3,460,626	\$3,460,626	\$3,460,626	\$3,460,626	\$3,460,626
6	In Service Date	Per Company's Book							
7	Book Amortization Period	Per Company's Book							
8	Beginning Book Balance	Line 5 ÷ Line 7 × month to Year End, 2019,2020, 2021							
		\$3,378,230	\$3,089,845	\$2,595,470	\$2,101,094	\$1,606,719	\$1,540,045	\$1,112,344	\$617,969
9	Ending Book Balance	Line 5 ÷ Line 7 × month to Year End, 2020 ,2021, 2022							
		\$3,089,845	\$2,595,470	\$2,101,094	\$1,606,719	\$1,540,045	\$1,112,344	\$617,969	\$123,594
10	Average Book Balance	(Line 8 + Line 9) ÷ 2							
		\$3,234,038	\$2,842,657	\$2,348,282	\$1,853,907	\$1,573,382	\$1,326,195	\$865,157	\$370,781
<u>Deferred Tax Calculation:</u>									
11	Total Spend								
12	In Service Date								
13	Tax Amortization Period	Page 9 of 36							
14	Tax Expensing	Per Tax Department							
15	Tax Bonus Rate	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
16	Bonus Depreciation	Per Tax Department							
		Year 1 = (L. 5 - L. 14) × L.15, Then = 0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
17	Beginning Acc. Tax Balance	(L. 5 - L. 14- L.16)× (Y1 ×0; Y2 × 33.33%; Y3 × 72.78%; Y4 × 92.59%; Y5 × 100%)							
		\$1,153,427	\$1,153,427	\$2,691,675	\$3,204,194	\$3,460,626	\$0	\$513,297	\$1,197,847
18	Ending Acc. Tax Balance	(L. 5 - L. 14- L.16) × (Y1 × 33.33%; Y2 × 77.78%; Y3 × 92.59%; Y4 × 100%)							
		\$1,153,427	\$2,691,675	\$3,204,194	\$3,460,626	\$3,460,626	\$513,297	\$1,197,847	\$1,425,928
19	Average Acc. Tax Balance	(Line 17 + Line 18) ÷ 2							
		\$1,153,427	\$1,922,551	\$2,947,934	\$3,332,410	\$3,460,626	\$256,649	\$855,572	\$1,311,887
20	Beginning Acc. Dep. Balance	Line 5 - Line 8							
		\$82,396	\$370,781	\$865,157	\$1,359,532	\$1,853,907	\$1,920,581	\$2,348,282	\$2,842,657
21	Ending Acc. Dep. Balance	Line 5 - Line 9							
		\$370,781	\$865,157	\$1,359,532	\$1,853,907	\$1,920,581	\$2,348,282	\$2,842,657	\$3,337,032
22	Average Acc. Dep. Balance	(Line 20 + Line 21) ÷ 2							
		\$226,589	\$617,969	\$1,112,344	\$1,606,719	\$1,887,244	\$2,134,432	\$2,595,470	\$3,089,845
23	Number of days								
24	Proration Percentage								
25	Average Book / Tax Timer	Line 19 - Line 22							
		\$926,838	\$1,304,582	\$1,835,590	\$1,725,691	\$232,774	(\$1,599,974)	(\$1,739,898)	(\$1,777,957)
26	Effective Tax Rate								
27	Deferred Tax Reserve	Line 25 × Line 26							
		\$194,636	\$273,962	\$385,474	\$362,395	\$48,883	(\$335,995)	(\$365,378)	(\$373,371)
<u>Rate Base Calculation:</u>									
28	Average Book Balance	Line 10							
		\$3,234,038	\$2,842,657	\$2,348,282	\$1,853,907	\$232,774	\$1,129,991	\$865,157	\$370,781
29	Deferred Tax Reserve	Line 27							
		\$194,636	\$273,962	\$385,474	\$362,395	\$48,883	(\$335,995)	(\$365,378)	(\$373,371)
30	Average Rate Base	Line 28 - Line 29							
		\$3,039,402	\$2,568,695	\$1,962,808	\$1,491,512	\$183,892	\$1,465,985	\$1,230,535	\$744,152
<u>Revenue Requirement Calculation:</u>									
31	Pre-Tax ROR	year 1 = Page 34 of 36, Line 27, column (e)×7÷12 Then = Page 34 of 36, Line 27(e)							
32	Return and Taxes	Line 30 × Line 31							
		\$145,917	\$211,404	\$161,539	\$122,751	\$15,134	\$120,651	\$101,273	\$61,244
33	Book Depreciation	Line 9 - Line 8							
		\$288,386	\$494,375	\$494,375	\$494,375	\$66,674	\$427,701	\$494,375	\$494,375
34	Annual Revenue Requirement	Line 32 + Line 33							
		\$434,302	\$705,779	\$655,914	\$617,127	\$81,808	\$548,352	\$595,648	\$555,619

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2024 Electric Infrastructure, Safety, and Reliability (ISR) Plan Reconciliation
MACRS Tables For Information Systems**

Line No.	Annual Rate			Monthly Cumulative Rate			
	Year			Year	Period	Cumulative Rate	
1	Yr 1	33.33%	33.33%	1	1	33.33%	2.78% Yr 1 - Monthly rate
2	Yr 2	44.45%	77.78%	1	2	33.33%	
3	Yr 3	14.81%	92.59%	1	3	33.33%	
4	Net Salvage Value	7.41%	100.00%	1	4	33.33%	
11				1	11	33.33%	
12				1	12	33.33%	
13				2	13	77.78%	3.70% Yr 2 - Monthly rate
25				3	25	92.59%	1.23% Yr 3 - Monthly rate
36				3	36	92.59%	0.62% Yr 3 - Monthly rate
48				4	48	100.00%	
60				5	60	100.00%	
72				6	72	100.00%	
84				7	84	100.00%	
96				8	96	100.00%	
108				9	108	100.00%	
120				10	120	100.00%	
132				11	132	100.00%	
144				12	144	100.00%	
156				13	156	100.00%	
168				14	168	100.00%	
180				15	180	100.00%	
192				16	192	100.00%	
204				17	204	100.00%	
216				18	216	100.00%	
228				19	228	100.00%	
240				20	240	100.00%	
252				21	252	100.00%	
264				22	264	100.00%	
276				23	276	100.00%	
288				24	288	100.00%	
300				25	300	100.00%	

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2024 Electric Infrastructure, Safety, and Reliability (ISR) Plan Reconciliation
Fiscal Year 2024 Revenue Requirement on FY 2020 Actual Incremental Capital Investment**

Line No.			Fiscal Year 2020 (a)	Fiscal Year 2021 (b)	Fiscal Year 2022 (c)	NG 4/1/22 - 5/24/22 2023 (d)	PPL 5/25/22 - 3/31/23 2023 (e)	Fiscal Year 2024 (f)
<u>Capital Investment Allowances</u>								
1	Non-Discretionary Capital		\$27,712,863					
2	Discretionary Capital Lesser of Actual Cumulative Non-Discretionary Capital Additions or Spending, or Approved Spending		\$39,597,335					
3	Total Allowed Capital Included in Rate Base	Page 26 of 36, Line 4(c)	\$67,310,198	\$0	\$0	\$0	\$0	\$0
<u>Depreciable Net Capital Included in Rate Base</u>								
4	Total Allowed Capital Included in Rate Base in Current Year	Line 3	\$67,310,198	\$0	\$0	\$0	\$0	\$0
5	Retirements	Page 26 of 36, Line 10, Col (c)	\$4,015,632	\$0	\$0	\$0	\$0	\$0
6	Net Depreciable Capital Included in Rate Base	Year 1 = Line 4 - Line 5; Then = Prior Year Line 6	\$63,294,566	\$63,294,566	\$63,294,566	\$63,294,566	\$63,294,566	\$63,294,566
<u>Change in Net Capital Included in Rate Base</u>								
7	Capital Included in Rate Base	Line 3	\$67,310,198	\$0	\$0	\$0	\$0	\$0
8	Depreciation Expense	Page 30 of 36, Line 41, Col (d) × 7 ÷ 12	\$29,112,370	\$0	\$0	\$0	\$0	\$0
9	Incremental Capital Amount	Year 1 = Line 7 - Line 8; then = Prior Year Line 9	\$38,197,828	\$38,197,828	\$38,197,828	\$38,197,828	\$38,197,828	\$38,197,828
10	Cost of Removal	Page 26 of 36, Line 7, Col (c)	\$11,332,719					
11	Total Net Plant in Service	Year 1 = Line 9 + Line 10, Then = Prior year	\$49,530,546	\$49,530,546	\$49,530,546	\$49,530,546	\$49,530,546	\$49,530,546
<u>Deferred Tax Calculation:</u>								
12	Composite Book Depreciation Rate	Page 28 of 36, Line 3, Col (e)	1/ 3.16%	3.16%	3.16%	3.16%	3.16%	3.16%
13	Number of days		2/			54	311	
14	Proration Percentage		2/			14.79%	85.21%	
15	Vintage Year Tax Depreciation:							
16	Tax Depreciation and Year 1 Basis Adjustments	Year 1 = Page 11 of 36, Line 28, Then = Page 11 of 36, Column (e)	\$23,485,409	\$4,297,773	\$3,975,098	\$544,058	\$2,325,526	\$4,476,792
17	Cumulative Tax Depreciation-NG	Year 1 = Line 16; then = Prior Year Line 17 + Current Year Line 16	\$23,485,409	\$27,783,182	\$31,758,279	\$32,302,337		
18	Cumulative Tax Depreciation-PPL	Year 1 = Line 16; then = Prior Year Line 18 + Current Year Line 16					\$2,325,526	\$6,802,318
19	Book Depreciation	Year 1 = Line 6 * Line 12 * 50%; Then = Line 6 * Line 12	\$1,000,054	\$2,000,108	\$2,000,108	\$295,906	\$1,704,202	\$2,000,108
20	Cumulative Book Depreciation	Year 1 = Line 16; Then = Prior Year Line 17 + Current Year Line 16	\$1,000,054	\$3,000,162	\$5,000,271	\$5,296,177	\$7,000,379	\$9,000,487
21	Cumulative Book / Tax Timer	Columns (c) & (d): Line 17 - Line 20, Then Line 18 - Line 20	\$22,485,354	\$24,783,019	\$26,758,009	\$27,006,160	(\$4,674,853)	(\$2,198,169)
22	Less: Cumulative Book Depreciation at Acquisition	Line 20 Column (d)					\$5,296,177	\$5,296,177
23	Cumulative Book / Tax Timer - PPL	Line 21 + Line 22					\$621,324	\$3,098,008
24	Effective Tax Rate	Columns (c) & (d): Line 21 * Line 24, Then Line 23 * Line 24	21.00%	21.00%	21.00%	21.00%	21.00%	21.00%
25	Deferred Tax Reserve	Line 24	\$4,721,924	\$5,204,434	\$5,619,182	\$5,671,294	\$130,478	\$650,582
26	Add: FY 2020 Federal NOL (Generation) / Utilization	Page 26 of 36, Line 15, Col (c)	(\$1,462,980)	(\$1,462,980)	(\$1,462,980)	(\$1,462,980)	\$0	\$0
27	Net Deferred Tax Reserve before Proration Adjustment	Sum of Lines 25 through 26	\$3,258,944	\$3,741,454	\$4,156,201	\$4,208,313	\$130,478	\$650,582
<u>Rate Base Calculation:</u>								
28	Cumulative Incremental Capital Included in Rate Base	Line 11	\$49,530,546	\$49,530,546	\$49,530,546	\$49,530,546	\$49,530,546	\$49,530,546
29	Accumulated Depreciation	-Line 20	(\$1,000,054)	(\$3,000,162)	(\$5,000,271)	(\$5,296,177)	(\$7,000,379)	(\$9,000,487)
30	Deferred Tax Reserve	-Line 27	(\$3,258,944)	(\$3,741,454)	(\$4,156,201)	(\$4,208,313)	(\$130,478)	(\$650,582)
31	Year End Rate Base before Deferred Tax Proration	Sum of Lines 28 through 30	\$45,271,548	\$42,788,930	\$40,374,074	\$40,026,056	\$42,399,689	\$39,879,477
<u>Revenue Requirement Calculation:</u>								
32	Average Rate Base before Deferred Tax Proration Adjustment	Year 1 = Current Year Line 31 * Page 16 of 36, Line 16, Col(e); Then =(Prior Year Line 31 + Current Year Line 31) ÷ 2	\$16,518,313	\$44,030,239	\$41,581,502	\$41,386,882	\$41,386,882	\$41,139,583
33	Proration Adjustment	Page 12 of 36, Line 41	\$30,912	\$18,700	\$17,802	\$7,837	\$7,837	\$22,324
34	Average ISR Rate Base after Deferred Tax Proration	Line 33 + Line 34	\$16,549,225	\$44,048,939	\$41,599,304	\$41,394,719	\$41,394,719	\$41,161,907
35	Pre-Tax ROR	Page 34 of 36, Line 35	8.23%	8.23%	8.23%	8.23%	8.23%	8.23%
36	Proration	Line 14	2/ 14.79%				85.21%	
37	Return and Taxes	Cols (a) through (c) and (f): L 34 * L 35;	\$1,362,001	\$3,625,228	\$3,423,623	\$504,018	\$2,902,768	\$3,387,625
38	Book Depreciation	Cols (d) and (e): L 34 * L 35 * L 36 Line 19	\$1,000,054	\$2,000,108	\$2,000,108	\$295,906	\$1,704,202	\$2,000,108
39	Annual Revenue Requirement	Line 37 + Line 38	\$2,362,055	\$5,625,336	\$5,423,731	\$799,924	\$4,606,970	\$5,387,733
40	Docket No. 4915, FY 2020 Electric ISR Reconciliation, Page 9, Line 29							
41	2020 Tax True Up							

1/ 3.16% = Composite Book Depreciation Rate for ISR plant per RIPUC Docket No. 4770 (Page 28 of 36, Line 3, Col (e))

2/ Columns (d) and (e) represent the 12 months within fiscal year 2023, but activity is separated to accommodate the impacts of the acquisition as described in note 3.

3/ National Grid and PPL Corporation ("PPL") elected to treat PPL's acquisition of The Narragansett Electric Company ("NECO") from National Grid on May 25, 2022 as an asset sale for U.S. federal income tax purposes under Internal Revenue Code Section 338(h)(10). As a result of this election, PPL was deemed to acquire the assets of NECO at fair market value (essentially equivalent to book value) for tax purposes. The resulting "step-up" in tax basis eliminates most book/tax timing differences and the related accumulated net deferred income tax liabilities as of the acquisition date, at which time PPL will reset the book/tax timing difference as if PPL purchased a new asset in the year of acquisition and will begin depreciating the new tax basis. Book cost, book accumulated depreciation and book depreciation continue as if the acquisition never took place.

4/ Columns (d) and (e) takes the average of the "Year End Rate Base before Deferred Tax Proration" at the beginning of the fiscal year on Line 31, Column (c) and the end of the fiscal year on Line 31, Column (e). See note 2.

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2024 Electric Infrastructure, Safety, and Reliability (ISR) Plan Reconciliation
Calculation of Tax Depreciation and Repairs Deduction on FY 2020 Incremental Capital Investments**

Line No.			Fiscal Year 2020 (a)	(b)	(c)	(d)	(e)	(f)
	<u>Capital Repairs Deduction</u>							
1	Plant Additions	Page 10 of 36, Line 3	\$67,310,198					
2	Capital Repairs Deduction Rate	Per Tax Department 1/	8.51%					
3	Capital Repairs Deduction	Line 1 * Line 2	\$5,728,098					
4								
5	<u>Bonus Depreciation</u>							
6	Plant Additions	Line 1	\$67,310,198					
7	Plant Additions		\$0					
8	Less Capital Repairs Deduction	Line 3	\$5,728,098					
9	Plant Additions Net of Capital Repairs Deduction	Line 6 + Line 7 - Line 8	\$61,582,100					
10	Percent of Plant Eligible for Bonus Depreciation	Per Tax Department	100.00%					
11	Plant Eligible for Bonus Depreciation	Line 9 * Line 10	\$61,582,100					
12	Bonus Depreciation Rate	1 * 14.78% * 30% * 75% 2/	3.33%					
13	Bonus Depreciation Rate	1 * 0% * 25%	0.00%					
14	Total Bonus Depreciation Rate	Line 12 + Line 13	3.33%					
15	Bonus Depreciation	Line 11 * Line 14	\$2,047,913					
16								
17	<u>Remaining Tax Depreciation</u>							
18	Plant Additions	Line 1	\$67,310,198					
19	Less Capital Repairs Deduction	Line 3	\$5,728,098					
20	Less Bonus Depreciation	Line 15	\$2,047,913					
21	Remaining Plant Additions Subject to 20 YR MACRS Tax Depreciation	Line 18 - Line 19 - Line 20	\$59,534,187					
22	20 YR MACRS Tax Depreciation Rates	Per IRS Publication 946	3.750%					
23	Remaining Tax Depreciation	Line 21 * Line 22	\$2,232,532					
24								
25	FY20 Loss incurred due to retirements	Per Tax Department 3/	\$2,144,147					
26	Cost of Removal	Page 10 of 36, Line 10	\$11,332,719					
27								
28	Total Tax Depreciation and Repairs Deduction	Sum of Lines 3, 15, 23, 25, and 26	\$23,485,409					
29								
30								
31								
32								
33								
34								
35								
36								
37								
38								

20 Year MACRS Depreciation			
NG MACRS basis:	Line 22, Column (a)	\$59,534,187	
Fiscal Year	Proration	Annual MACRS	Cumulative Tax Depr
FY Mar-2020	3.750%	\$2,232,532	\$23,485,409
FY Mar-2021	7.219%	\$4,297,773	\$27,783,182
FY Mar-2022	6.677%	\$3,975,098	\$31,758,279
FY Mar-2023 (Apr-May 2022)	6.177%	\$544,058	\$32,302,337
PPL Acquisition - May 25, 2022			
Book Cost	Line 1, Column (a)	\$67,310,198	
Cumulative Book Depreciation	- Page 10 of 36, Line 20, Col (d)	(\$5,296,177)	
PPL MACRS basis:	Line 12(e) + Line 13(e)	\$62,014,021	
FY Mar-2023 (Jun-Mar 2023)	3.750%	\$2,325,526	\$2,325,526
Mar-2024	7.219%	\$4,476,792	\$6,802,318
Mar-2025	6.677%	\$4,140,676	\$10,942,994
Mar-2026	6.177%	\$3,830,606	\$14,773,600
Mar-2027	5.713%	\$3,542,861	\$18,316,461
Mar-2028	5.285%	\$3,277,441	\$21,593,902
Mar-2029	4.888%	\$3,031,245	\$24,625,148
Mar-2030	4.522%	\$2,804,274	\$27,429,422
Mar-2031	4.462%	\$2,767,066	\$30,196,487
Mar-2032	4.461%	\$2,766,445	\$32,962,933
Mar-2033	4.462%	\$2,767,066	\$35,729,998
Mar-2034	4.461%	\$2,766,445	\$38,496,444
Mar-2035	4.462%	\$2,767,066	\$41,263,509
Mar-2036	4.461%	\$2,766,445	\$44,029,955
Mar-2037	4.462%	\$2,767,066	\$46,797,020
Mar-2038	4.461%	\$2,766,445	\$49,563,466
Mar-2039	4.462%	\$2,767,066	\$52,330,531
Mar-2040	4.461%	\$2,766,445	\$55,096,977
Mar-2041	4.462%	\$2,767,066	\$57,864,043
Mar-2042	4.461%	\$2,766,445	\$60,630,488
Mar-2043	2.231%	\$1,383,533	\$62,014,021
	100.000%	\$62,014,021	

1/ Per Tax Department

2/ Per Tax Department

3/ Per Tax Department

Column (d), Line 9 = MACRS Rate 6.177% / 365 days x 54 days

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2024 Electric Infrastructure, Safety, and Reliability (ISR) Plan Reconciliation
Calculation of Net Deferred Tax Reserve Proration on FY 2020 Incremental Capital Investment**

Line No.			FY22 (a)	FY23 (b)	FY24 (c)	FY25 (d)
	Deferred Tax Subject to Proration					
1	Book Depreciation	See the corresponding Fiscal Year on Page 10 of 36, Line 19. Note there are 2 columns to sum for FY23.	\$2,000,108	\$2,000,108	\$2,000,108	\$2,000,108
2	Bonus Depreciation		\$0	\$0	\$0	\$0
3	Remaining MACRS Tax Depreciation	See the corresponding Fiscal Year on Page 10 of 36, Line 16. Note there are 2 columns to sum for FY23.	(\$3,975,098)	(\$2,869,583)	(\$4,476,792)	(\$4,140,676)
4	FY 2020 tax (gain)/loss on retirements	Year 1 = Docket No. 4915, R.S. 3, Att. 1R, page 10 Col (a); then = 0				
5	Cumulative Book / Tax Timer	Sum of Lines 1 through 4	(\$1,974,989)	(\$869,475)	(\$2,476,684)	(\$2,140,568)
6	Effective Tax Rate		21.00%	21.00%	21.00%	21.00%
7	Deferred Tax Reserve	Line 5 * Line 6	(\$414,748)	(\$182,590)	(\$520,104)	(\$449,519)
	Deferred Tax Not Subject to Proration					
8	Capital Repairs Deduction	Year 1 = Docket no. 4915, R.S. 3, Att. 1R, page 10 Col (a); then = 0				
9	Cost of Removal	Year 1 = Docket no. 4915, R.S. 3, Att. 1R, page 10 Col (a); then = 0				
10	Book/Tax Depreciation Timing Difference at 3/31/2020					
11	Cumulative Book / Tax Timer	Line 8 + Line 9 + Line 10	\$0	\$0	\$0	\$0
12	Effective Tax Rate		21.00%	21.00%	21.00%	21.00%
13	Deferred Tax Reserve	Line 11 * Line 12	\$0	\$0	\$0	\$0
14	Total Deferred Tax Reserve	Line 7 + Line 13	(\$414,748)	(\$182,590)	(\$520,104)	(\$449,519)
15	Net Operating Loss	Docket No. 4915, R. S. 5, Att. 1S, P 10 of 19, Col (a)	\$0	\$0	\$0	\$0
16	Net Deferred Tax Reserve	Line 14 + Line 15	(\$414,748)	(\$182,590)	(\$520,104)	(\$449,519)
	Allocation of FY 2020 Estimated Federal NOL					
17	Cumulative Book/Tax Timer Subject to Proration	Col (a) = Line 5	(\$1,974,989)	(\$869,475)	(\$2,476,684)	(\$2,140,568)
18	Cumulative Book/Tax Timer Not Subject to Proration	Line 11	\$0	\$0	\$0	\$0
19	Total Cumulative Book/Tax Timer	Line 17 + Line 18	(\$1,974,989)	(\$869,475)	(\$2,476,684)	(\$2,140,568)
20	Total FY 2020 Federal NOL (Utilization)	Docket No. 4915, R. S. 5, Att. 1S, P 10 of 19, Col (a)	\$0	\$0	\$0	\$0
21	Allocated FY 2020 Federal NOL Not Subject to Proration	(Line 18 / Line 19) * Line 20	\$0	\$0	\$0	\$0
22	Allocated FY 2020 Federal NOL Subject to Proration	(Line 17 / Line 19) * Line 20	\$0	\$0	\$0	\$0
23	Effective Tax Rate		21%	21%	21%	21%
24	Deferred Tax Benefit subject to proration	Line 22 * Line 23	\$0	\$0	\$0	\$0
25	Net Deferred Tax Reserve subject to proration	Line 7 + Line 24	(\$414,748)	(\$182,590)	(\$520,104)	(\$449,519)
		(e) (f) (g) (h) (i) (j)				
	Proration Calculation	Number of Days in Month Proration Percentage	FY22	FY23	FY24	FY25
26	April	30 91.78%	(\$31,722)	(\$13,965)	(\$39,780)	(\$34,381)
27	May	31 83.29%	(\$28,786)	(\$12,673)	(\$36,099)	(\$31,200)
28	June	30 75.07%	(\$25,945)	(\$11,422)	(\$32,536)	(\$28,121)
29	July	31 66.58%	(\$23,010)	(\$10,130)	(\$28,855)	(\$24,939)
30	August	31 58.08%	(\$20,075)	(\$8,838)	(\$25,174)	(\$21,758)
31	September	30 49.86%	(\$17,234)	(\$7,587)	(\$21,612)	(\$18,679)
32	October	31 41.37%	(\$14,298)	(\$6,295)	(\$17,931)	(\$15,497)
33	November	30 33.15%	(\$11,458)	(\$5,044)	(\$14,368)	(\$12,418)
34	December	31 24.66%	(\$8,522)	(\$3,752)	(\$10,687)	(\$9,237)
35	January	31 16.16%	(\$5,587)	(\$2,460)	(\$7,006)	(\$6,055)
36	February	28 8.49%	(\$2,935)	(\$1,292)	(\$3,681)	(\$3,182)
37	March	31 0.00%	\$0	\$0	\$0	\$0
38	Total	365	(\$189,572)	(\$83,458)	(\$237,728)	(\$205,465)
39	Deferred Tax Without Proration	Line 25	(\$414,748)	(\$182,590)	(\$520,104)	(\$449,519)
40	Average Deferred Tax without Proration	Year 1=Line 39 * Page 16 of 36, Line 16, Col (e); then = Line 39 * 50%	(\$207,374)	(\$91,295)	(\$260,052)	(\$224,760)
41	Proration Adjustment	Line 38 - Line 40	\$17,802	\$7,837	\$22,324	\$19,294

Column Notes:

(f) Sum of remaining days in the year (Col (e)) ÷ 365
(g) & (j) Current Year Line 25 ÷ 12 × Current Month Col (f)

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2024 Electric Infrastructure, Safety, and Reliability (ISR) Plan Reconciliation
Fiscal Year 2024 Revenue Requirement on FY 2021 Actual Incremental Capital Investment**

Line No.		Fiscal Year 2021 (a)	Fiscal Year 2022 (b)	NG 4/1/22 - 5/24/22 2023 (c)	PPL 5/25/22 - 3/31/23 2023 (d)	Fiscal Year 2024 (e)
Capital Investment Allowance						
1	Non-Discretionary Capital	\$35,194,785				
2	Discretionary Capital Lesser of Actual Cumulative Non-Discretionary Capital Additions or Spending, or Approved Spending (non-intangible)	\$80,041,254				
3	Total Allowed Capital Included in Rate Base (non-intangible) Page 26 of 36, Line 4(d)	\$115,236,039	\$0	\$0	\$0	\$0
Depreciable Net Capital Included in Rate Base						
4	Total Allowed Capital Included in Rate Base in Current Year Line 3	\$115,236,039	\$0	\$0	\$0	\$0
5	Retirements Page 26 of 36, Line 10, Col (d)	\$21,996,026	\$0	\$0	\$0	\$0
6	Net Depreciable Capital Included in Rate Base Year 1 = Line 4 - Line 5; Then = Prior Year Line 6	\$93,240,013	\$93,240,013	\$93,240,013	\$93,240,013	\$93,240,013
Change in Net Capital Included in Rate Base						
7	Capital Included in Rate Base Line 3	\$115,236,039	\$0	\$0	\$0	\$0
8	Depreciation Expense Page 30 of 36, Line 41, Col (d) * 5 ÷ 12 + Line 62 Column (d) * 7 ÷ 12	\$49,906,920	\$0	\$0	\$0	\$0
9	Incremental Capital Amount Year 1 = Line 7 - Line 8; Then = Prior Year Line 9	\$65,329,118	\$65,329,118	\$65,329,118	\$65,329,118	\$65,329,118
10	Cost of Removal Page 26 of 36, Line 7, Col (d)	\$10,232,810				
11	Total Net Plant in Service Line 9 + Line 10	\$75,561,928	\$75,561,928	\$75,561,928	\$75,561,928	\$75,561,928
Deferred Tax Calculation:						
12	Composite Book Depreciation Rate Page 28 of 36, Line 3, Col (c)	1/	3.16%	3.16%	3.16%	3.16%
13	Number of days	2/		54	311	
14	Proration Percentage	2/		14.79%	85.21%	
15	Vintage Year Tax Depreciation:					
16	Tax Depreciation and Year 1 Basis Adjustments Year 1 = Page 14 of 36, Line 28, Column (a), Then = Line Page 14 of 36, Column (c)	\$44,142,409	\$6,365,192	\$870,997	\$4,139,271	\$7,968,373
17	Cumulative Tax Depreciation-NG Year 1 = Line 16; then = Prior Year Line 17 + Current Year Line 16	\$44,142,409	\$50,507,601	\$51,378,598		
18	Cumulative Tax Depreciation-PPL Year 1 = Line 16; then = Prior Year Line 18 + Current Year Line 16				\$4,139,271	\$12,107,643
19	Book Depreciation year 1 = Line 6 * Line 12 * 50%; Then = Line 6 * Line 12 Year 1 = Line 19;	\$1,473,192	\$2,946,384	\$435,903	\$2,510,481	\$2,946,384
20	Cumulative Book Depreciation then = Prior Year Line 20 + Current Year Line 19	\$1,473,192	\$4,419,577	\$4,855,480	\$7,365,961	\$10,312,345
21	Cumulative Book / Tax Timer Columns (a) through (c): Line 17 - Line 20, Then Line 18 - Line 20	\$42,669,217	\$46,088,025	\$46,523,118	(\$3,226,690)	\$1,795,298
22	Less: Cumulative Book Depreciation at Acquisition Line 20 Column (c)				\$4,855,480	\$4,855,480
23	Cumulative Book / Tax Timer - PPL Line 21 + Line 22				\$1,628,790	\$6,650,778
24	Effective Tax Rate	21.00%	21.00%	21.00%	21.00%	21.00%
25	Deferred Tax Reserve Columns (a) through (c): Line 21 * Line 24, Then Line 23 * Line 24	\$8,960,536	\$9,678,485	\$9,769,855	\$342,046	\$1,396,663
26	Add: FY 2021 Federal NOL (Generation) / Utilization Page 26 of 36, Line 15, Col (d)	(\$5,639,147)	(\$5,639,147)	(\$5,639,147)	\$0	\$0
27	Net Deferred Tax Reserve before Proration Adjustmer Sum of Lines 25 through 26	\$3,321,388	\$4,039,338	\$4,130,707	\$342,046	\$1,396,663
Rate Base Calculation:						
28	Cumulative Incremental Capital Included in Rate Base Line 11	\$75,561,928	\$75,561,928	\$75,561,928	\$75,561,928	\$75,561,928
29	Accumulated Depreciation -Line 20	(\$1,473,192)	(\$4,419,577)	(\$4,855,480)	(\$7,365,961)	(\$10,312,345)
30	Deferred Tax Reserve -Line 27	(\$3,321,388)	(\$4,039,338)	(\$4,130,707)	(\$342,046)	(\$1,396,663)
31	Year End Rate Base before Deferred Tax Proration Sum of Lines 28 through 30	\$70,767,348	\$67,103,014	\$66,575,741	\$67,853,921	\$63,852,919
Revenue Requirement Calculation:						
32	Average Rate Base before Deferred Tax Proration Adjustment Year 1 = Current Year, Line 31 * 50%; Then = (Prior Year Line 31 + Current Year Line 31) ÷ 2	\$35,383,674	\$68,935,181	\$67,478,468	\$67,478,468	\$65,853,420
33	Proration Adjustment Page 15 of 36, Line 41	\$16,525	\$30,816	\$18,603	\$18,603	\$45,267
34	Average ISR Rate Base after Deferred Tax Proration Line 32 + Line 33	\$35,400,199	\$68,965,997	\$67,497,071	\$67,497,071	\$65,898,687
35	Pre-Tax ROR Page 34 of 36, Line 35	8.23%	8.23%	8.23%	8.23%	8.23%
36	Proration Line 14			14.79%	85.21%	
37	Return and Taxes Cols (a),(b) and (c): L 34 * L 35;	\$2,913,436	\$5,675,902	\$821,837	\$4,733,172	\$5,423,462
38	Book Depreciation Cols (c) and (d): L 34 * L 35 * L 36	\$1,473,192	\$2,946,384	\$435,903	\$2,510,481	\$2,946,384
39	Revenue Requirement of Intangible Assets Line 19					
40	Annual Revenue Requirement Line 37 + Line 38 + Line 39	\$4,386,629	\$8,622,286	\$1,257,740	\$7,243,653	\$8,369,846

1/ 3.16% = Composite Book Depreciation Rate for ISR plant per RIPUC Docket No. 4770 (Page 28 of 36, Line 3, Col (c))

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4/ Columns (c) and (d) takes the average of the "Year End Rate Base before Deferred Tax Proration" at the beginning of the fiscal year on Line 31, Column (b) and the end of the fiscal year on Line 31, Column (d). See note 2.

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2024 Electric Infrastructure, Safety, and Reliability (ISR) Plan Reconciliation
Calculation of Tax Depreciation and Repairs Deduction on FY 2021 Incremental Capital Investments

Line No.		Fiscal Year 2021 (a)	(b)	(c)	(d)	(e)	(f)
	<u>Capital Repairs Deduction</u>						
1	Plant Additions	Page 13 of 36, Line 3(a)	\$115,236,039				
2	Capital Repairs Deduction Rate	Per Tax Department 1/	23.49%				
3	Capital Repairs Deduction	Line 1 * Line 2	\$27,063,271				
4							
5	<u>Bonus Depreciation</u>						
6	Plant Additions	Line 1	\$115,236,039				
7	Plant Additions		\$0				
8	Less Capital Repairs Deduction	Line 3	\$27,063,271				
9	Plant Additions Net of Capital Repairs Deduction	Line 6 + Line 7 - Line 8	\$88,172,768				
10	Percent of Plant Eligible for Bonus Depreciation	Per Tax Department	0.00%				
11	Plant Eligible for Bonus Depreciation	Line 9 * Line 10	\$0				
12	Bonus Depreciation Rate	1 * 14.78% * 75% * 30%	0.00%				
13	Bonus Depreciation Rate	1 * 25% * 0%	0.00%				
14	Total Bonus Depreciation Rate	Line 12 + Line 13	0.00%				
15	Bonus Depreciation	Line 11 * Line 14	\$0				
16							
17	<u>Remaining Tax Depreciation</u>						
18	Plant Additions	Line 1	\$115,236,039				
19	Less Capital Repairs Deduction	Line 3	\$27,063,271				
20	Less Bonus Depreciation	Line 15	\$0				
21	Remaining Plant Additions Subject to 20 YR MACRS Tax Depreciation	Line 18 - Line 19 - Line 20	\$88,172,768				
22	20 YR MACRS Tax Depreciation Rates	Per IRS Publication 946	3.750%				
23	Remaining Tax Depreciation	Line 21 * Line 22	\$3,306,479				
24							
25	FY21 (Gain)/Loss incurred due to retirements	Per Tax Department 2/	\$3,539,849				
26	Cost of Removal	Page 13 of 36, Line 10	\$10,232,810				
27							
28	Total Tax Depreciation and Repairs Deduction	Sum of Lines 3, 15, 23, 25, and 26	\$44,142,409				
29							
30							
31							
32							
33							
34							
35							
36							
37							

20 Year MACRS Depreciation				
MACRS basis:	Line 21, Column (a)	\$88,172,768		
Fiscal Year	Prorated	Annual	Cumulative	
FY Mar-2021	3.750%	MACRS	Tax Depr	
FY Mar-2022	7.219%	\$3,306,479	\$44,142,409	
FY Mar-2023 (Apr-May 2022)	6.677%	\$6,365,192	\$50,507,601	
	0.988%	\$870,997	\$51,378,598	
PPL Acquisition - May 25, 2022				
Book Cost	Line 1, Column (a)	\$115,236,039		
Cumulative Book Depreciation	- Page 13 of 36, Line 20, Col (c)	(\$4,855,480)		
PPL MACRS basis:	Line 11(e) + Line 12(e)	\$110,380,559		
FY Mar-2023 (Jun-Mar 2023)	3.750%	\$4,139,271	\$4,139,271	
Mar-2024	7.219%	\$7,968,373	\$12,107,643	
Mar-2025	6.677%	\$7,370,110	\$19,477,753	
Mar-2026	6.177%	\$6,818,207	\$26,295,961	
Mar-2027	5.713%	\$6,306,041	\$32,602,002	
Mar-2028	5.285%	\$5,833,613	\$38,435,614	
Mar-2029	4.888%	\$5,395,402	\$43,831,016	
Mar-2030	4.522%	\$4,991,409	\$48,822,425	
Mar-2031	4.462%	\$4,925,181	\$53,747,606	
Mar-2032	4.461%	\$4,924,077	\$58,671,682	
Mar-2033	4.462%	\$4,925,181	\$63,596,863	
Mar-2034	4.461%	\$4,924,077	\$68,520,939	
Mar-2035	4.462%	\$4,925,181	\$73,446,120	
Mar-2036	4.461%	\$4,924,077	\$78,370,197	
Mar-2037	4.462%	\$4,925,181	\$83,295,377	
Mar-2038	4.461%	\$4,924,077	\$88,219,454	
Mar-2039	4.462%	\$4,925,181	\$93,144,635	
Mar-2040	4.461%	\$4,924,077	\$98,068,711	
Mar-2041	4.462%	\$4,925,181	\$102,993,892	
Mar-2042	4.461%	\$4,924,077	\$107,917,969	
Mar-2043	2.231%	\$2,462,590	\$110,380,559	
	100.00%	\$110,380,559		

1/ Per Tax Department

2/ Per Tax Department

Column (d), Line 8 = MACRS Rate 6.677% / 365 days x 54 days

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2024 Electric Infrastructure, Safety, and Reliability (ISR) Plan Reconciliation
Calculation of Net Deferred Tax Reserve Proration on FY 2021 Incremental Capital Investment**

Line No.			<u>FY22</u> (a)	<u>FY23</u> (b)	<u>FY24</u> (c)	<u>FY25</u> (d)
Deferred Tax Subject to Proration						
1	Book Depreciation	See the corresponding Fiscal Year on Page 13 of 36, Line 19. Note there are 2 columns to sum for FY23.	\$2,946,384	\$2,946,384	\$2,946,384	\$2,946,384
2	Bonus Depreciation	Page 14 of 36, Line 20	\$0	\$0	\$0	\$0
3	Remaining MACRS Tax Depreciation	See the corresponding Fiscal Year on Page 13 of 36, Line 16. Note there are 2 columns to sum for FY23.	(\$6,365,192)	(\$5,010,268)	(\$7,968,373)	(\$7,370,110)
4	FY 2021 tax (gain)/loss on retirements	- Page 14 of 36, Line 25				
5	Cumulative Book / Tax Timer	Sum of Lines 1 through 4	(\$3,418,808)	(\$2,063,884)	(\$5,021,988)	(\$4,423,726)
6	Effective Tax Rate		21.00%	21.00%	21.00%	21.00%
7	Deferred Tax Reserve	Line 5 * Line 6	(\$717,950)	(\$433,416)	(\$1,054,618)	(\$928,982)
Deferred Tax Not Subject to Proration						
8	Capital Repairs Deduction	- Page 14 of 36, Line 3				
9	Cost of Removal	- Page 14 of 36, Line 26				
10	Book/Tax Depreciation Timing Difference at 3/31/2021					
11	Cumulative Book / Tax Timer	Line 8 + Line 9 + Line 10	\$0	\$0	\$0	\$0
12	Effective Tax Rate		21.00%	21.00%	21.00%	21.00%
13	Deferred Tax Reserve	Line 11 * Line 12		\$0	\$0	\$0
14	Total Deferred Tax Reserve	Line 7 + Line 13	(\$717,950)	(\$433,416)	(\$1,054,618)	(\$928,982)
15	Net Operating Loss	Page 13 of 36, Line 26	\$0	\$0	\$0	\$0
16	Net Deferred Tax Reserve	Line 14 + Line 15	(\$717,950)	(\$433,416)	(\$1,054,618)	(\$928,982)
Allocation of FY 2021 Estimated Federal NOL						
17	Cumulative Book/Tax Timer Subject to Proration	Col (b) = Line 5	(\$3,418,808)	(\$2,063,884)	(\$5,021,988)	(\$4,423,726)
18	Cumulative Book/Tax Timer Not Subject to Proration	Line 11	\$0	\$0	\$0	\$0
19	Total Cumulative Book/Tax Timer	Line 17 + Line 18	(\$3,418,808)	(\$2,063,884)	(\$5,021,988)	(\$4,423,726)
20	Total FY 2021 Federal NOL (Utilization)	- Page 13 of 36, Line 26 / 21%	\$0	\$0	\$0	\$0
21	Allocated FY 2021 Federal NOL Not Subject to Proration	(Line 18 / Line 19) * Line 20	\$0	\$0	\$0	\$0
22	Allocated FY 2021 Federal NOL Subject to Proration	(Line 17 / Line 19) * Line 20	\$0	\$0	\$0	\$0
23	Effective Tax Rate		21%	21%	21%	21%
24	Deferred Tax Benefit subject to proration	Line 22 * Line 23	\$0	\$0	\$0	\$0
25	Net Deferred Tax Reserve subject to proration	Line 7 + Line 24	(\$717,950)	(\$433,416)	(\$1,054,618)	(\$928,982)
		(e)	(f)	(g)	(h)	(i)
		(j)				
Proration Calculation						
		<u>Number of Days in Month</u>	<u>Proration Percentage</u>	<u>FY22</u>	<u>FY23</u>	<u>FY24</u>
26	April	30	91.78%	(\$54,912)	(\$33,149)	(\$80,661)
27	May	31	83.29%	(\$49,830)	(\$30,082)	(\$73,197)
28	June	30	75.07%	(\$44,913)	(\$27,113)	(\$65,974)
29	July	31	66.58%	(\$39,831)	(\$24,046)	(\$58,510)
30	August	31	58.08%	(\$34,750)	(\$20,978)	(\$51,045)
31	September	30	49.86%	(\$29,833)	(\$18,010)	(\$43,822)
32	October	31	41.37%	(\$24,751)	(\$14,942)	(\$36,358)
33	November	30	33.15%	(\$19,834)	(\$11,973)	(\$29,134)
34	December	31	24.66%	(\$14,752)	(\$8,906)	(\$21,670)
35	January	31	16.16%	(\$9,671)	(\$5,838)	(\$14,206)
36	February	28	8.49%	(\$5,081)	(\$3,068)	(\$7,464)
37	March	31	0.00%	\$0	\$0	\$0
38	Total	365		(\$328,159)	(\$198,105)	(\$482,042)
39	Deferred Tax Without Proration	Line 25		(\$717,950)	(\$433,416)	(\$1,054,618)
40	Average Deferred Tax without Proration	Line 39 × 0.5		(\$358,975)	(\$216,708)	(\$527,309)
41	Proration Adjustment	Line 38 - Line 40		\$30,816	\$18,603	\$45,267

Column Notes:

(f) Sum of remaining days in the year (Col (e)) ÷ 365
(g) through (j) Current Year Line 25 ÷ 12 × Current Month Col (f)

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2024 Electric Infrastructure, Safety, and Reliability (ISR) Plan Reconciliation
ISR Additions April 2020 through March 2021

<u>Line</u> <u>No.</u>	<u>Month</u> <u>No.</u>	<u>Month</u>	<u>FY 2021 Plant</u> <u>Additions</u> (a)	<u>In</u> <u>Rates</u> (b)	<u>Not In</u> <u>Rates</u> (c) = (a) - (b)	<u>Weight</u> <u>for Days</u> (d)	<u>Weighted</u> <u>Average</u> (e) = (d) * (c)	<u>Weight for</u> <u>Not in Rates</u> (f)=(c)/Total(c)
1								
2	1	Apr-20	8,207,898	6,236,917	1,970,982	0.958	1,888,858	2.93%
3	2	May-20	8,207,898	6,236,917	1,970,982	0.875	1,724,609	2.93%
4	3	Jun-20	8,207,898	6,236,917	1,970,982	0.792	1,560,361	2.93%
5	4	Jul-20	8,207,898	6,236,917	1,970,982	0.708	1,396,112	2.93%
6	5	Aug-20	8,207,898	6,236,917	1,970,982	0.625	1,231,864	2.93%
7	6	Sep-20	8,207,898	-	8,207,898	0.542	4,445,945	12.19%
8	7	Oct-20	8,207,898	-	8,207,898	0.458	3,761,953	12.19%
9	8	Nov-20	8,207,898	-	8,207,898	0.375	3,077,962	12.19%
10	9	Dec-20	8,207,898	-	8,207,898	0.292	2,393,970	12.19%
11	10	Jan-21	8,207,898	-	8,207,898	0.208	1,709,979	12.19%
12	11	Feb-21	8,207,898	-	8,207,898	0.125	1,025,987	12.19%
13	12	Mar-21	8,207,898	-	8,207,898	0.042	341,996	12.19%
14		Total	\$98,494,781	\$31,184,583	\$67,310,198		\$24,559,595	100.00%
15	Total September 2020 through March 2021				\$ 57,455,289			
16	FY 2020 Weighted Average Incremental Rate Base Percentage						36.49%	

Column (a)=Page 26 of 36, Line 1(c)

Column(b)=Page 26 of 36, Line 3(c)

Line 15 = sum of Line 7(c) through Line 13(c)

Line 16 = Line 14(f)/Line 14(c)

**The Narragansett Electric Company
d/b/a National Grid
Electric Infrastructure, Safety, and Reliability (ISR) Plan
Fiscal Year 2024 Revenue Requirement on FY 2022 Actual Incremental Capital Investment**

Line No.			Fiscal Year 2022 (a)	NG 4/1/22 - 5/24/2022 2023 (b)	PPL 5/25/22 - 3/31/23 2023 (c)	Fiscal Year 2024 (d)
<u>Capital Investment Allowance</u>						
1	Non-Discretionary Capital	Docket 5098, P 29 of 29, Line 1(a)	\$44,629,608			
2	Discretionary Capital Lesser of Actual Cumulative Non-Discretionary Capital Additions or Spending, or Approved Spending (non- intangible)	Docket 5098, P 29 of 29, Line 2(a)	\$42,200,430			
3	Total Allowed Capital Included in Rate Base (non- intangible)	Page 26 of 36, Line 4(e)	\$86,830,038	\$0	\$0	\$0
<u>Depreciable Net Capital Included in Rate Base</u>						
4	Total Allowed Capital Included in Rate Base in Current Year	Line 3	\$86,830,038	\$0	\$0	\$0
5	Retirements	Page 26 of 36, Line 10, Col (e)	\$34,853,004	\$0	\$0	\$0
6	Net Depreciable Capital Included in Rate Base	Year 1 = Line 4 - Line 5; Then = Prior Year Line 6	\$51,977,034	\$51,977,034	\$51,977,034	\$51,977,034
<u>Change in Net Capital Included in Rate Base</u>						
7	Capital Included in Rate Base	Line 3	\$86,830,038	\$0	\$0	\$0
8	Depreciation Expense	Page 30 of 36, Line 62, Col (d)	\$49,906,920	\$0	\$0	\$0
9	Incremental Capital Amount	Year 1 = Line 7 - Line 8; Then = Prior Year Line 9	\$36,923,118	\$36,923,118	\$36,923,118	\$36,923,118
10	Cost of Removal	Page 26 of 36, Line 7, Col (e)	\$7,600,505	\$0	\$0	\$0
11	Total Net Plant in Service	Line 9 + Line 10	\$44,523,622	\$44,523,622	\$44,523,622	\$44,523,622
<u>Deferred Tax Calculation:</u>						
12	Composite Book Depreciation Rate	Page 28 of 36, Line 3, Col (e)	1/	3.16%	3.16%	3.16%
13	Number of days		2/	54	311	
14	Proration Percentage		2/	14.79%	85.21%	
15	Vintage Year Tax Depreciation:					
16	Tax Depreciation and Year 1 Basis Adjustments	Year 1 = Page 18 of 36, Line 27, Column (a), Then = Line Page 18 of 36, Column (e)	\$41,756,966	\$652,212	\$3,216,218	\$6,191,433
17	Cumulative Tax Depreciation-NG	Year 1 = Line 16; then = Prior Year Line 17 + Current Year Line 16	\$41,756,966	\$42,409,177		
18	Cumulative Tax Depreciation-PPL	Year 1 = Line 16; then = Prior Year Line 18 + Current Year Line 16			\$3,216,218	\$9,407,651
19	Book Depreciation	year 1 = Line 6 * Line 12 * 50%; Then = Line 6 * Line 12	\$821,237	\$242,996	\$1,399,478	\$1,642,474
20	Cumulative Book Depreciation	Prior Year Line 20 + Current Year Line 19	\$821,237	\$1,064,233	\$2,463,711	\$4,106,186
21	Cumulative Book / Tax Timer	Columns (a) & (b): Line 17 - Line 20, Then Line 18 - Line 20	\$40,935,729	\$41,344,944	\$752,506	\$5,301,465
22	Less: Cumulative Book Depreciation at Acquisition	Line 20 Column (b)			\$1,064,233	\$1,064,233
23	Cumulative Book / Tax Timer - PPL	Line 21 + Line 22			\$1,816,740	\$6,365,699
24	Effective Tax Rate		21.00%	21.00%	21.00%	21.00%
25	Deferred Tax Reserve	Cols (a) and (b): Line 21 * Line 24, Then Line 23 * Line 24	\$8,596,503	\$8,682,438	\$381,515	\$1,336,797
26	Add: FY 2022 Federal NOL (Generation) / Utilization	Page 26 of 36, Line 15, Col (e)	3/ (\$3,602,966)	3/ (\$3,602,966)	\$0	\$0
27	Net Deferred Tax Reserve before Proration Adjuster	Sum of Lines 25 through 26	\$4,993,537	\$5,079,472	\$381,515	\$1,336,797
<u>Rate Base Calculation:</u>						
28	Cumulative Incremental Capital Included in Rate Base	Line 11	\$44,523,622	\$44,523,622	\$44,523,622	\$44,523,622
29	Accumulated Depreciation	-Line 20	(\$821,237)	(\$1,064,233)	(\$2,463,711)	(\$4,106,186)
30	Deferred Tax Reserve	-Line 27	(\$4,993,537)	(\$5,079,472)	(\$381,515)	(\$1,336,797)
31	Year End Rate Base before Deferred Tax Proration	Sum of Lines 28 through 30	\$38,708,848	\$38,379,917	\$41,678,395	\$39,080,640
<u>Revenue Requirement Calculation:</u>						
32	Average Rate Base before Deferred Tax Proration Adjustment	Year 1 = Current Year, Line 31 * 50%; Then = (Prior Year Line 31 + Current Year Line 31) ÷ 2	\$19,354,424	\$40,193,622	\$40,193,622	\$40,379,518
33	Proration Adjustment	Page 19 of 36, Line 41	\$13,239	\$20,064	\$20,064	\$41,003
34	Average ISR Rate Base after Deferred Tax Proration	Line 33 + Line 34	\$19,367,663	\$40,213,686	\$40,213,686	\$40,420,521
35	Pre-Tax ROR	Page 34 of 36, Line 35	8.23%	8.23%	8.23%	8.23%
36	Proration	Line 14	2/	14.79%	85.21%	
37	Return and Taxes	Col (a) and (d): L 34 * L 35; Cols (b) through (c): L 34 * L 35 * L 36	\$1,593,959	\$489,637	\$2,819,949	\$3,326,609
38	Book Depreciation	Line 19	\$821,237	\$242,996	\$1,399,478	\$1,642,474
39	Annual Revenue Requirement	Line 37 + Line 38	\$2,415,196	\$732,634	\$4,219,427	\$4,969,083

1/ 3.16% = Composite Book Depreciation Rate for ISR plant per RIPUC Docket No. 4770 (Page 28 of 36, Line 3, Col (e))

2/ Columns (b) and (c) represent the 12 months within fiscal year 2023, but activity is separated to accommodate the impacts of the acquisition as described in note 3.

3/ National Grid and PPL Corporation ("PPL") elected to treat PPL's acquisition of The Narragansett Electric Company ("NECO") from National Grid on May 25, 2022 as an asset sale for U.S. federal income tax purposes under Internal Revenue Code Section 338(h)(10). As a result of this election, PPL was deemed to acquire the assets of NECO at fair market value (essentially equivalent to book value) for tax purposes. The resulting "step-up" in tax basis eliminates most book/tax timing differences and the related accumulated net deferred income tax liabilities as of the acquisition date, at which time PPL will reset the book/tax timing difference as if PPL purchased a new asset in the year of acquisition and will begin depreciating the new tax basis. Book cost, book accumulated depreciation and book depreciation continue as if the acquisition never took place.

4/ Columns (b) and (c) takes the average of the "Year End Rate Base before Deferred Tax Proration" at the beginning of the fiscal year on Line 31, Column (a) and the end of the fiscal year on Line 31, Column (c). See note 2.

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2024 Electric Infrastructure, Safety, and Reliability (ISR) Plan Reconciliation
Calculation of Tax Depreciation and Repairs Deduction on FY 2022 Incremental Capital Investments**

Line No.			Fiscal Year 2022 (a)	(b)	(c)	(d)	(e)	(f)
	<u>Capital Repairs Deduction</u>			20 Year MACRS Depreciation				
1	Plant Additions	Page 17 of 36, Line 3	\$86,830,038					
2	Capital Repairs Deduction Rate	Per Tax Department	1/ 29.67%					
3	Capital Repairs Deduction	Line 1 * Line 2	\$25,762,472	NG MACRS basis:				
4								
5	<u>Bonus Depreciation</u>			Fiscal Year				
6	Plant Additions	Line 1	\$86,830,038					
7	Plant Additions		\$0	Prorated				
8	Less Capital Repairs Deduction	Line 3	\$25,762,472					
9	Plant Additions Net of Capital Repairs Deduction	Line 6 + Line 7 - Line 8	\$61,067,566	FY Mar-2022				
10	Percent of Plant Eligible for Bonus Depreciation	Per Tax Department	0.00%					
11	Plant Eligible for Bonus Depreciation	Line 9 * Line 10	\$0	FY Mar-2023 (Apr-May 2022)				
12	Bonus Depreciation Rate	at 0%	0.00%					
13	Total Bonus Depreciation Rate	Line 12	0.00%	1.068%				
14	Bonus Depreciation	Line 11 * Line 13	\$0					
15				PPL Acquisition - May 25, 2022				
16	<u>Remaining Tax Depreciation</u>							
17	Plant Additions	Line 1	\$86,830,038	Book Cost				
18	Less Capital Repairs Deduction	Line 3	\$25,762,472					
19	Less Bonus Depreciation	Line 14	\$0	Line 1, Column (a)				
20	Remaining Plant Additions Subject to 20 YR MACRS Tax	Line 17 - Line 18 - Line 19	\$61,067,566					
21	Depreciation	Per IRS Publication 946	3.750%	Cumulative Book Depreciation				
22	20 YR MACRS Tax Depreciation Rates	Line 20 * Line 21	\$2,290,034					
23	Remaining Tax Depreciation			PPL MACRS basis:				
24	FY22 (Gain)/Loss incurred due to retirements	Per Tax Department	2/ \$6,103,955					
25	Cost of Removal	Page 17 of 36, Line 10	\$7,600,505	Line 10(e) + Line 11(e)				
26								
27	Total Tax Depreciation and Repairs Deduction	Sum of Lines 3, 14, 22, 24, and 25	\$41,756,966	FY Mar-2023 (Jun-Mar 2023)				
28								
29				Mar-2024				
30								
31				Mar-2025				
32								
33				Mar-2026				
34								
35				Mar-2027				
36								
				Mar-2028				
				Mar-2029				
				Mar-2030				
				Mar-2031				
				Mar-2032				
				Mar-2033				
				Mar-2034				
				Mar-2035				
				Mar-2036				
				Mar-2037				
				Mar-2038				
				Mar-2039				
				Mar-2040				
				Mar-2041				
				Mar-2042				
				Mar-2043				
				2.231%				
				100.000%				

1/ Per Tax Department

2/ Per Tax Department

Column (d), Line 7 = MACRS Rate 7.219% / 365 days x 54 days

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2024 Electric Infrastructure, Safety, and Reliability (ISR) Plan Reconciliation
Calculation of Net Deferred Tax Reserve Proration on FY 2022 Incremental Capital Investment**

Line No.	Deferred Tax Subject to Proration		FY22 (a)	FY23 (b)	FY24 (c)	FY25 (d)
1	Book Depreciation	See the corresponding Fiscal Year on Page 17 of 36, Line 19. Note there are 2 columns to sum for FY23.	\$821,237	\$1,642,474	\$1,642,474	\$1,642,474
2	Bonus Depreciation	Page 14 of 36, Line 20	\$0	\$0	\$0	\$0
3	Remaining MACRS Tax Depreciation	Col (a): - Page 18 of 36, Line 22, column (a), thereafter, see the corresponding Fiscal Year on Page 17 of 36, Line 16. Note there are 2 columns to sum for FY23.	(\$2,290,034)	(\$3,868,429)	(\$6,191,433)	(\$5,726,583)
4	FY 2022 tax (gain)/loss on retirements	- Page 18 of 36, Line 24				
5	Cumulative Book / Tax Timer	Sum of Lines 1 through 4	(\$1,468,797)	(\$2,225,955)	(\$4,548,959)	(\$4,084,109)
6	Effective Tax Rate	21.00%	21.00%	21.00%	21.00%	21.00%
7	Deferred Tax Reserve	Line 5 * Line 6	(\$308,447)	(\$467,451)	(\$955,281)	(\$857,663)
Deferred Tax Not Subject to Proration						
8	Capital Repairs Deduction	- Page 18 of 36, Line 3	(\$25,762,472)			
9	Cost of Removal	- Page 18 of 36, Line 25	(\$7,600,505)			
10	Book/Tax Depreciation Timing Difference at 3/31/2022					
11	Cumulative Book / Tax Timer	Line 8 + Line 9 + Line 10	(\$33,362,977)	\$0	\$0	\$0
12	Effective Tax Rate	21.00%	21.00%	21.00%	21.00%	21.00%
13	Deferred Tax Reserve	Line 11 * Line 12	(\$7,006,225)	\$0	\$0	\$0
14	Total Deferred Tax Reserve	Line 7 + Line 13	(\$7,314,672)	(\$467,451)	(\$955,281)	(\$857,663)
15	Net Operating Loss	Page 17 of 36, Line 26	\$0	\$0	\$0	\$0
16	Net Deferred Tax Reserve	Line 14 + Line 15	(\$7,314,672)	(\$467,451)	(\$955,281)	(\$857,663)
Allocation of FY 2022 Estimated Federal NOL						
17	Cumulative Book/Tax Timer Subject to Proration	Col (b) = Line 5	(\$1,468,797)	(\$2,225,955)	(\$4,548,959)	(\$4,084,109)
18	Cumulative Book/Tax Timer Not Subject to Proration	Line 11	(\$33,362,977)	\$0	\$0	\$0
19	Total Cumulative Book/Tax Timer	Line 17 + Line 18	(\$34,831,773)	(\$2,225,955)	(\$4,548,959)	(\$4,084,109)
20	Total FY 2022 Federal NOL (Utilization)	- Page 17 of 36, Line 26 / 21%	\$0	\$0	\$0	\$0
21	Allocated FY 2022 Federal NOL Not Subject to Proration	(Line 18 / Line 19) * Line 20	\$0	\$0	\$0	\$0
22	Allocated FY 2022 Federal NOL Subject to Proration	(Line 17 / Line 19) * Line 20	\$0	\$0	\$0	\$0
23	Effective Tax Rate	21%	21%	21%	21%	21%
24	Deferred Tax Benefit subject to proration	Line 22 * Line 23	\$0	\$0	\$0	\$0
25	Net Deferred Tax Reserve subject to proration	Line 7 + Line 24	(\$308,447)	(\$467,451)	(\$955,281)	(\$857,663)
		(e) (f)	(g)	(h)	(i)	(j)
Proration Calculation		Number of Days in Month Proration Percentage	FY22	FY23	FY24	FY25
26	April	30 91.78%	(\$23,591)	(\$35,752)	(\$73,064)	(\$65,597)
27	May	31 83.29%	(\$21,408)	(\$32,444)	(\$66,303)	(\$59,527)
28	June	30 75.07%	(\$19,296)	(\$29,242)	(\$59,760)	(\$53,653)
29	July	31 66.58%	(\$17,112)	(\$25,934)	(\$52,998)	(\$47,583)
30	August	31 58.08%	(\$14,929)	(\$22,625)	(\$46,237)	(\$41,512)
31	September	30 49.86%	(\$12,817)	(\$19,424)	(\$39,694)	(\$35,638)
32	October	31 41.37%	(\$10,634)	(\$16,115)	(\$32,933)	(\$29,568)
33	November	30 33.15%	(\$8,521)	(\$12,914)	(\$26,390)	(\$23,693)
34	December	31 24.66%	(\$6,338)	(\$9,605)	(\$19,629)	(\$17,623)
35	January	31 16.16%	(\$4,155)	(\$6,297)	(\$12,868)	(\$11,553)
36	February	28 8.49%	(\$2,183)	(\$3,308)	(\$6,761)	(\$6,070)
37	March	31 0.00%	\$0	\$0	\$0	\$0
38	Total	365	(\$140,984)	(\$213,661)	(\$436,638)	(\$392,018)
39	Deferred Tax Without Proration	Line 25	(\$308,447)	(\$467,451)	(\$955,281)	(\$857,663)
40	Average Deferred Tax without Proration	Line 39 × 0.5	(\$154,224)	(\$233,725)	(\$477,641)	(\$428,831)
41	Proration Adjustment	Line 38 - Line 40	\$13,239	\$20,064	\$41,003	\$36,813

Column Notes:

(f) Sum of remaining days in the year (Col (e)) ÷ 365
(g) through (h) Current Year Line 25 ÷ 12 × Current Month Col (f)

**The Narragansett Electric Company
d/b/a Rhode Island Energy
Electric Infrastructure, Safety, and Reliability (ISR) Plan
Fiscal Year 2024 Revenue Requirement on FY 2023 Actual Incremental Capital Investment**

Line No.			4/1/22 - 5/24/2022 2023 (a)	5/25/22 - 3/31/23 2023 (b)	Fiscal Year 2024 (c)
<u>Capital Investment Allowance</u>					
1	Non-Discretionary Capital	Docket 5209, P 33 of 33, Line 1	2/	\$6,166,640	\$35,515,280
2	Discretionary Capital Lesser of Actual Cumulative Non-Discretionary Capital Additions or Spending, or Approved Spending (non-intangible)	Docket 5209, P 33 of 33, Line 13	2/	\$7,632,024	\$43,954,804
3	Total Allowed Capital Included in Rate Base (non-intangible)	Sum of Lines 1 through 2		\$13,798,664	\$79,470,084
<u>Depreciable Net Capital Included in Rate Base</u>					
4	Total Allowed Capital Included in Rate Base in Current Year	Line 3		\$13,798,664	\$79,470,084
5	Retirements	Company's Record	2/	\$2,633,153	\$15,165,012
6	Net Depreciable Capital Included in Rate Base	Year 1 = Line 4 - Line 5; Then = Prior Year Line 6		\$11,165,511	\$64,305,072
<u>Change in Net Capital Included in Rate Base</u>					
7	Capital Included in Rate Base	Line 3		\$13,798,664	\$79,470,084
8	Depreciation Expense	Page 30 of 36, Line 62, Col (d)	2/	\$7,383,490	\$42,523,431
9	Incremental Capital Amount	Year 1 = Line 7 - Line 8; Then = Prior Year Line 9		\$6,415,174	\$36,946,653
10	Cost of Removal	Company's Record	2/	\$1,142,377	\$6,579,244
11	Total Net Plant in Service	Line 9 + Line 10		\$7,557,551	\$43,525,897
<u>Deferred Tax Calculation:</u>					
12	Composite Book Depreciation Rate	Page 28 of 36, Line 3, Col (c)	1/	3.16%	3.16%
13	Proration Percentage				
14	Vintage Year Tax Depreciation:				
15	Tax Depreciation and Year 1 Basis Adjustments	Col (a) = Page 21 of 36, Column (a), Line 27; Col (b) = Page 21 of 36, Col (b), Lines 18,24,25 + Col (c), Line 15, Then remaining years from Page 21 of 36, Col (c)		\$6,181,052	\$36,109,117
16	Cumulative Tax Depreciation-NG	Col (a) = Line 15; then 0	3/	\$6,181,052	
17	Cumulative Tax Depreciation-PPL	Col (b) = Line 15; then = Prior Year Line 17 + Current Year Line 15	3/		\$36,109,117
18	Book Depreciation	Year 1 (Columns (a) and (b)) = Line 6 * Line 12 * 50%; Then = Line 6 * Line 12		\$176,415	\$1,016,020
19	Cumulative Book Depreciation	Year 1 = Line 18; then = Prior Year Line 19 + Current Year Line 18		\$176,415	\$1,192,435
20	Book / Tax Timer	Line 15 - Line 18		\$6,004,637	\$35,093,097
21	Cumulative Book / Tax Timer -NG	Col (a) = Line 20, Column (a), Then = 0	3/	\$6,004,637	
22	Cumulative Book / Tax Timer - PPL	Col (a) = 0; Col (b) = Line 20, Column (b); then = Prior Year Line 22 + Current Year Line 20	3/		\$35,093,097
23	Cumulative Book / Tax Timer - Total	Line 21 + Line 22		\$6,004,637	\$35,093,097
24	Effective Tax Rate			21.00%	21.00%
25	Deferred Tax Reserve	Line 23 * Line 24		\$1,260,974	\$7,369,550
26	Add: FY 2023 Federal NOL (Generation) / Utilization	Page 26 of 36, Line 13, Col (f)	3/	\$23,627,830	\$7,369,550
27	Net Deferred Tax Reserve before Proration Adjustment	Sum of Lines 25 through 26		\$24,888,804	\$8,035,914
<u>Rate Base Calculation:</u>					
28	Cumulative Incremental Capital Included in Rate Base	Line 11		\$7,557,551	\$43,525,897
29	Accumulated Depreciation	Year 1 (Cols (a) and (b)) = -Line 18; Then = -Line 19		(\$176,415)	(\$1,016,020)
30	Deferred Tax Reserve	-Line 27		(\$24,888,804)	(\$7,369,550)
31	Year End Rate Base before Deferred Tax Proration	Sum of Lines 28 through 30		(\$17,507,668)	\$35,140,327
<u>Revenue Requirement Calculation:</u>					
32	Average Rate Base before Deferred Tax Proration Adjustment	Year 1 (Cols (a) and (b)) = Current Year, Line 31 * 50%; Then = (Prior Year Line 31 + Current Year Line 31) ÷ 2	4/	(\$8,753,834)	\$17,570,163
33	Proration Adjustment	Page 22 of 36, Line 41	2/	\$120,555	\$33,147
34	Average ISR Rate Base after Deferred Tax Proration	Line 32 + Line 33		(\$8,633,279)	\$17,603,310
35	Pre-Tax ROR	Page 34 of 36, Line 35		8.23%	8.23%
36	Proration	Line 13			
37	Return and Taxes	Line 34 x Line 35		(\$710,519)	\$1,448,752
38	Book Depreciation	Line 18		\$176,415	\$1,016,020
39	Annual Revenue Requirement	Line 37 + Line 38		(\$534,104)	\$2,464,773
Sum of Columns (a) and (b) equal Docket No. 5209 FY 2023 Electric ISR Reconciliation, Page 1, Line 10(b) or Page 20, Line 39(a) and 39(b)					
40				\$390,169	\$2,436,254
41	2023 Tax True-Up including impact on DG Adjustments made through FY 2023 reconciliation filing			(\$924,273)	\$28,519
42	FY 2023 Tax True-up as reflected on Line 46			(\$926,258)	\$17,115
43	FY 2023 DG Adjustment as reflected on Page 36, Column c, Line 22	Line 41 - Line 42		\$1,985	\$11,404
Check:					
44	FY 2023 revenue requirement from Line 40 after tax adjustments			(\$536,088)	\$2,453,369
45	FY 2023 revenue requirement from Line 40 before tax adjustments			\$390,169	\$2,436,254
46	FY 2023 Tax True-up			(\$926,258)	\$17,115

1/ 3.16% = Composite Book Depreciation Rate for ISR plant per RIPUC Docket No. 4770 (Page 28 of 36, Line 3, Col (c))

2/ Columns (a) and (b) represent the 12 months within fiscal year 2023, but activity is separated to accommodate the impacts of the acquisition as described in note 3.

3/ National Grid and PPL Corporation ("PPL") elected to treat PPL's acquisition of The Narragansett Electric Company ("NECO") from National Grid on May 25, 2022 as an asset sale for U.S. federal income tax purposes under Internal Revenue Code Section 338(h)(10). As a result of this election, PPL was deemed to acquire the assets of NECO at fair market value (essentially equivalent to book value) for tax purposes. The resulting "step-up" in tax basis eliminates most book/tax timing differences and the related accumulated net deferred income tax liabilities as of the acquisition date, at which time PPL will reset the book/tax timing difference as if PPL purchased a new asset in the year of acquisition and will begin depreciating the new tax basis. Book cost, book accumulated depreciation and book depreciation continue as if the acquisition never took place.

4/ Column (c) takes the average of the "Year End Rate Base before Deferred Tax Proration" at the beginning of the fiscal year on Line 32, Columns (a) and (b) and the end of the fiscal year on Line 30, Column (c). See note 2.

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2024 Electric Infrastructure, Safety, and Reliability (ISR) Plan Reconciliation
Calculation of Tax Depreciation and Repairs Deduction on FY 2023-NG Incremental Capital Investments

Line No.			NG	PPL	(c)	(d)	(e)	(f)
			Apr 1-May 24, 2022	May 25-Mar 31, 2023				
			Fiscal Year 2023 (a)	Fiscal Year 2023 (b)				
	<u>Capital Repairs Deduction</u>							
		Page 20 of 36, Line 3, Columns (a) through (c)						
1	Plant Additions		\$13,798,664	\$79,470,084				
2	Capital Repairs Deduction Rate	Per Tax Department 1/	20.26%	20.26%				
3	Capital Repairs Deduction	Line 1 * Line 2	\$2,795,609	\$16,100,639				
4								
5	<u>Bonus Depreciation</u>							
6	Plant Additions	Line 1	\$13,798,664	\$79,470,084				
7	Plant Additions		\$0	\$0				
8	Less Capital Repairs Deduction	Line 3	\$2,795,609	\$16,100,639				
9	Plant Additions Net of Capital Repairs Deduction	Line 6 + Line 7 - Line 8	\$11,003,055	\$63,369,445				
10	Percent of Plant Eligible for Bonus Depreciation	Per Tax Department	0.00%	0.00%				
11	Plant Eligible for Bonus Depreciation	Line 9 * Line 10	\$0	\$0				
12	Bonus Depreciation Rate	at 0%	0.00%	0.00%				
13	Total Bonus Depreciation Rate	Line 12	0.00%	0.00%				
14	Bonus Depreciation	Line 11 * Line 13	\$0	\$0				
15								
16	<u>Remaining Tax Depreciation</u>							
17	Plant Additions	Line 1	\$13,798,664	\$79,470,084				
18	Less Capital Repairs Deduction	Line 3	\$2,795,609	\$16,100,639				
19	Less Bonus Depreciation	Line 14	\$0	\$0				
20	Remaining Plant Additions Subject to 20 YR MACRS Tax Depreciation	Line 17 - Line 18 - Line 19	\$11,003,055	\$63,369,445				
21	20 YR MACRS Tax Depreciation Rates	Per IRS Publication 946	3.750%	3.750%				
22	Remaining Tax Depreciation	Line 20 * Line 21	\$412,615	\$2,376,354				
23								
24	FY23 (Gain)/Loss incurred due to retirements	Per Tax Department 2/	\$1,830,452	\$10,542,045				
25	Cost of Removal	Page 20 of 36, Line 10	\$1,142,377	\$6,579,244				
26								
27	Total Tax Depreciation and Repairs Deduction	Sum of Lines 3, 14, 22, 24, and 25	\$6,181,052	\$35,598,283				
28								
29	<u>Reconciliation of MACRS Tax Depreciation:</u>							
30	Apr 1 -May 24, 2022 Plant Additions	Line 1, Column (a)		\$13,798,664				
31	Cumulative Book Depreciation through May 24, 2022	Page 20 of 36, Line 18, Col (a)		(\$176,415)				
32	2023 Plant Additions (Net Book) through Acquisition	Line 30 + Line 31		\$13,622,249				
33	20 YR MACRS Tax Depreciation Rates	Per IRS Publication 946		3.750%				
34	Tax Depreciation	Line 32 * Line 33		\$510,833				
35								
36	MACRS Basis in May 25-Mar 2023 Plant Additions	Line 20, Column (b)		\$63,369,445				
37	20 YR MACRS Tax Depreciation Rates	Per IRS Publication 946		3.750%				
38	Tax Depreciation	Line 36 * Line 37		\$2,376,353				
39								
40	Total MACRS Tax Depreciation	Sum of Lines 34, 38, Column (b)		\$2,887,187				
41								

20 Year MACRS Depreciation			
MACRS basis:	Line 20, Column (a)	\$11,003,055	
Fiscal Year		Annual MACRS	Cumulative Tax Depr
FY Mar-2023 (Apr-May 2022)	3.750%	\$412,615	\$6,181,052
PPL Acquisition - May 25, 2022			
Book Cost	Line 1, Column (a)	\$13,798,664	
Cumulative Book Depreciation	- Page 20 of 36, Line 18, Col (a)	(\$176,415)	
MACRS basis from Acquisition:	Line 9(e) + Line 10(e)	\$13,622,249	
MACRS basis (Jun-Mar 2023)	Line 20, Column (b)	\$63,369,445	
Total MACRS Basis in 2022	Line 11(e) + Line 12(e)	\$76,991,694	
FY Mar-2023 (Jun-Mar 2023)	3.750%	\$2,887,189	\$36,109,117
Mar 2024	7.219%	\$5,558,030	\$41,667,147
Mar 2025	6.677%	\$5,140,735	\$46,807,883
Mar 2026	6.177%	\$4,755,777	\$51,563,660
Mar 2027	5.713%	\$4,398,535	\$55,962,195
Mar 2028	5.285%	\$4,069,011	\$60,031,206
Mar 2029	4.888%	\$3,763,354	\$63,794,560
Mar 2030	4.522%	\$3,481,564	\$67,276,125
Mar 2031	4.462%	\$3,435,369	\$70,711,494
Mar 2032	4.461%	\$3,434,599	\$74,146,094
Mar 2033	4.462%	\$3,435,369	\$77,581,463
Mar 2034	4.461%	\$3,434,599	\$81,016,062
Mar 2035	4.462%	\$3,435,369	\$84,451,432
Mar 2036	4.461%	\$3,434,599	\$87,886,031
Mar 2037	4.462%	\$3,435,369	\$91,321,401
Mar 2038	4.461%	\$3,434,599	\$94,756,000
Mar 2039	4.462%	\$3,435,369	\$98,191,370
Mar 2040	4.461%	\$3,434,599	\$101,625,969
Mar 2041	4.462%	\$3,435,369	\$105,061,338
Mar 2042	4.461%	\$3,434,599	\$108,495,938
Mar 2043	2.231%	\$1,717,685	\$110,213,623
	100.00%	\$76,991,694	

- 1/ Capital Repairs percentage is based on the actual results of National Grid's short period FY2023 tax return and PPL's short period CY2022 tax return, which covers the period from April 2022 through December 2022.
- 2/ When PPL files its calendar year 2023 consolidated tax return in October of 2024, the tax repairs percentage will be updated to reflect the January through March 2023 actual tax repairs.
- 3/ FY 2023 tax loss on retirements is based on actual tax losses from April through December 2022. When PPL files its calendar year 2023 consolidated tax return in October of 2024, a portion of the tax gain/loss on retirements will be allocated to the January through March 2023 period to finalize this fiscal year.

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2024 Electric Infrastructure, Safety, and Reliability (ISR) Plan Reconciliation
Calculation of Net Deferred Tax Reserve Proration on FY 2023 Incremental Capital Investment

			NG	PPL		
			4/1/22 - 5/24/2022	5/25/22 - 3/31/23		
Line No.	Deferred Tax Subject to Proration		FY23	FY23	FY24	FY25
			(a)	(b)	(c)	(d)
1	Book Depreciation	See the corresponding Fiscal Year on Page 20 of 36, Line 18	\$176,415	\$1,016,020	\$2,384,870	\$2,384,870
2	Bonus Depreciation	- Page 21 of 36, Line 14	\$0	\$0	\$0	\$0
3	Remaining MACRS Tax Depreciation	- Page 21 of 36, column (e), Lines 6,18,19,20	(\$412,615)	(\$2,887,189)	(\$5,558,030)	(\$5,140,735)
4	FY 2023 tax (gain)/loss on retirements	- Page 21 of 36, Line 24	(\$1,830,452)	(\$10,542,045)		
5	Cumulative Book / Tax Timer	Sum of Lines 1 through 4	(\$2,066,651)	(\$12,413,214)	(\$3,173,160)	(\$2,755,865)
6	Effective Tax Rate		21.00%	21.00%	21.00%	21.00%
7	Deferred Tax Reserve	Line 5 * Line 6	(\$433,997)	(\$2,606,775)	(\$666,364)	(\$578,732)
Deferred Tax Not Subject to Proration						
8	Capital Repairs Deduction	- Page 21 of 36, Line 3	(\$2,795,609)	(\$16,100,639)		
9	Cost of Removal	- Page 21 of 36, Line 25	(\$1,142,377)	(\$6,579,244)		
10	Book/Tax Depreciation Timing Difference at 3/31/2023					
11	Cumulative Book / Tax Timer	Line 8 + Line 9 + Line 10	(\$3,937,986)	(\$22,679,883)	\$0	\$0
12	Effective Tax Rate		21.00%	21.00%	21.00%	21.00%
13	Deferred Tax Reserve	Line 11 * Line 12	(\$826,977)	(\$4,762,775)	\$0	\$0
14	Total Deferred Tax Reserve	Line 7 + Line 13	(\$1,260,974)	(\$7,369,550)	(\$666,364)	(\$578,732)
15	Net Operating Loss	- Page 20 of 36, Line 26	\$0	\$0	\$0	\$0
16	Net Deferred Tax Reserve	Line 14 + Line 15	(\$1,260,974)	(\$7,369,550)	(\$666,364)	(\$578,732)
Allocation of FY 2023 Estimated Federal NOL						
17	Cumulative Book/Tax Timer Subject to Proration	Col (b) = Line 5	(\$2,066,651)	(\$12,413,214)	(\$3,173,160)	(\$2,755,865)
18	Cumulative Book/Tax Timer Not Subject to Proration	Line 11	(\$3,937,986)	(\$22,679,883)	\$0	\$0
19	Total Cumulative Book/Tax Timer	Line 17 + Line 18	(\$6,004,637)	(\$35,093,097)	(\$3,173,160)	(\$2,755,865)
20	Total FY 2023 Federal NOL (Utilization)	- Page 20 of 36, Line 26 / 21%	\$0	\$0	\$0	\$0
21	Allocated FY 2023 Federal NOL Not Subject to Proration	(Line 18 / Line 19) * Line 20	\$0	\$0	\$0	\$0
22	Allocated FY 2023 Federal NOL Subject to Proration	(Line 17 / Line 19) * Line 20	\$0	\$0	\$0	\$0
23	Effective Tax Rate		21%	21%	21%	21%
24	Deferred Tax Benefit subject to proration	Line 22 * Line 23	\$0	\$0	\$0	\$0
25	Net Deferred Tax Reserve subject to proration	Line 7 + Line 24	(\$433,997)	(\$2,606,775)	(\$666,364)	(\$578,732)
			(g)	(h)	(i)	(j)
Proration Calculation						
			<u>Number of Days in</u>	<u>Proration</u>		
			<u>Month</u>	<u>Percentage</u>	<u>FY23</u>	<u>FY23</u>
26	April	30	91.78%	(\$96,444)		(\$50,966)
27	May	31	83.29%	\$0	(\$231,646)	(\$46,250)
28	June	30	75.07%		(\$208,786)	(\$41,686)
29	July	31	66.58%		(\$185,164)	(\$36,969)
30	August	31	58.08%		(\$161,542)	(\$32,253)
31	September	30	49.86%		(\$138,683)	(\$27,689)
32	October	31	41.37%		(\$115,061)	(\$22,973)
33	November	30	33.15%		(\$92,201)	(\$18,409)
34	December	31	24.66%		(\$68,579)	(\$13,692)
35	January	31	16.16%		(\$44,958)	(\$8,976)
36	February	28	8.49%		(\$23,622)	(\$4,716)
37	March	31	0.00%		\$0	\$0
38	Total	365		(\$96,444)	(\$1,270,241)	(\$304,580)
39	Deferred Tax Without Proration	Line 25	(\$433,997)	(\$2,606,775)	(\$666,364)	(\$578,732)
40	Average Deferred Tax without Proration	Line 39 × 0.5	(\$216,998)	(\$1,303,387)	(\$333,182)	(\$289,366)
41	Proration Adjustment	Line 38 - Line 40	\$120,555	\$33,147	\$28,602	\$24,841

Column Notes:

(f) Sum of remaining days in the year (Col (e)) ÷ 365
(g) through (j) Current Year Line 25 ÷ 12 × Current Month Col (f)

**The Narragansett Electric Company
d/b/a Rhode Island Energy
Electric Infrastructure, Safety, and Reliability (ISR) Plan
Fiscal Year 2024 Revenue Requirement on FY 2024 Actual Incremental Capital Investment**

Line No.			Fiscal Year <u>2024</u> (a)
	<u>Capital Investment Allowance</u>		
1	Non-Discretionary Capital	P 35 of 36. Line 1	\$45,486,999
2	Discretionary Capital Lesser of Actual Cumulative Non-Discretionary Capital Additions or Spending, or Approved Spending (non-intangible)	P 35 of 36. Line 13	<u>\$51,836,809</u>
3	Total Allowed Capital Included in Rate Base (non-intangible)	Sum of Lines 1 through 2	\$97,323,808
	<u>Depreciable Net Capital Included in Rate Base</u>		
4	Total Allowed Capital Included in Rate Base in Current Year	Line 3	\$97,323,808
5	Retirements	Company's Record	<u>\$20,913,590</u>
6	Net Depreciable Capital Included in Rate Base	Year 1 = Line 4 - Line 5; Then = Prior Year Line 6	<u>\$76,410,218</u>
	<u>Change in Net Capital Included in Rate Base</u>		
7	Capital Included in Rate Base	Line 3	\$97,323,808
8	Depreciation Expense	Page 30 of 36, Line 62, Col (d)	<u>\$49,906,920</u>
9	Incremental Capital Amount	Year 1 = Line 7 - Line 8; Then = Prior Year Line 9	<u>\$47,416,888</u>
10	Cost of Removal	Company's Record	\$9,267,248
11	Total Net Plant in Service	Line 9 + Line 10	<u>\$56,684,136</u>
	<u>Deferred Tax Calculation:</u>		
12	Composite Book Depreciation Rate	Page 28 of 36, Line 3, Col (e)	1/ 3.16%
13	Proration Percentage		
14	Vintage Year Tax Depreciation:		
15	Tax Depreciation and Year 1 Basis Adjustments	Year 1 = Page 24 of 36, Line 27, Column (a), Then = Line Page 24 of 36, Column (d)	\$72,624,283
16	Cumulative Tax Depreciation	Prior Year Line 15 + Current Year Line 14	\$72,624,283
17	Book Depreciation	year 1 = Line 6 * Line 12 * 50% ; Then = Line 6 * Line 12	\$1,207,281
18	Cumulative Book Depreciation	Prior Year Line 17 + Current Year Line 16	\$1,207,281
19	Cumulative Book / Tax Timer	Line 16 - Line 18	\$71,417,002
20	Effective Tax Rate		21.00%
21	Deferred Tax Reserve	Line 19 * Line 20	\$14,997,570
22	Add: CY 2024 Federal NOL (Generation) / Utilization	Company's Record	\$0
23	Net Deferred Tax Reserve before Proration Adjustment	Sum of Lines 21 through 22	<u>\$14,997,570</u>
	<u>Rate Base Calculation:</u>		
24	Cumulative Incremental Capital Included in Rate Base	Line 11	\$56,684,136
25	Accumulated Depreciation	-Line 18	(\$1,207,281)
26	Deferred Tax Reserve	-Line 23	(\$14,997,570)
27	Year End Rate Base before Deferred Tax Proration	Sum of Lines 24 through 26	<u>\$40,479,284</u>
	<u>Revenue Requirement Calculation:</u>		
28	Average Rate Base before Deferred Tax Proration Adjustment	Year 1 = Current Year, Line 27 * 50%; Then = (Prior Year Line 27 + Current Year Line 27) ÷ 2	\$20,239,642
29	Proration Adjustment	Page 25 of 36, Line 41	<u>\$168,684</u>
30	Average ISR Rate Base after Deferred Tax Proration	Line 29 + Line 30	\$20,408,325
31	Pre-Tax ROR	Page 34 of 36, Line 33	<u>8.23%</u>
32	Proration	Line 13	100.00%
33	Return and Taxes	Year 1 = Lines 30 * 31 * 32	\$1,679,605
34	Book Depreciation	Line 17	\$1,207,281
35	Annual Revenue Requirement	Line 33 + Line 34	<u>\$2,886,887</u>

1/ 3.16% = Composite Book Depreciation Rate for ISR plant per RIPUC Docket No. 4770 (Page 28 of 36, Line 3, Col (e))

**The Narragansett Electric Company
d/b/a National Grid
Electric Infrastructure, Safety, and Reliability (ISR) Plan
Calculation of Tax Depreciation and Repairs Deduction on FY 2024 Incremental Capital Investments**

Line No.			Fiscal Year 2024 (a)	(b)	(c)	(d)	(e)
	<u>Capital Repairs Deduction</u>						
1	Plant Additions	Page 23 of 36, Line 3	\$97,323,808	20 Year MACRS Depreciation			
2	Capital Repairs Deduction Rate	Per Tax Department 1/	44.63%				
3	Capital Repairs Deduction	Line 1 * Line 2	\$43,435,616				
4				MACRS basis:	Line 20	\$53,888,192	
5	<u>Bonus Depreciation</u>				Annual		Cumulative
6	Plant Additions	Line 1	\$97,323,808	Calendar Year			
7	Plant Additions		\$0	Mar-2024	3.750%	\$2,020,807	\$72,624,283
8	Less Capital Repairs Deduction	Line 3	\$43,435,616	Mar-2025	7.219%	\$3,890,189	\$76,514,472
9	Plant Additions Net of Capital Repairs Deduction	Line 6 + Line 7 - Line 8	\$53,888,192	Mar-2026	6.677%	\$3,598,115	\$80,112,586
10	Percent of Plant Eligible for Bonus Depreciation	Per Tax Department	0.00%	Mar-2027	6.177%	\$3,328,674	\$83,441,260
11	Plant Eligible for Bonus Depreciation	Line 9 * Line 10	\$0	Mar-2028	5.713%	\$3,078,632	\$86,519,892
12	Bonus Depreciation Rate	at 0%	0.00%	Mar-2029	5.285%	\$2,847,991	\$89,367,883
13	Total Bonus Depreciation Rate	Line 12	0.00%	Mar-2030	4.888%	\$2,634,055	\$92,001,938
14	Bonus Depreciation	Line 11 * Line 13	\$0	Mar-2031	4.522%	\$2,436,824	\$94,438,762
15				Mar-2032	4.462%	\$2,404,491	\$96,843,253
16	<u>Remaining Tax Depreciation</u>			Mar-2033	4.461%	\$2,403,952	\$99,247,205
17	Plant Additions	Line 1	\$97,323,808	Mar-2034	4.462%	\$2,404,491	\$101,651,697
18	Less Capital Repairs Deduction	Line 3	\$43,435,616	Mar-2035	4.461%	\$2,403,952	\$104,055,649
19	Less Bonus Depreciation	Line 14	\$0	Mar-2036	4.462%	\$2,404,491	\$106,460,140
	Remaining Plant Additions Subject to 20 YR MACRS Tax			Mar-2037	4.461%	\$2,403,952	\$108,864,092
20	Depreciation	Line 17 - Line 18 - Line 19	\$53,888,192	Mar-2038	4.462%	\$2,404,491	\$111,268,583
21	20 YR MACRS Tax Depreciation Rates	Per IRS Publication 946	3.750%	Mar-2039	4.461%	\$2,403,952	\$113,672,535
22	Remaining Tax Depreciation	Line 20 * Line 21	\$2,020,807	Mar-2040	4.462%	\$2,404,491	\$116,077,027
23				Mar-2041	4.461%	\$2,403,952	\$118,480,979
24	FY24 (Gain)/Loss incurred due to retirements	Per Tax Department 2/	\$17,900,612	Mar-2042	4.462%	\$2,404,491	\$120,885,470
25	Cost of Removal	Page 23 of 36, Line 10	\$9,267,248	Mar-2043	4.461%	\$2,403,952	\$123,289,422
26				Mar-2044	2.231%	\$1,202,246	\$124,491,668
27	Total Tax Depreciation and Repairs Deduction	Sum of Lines 3, 14, 22, 24, and 25	\$72,624,283		100.00%	\$53,888,192	

1/ Per Tax Department

2/ Per Tax Department

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2024 Electric Infrastructure, Safety, and Reliability (ISR) Plan Reconciliation
Calculation of Net Deferred Tax Reserve Proration on FY 2024 Incremental Capital Investment**

Line No.			FY24 (a)	FY25 (b)
	Deferred Tax Subject to Proration			
1	Book Depreciation	Page 23 of 36, Line 17	\$1,207,281	\$2,414,563
2	Bonus Depreciation	- Page 24 of 36, Line 14	\$0	
3	Remaining MACRS Tax Depreciation	- Page 24 of 36, column (d), Lines 6 and 7	(\$2,020,807)	(\$3,890,189)
4	Plan Year 2024 tax (gain)/loss on retirements	- Page 24 of 36, Line 24	(\$17,900,612)	
5	Cumulative Book / Tax Timer	Sum of Lines 1 through 4	(\$18,714,138)	(\$1,475,626)
6	Effective Tax Rate	21.00%	21.00%	21.00%
7	Deferred Tax Reserve	Line 5 * Line 6	(\$3,929,969)	(\$309,881)
	Deferred Tax Not Subject to Proration			
8	Capital Repairs Deduction	- Page 24 of 36, Line 3	(\$43,435,616)	
9	Cost of Removal	- Page 24 of 36, Line 25	(\$9,267,248)	
10	Book/Tax Depreciation Timing Difference at 3/31/2024			
11	Cumulative Book / Tax Timer	Line 8 + Line 9 + Line 10	(\$52,702,864)	\$0
12	Effective Tax Rate	21.00%	21.00%	21.00%
13	Deferred Tax Reserve	Line 11 * Line 12	(\$11,067,601)	\$0
14	Total Deferred Tax Reserve	Line 7 + Line 13	(\$14,997,570)	(\$309,881)
15	Net Operating Loss	Page 23 of 36, Line 22	\$0	\$0
16	Net Deferred Tax Reserve	Line 14 + Line 15	(\$14,997,570)	(\$309,881)
	Allocation of Plan Year 2024 Estimated Federal NOL			
17	Cumulative Book/Tax Timer Subject to Proration	Col (b) = Line 5	(\$18,714,138)	(\$1,475,626)
18	Cumulative Book/Tax Timer Not Subject to Proration	Line 11	(\$52,702,864)	\$0
19	Total Cumulative Book/Tax Timer	Line 17 + Line 18	(\$71,417,002)	(\$1,475,626)
20	Total Plan Year 2024 Federal NOL (Utilization)	- Page 23 of 36, Line 22 / 21%	\$0	\$0
21	Allocated Plan Year 2024 Federal NOL Not Subject to Proration	(Line 18 / Line 19) * Line 20	\$0	\$0
22	Allocated Plan Year 2024 Federal NOL Subject to Proration	(Line 17 / Line 19) * Line 20	\$0	\$0
23	Effective Tax Rate	21%	21%	21%
24	Deferred Tax Benefit subject to proration	Line 22 * Line 23	\$0	\$0
25	Net Deferred Tax Reserve subject to proration	Line 7 + Line 24	(\$3,929,969)	(\$309,881)
	Proration Calculation			
		(c) (d) (e) (f)		
		Number of Days in		
		Month	Proration Percentage	
26	April	30	91.78%	(\$300,580) (\$23,701)
27	May	31	83.29%	(\$272,765) (\$21,508)
28	June	30	75.07%	(\$245,847) (\$19,385)
29	July	31	66.58%	(\$218,033) (\$17,192)
30	August	31	58.08%	(\$190,218) (\$14,999)
31	September	30	49.86%	(\$163,300) (\$12,876)
32	October	31	41.37%	(\$135,485) (\$10,683)
33	November	30	33.15%	(\$108,568) (\$8,561)
34	December	31	24.66%	(\$80,753) (\$6,367)
35	January	31	16.16%	(\$52,938) (\$4,174)
36	February	28	8.49%	(\$27,815) (\$2,193)
37	March	31	0.00%	\$0 \$0
38	Total	365		(\$1,796,301) (\$141,640)
39	Deferred Tax Without Proration	Line 25	(\$3,929,969)	(\$309,881)
40	Average Deferred Tax without Proration	Line 39 × 0.5	(\$1,964,984)	(\$154,941)
41	Proration Adjustment	Line 38 - Line 40	\$168,684	\$13,301

Column Notes:

(d) Sum of remaining days in the Apr 1-Dec 31 period (Col (c)) ÷ 275
(e) through (f) Current Year Line 25 ÷ 12 × Current Month Col (d)

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2024 Electric Infrastructure, Safety, and Reliability (ISR) Plan Reconciliation
FY 2018 - 2024 Incremental Capital Investment Summary**

Line No.			Fiscal Year 2018 (a)	Fiscal Year 2019 (b)	Fiscal Year 2020 (c)	Fiscal Year 2021 (d)	Fiscal Year 2022 (e)	Fiscal Year 2023 (f)
<u>Capital Investment</u>								
1	ISR - Eligible Capital Investment	Col (a) = FY 2018 ISR Docket No.4682, Att MAL-1 P2, L3; Col (b)=FY 2019 ISR Docket No.4783, Att PCE-1 P3, Table 1; Col (c)= Section 1 of Att. PCE-1, Table 2	\$91,750,966	\$110,106,650	\$98,494,781	\$115,236,039	\$86,830,038	\$93,268,748
2	Intangible Assest included in Total Allowed Discretionary Capital	Col (a) =0; Col (b) = FY 2019 ISR Docket No. 4783, Att. MAL-1,Page 30 of 38, Line13; Col (c) = Actual per Operation	\$0	\$3,460,626	\$0	\$0	\$0	\$0
3	ISR - Eligible Capital Additions included in Rate Base per RIPUC Docket No. 4770	Docket No. 4770, S. C. Att. 2, Sch 11-ELEC, P5, L1, Col (a) = Col(a)+Col(b); Col(b)=Col(c)+Col(d); Col(c)=Col(e), Col(d)=Col(j)+Col(k)	\$74,843,000	\$74,843,000	\$31,184,583	\$0	\$0	\$0
4	Incremental ISR Capital Investment (non-intangible)	Line 1 - Line 2 - Line 3	\$16,907,966	\$31,803,024	\$67,310,198	\$115,236,039	\$86,830,038	\$93,268,748
<u>Cost of Removal</u>								
5	ISR - Eligible Cost of Removal	Col (a) =FY 2018 ISR Docket No. 4682; Col (b) = FY 2019 ISR Docket No. 4783, Att PCE-1 P3, Table 2, Col (c) = Section 1 of Att. PCE-1, Table 3	\$9,952,716	\$8,209,732	\$14,770,644	\$10,438,210	\$7,686,088	\$7,721,621
6	ISR - Eligible Cost of Removal in Rate Base per RIPUC Docket No. 4770	Schedule 6-ELEC, Docket No. 4770: Col(a)=Docket No. 4682, FY2018 ISR Elec Rec, [P2]L10×3÷12, [P1]L26+L45×7÷12; Col(b)=[P1]L45×5÷12+[P2]L18×7÷12; Col (c) = [P2]L18×5÷12+L39×7÷12	\$8,259,707	\$7,848,009	\$3,437,925	\$205,400	\$85,583	\$0
7	Incremental Cost of Removal	Line 5 - Line 6	\$1,693,009	\$361,723	\$11,332,719	\$10,232,810	\$7,600,505	\$7,721,621
<u>Retirements</u>								
8	ISR - Eligible Retirements/Actual	Col (a) =FY 2018 ISR Docket No. 4682; Col (b) = FY 2019 ISR Docket No. 4783, Att PCE-1 P3, Table 2, Col (c)=Per Company's Book	\$15,206,748	\$12,015,754	\$13,944,441	\$22,589,226	\$35,100,171	\$17,798,165
9	ISR - Eligible Retirements in Rate Base per RIPUC Docket No. 4770	Schedule 6-ELEC, Docket No. 4770: Col(a)=Docket No. 4682, FY2018 ISR Elec Rec, [P2]L5×3÷12+[P1]L25+L27+L46×7÷12; Col(b)=[P1]L46×5÷12+[P2]L19×7÷12; Col (c)=[P2]L19×5÷12+L40×7÷12	\$20,451,820	\$22,665,233	\$9,928,809	\$593,200	\$247,167	\$0
10	Incremental Retirements	Line 8 - Line 9	(\$5,245,072)	(\$10,649,479)	\$4,015,632	\$21,996,026	\$34,853,004	\$17,798,165
<u>Net NOL Position</u>								
11	ISR - (NOL)/Utilization	Col (a) =FY 2018 ISR Docket No. 4682; Col (b) = FY 2021 ISR Plan Docket No. 4995, Col (c)=Per Tax Departmen	(\$4,571,409)	\$1,506,783	\$0	\$1,695,589	\$730,905	\$35,805,866
12	less: (NOL)/Utilization recovered in transmission rates	Quarterly average transmission plant allocator per Integrated Facilities Agreement (IFA) * Line 11	(\$1,572,911)	\$515,161	\$0	\$570,357	\$248,590	\$12,178,036
13	Distribution-related (NOL)/Utilization	Maximum of (Line 11 - Line 12) or -Page 27 of 36, Line 12	(\$2,998,499)	\$991,622	\$0	\$1,125,232	\$482,315	\$23,627,830
14	(NOL)/Utilization in Rate Base per RIPUC Docket No. 4770	Docket No. 4770, S. C. Att. 2, Sch 11-ELEC, P. 12: Col (c)= L39×7÷12	\$0	\$0	\$1,462,980	\$6,764,379	\$4,085,281	\$0
15	Incremental (NOL)/Utilization	Line 13 - Line 14	(\$2,998,499)	\$991,622	(\$1,462,980)	(\$5,639,147)	(\$3,602,966)	\$23,627,830

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2024 Electric Infrastructure, Safety, and Reliability (ISR) Plan Reconciliation
Deferred Income Tax ("DIT") Provisions and Net Operating Losses ("NOL")**

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	
		<u>Test Year July 2016</u> <u>- June 2017</u>					<u>Jul & Aug 2017</u>	<u>12 Mths Aug 31</u> <u>2018</u>	<u>12 Mths Aug 31</u> <u>2019</u>	<u>12 Mths Aug 31</u> <u>2020</u>	<u>12 Mths Aug 31</u> <u>2021</u>	<u>12 Mths Aug 31</u> <u>2022</u>	
1	Total Base Rate Plant DIT Provision	\$18,265,666					\$2,580,654	\$5,847,765	\$4,355,117	\$707,056	\$3,826,291	\$0	
2	Excess DIT Amortization								(\$3,074,665)	(\$3,074,665)	(\$3,074,665)	\$0	
		FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023-NG	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023-NG
3	Total Base Rate Plant DIT Provision							\$10,558,267	\$3,183,499	(\$847,583.55)	(\$548,055)	\$313,177	\$0
4	Incremental FY 18	\$4,261,399	\$4,223,434	\$4,181,310	\$4,130,879	\$4,072,741	\$4,063,088	\$4,261,399	(\$37,965)	(\$42,125)	(\$50,431)	(\$58,138)	(\$9,653)
5	Incremental FY 19		\$2,128,597	\$2,305,665	\$2,485,863	\$2,504,666	\$2,193,670		\$2,128,597	\$177,068	\$180,198	\$18,803	(\$310,996)
6	Incremental FY 20			\$4,774,661	\$5,289,496	\$5,731,763	\$5,787,291			\$4,774,661	\$514,834	\$442,268	\$55,528
7	Incremental FY 21				\$9,206,417	\$9,930,574	\$10,022,701				\$9,206,417	\$724,158	\$92,127
8	Incremental FY 22					\$4,105,561	\$4,234,773					\$4,105,561	\$129,212
9	Incremental FY 23						\$981,448						\$981,448
10	TOTAL Plant DIT Provision	\$4,261,399	\$6,352,031	\$11,261,635	\$21,112,654	\$26,345,306	\$27,282,971	\$14,819,666	\$5,274,131	\$4,062,021	\$9,302,963	\$5,545,830	\$937,665
11	Distribution-related NOL							\$2,998,499	(\$991,622)	\$0	(\$1,125,232)	(\$482,315)	23,722,289.55
12	Lesser of Distribution-related NOL or DIT Provision							\$2,998,499	(\$991,622)	\$0	(\$1,125,232)	(\$482,315)	\$937,665
13	Total NOL												35,805,866.00
14	NOL recovered in transmission rates												12,083,576.45
15	Distribution-related NOL												23,722,289.55

Line Notes:

- 1(b) RIPUC Docket Nos. 4770/4780, Compliance, Revised Rebuttal Attachment 1, Schedule 11-ELEC, Page 2 of 23, Line 29, Col (e) - (a)
- 1(g) RIPUC Docket Nos. 4770/4780, Compliance, Revised Rebuttal Attachment 1, Schedule 11-ELEC, Page 11 of 20, Line 3
- 1(h) RIPUC Docket Nos. 4770/4780, Compliance, Revised Rebuttal Attachment 1, Schedule 11-ELEC, Page 11 of 20, Line 7
- 1(i) RIPUC Docket Nos. 4770/4780, Compliance, Revised Rebuttal Attachment 1, Schedule 11-ELEC, Page 11 of 20, Line 50
- 2 RIPUC Docket Nos. 4770/4780, Compliance, Revised Rebuttal Attachment 1, Sch. 11-ELEC, P.11 of 20, L. 51; P. 12 of 20, L. 42 & 5
- 3 Col(e) = Line 1(b)÷12×3 + Line1(d) + Line1(e)÷12×7; Col (f) = (Line1(e) + Line2(e)÷12×5 + (Line1(f) + Line2(f)÷12×7; Col (g) = (Line1(f) + Line2(f)÷12×5 + (Line1(g) + Line2(g))÷12×7
- 4(a)-(f) Cumulative DIT per vintage year ISR revenue requirement calculations (P.2, L.25(a)+L.27(a); P.2, L.25(b)+L.27(b); P.2, L.25(c)+L.27(c); P.2, L.25(d)+L.27(d); P.2, L.25(e)+L.27(e); P.2, L.25(f)+L.27(f))
- 5(b)-(f) Cumulative DIT per vintage year ISR revenue requirement calculations (P.5, L.25(a)+P.8, L.27(c); P.5, L.25(b)+P.8, L.27(f); P.5, L.25(c)+P.8, L.27(i); P.5, L.25(d)+P.8, L.27(l); P.5, L.25(e)+P.8, L.27(o))
- 6(c)-(f) Cumulative DIT per vintage year ISR revenue requirement calculations (P.10, L.25(a); P.10, L.25(b); P.10, L.25(c); P.10, L.25(d))
- 7(d)-(f) Cumulative DIT per vintage year ISR revenue requirement calculations (P.13, L.25(a); P.13, L.25(b); P.13, L.25(c))
- 8(e)-(f) Cumulative DIT per vintage year ISR revenue requirement calculations (P.17, L.25(a)+P.17, L.25(b))
- 9(f) Cumulative DIT per vintage year ISR revenue requirement calculations (P.20, L.25(a))
- 4(g)-9(l) Year over year change in cumulative DIT shown in Cols (a) through (f)
- 10 Sum of Lines 3 through 9
- 11 Page 26 of 36, Line 13
- 12 Lesser of Line 10 or Line 11
- 13 Per Tax Department
- 14 Quarterly average transmission plant allocator per Integrated Facilities Agreement (IFA) * Line 13
- 15 Line 13 - Line 14

THE NARRAGANSETT ELECTRIC COMPANY
d/b/a NATIONAL GRID
RIPUC Docket Nos. 4770/4780
Compliance Attachment 2
Schedule 6-ELEC
Page 3 of 5

The Narragansett Electric Company d/b/a National Grid
Depreciation Expense - Electric
For the Test Year Ended June 30, 2017 and the Rate Year Ending August 31, 2019

The Narragansett Electric Company
d/b/a National Grid
ISR Depreciation Rate per RIPUC Docket No. 4995

			Adjusted Plant Balance (a)	Approved Rate (b)	Test Year Depreciation (c) = (a) x (b)
		<u>Intangible Plant</u>			
1	303.00	Intangible Cap Software	(\$0)	0.00%	\$0
2					
3		Total Intangible Plant	(\$0)		\$0
4					
5		<u>Production Plant</u>			
6					
7	330.00	Land Hydro	\$6,989	0.00%	\$0
8	331.00	Struct & Improvements	\$1,993,757	0.00%	\$0
9	332.00	Reservoirs Dams And Water	\$1,125,689	0.00%	\$0
10					
11		Total Production Plant	\$3,126,434		\$0
12					
13		Total Transmission Plant	\$0		\$0
14					
15		Distribution Plant			
16					
17	360	Land & Land Rights New	\$ -	0.00%	\$ -
18	362	Station Equipment	\$ -	2.32%	\$ -
19	365	Overhead Conductors and Devices	\$ -	3.02%	\$ -
20	367.1	Underground Conductors and Devices	\$ -	2.52%	\$ -
21	360.00	Land & Land Rights New	\$ 12,874,490	0.00%	\$ -
22	360.10	Land Structures & Dist	\$ 95,396	0.00%	\$ -
23	361.00	Struct & Improvements	\$ 10,144,741	1.36%	\$ 137,968
24	362.00	Station Equipment	\$ 253,879,227	2.19%	\$ 5,559,955
25	362.10	Station Equip Pollution	\$ 71,597	2.19%	\$ 1,568
26	362.55	Station Equipment - Energy Management Syste	\$ 663,280	6.70%	\$ 44,440
27	364.00	Poles, Towers And Fixtures	\$ 237,914,852	4.27%	\$ 10,158,964
28	365.00	Oh Conduct-Smart Grid	\$ 308,051,305	2.65%	\$ 8,163,360
29	366.10	Underground Manholes A	\$ 23,368,987	1.33%	\$ 310,808
30	366.20	Underground Conduit	\$ 48,513,051	1.55%	\$ 751,952
31	367.10	Underground Conductors	\$ 173,808,945	3.42%	\$ 5,944,266
32	368.10	Line Transformers - Stations	\$ 10,674,398	2.76%	\$ 294,613
33	368.20	Line Transformers - Bare Cost	\$ 101,452,162	3.14%	\$ 3,180,525
34	368.30	Line Transformers - Install Cost	\$ 77,701,753	3.22%	\$ 2,501,996
35	369.10	Overhead Services	\$ 83,166,615	5.04%	\$ 4,191,597
36	369.20	Underground Services C	\$ 1,691,919	4.87%	\$ 82,396
37	369.21	Underground Services C	\$ 22,150,773	4.87%	\$ 1,078,743
38	370.10	Meters - Bare Cost - Domestic	\$ 26,366,117	5.61%	\$ 1,479,139
39	370.20	Meters - Install Cost - Domestic	\$ 10,026,102	5.81%	\$ 582,517
40	370.30	Meters - Bare Cost - Large	\$ 11,492,790	5.69%	\$ 653,940
41	370.35	Meters - Install Cost - Large	\$ 9,186,534	5.13%	\$ 471,269
42	371.00	Installation On Custom	\$ 119,825	3.61%	\$ 4,326
43	373.10	Oh Streetlighting	\$ 23,671,126	1.46%	\$ 345,598
44	373.20	Ug Streetlighting	\$ 16,012,987	1.52%	\$ 243,397
45	374.00	1/ Elect Equip ARO	\$ -	0.00%	\$ -
46					
47		Total Distribution Plant	\$ 1,463,098,971	3.16%	\$ 46,183,339
48					
49		General Plant			
50					
51	389.00	Land And Land Rights	\$ 842,411	0.00%	\$ -
52	390.00	Struct And Improvement Electric	\$ 34,216,272	2.28%	\$ 780,131
53	391.00	Office Furn &Fixt Electric (Fully Dep)	\$ 30,645	0.00%	\$ 29,542
54	391.00	Office Furn &Fixt Electric	\$ 412,269	6.67%	\$ 27,498
55	393.00	Stores Equipment	\$ 93,412	5.00%	\$ 4,671
56	394.00	General Plant Tools Shop	\$ 1,934,730	5.00%	\$ 96,736
57	395.00	General Plant Laboratory (Fully Dep)	\$ 288,227	0.00%	\$ -
58	395.00	General Plant Laboratory (Fully Dep)	\$ 1,226,832	6.67%	\$ 81,830
59	397.00	Communication Equipment	\$ 5,337,629	5.00%	\$ 266,881
60	397.10	Communication Equipment Site Specific	\$ 2,530,920	3.90%	\$ 98,706
61	397.50	Communication Equipment Network	\$ 49,498	5.00%	\$ 2,475
62	398.00	General Plant Miscellaneous	\$ 706,169	6.67%	\$ 47,101
63	399.00	Other Tangible Property	\$ 12,484	0.00%	\$ -
64	399.10	1/ ARO	\$ (0)	0.00%	\$ -
65					
66		Total General Plant	\$ 47,681,498	3.01%	\$ 1,435,572
67					
68		Grand Total - All Categories	\$ 1,513,906,902	3.15%	\$ 47,618,911

1	Total Distribution Plant	\$ 1,463,098,971	3.16%	\$ 46,183,339
2	Communication Equipment	\$ 7,918,047	4.65%	\$ 368,062
3	Total ISR eligible Plant	\$ 1,471,017,018	3.16%	\$ 46,551,401
4				
5	Non-ISR or Communication Plant	\$ 42,889,885		
6	Grand Total - All Plant	\$ 1,513,906,902		

Line Notes:

- Docket No. 4770, Schedule 6-ELEC: [P3 and P4] on left Line 47
- Docket No. 4770, Schedule 6-ELEC: [P3 and P4] on Left Lines 59 through 61
- Line 1+Line 2
- Docket No. 4770, Schedule 6-ELEC: [P3 and P4] on Left Lines 59 through 61
- Line 3+Line 6

Column Notes:

(a) - (c) - Per Docket 4770/4780 Compliance Attachment 2, Schedule 6 ELEC, Pages 3 & 4

THE NARRAGANSETT ELECTRIC COMPANY d/b/a NATIONAL GRID RIPUC Docket Nos. 4770/4780 Compliance Attachment 2 Schedule 6-ELEC Page 1 of 5				The Narragansett Electric Company d/b/a National Grid ISR Depreciation Expense in Base Rates less non-ISR eligible plant ISR Eligible Amount	
The Narragansett Electric Company d/b/a National Grid Depreciation Expense - Electric For the Test Year Ended June 30, 2017 and the Rate Year Ending August 31, 2019					
Line No.	Description	Reference (a)	Amount (b)	(c)	(d)
1	Total Company Rate Year Distribution Depreciation Expense	Sum of Page 2, Line 16 and Line 17	\$50,128,332		
2	Test Year Depreciation Expense	Per Company Books	\$69,031,187		
3	Less : Test Year IFA related Depreciation Expense	Page 4, Line 30, Column (c)	(\$19,814,202)		
4	Less: ARO and other adjustments	Page 4, Line 30, Column (b) + Column (d)	(\$55,610)		
5	Adjusted Total Company Test Year Distribution Depreciation Expense	Sum of Line 2 through Line 4	\$49,161,375		
6	Depreciation Expense Adjustment	Line 1 - Line 5	\$966,957		
7					
8			Per Book		
9	Test Year Depreciation Expense 12 Months Ended 06/30/17:		Amount		
10	Total Distribution Utility Plant 06/30/17	Page 4, Line 28, Column (e)	\$2,141,474,644	10 (\$39,763,450)	\$2,101,711,193
11	Less Non Depreciable Plant	Page 4, Line 26, Column (e)	(\$627,567,742)	11	(\$627,567,742)
12	Depreciable Utility Plant 6/30/17	Line 10 + Line 11	\$1,513,906,902	12 (\$39,763,450)	\$1,474,143,451
13				13	
14	Plus: Added Plant 2 Mos Ended 08/31/17	Schedule 11-ELEC, Page 6, Line 7	\$12,473,833	14	\$0 \$12,473,833
15	Less: Streetlights retired in the 2 Mos Ended 08/31/17	Per Company Books	(\$1,057,011)	15	\$0 (\$1,057,011)
16	Less: Retired Plant 2 Months Ended 08/31/17	1/ Line 14 x Retirement Rate	(\$3,699,739)	16	\$0 (\$3,699,739)
17	Depreciable Utility Plant 08/31/17	Line 12 + Line 14 + Line 16	\$1,521,623,985	17 (\$39,763,450)	\$1,481,860,535
18				18	
19	Average Depreciable Plant from 06/30/17 to 08/31/17	(Line 12 + Line 17)/2	\$1,517,765,443	19	\$1,478,001,993
20				20	
21	Composite Book Rate %	As Approved in RIPUC Docket No. 4323	3.40%	21	3.40%
22				22	
23	Book Depreciation Reserve 06/30/17	Page 5, Line 69, Column (e)	\$652,405,159	23	
24	Plus: Book Depreciation Expense excluding Streetlight Retirement	1/6 of (Line 19 excl. Line 15 x Line 21)	\$8,603,666	24	\$8,381,334
25	Less: Streetlights retired in the 2 Mos Ended 08/31/17 and Dep. for 2 Mos	1/12 of (Line 15 x SL Dep Rate)	(\$1,307)	25	(\$1,307)
26	Less: Net Cost of Removal/(Salvage)	2/ Line 14 x Cost of Removal Rate	(\$1,281,063)	26	
27	Less: Retired Plant	Line 16	(\$3,699,739)	27	
28	Book Depreciation Reserve 08/31/17	Sum of Line 23 through Line 27	\$656,026,715	28	
29				29	
30	Depreciation Expense 12 Months Ended 08/31/18			30	
31	Total Utility Plant 08/31/17	Line 10 + Line 14 + Line 15 + Line 16	\$2,149,191,727	31 (\$39,763,450)	\$2,109,428,277
32	Less Non Depreciable Plant	Line 11	(\$627,567,742)	32	\$0 (\$627,567,742)
33	Depreciable Utility Plant 08/31/17	Line 31 + Line 32	\$1,521,623,985	33 (\$39,763,450)	\$1,481,860,535
34				34	
35	Plus: Plant Added in 12 Months Ended 08/31/18	Schedule 11-ELEC, Page 6, Line 14	\$74,843,000	35	\$0 \$74,843,000
36	Less: Plant Retired in 12 Months Ended 08/31/18	1/ Line 35 x Retirement rate	(\$22,198,434)	36	\$0 (\$22,198,434)
37	Depreciable Utility Plant 08/31/18	Sum of Line 33 through Line 36	\$1,574,268,551	37 (\$39,763,450)	\$1,534,505,101
38				38	
39	Average Depreciable Plant for 12 Months Ended 08/31/18	(Line 33 + Line 37)/2	\$1,547,946,268	39 (\$39,763,450)	\$1,508,182,818
40				40	
41	Composite Book Rate %	As Approved in RIPUC Docket No. 4323	3.40%	41	3.40%
42				42	
43	Book Depreciation Reserve 08/31/17	Line 28	\$656,026,715	43	
44	Plus: Book Depreciation 08/31/18	Line 39 x Line 41	\$52,630,173	44	\$51,278,216
45	Less: Net Cost of Removal/(Salvage)	2/ Line 35 x Cost of Removal Rate	(\$7,686,376)	45	
46	Less: Retired Plant	Line 36	(\$22,198,434)	46	
47	Book Depreciation Reserve 08/31/18	Sum of Line 43 through Line 46	\$678,772,079	47	
1/	3 year average retirement over plant addition in service FY 15 ~ FY17		29.66%		
2/	3 year average Cost of Removal over plant addition in service FY 15 ~ FY17		10.27%		

			Compliance Attachment 2 Schedule 6-ELEC Page 2 of 5		
The Narragansett Electric Company d/b/a National Grid Depreciation Expense - Electric				The Narragansett Electric Company d/b/a National Grid ISR Depreciation Expense in Base Rates (Continued)	
For the Test Year Ended June 30, 2017 and the Rate Year Ending August 31, 2019				less non-ISR eligible plant	ISR Eligible Amount
Line No.	Description	Reference	Amount	(c)	(d)
1	Rate Year Depreciation Expense 12 Months Ended 08/31/19:				
2	Total Utility Plant 08/31/18	Page 1, Line 31 + Line 35 + Line 36	\$2,201,836,293	2 (\$39,763,450)	\$2,162,072,843
3	Less Non-Depreciable Plant	Page 1, Line 11	(\$627,567,742)	3 \$0	(\$627,567,742)
4	Depreciable Utility Plant 08/31/18	Line 2 + Line 3	\$1,574,268,551	4 (\$39,763,450)	\$1,534,505,101
5				5	
6	Plus: Added Plant 12 Months Ended 08/31/19	Schedule 11-ELEC, Page 6, Line 38	\$77,541,000	6 (\$2,698,000)	\$74,843,000
7	Less: Depreciable Retired Plant	1/ Line 6 x Retirement rate	(\$22,998,661)	7 \$800,227	(\$22,198,434)
8				8	
9	Depreciable Utility Plant 08/31/19	Sum of Line 4 through Line 7	\$1,628,810,891	9 (\$41,661,224)	\$1,587,149,667
10				10	
11	Average Depreciable Plant for Rate Year Ended 08/31/19	(Line 4 + Line 9)/2	\$1,601,539,721	11 (\$40,712,337)	\$1,560,827,384
12				12	
13	Proposed Composite Rate %	Page 4, Line 18, Columnn (f)	3.15%	13	3.16%
14				14	
15	Book Depreciation Reserve 08/31/18	Page 1, Line 47	\$678,772,079	15	
16	Plus: Book Depreciation Expense	Line 11 x Line 13	\$50,375,341	16	\$49,322,145
17	Plus: Unrecovered Reserve Adjustment	Schedule NWA-1-ELECTRIC, Part VI, Page 6	(\$247,009)	17	(\$247,009)
18	Less: Net Cost of Removal/(Salvage)	2/ Line 6 x Cost of Removal Rate	(\$7,963,461)	18	
19	Less: Retired Plant	Line 7	(\$22,998,661)	19	
20	Book Depreciation Reserve 08/31/19	Sum of Line 15 through Line 19	\$697,938,290	20	\$49,075,136
21				21	
22	Rate Year Depreciation Expense 12 Months Ended 08/31/20:			22	
23	Total Utility Plant 08/31/19	Line 2 + Line 6 + Line 7	\$2,256,378,633	23 (\$41,661,224)	\$2,214,717,409
24	Less Non-Depreciable Plant	Page 1, Line 11	(\$627,567,742)	24 \$0	(\$627,567,742)
25	Depreciable Utility Plant 08/31/19	Line 23 + Line 24	\$1,628,810,891	25 (\$41,661,224)	\$1,587,149,667
26				26	
27	Plus: Added Plant 12 Months Ended 08/31/20	Schedule 11-ELEC, Page 5, Line 15(i)	\$2,000,000	27 (\$2,000,000)	\$0
28	Less: Depreciable Retired Plant	1/ Line 27 x Retirement rate	(\$593,200)	28 \$593,200	\$0
29				29	
30	Depreciable Utility Plant 08/31/20	Sum of Line 25 through Line 28	\$1,630,217,691	30 (\$43,068,024)	\$1,587,149,667
31				31	
32	Average Depreciable Plant for Rate Year Ended 08/31/20	(Line 25 + Line 30)/2	\$1,629,514,291	32 (\$42,364,624)	\$1,587,149,667
33				33	
34	Proposed Composite Rate %	Page 4, Line 18, Column (f)	3.15%	34	3.16%
35				35	
36	Book Depreciation Reserve 08/31/20	Line 20	\$697,938,290	36	
37	Plus: Book Depreciation Expense	Line 32 x Line 34	\$51,255,262	37	\$50,153,929
38	Plus: Unrecovered Reserve Adjustment	Schedule NWA-1-ELECTRIC, Part VI, Page 6	(\$247,009)	38	(\$247,009)
39	Less: Net Cost of Removal/(Salvage)	2/ Line 27 x Cost of Removal Rate	(\$205,400)	39	
40	Less: Retired Plant	Line 28	(\$593,200)	40	
41	Book Depreciation Reserve 08/31/20	Sum of Line 36 through Line 40	\$748,147,943	41 \$ 436,419,633	\$49,906,920
42				42	
43	Rate Year Depreciation Expense 12 Months Ended 08/31/21:			43	
44	Total Utility Plant 08/31/20	Line 23 + Line 27 + Line 28	\$2,257,785,433	44 (\$43,068,024)	\$2,214,717,409
45	Less Non-Depreciable Plant	Page 1, Line 11	(\$627,567,742)	45 \$0	(\$627,567,742)
46	Depreciable Utility Plant 08/31/20	Line 44 + Line 45	\$1,630,217,691	46 (\$43,068,024)	\$1,587,149,667
47				47	
48	Plus: Added Plant 12 Months Ended 08/31/21	Schedule 11-ELEC, Page 5, Line 15(l)	\$2,000,000	48 (\$2,000,000)	\$0
49	Less: Depreciable Retired Plant	1/ Line 48 x Retirement rate	(\$593,200)	49 \$593,200	\$0
50				50	
51	Depreciable Utility Plant 08/31/21	Sum of Line 46 through Line 49	\$1,631,624,491	51 (\$44,474,824)	\$1,587,149,667
52				52	
53	Average Depreciable Plant for Rate Year Ended 08/31/21	(Line 46 + Line 51)/2	\$1,630,921,091	53 (\$43,771,424)	\$1,587,149,667
54				54	
55	Proposed Composite Rate %	Page 4, Line 18, Columnn (f)	3.15%	55	3.16%
56				56	
57	Book Depreciation Reserve 08/31/20	Line 41	\$748,147,943	57	
58	Plus: Book Depreciation Expense	Line 53 x Line 55	\$51,299,512	58	\$50,153,929
59	Plus: Unrecovered Reserve Adjustment	Schedule NWA-1-ELECTRIC, Part VI, Page 6	(\$247,009)	59	(\$247,009)
60	Less: Net Cost of Removal/(Salvage)	2/ Line 48 x Cost of Removal Rate	(\$205,400)	60	
61	Less: Retired Plant	Line 49	(\$593,200)	61	
62	Book Depreciation Reserve 08/31/21	Sum of Line 57 through Line 61	\$798,401,846	62	\$49,906,920
63					
64	1/ 3 year average retirement over plant addition in service FY 15 ~ FY17	29.66%	Retirements		
65	2/ 3 year average Cost of Removal over plant addition in service FY 15 ~ FY17	10.27%	COR		
66					
67	Book Depreciation RY2	Line 37 (a) + Line 38 (b)			\$51,008,253
68	Less: General Plant Depreciation (assuming add=retirement)	- Page 28 of 36, Line 66 (c)			(\$1,435,572)
69	Plus: Comm Equipment Depreciation	Page 28 of 36, sum of Lines 59 (c) through 61 (c)			\$368,062
70	Total				\$49,940,743
71	7 Months				x7/12
72	FY 2020 Depreciation Expense	Line 66 (d) x7 ÷12			\$29,132,100
73					
74	Book Depreciation RY3	Line 58 (a) + Line 59 (b)			\$51,052,503
75	Less: General Plant Depreciation	- Page 28 of 36, Line 66 (c)			(\$1,435,572)
76	Plus: Comm Equipment Depreciation	Page 28 of 36, sum of Lines 59 (c) through 61 (c)			\$368,062
77	Total				\$49,984,993
78	FY 2021 Depreciation Expense	Line 66 (d) x5 ÷12 + Line 73 (d) x7 ÷12			\$49,966,556

The Narragansett Electric Company d/b/a Rhode Island Energy Fiscal Year Year 2023 ISR Property Tax Recovery Adjustment 1 (000s)								
Line	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
	Effective Tax Rate Calculation							
	End of FY 2018	ISR Additions	Non-ISR Add's	Total Add's	Bk Depr (1)	Retirements	COR	End of FY 2019
1	Plant In Service	\$1,395,499	\$111,243	\$3,137	\$114,380			\$1,697,863
2	Accumulated Depr	\$672,116				\$52,896	(\$12,016)	\$705,047
3	Net Plant	\$923,383					(\$7,949)	\$992,816
4	Property Tax Expense	\$30,354						\$32,077
5	Effective Prop Tax Rate	3.29%						3.23%
	Effective Tax Rate Calculation							
	End of FY 2019	ISR Additions	Non-ISR Add's	Total Add's	Bk Depr (1)	Retirements	COR	End of FY 2020
6	Plant In Service	\$1,697,863	\$98,495	\$9,017	\$107,511		(\$14,649)	\$1,790,725
7	Accumulated Depr	\$705,047				\$54,178	(\$14,649)	\$729,804
8	Net Plant	\$992,816					(\$14,771)	\$1,060,921
9	Property Tax Expense	\$32,077						\$32,568
10	Effective Prop Tax Rate	3.23%						3.07%
	Effective Tax Rate Calculation							
	End of FY 2020	ISR Additions	Non-ISR Add's	Total Add's	Bk Depr (1)	Retirements	COR	End of FY 2021
11	Plant In Service	\$1,790,725	\$115,236	\$3,274	\$118,510		(\$22,589)	\$1,886,646
12	Accumulated Depr	\$729,804				\$57,246	(\$22,589)	\$753,088
13	Net Plant	\$1,060,921					(\$11,374)	\$1,133,559
14	Property Tax Expense	\$32,568						\$33,333
15	Effective Prop Tax Rate	3.07%						2.94%
	Effective Tax Rate Calculation							
	End of FY 2021	ISR Additions	Non-ISR Add's	Total Add's	Bk Depr (1)	Retirements	COR	End of FY 2022
16	Plant In Service	\$1,886,646	\$86,830	\$13,092	\$99,923		(\$35,100)	\$1,951,469
17	Accumulated Depr	\$753,088				\$59,937	(\$35,100)	\$770,238
18	Net Plant	\$1,133,559					(\$7,686)	\$1,181,231
19	Property Tax Expense	\$33,333						\$33,955
20	Effective Prop Tax Rate	2.94%						2.88%
	Effective Tax Rate Calculation							
	End of FY 2022	ISR Additions	Non-ISR Add's	Total Add's	Bk Depr (1)	Retirements	COR	End of FY 2023
21	Plant In Service	\$1,951,469	\$93,269	\$11,413	\$104,682		(\$17,798)	\$2,038,353
22	Accumulated Depr	\$770,238				\$63,592	(\$17,798)	\$807,601
23	Net Plant	\$1,181,231					(\$8,431)	\$1,230,752
24	Property Tax Expense	\$33,955						\$34,532
25	Effective Prop Tax Rate	2.87%						2.81%
	Effective Tax Rate Calculation							
	End of FY 2023	ISR Additions	Non-ISR Add's	Total Add's	Bk Depr (1)	Retirements	COR	End of FY 2024
26	Plant In Service	\$2,038,353	\$97,324	\$6,933	\$104,257		(\$35,642)	\$2,106,968
27	Accumulated Depr	\$807,601				\$64,348	(\$35,642)	\$827,039
28	Net Plant	\$1,230,752					(\$9,267)	\$1,279,929
29	Property Tax Expense	\$34,532						\$40,092
30	Effective Prop Tax Rate	2.81%						3.13%
	Effective Tax Rate Calculation							
	End of FY 2024	ISR Additions	Non-ISR Add's	Total Add's	Bk Depr (1)	Retirements	COR	End of FY 2025
31	Plant In Service	\$2,106,968	\$100,138	\$11,413	\$111,551		(\$25,441)	\$2,193,078
32	Accumulated Depr	\$827,039				\$65,064	(\$25,441)	\$847,342
33	Net Plant	\$1,279,929					(\$19,320)	\$1,345,735
34	Property Tax Expense	\$40,092						\$37,761
35	Effective Prop Tax Rate	3.13%						2.81%

The Narragansett Electric Company
d/b/a Rhode Island Energy
Fiscal Year Year 2023 ISR Property Tax Recovery Adjustment 2 (continued)
(000s)

Property Tax Recovery Calculation				(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
				Cumulative Increm. ISR Prop. Tax for FY2018			Cumulative Increm. ISR Prop. Tax for FY2019			Cumulative Increm. ISR Prop. Tax for FY2019		
							1st 5 months			7 months		
36	Incremental ISR Additions				\$92,660			\$111,243			\$35,264	
37	Book Depreciation: base allowance on ISR eligible plant				(\$43,032)			(\$43,032)			\$0	
38	Book Depreciation: current year ISR additions				(\$1,317)			(\$1,628)			(\$980)	
39	COR				\$9,980			\$7,949			\$362	
40	Net Plant Additions				\$58,291			\$74,532			\$34,645	
41	RY Effective Tax Rate				3.98%			3.98%			3.28%	
											1.91%	
42	ISR Year Effective Tax Rate			3.29%			3.23%					
43	RY Effective Tax Rate			3.98%	-0.69%		3.98%	-0.75%		3.23%		
44	RY Effective Tax Rate 5 mos for FY 2019				-0.69%		5 month	-0.31%		3.28%	-0.05%	
45	RY Net Plant times 5 mo rate	\$746,900	-0.69%	(\$5,191)			\$746,900	-0.31%	(\$2,338)		-0.03% 7 mos	
46	FY 2014 Net Adds times ISR Year Effective Tax rate	\$1,566	3.29%	\$51			\$1,232	1.35%	\$17	\$930,873	-0.03%	(\$279)
47	FY 2015 Net Adds times ISR Year Effective Tax rate	\$34,308	3.29%	\$1,128			\$32,324	1.35%	\$435			
48	FY 2016 Net Adds times ISR Year Effective Tax rate	\$33,535	3.29%	\$1,102			\$32,090	1.35%	\$432	\$17,502	1.88%	\$330
49	FY 2017 Net Adds times ISR Year Effective Tax rate	\$38,200	3.29%	\$1,256			\$37,040	1.35%	\$499	\$34,645	1.88%	\$652
50	FY 2018 Net Adds times ISR Year Effective Tax rate	\$58,291	3.29%	\$1,916			\$55,850	1.35%	\$752			
51	FY 2019 Net Adds times ISR Year Effective Tax rate						\$74,532	1.35%	\$1,003			
52	Total ISR Property Tax Recovery			\$263					\$800			\$703
				(j)	(k)	(l)	(m)	(n)	(o)	(p)	(q)	(r)
				Cumulative Increm. ISR Prop. Tax for FY2020			Cumulative Increm. ISR Prop. Tax for FY2021			Cumulative Increm. ISR Prop. Tax for FY2022		
53	Incremental ISR Additions				\$67,310			\$115,236			\$86,830	
54	Book Depreciation: base allowance on ISR eligible plant				\$0			\$0			(\$29,112)	
55	Book Depreciation: current year ISR additions				(\$1,000)			(\$1,473)			(\$821)	
56	COR				\$11,333			\$10,233			\$7,601	
57	Net Plant Additions				\$77,643			\$123,996			\$64,497	
58	RY Effective Tax Rate				3.38%			3.58%			3.66%	
59	ISR Property Tax Recovery on non-ISR											
60	ISR Year Effective Tax Rate			3.07%			2.94%			2.88%		
61	RY Effective Tax Rate			3.38%	-0.31%		3.58%	-0.64%		3.66%	-0.79%	
62	RY Effective Tax Rate 7 mos for FY 2019											
63	RY Net Plant times Rate Difference	\$902,404	-0.31%	(\$2,825)			\$853,576	* -0.64%	(\$5,427)	\$833,223	* -0.79%	(\$6,574)
64	Non-ISR plant times rate difference	(\$2,269)	-0.31%	\$7			(\$4,269)	* -0.64%	\$27	(\$6,269)	* -0.79%	\$49
65	FY 2018 Net Incremental times rate difference	\$16,802	3.07%	\$516			\$16,102	* 2.94%	\$474	\$15,402	* 2.88%	\$443
66	FY 2019 Net Incremental times rate difference	\$32,809	3.07%	\$1,007			\$30,973	* 2.94%	\$911	\$29,137	* 2.88%	\$838
67	FY 2020 Net Incremental times rate difference	\$77,643	3.07%	\$2,384			\$75,643	* 2.94%	\$2,225	\$73,643	* 2.88%	\$2,117
68	FY 2021 Net Incremental times rate difference						\$123,996	* 2.94%	\$3,647	\$121,049	* 2.88%	\$3,480
69	FY 2022 Net Adds times rate difference									\$64,497	* 2.88%	\$1,854
70	Total ISR Property Tax Recovery			\$1,090					\$1,856			\$2,208

**The Narragansett Electric Company
d/b/a Rhode Island Energy
Fiscal Year Year 2023 ISR Property Tax Recovery Adjustment 3 (continued)
(000s)**

		(s)	(t)	(u)		(v)	(w)	(x)		(y)	(z)	(aa)
		Cumulative Increm. ISR Prop. Tax for FY2023				Cumulative Increm. ISR Prop. Tax for FY2024				Cumulative Increm. ISR Prop. Tax for FY2025		
71	Incremental ISR Additions			\$93,269				\$97,324				\$100,138
72	Book Depreciation: base allowance on ISR eligible plant			(\$49,907)				(\$49,907)				(\$49,907)
73	Book Depreciation: current year ISR additions			(\$1,192)				(\$1,207)				(\$45,344)
74	COR			\$7,722				\$9,267				\$19,320
75	Net Plant Additions			\$49,891				\$55,477				\$24,206
76	RY Effective Tax Rate			3.66%				3.66%				3.66%
77	ISR Property Tax Recovery on non-ISR											
78	ISR Year Effective Tax Rate	2.81%				3.13%				2.81%		
79	RY Effective Tax Rate	3.66%	-0.86%			3.66%	-0.53%			3.66%	-0.86%	
80	RY Effective Tax Rate 7 mos for FY 2019											
81	RY Net Plant times Rate Difference	\$833,223	* -0.86%	(\$7,149)		\$833,223	* -0.53%	(\$4,433)		\$833,223	* -0.86%	(\$7,149)
82	Non-ISR plant times rate difference	(\$8,269)	* -0.86%	\$71		(\$10,269)	* -0.53%	\$55		(\$12,269)	* -0.86%	\$105
83	FY 2018 Net Incremental times rate difference	\$14,702	* 2.81%	\$413		\$14,002	* 3.13%	\$439		\$13,302	* 2.81%	\$373
84	FY 2019 Net Incremental times rate difference	\$27,302	* 2.81%	\$766		\$25,466	* 3.13%	\$798		\$23,630	* 2.81%	\$663
85	FY 2020 Net Incremental times rate difference	\$71,643	* 2.81%	\$2,010		\$69,642	* 3.13%	\$2,181		\$67,642	* 2.81%	\$1,898
86	FY 2021 Net Incremental times rate difference	\$118,103	* 2.81%	\$3,314		\$115,157	* 3.13%	\$3,607		\$112,210	* 2.81%	\$3,149
87	FY 2022 Net Incremental times rate difference	\$62,854	* 2.81%	\$1,764		\$61,212	* 3.13%	\$1,917		\$59,570	* 2.81%	\$1,672
88	FY 2023 Net Incremental times rate difference	\$49,891	* 2.81%	\$1,400		\$47,506	* 3.13%	\$1,488		\$45,121	* 2.81%	\$1,266
89	FY 2024 Net Incremental times rate difference					\$55,477	* 3.13%	\$1,738		\$53,062	* 2.81%	\$1,489
90	FY 2025 Net Incremental times rate difference									\$24,206	* 2.81%	\$679
91	Total ISR Property Tax Recovery			\$2,588				\$7,789				\$4,145

Line Notes		Line Notes		Line Notes	
1(a) - 15(h)	Per Docket No. 4915, FY2020 Rec, Part 1 -Attachment MAL-1, Compliance Page 20,	24(h)	Per Company's Book	79(s)	=76(t)
16(a) - 20(a)	=11(h) - 15(h)	25(h)	Line 24(h) ÷ 23(h)	79(t)	78(s) -79(s)
16(b) - 16(d)	Docket No. 5098 Attachment 1C, Page 26 of 29, 16(b) to 16(d)	36(a) - 52(i)	Per Docket No. 4915, FY2020 Rec, Part 1 -Attachment MAL-1, Compliance	81(s)	Docket No. 4770, R. Rebuttal Att. 1, Sch 6-E, P2, (L51-
16(c)	Docket 5098, C. Att. 2, Sch 6-ELEC, P2: (L37(b) + L38(b)) +(Page 2 of 36, L 6(a) + Page 5 of 36, L 6(a)+Page 10 of 36, L(a)+, L6(a)) × 0.0316+Page 8 of 3633(d)+, L(b))/1000 + (L1(c)+L6(c)+L11(c))×0.0301+, L6(a) × 0.0316× 0.5)/1000+L16(c)×0.5×0.0301		Page 21, Line 28(a)-Line 44(g)		L62)/1000]
16(f) - 17(g)	Docket No. 5098 Attachment 1C, Page 26 of 29, 16(f) to 17(g)	53(j) - 70(o)	Per Docket No. 4915, FY2020 Rec, Part 1 -Attachment MAL-1, Compliance	82(s)	=64(p) - 2000
16(h)	Sum of Lines 16(a) through 16(g)		Page 21, Line 28(a)-Line 44(g)	83(s)	=65(p) - (Page 2 of 36, Line 19(i) / 1000
17(h)	Sum of Lines 17(a) through 17(g)	53(q) - 67(r)	Docket No. 5098 Attachment 1C, Page 26 of 29, 38(j) to 50(k)	84(s)	=66(p) - (Page 5 of 36, Line 19(e) + Page 8 of 36, Line 33(o))/1000
18(h)	=16(h)-17(h)	68(p)	=68(m) - (Page 13 of 36, Line 19(b) ÷ 1000		
19(h)	Per Company's Book	69(p)	=57(q)	85(s)	=67(p) - (Page 10 of 36, Line 19(d) through 19(f) / 1000
20(h)	Line 19(h) ÷ 18(h)	68(q) - 69(q)	=60(p)	86(s)	=68(p) - (Page 13 of 36, Line 19(c) through 19(e) / 1000
21(a) - 25(a)	=16(h) - 20(h)	68(r) - 69(r)	=68(p) to 69(p) x 68(q) to 69(q)	87(s)	=69(p) - (Page 17 of 36, Line 19(b) through 19(d) / 1000
21(b)	Page 20 of 36, Line 3(a) through 3(c) / 1000	70(r)	Sum of Lines 63(r) through 69(r)	88(s)	=75(t)
21(c)	Per Company's Book	71(t)	Page 20 of 36, Line 3(a) through 3(c) / 1000	81(t)-82(t)	=79(t)
21(d)	Line 21(b) + Line 21(c)	72(t)	Page 20 of 36, Line 8(a) through 8(c) / 1000		83(t)-88(t) =78(s)
21(f), 22(f)	Per Company's Book	73(t)	Page 20 of 36, Line 19(a) through 19(c)/1000	81(u) - 88(u)	=81(s) to 88(s) x 81(t) to 88(t)
21(h)	Line21(a) + 21(d) + 21(f)	74(t)	Page 20 of 36, Line 10(a) through 10(c) / 1000	91(u)	Sum of Lines 81(u) through 88(u)
22(e)	Per Company's Book	75(t)	Sum of Lines 71(t) through 74(t)		
22(h)	Line22(a) + 22(c) + 22(f) + 22(g)	76(t)	=58(q)		
23(h)	21(h)-22(h)	78(s)	=25(h)		

The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2024 Electric Infrastructure, Safety, and Reliability (ISR) Plan Reconciliation
Calculation of Weighted Average Cost of Capital

Line No.	(a)	(b)	(c)	(d)	(e)
1	Weighted Average Cost of Capital as approved in RIPUC Docket No. 4323 at 35% income tax rate effective				
2	April 1, 2013				
3		Ratio	Rate	Weighted Rate	Taxes
4	Long Term Debt	49.95%	4.96%	2.48%	2.48%
5	Short Term Debt	0.76%	0.79%	0.01%	0.01%
6	Preferred Stock	0.15%	4.50%	0.01%	0.01%
7	Common Equity	49.14%	9.50%	4.67%	2.51%
8		100.00%		7.17%	9.68%
9	(d) - Column (c) x 35% divided by (1 - 35%)				
10					
11	Weighted Average Cost of Capital as approved in RIPUC Docket No. 4323 at 21% income tax rate effective				
12	January 1, 2018				
13		Ratio	Rate	Weighted Rate	Taxes
14	Long Term Debt	49.95%	4.96%	2.48%	2.48%
15	Short Term Debt	0.76%	0.79%	0.01%	0.01%
16	Preferred Stock	0.15%	4.50%	0.01%	0.01%
17	Common Equity	49.14%	9.50%	4.67%	1.24%
18		100.00%		7.17%	8.41%
19	(d) - Column (c) x 21% divided by (1 - 21%)				
20					
21	Weighted Average Cost of Capital as approved in RIPUC Docket No. 4770 effective September 1, 2018				
22		Ratio	Rate	Weighted Rate	Taxes
23	Long Term Debt	48.35%	4.62%	2.23%	2.23%
24	Short Term Debt	0.60%	1.76%	0.01%	0.01%
25	Preferred Stock	0.10%	4.50%	0.00%	0.00%
26	Common Equity	50.95%	9.28%	4.73%	1.26%
27		100.00%		6.97%	8.23%
28					
29	(d) - Column (c) x 21% divided by (1 - 21%)				
30					
31	FY18 Blended Rate	Line 7(e) x 75% + Line 17(e) x 25%			9.36%
32					
33	FY19 Blended Rate	Line 17 x 5 ÷ 12 + Line 27 x 7 ÷ 12			8.31%
34					
35	FY20 and after Rate	Line 27(e)			8.23%

**The Narragansett Electric Company
d/b/a Rhode Island Energy
FY 2024 Incremental Capital Investment**

Line No.			<u>Fiscal Year 2024</u> (a)	<u>In Base Rates Included In Docket No. 4770</u> (b)	<u>Amount to be Included in FY 2024 ISR</u> (c) = (a) - (b)
	<u>Non Discretionary Capital</u>				
1	Fiscal Year 2024 Proposed Non-Discretionary Capital Additions	Attachment NAG-1, Table 1, Col (b), Line 1	\$45,486,999	\$0	\$45,486,999
	<u>Discretionary Capital</u>				
2	Cumulative FY 2023 Discretionary Capital ADDITIONS	Docket 4915 + Docket 4995 + Docket 5098 + Docket 5209	\$564,708,179		
3	FY 2024 Discretionary Capital ADDITIONS	Attachment NAG-1, Table 1, Col (b), Line 2	\$51,836,809		
4	Cumulative Actual Discretionary Capital Additions	Line 2 + Line 3	\$616,544,988		
5	Cumulative FY 2023 Discretionary Capital SPENDING	Docket 4915 + Docket 4995 + Docket 5098 + Docket 5209	\$614,292,033		
6	FY 2024 Discretionary Capital SPENDING	Attachment NAG-1, Table 1, Col (b), Line 8	\$68,608,942		
7	Cumulative Actual Discretionary Capital Spending	Line 5 + Line 6	\$682,900,975		
8	Cumulative FY 2023 Approved Discretionary Capital SPENDING	Docket 4915 + Docket 4995 + Docket 5098 + Docket 5209	\$615,807,536		
9	FY 2024 Approved Discretionary Capital SPENDING	Attachment NAG-1, Table 1, Col (b), Line 8	\$68,608,942		
10	Cumulative Actual Approved Discretionary Capital Spending	Line 8 + Line 9	\$684,416,478		
11	Cumulative Allowed Discretionary Capital Included in Rate Base	Lesser of Line 4, Line 7, or Line 10	\$616,544,988		
12	Prior Year Cumulative Allowed Discretionary Capital Included in Rate Base	Docket No. 5209 -ISR Plan Reconciliation	\$564,708,179		
13	Total Allowed Discretionary Capital Included in Rate Base Current Year	Line 11 - Line 12	\$51,836,809	\$0	\$51,836,809
14	Total Allowed Capital Included in Rate Base Current Year	Line 1 + Line 13	\$97,323,808	\$0	\$97,323,808
15	Intangible Assets included in Total Allowed Discretionary Capital Total Allowed Discretionary Capital Included in non-Intangible Rate Base Current Year				\$0
16		Line 14 - Line 15			\$97,323,808

The Narragansett Electric Company
d/b/a Rhode Island Energy
Electric Infrastructure, Safety, and Reliability (ISR) Plan
Revenue Requirement Adjustment for DG Project Review

Line No.		Actual-Revised Fiscal Year 2018 (a)	Actual-Revised Fiscal Year 2019 (b)	Actual-Revised Fiscal Year 2020 (c)	Actual-Revised Fiscal Year 2021 (d)	Actual-Revised Fiscal Year 2022 (e)	Actual-Revised Fiscal Year 2023 (e)
Capital Investment:							
1	Actual Revenue Requirement on FY 2018 Incremental Capital included in ISR Rate Base	\$1,081,472	\$2,103,770	\$2,026,221	\$1,972,340	\$1,919,087	\$1,845,740
2	Actual Revenue Requirement on FY 2019 Incremental Capital included in ISR Rate Base		\$1,523,254	\$4,337,891	\$4,171,209	\$4,017,782	\$4,048,255
3	Actual Revenue Requirement on FY 2020 Incremental Capital included in ISR Rate Base			\$2,362,055	\$5,625,336	\$5,423,731	\$5,406,894
4	Actual Revenue Requirement on FY 2021 Incremental Capital included in ISR Rate Base				\$4,386,629	\$8,622,286	\$8,501,393
5	Actual Revenue Requirement on FY 2022 Incremental Capital included in ISR Rate Base					\$2,415,196	\$4,952,061
6	Actual Revenue Requirement on FY 2023 Incremental Capital included in ISR Rate Base						\$1,930,669
7	Subtotal	\$1,081,472	\$3,627,024	\$8,726,167	\$16,155,514	\$22,398,082	\$26,685,011
8	Property Tax Recovery Adjustment	\$263,025	\$1,502,447	\$1,089,549	\$1,856,392	\$2,207,523	\$2,588,410
9	Total Capital Investment Component of Revenue Requirement	\$1,344,497	\$5,129,471	\$9,815,716	\$18,011,906	\$24,605,605	\$29,273,421
		As Filed Docket No. 5209, Page 33 Fiscal Year 2018 (a)	As Filed Docket No. 5209, Page 33 Fiscal Year 2019 (b)	As Filed Docket No. 5209, Page 33 Fiscal Year 2020 (c)	As Filed Docket No. 5209, Page 33 Fiscal Year 2021 (d)	As Filed Docket No. 5209, Page 33 Fiscal Year 2022 (e)	As Calculated Before DG Adjustment Fiscal Year 2023 (e)
10	Actual Revenue Requirement on FY 2018 Incremental Capital included in ISR Rate Base	1,059,288	2,060,611	1,984,661	1,931,906	1,879,763	1,805,484
11	Actual Revenue Requirement on FY 2019 Incremental Capital included in ISR Rate Base		1,521,500	4,332,013	4,165,495	4,012,227	4,042,712
12	Actual Revenue Requirement on FY 2020 Incremental Capital included in ISR Rate Base			2,368,560	5,638,935	5,436,943	5,419,949
13	Actual Revenue Requirement on FY 2021 Incremental Capital included in ISR Rate Base				4,393,352	8,635,547	8,514,586
14	Actual Revenue Requirement on FY 2022 Incremental Capital included in ISR Rate Base					2,395,558	4,912,322
15	Actual Revenue Requirement on FY 2023 Incremental Capital included in ISR Rate Base						1,917,280
16	Subtotal	\$1,059,288	\$3,582,110	\$8,685,233	\$16,129,689	\$22,360,037	\$26,612,335
17	Property Tax Recovery Adjustment	263,025	1,493,525	1,079,265	1,850,478	2,191,610	2,578,312
18	Total Capital Investment Component of Revenue Requirement	\$1,322,314	\$5,075,635	\$9,764,498	\$17,980,167	\$24,551,648	\$29,190,647
		Variance Fiscal Year 2018 (a)	Variance Fiscal Year 2019 (b)	Variance Fiscal Year 2020 (c)	Variance Fiscal Year 2021 (d)	Variance Fiscal Year 2022 (e)	Variance Fiscal Year 2023 (e)
19	Actual Revenue Requirement on FY 2018 Incremental Capital included in ISR Rate Base	22,184	43,159	41,560	40,434	39,325	40,255
20	Actual Revenue Requirement on FY 2019 Incremental Capital included in ISR Rate Base		1,755	5,878	5,714	5,555	5,543
21	Actual Revenue Requirement on FY 2020 Incremental Capital included in ISR Rate Base			(6,504)	(13,599)	(13,212)	(13,055)
22	Actual Revenue Requirement on FY 2021 Incremental Capital included in ISR Rate Base				(6,724)	(13,261)	(13,193)
23	Actual Revenue Requirement on FY 2022 Incremental Capital included in ISR Rate Base					19,638	39,738
24	Actual Revenue Requirement on FY 2023 Incremental Capital included in ISR Rate Base						13,388
25	Subtotal	\$22,184	\$44,914	\$40,934	\$25,825	\$38,045	\$72,676
26	Property Tax Recovery Adjustment	-	8,922	10,284	5,913	15,913	10,098
27	Total Capital Investment Component of Revenue Requirement - DG Adjustment	\$22,184	\$53,836	\$51,218	\$31,739	\$53,957	\$82,773
							Total Adjustment (f)
28							\$295,707

Column/Line Notes:

- Page 2 of 36, Line 40 column a through g
- Page 5 of 36, Line 42 column a through f
- Page 10 of 36, Line 39 column a through e
- Page 13 of 36, Line 40 column a through d
- Page 17 of 36, Line 39 column a through c
- Page 20 of 36, Line 39 column a through b
- Lines 1 through 6
- Page 32 of 36, Line 52 & 70
- Line 7 + Line 8
- Docket No. 5209 Reconciliation, Attachment SAB/JDO-1 (C), Page 33, Line 1
- Docket No. 5209 Reconciliation, Attachment SAB/JDO-1 (C), Page 33, Line 2
- Docket No. 5209 Reconciliation, Attachment SAB/JDO-1 (C), Page 33, Line 3
- Docket No. 5209 Reconciliation, Attachment SAB/JDO-1 (C), Page 33, Line 4
- Docket No. 5209 Reconciliation, Attachment SAB/JDO-1 (C), Page 33, Line 5

Column/Line Notes:

- Page 20, Line 4, Column a & b
- Lines 10 through 15
- Docket No. 5209 Reconciliation, Attachment SAB/JDO-1 (C), Page 33, Line 7
- Line 16 + Line 17
- Line 1 - Line 10
- Line 2 - Line 11
- Line 3 - Line 12
- Line 4 - Line 13
- Line 5 - Line 14
- Line 6 - Line 15
- Lines 19 through 24
- Line 8 - Line 17
- Line 25 + Line 26

PRE-FILED DIRECT TESTIMONY

OF

NATALIE HAWK

August 1, 2024

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1 **I. Introduction**

2 **Q. Please state your full name and business address.**

3 A. My name is Natalie Hawk, and my business address is 645 Hamilton Street, Allentown,
4 Pennsylvania 18101.

6 **Q. Please state your position and your responsibilities within that position.**

7 A. I am employed by PPL Services Corporation (“Services Corporation”) as the Director of
8 tax accounting and reporting. My current responsibilities are primarily to oversee the
9 accounting and reporting of income taxes under U.S. Generally Accepted Accounting
10 Principles and the FERC Uniform System of Accounts and support regulatory rate filings
11 from a tax perspective for all members of the PPL Corporation (“PPL”) group of
12 companies.

14 **Q. Please describe your education and professional experience**

15 A. In 1992, I received a Bachelor of Science in Business Administration degree with a major
16 in Accounting from Kutztown University. In 1998, I received a Master’s in Business
17 Administration degree from Lehigh University. In 1993, I started my career as a first-
18 year Accountant in the Accounting Department at Metropolitan Edison Company, a
19 wholly owned subsidiary of GPU, Inc. GPU is a public utility holding company based in
20 New Jersey that was acquired by First Energy in 2001. I held various accounting roles in

1 Accounting Operations, the Tax Department and Plant Accounting. In 2001, I accepted a
2 position at Services Corporation as an Accounting Analyst in the Tax Department. My
3 responsibilities included accounting for income and non-income taxes, and I later became
4 involved in financial tax reporting for SEC and regulatory purposes, preparing tax
5 information and providing guidance on tax matters for rate cases, formula rates and other
6 rate mechanisms. I was promoted to Team Leader in 2004, 1st-level Manager in 2011,
7 2nd-level Manager in 2015 and to my current position as Tax Director in 2021.

8
9 **Q. Have you previously testified before the Rhode Island Public Utilities Commission**
10 **(PUC) or other regulatory bodies?**

11 A. Yes, I have testified before the PUC in support of the Company's filings in several
12 proceedings of which two of the most recent filings are the Fiscal Year ("FY") 2025
13 Electric Infrastructure, Safety and Reliability ("ISR") Plan Filing, Docket No. 23-48-EL
14 and the FY 2023 Electric ISR Plan Reconciliation Filing in Docket No. 5209.

15
16 **Q. What is the purpose of your testimony?**

17 A. The purpose of my testimony is to describe the income tax components of the FY 2024
18 ISR revenue requirement. In addition, I will describe the FY 2024 tax updates used to
19

1 calculate accumulated deferred income taxes (“ADIT”) in rate base for the revenue
2 requirement in this FY 2024 Electric ISR reconciliation filing. My testimony will also
3 discuss tax updates to FY 2023, which resulted in a “true-up” to the revenue requirement
4 adjustment as reflected on Attachment JDO-1 to the pre-filed direct testimony of
5 Company witness Jeffrey D. Oliveira on Page 1 of 36, Line 14. Finally, my testimony
6 will discuss the impacts of the above noted updates to the FY 2023 and FY 2024 hold
7 harmless revenue credit calculations, as reflected on Attachment JDO-1, Page 1 of 36,
8 Lines 17 and 18, and also shown on Attachments NH-1 and NH-2, respectively.

9
10 **Q. Are there any schedules attached to your testimony?**

11 A. Yes, I am sponsoring Attachments NH-1 and NH-2 for the FY 2024 and FY 2023 hold
12 harmless adjustments, respectively, which are discussed later in my testimony.

13
14 **II. Tax Updates**

15 **Q. Does the updated FY 2024 revenue requirement in this filing include updates to the**
16 **capital repairs deduction rate and the tax loss on retirements?**

17 A. Yes, the Company used revised estimates for the capital repairs deduction rate of 44.63%
18 and the tax loss on retirements of \$17,900,612 to calculate ADIT for the FY 2024 rate

base and revenue requirement. These revised estimates were based on three-quarters of the Company's 2023 calendar year tax return results, representing the April through December 2023 period. Although, the Company does not expect to file its final 2023 tax return until October of 2024, it does not anticipate further changes to the required tax information in the ISR relating to the capital repairs deduction rate and tax losses on retirements. In order to finalize FY 2024 tax activity for the ISR, the Company will sum three-quarters of its 2023 tax return activity, as will be reflected in this filing, and one-quarter of its 2024 tax return activity, representing the January through March 2024 period, to be updated in a subsequent ISR filing. The Company's 2024 tax return will not be filed with the Internal Revenue Service ("IRS") until October of 2025. The Company expects to finalize and reflect one-quarter of its 2024 tax return results in the tax updates to FY 2024 in the FY 2025 ISR Reconciliation, which will necessitate a tax true-up.

Q. Are there any tax updates to the FY 2023 revenue requirement reflected in the FY 2024 Electric ISR Reconciliation?

A. Yes, the Company has revised its vintage FY 2023 revenue requirement to reflect the following updates in Attachment JDO-1: (1) actual capital repairs deduction rate of 20.26%, as shown on Page 21, Line 2; (2) actual tax loss on retirements of \$12,372,497, as shown on Page 21, Line 24, Columns (a) and (b); and (3) actual NOL utilization by

1 National Grid of \$35,805,866, as shown on Page 26, Line 11. In order to finalize tax
2 results for the FY 2023 period, the Company was required to refer to three separate tax
3 returns. The first tax return is the short period tax return that was filed by National Grid
4 for the period of April 1 through May 25, 2022, which is the date of which PPL Rhode
5 Island Holdings, LLC, a wholly owned indirect subsidiary of PPL, acquired 100 percent
6 of the outstanding shares of common stock of Company from National Grid USA (the
7 “Acquisition”). The second tax return is the short period tax return that was filed by PPL
8 Corporation (“PPL”) for the period May 26 through December 31, 2022, which is PPL’s
9 calendar year-end. The third tax return, which will be filed by PPL for the 2023 calendar
10 year period is referenced in the analysis in order to derive the activity for the first quarter
11 of 2023 and thereby correspond the information to the FY 2023 ISR year. PPL’s 2023
12 tax return will not be filed with the IRS until October 2024, but as previously stated,
13 PPL does not anticipate any further changes to the tax information required for or
14 relevant to the FY 2023 period. The impact of these changes created a net decrease in
15 the revenue requirement of \$40,831, which is made up of a FY 2023 income tax true-up
16 downward adjustment of \$909,143 and a FY 2023 hold harmless true-up upward
17 adjustment of \$868,312, found on Attachment JDO-1, Page 1 of 36, Lines 14 and 18,
18 respectively. Additionally, these tax updates combined with plant in service and DG
19

1 related updates created a downward adjustment to the FY 2023 period as reflected on
2 Attachment JDO-1, Page 1 of 36, Line 10 to the pre-filed testimony of Mr. Oliveira.

3
4 **Q. Are there any updates to the calculation of the excess deferred income tax amounts**
5 **as a result of Tax Cuts and Jobs Act of 2017 (“2017 Tax Act”)?**

6 A. There are no new updates to the calculation of the excess deferred income tax amounts
7 for FY 2024. Among the vintage years, only FY 2018 incremental ISR investment
8 created excess deferred tax. As in prior fiscal years, the Company derived the excess
9 deferred income tax amounts by multiplying the cumulative balance of ISR book to tax
10 depreciation differences as of March 31, 2018 by the 10.55 percent change in the tax rate
11 (31.55 percent average rate for FY 2018 minus 21 percent). As noted in the pre-filed
12 testimony of Mr. Oliveira, this amount is reflected in the updated FY 2024 revenue
13 requirement as shown on Line 27, Page 2 of Attachment JDO-1.

14
15 **Q. Does the updated FY 2024 revenue requirement include bonus depreciation as a**
16 **result of the 2017 Tax Act?**

17 A. Yes. As indicated in the Company’s FY 2024 Electric ISR Plan Section 5, the
18 Company’s original interpretation of the 2017 Tax Act was that no deduction for bonus
19 depreciation would be allowed in FY 2019 and FY 2020. However, based on current
20 industry practice, the Company has included actual FY 2019 and FY 2020 bonus

1 depreciation in its calculation of accumulated deferred income taxes in the respective
2 vintage year's rate base. The Company's FY 2024 revenue requirement includes the
3 impact of the 2017 Tax Act on vintage FY 2018 through FY 2024 investments.
4

5 **III. Hold Harmless Adjustment**

6 **Q. Please describe the background of the hold harmless adjustment, as reflected in the**
7 **attachments to your testimony.**

8 A. The Acquisition was treated as an asset acquisition for tax purposes under Internal
9 Revenue Code (IRC) §338(h)(10) ("the §338 election"), which, for the Company,
10 resulted in the "step up" in the tax basis of the acquired assets to fair market value
11 (effectively book value) and the corresponding elimination of most deferred tax
12 liabilities. In addition, the NOL-related deferred tax assets were eliminated in FY 2023,
13 as these NOLs were utilized by National Grid to offset the gain on the deemed asset sale
14 for tax purposes. The reversal of nearly all deferred tax assets and liabilities, including
15 NOL deferred tax assets, reduced net deferred tax liabilities, which increased rate base
16 for each year represented in the ISR filings starting with the FY 2023 Electric ISR Plan
17

(the year of the Acquisition) and forward.¹ Consequently, the increase in rate base necessarily increases the revenue requirement associated with the ISR mechanism.

Q. How does the Company propose to address the above increases to the revenue requirements on the FY 2024 Electric ISR Plan revenue requirement as a result of the Acquisition?

A. As part of the transaction approval proceeding before the Division of Public Utilities and Carriers in Docket No. D-21-09, PPL committed to hold harmless Rhode Island customers from any changes to Accumulated Deferred Income Taxes (“ADIT”) as a result of the Acquisition.² Because of the §338 election, PPL generated tax-deductible goodwill, which creates cash tax benefits to the Company. The Company plans to share these cash tax benefits with customers in the form of revenue credits to offset the increase in revenue requirements from the increase in rate base because of the elimination of deferred taxes in the Acquisition. As discussed in Mr. Oliveira’s pre-filed testimony, the Company is proposing to increase the FY 2024 revenue requirement by the calculated hold harmless amounts totaling \$30,228 as shown on Attachment JDO-1, Page 1, Lines 17 and 18 or in Attachments NH-1, Page 1, Line 23(a) and NH-2, Page 1, Line 23(e).

¹ As the Company has not filed for or been involved in a rate case proceeding since 2018, the increase in rate base and corresponding hold harmless commitment has not been relevant apart from ISR proceedings since the date of acquisition.

² See Report and Order, Docket No. D-21-09 at 257, commitment #16 (February 23, 2023).

1 **Q. Please describe any impacts of the Acquisition on the presentation of the revenue**
2 **requirement calculations.**

3 A. As stated above, the Acquisition resulted in the reversal of book and tax timing
4 differences and the elimination of the related deferred taxes. In addition, tax depreciation
5 starts over on a new tax basis equal to net book value on the date of the Acquisition. The
6 Company has reflected these impacts of the Acquisition in the presentation of its revenue
7 requirement calculations in Schedule JDO-1, as described in Mr. Oliveira's testimony.
8 Starting in FY 2023, each ISR plan year, FY 2018 through FY 2023, will include a new
9 tax basis for the Company. Further, an ADIT liability balance will increase as
10 accelerated tax depreciation is taken each year on increased tax basis of the acquired
11 assets.

12
13 **Q. Please describe the purpose of the attachments to your testimony.**

14 A. Attachments NH-1 and NH-2 show the calculation of the hold harmless credits to the
15 FY 2024 revenue requirement. To determine the impact of the Acquisition to customers
16 and the required hold harmless adjustment, the Company must compare actual ADIT in
17 rate base to hypothetical ADIT in rate base as if the Acquisition did not occur and apply
18 the weighted average cost of capital to the difference to determine the revenue
19 requirement impact on all pre-acquisition periods presented in the ISR.

20

1 Attachment NH-1 reflects the hold harmless revenue requirement impact of FY 2024 and
2 Attachment NH-2 reflects the hold harmless revenue requirement true-up adjustment for
3 FY 2023. Page 1 of both Attachments NH-1 and NH-2 provide the cost of capital factors,
4 the change in ADIT on the “with and without acquisition” scenarios from Page 2 and the
5 revenue requirement impacts of the Acquisition to determine the hold harmless revenue
6 adjustment needed to make customers whole.

7
8 **Q. Please describe any updates to the hold harmless adjustment presented in this filing?**

9 A. For FY 2023, the hold harmless true-up adjustment reflects an increase to the revenue
10 requirement of \$868,312 on Attachment NH-2, Page 1, Line 23, Column (e) and is
11 primarily related to the increase in the net operating loss (“NOL”) utilization in the “with
12 acquisition” scenario as compared to the “without acquisition” scenario. In the “with
13 acquisition” scenario, the estimated NOL related deferred tax assets reversals increased
14 from \$937,665, as reflected in the FY 2023 Electric ISR Reconciliation Filing, to
15 \$23,627,830 in this FY 2024 Electric ISR Reconciliation filing. The Acquisition allowed
16 National Grid to utilize all of the Company’s NOLs whereas in the “without Acquisition”
17 scenario, the NOL is hypothetically utilized over a 7-year period, which was approved in
18 the FY 2025 Electric ISR Plan in Docket No. 23-48-EL. The “without acquisition”
19 scenario reflected a lower increase in NOL related deferred tax asset reversals (from
20 \$937,665 to \$3,375,404) than the “with acquisition scenario” due to the longer utilization

1 period. An increase in NOL utilization reduces deferred tax assets, which decreases rate
2 base and the resulting revenue requirement. Since the Acquisition decreases the revenue
3 requirement, as it relates to NOL utilization, the hold harmless adjustment also decreases.

4
5 For FY 2024, the hold harmless adjustment reduced the revenue requirement by
6 \$838,084, as reflected on Attachment NH-1, Page 1, Line 23. This hold harmless
7 adjustment decreased by \$741,449 from the \$1,579,533 estimate calculated for the
8 FY 2024 Electric ISR Plan filing primarily due to the increase in NOL utilization in
9 FY 2023 discussed above. The FY 2023 NOL tax update impacts FY 2024 because the
10 NOL related deferred tax impacts reduce rate base, on which the revenue requirement is
11 determined by averaging the rate base amounts calculated at the end of the prior and the
12 current periods. Other factors that contributed to the change in the hold harmless
13 adjustment are (1) plant updates related to DG projects prior to the Acquisition date and
14 their related tax impacts; (2) FY 2022 and FY 2023 tax updates to adjust the repairs
15 reduction rate, the tax loss on retirements and NOLs to the final tax returns, which were
16 not available at the time of the Electric ISR FY 2024 Plan filing; (3) FY 2024 estimated
17 tax updates to adjust the repairs reduction rate and tax loss on retirements based on the
18 PPL's 2023 tax return to be filed in October 2024; and (4) the change to a 7-year NOL
19 utilization period discussed above.

1 IV. Conclusion

2 Q. Does this conclude your testimony?

3 A. Yes.

**THE NARRAGANSETT ELECTRIC COMPANY
d/b/a RHODE ISLAND ENERGY
RIPUC DOCKET NO. 22-53-EL
FY 2024 ELECTRIC INFRASTRUCTURE, SAFETY, AND RELIABILITY PLAN
ANNUAL RECONCILIATION FILING
WITNESS: NATALIE HAWK
ATTACHMENTS**

List of Attachments

Attachment NH-1	Hold Harmless Calculation FY 2024 Electric Infrastructure, Safety and Reliability Reconciliation
Attachment NH-2	True-Up Calculation for FY 2023 FY 2024 Electric Infrastructure, Safety and Reliability Reconciliation Hold Harmless

**THE NARRAGANSETT ELECTRIC COMPANY
d/b/a RHODE ISLAND ENERGY
RIPUC DOCKET NO. 22-53-EL
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Attachment NH-1

Hold Harmless Calculation
FY 2024 Electric Infrastructure, Safety and Reliability Reconciliation

FY 2024 Impact of Elimination of ADIT and Hold Harmless Commitment
Plan Year 2024 - April 2023-March 2024

Inputs			
		Column (A)	
1	Tax Rate	21.00%	
2	Long Term Debt	48.350%	
3	Short Term Debt	0.600%	
4	Preferred Stock	0.100%	
5	Debt Weighting	49.050%	Lines 2+3+4
6	Equity Weighting	50.950%	1 - Line 5
7	Long Term Debt Rate	4.620%	
8	Short Term Debt Rate	1.760%	
9	Cost of Debt	4.585%	Line 2 / (Lines 2 + 3) * Line 7 + Line 3 / (Lines 2 + 3) * Line 8
10	Cost of Equity	9.275%	
11	Revenue WACC (pre-tax)	8.2300%	Line 9 * Line 5 + (Line 10 / (1 - Line 1)) * Line 6
12	WACC (after-tax)	6.975%	(Line 9 * Line 5) + (Line 10 * Line 6)
13	Rate Base - PPL (after purchase)	\$ 215,678,916	
14	Rate Base - NG (before sale)	\$ 205,495,623	
15	Deferred Taxes / Hold Harmless	\$ 10,183,293	Lines 13 - 14 Elimination of Deferred Taxes
ROE Mechanics			

Notes:

- The sale of the business is treated as a sale of assets for income tax purposes causing the reversal of cumulative timing differences and a payment to the government of the amounts that had been recorded as deferred tax liabilities by National Grid ("NG").
- PPL does not assume the interest-free liability of ADIT from NG because NG paid this tax liability to the government as a result of the sales transaction. As such, PPL has to replace the no-cost capital with other capital. This calculation assumes that the substitute for the eliminated DTL is debt and equity in the same proportion as stated in Lines 5 and 6.
- The revenue credit for hold harmless is reflected on Line 23.
- Line 28 reflects the goodwill tax deduction needed to hold customers harmless from the increased revenue requirement due to the rate base increase from the elimination of deferred taxes. Any tax deduction lower than the amount reflected on this line will not provide enough of a tax benefit to share with customers.
- Line 29 reflects the cash tax benefit of the goodwill tax deduction and is recorded for GAAP reporting (not reflected for FERC reporting). There is not an income statement tax benefit since the goodwill tax deduction is a flip between current and deferred taxes. This amount grossed up for tax shown on Line 30 is the revenue credit reflected on Line 23.

		Post-Acquisition Results for ISR Capital Adjustments through the Date of Acquisition	Results for ISR Capital Adjustments through the Date of Acquisition as if the Acquisition did not occur	Difference	
		(a)	(b)	(c) = (a) - (b)	
16	Rate Base after Acquisition	Line 13	215,678,916	215,678,916	-
17	ADIT Adjustment	- Line 15	-	(10,183,293)	10,183,293
18	Adjusted Rate Base	Lines 16 + 17	215,678,916	205,495,623	10,183,293
19	Debt Return (4.576%)	Lines 18 * 5 * 9	4,850,436	4,621,422	229,014
20	Equity Return (9.275%)	Lines 18 * 6 * 10	10,192,150	9,710,927	481,223
21	Taxes on Equity (21%)	(Line 20 / (1 - Line 1)) * Line 1	2,709,306	2,581,386	127,920
22	Total Unadjusted Revenue	Sum of Lines 19 , 20, 21	17,751,891	16,913,734	838,157
23	Revenue Adjustment	- Line 15 * Line 11	(838,084)	-	(838,084) Note 1
24	Total Revenue	Lines 22 + 23	16,913,807	16,913,734	73
25	Interest Expense	Lines 18, Col (b) * 5 * 9	4,621,422	4,621,422	-
26	Tax Expense	(Lines 24 - 25) * Line 1	2,581,401	2,581,386	15
27	Net Income	Lines 24 - 25 - 26	9,710,984	9,710,927	57
Impact of Transaction					
28	Transaction-related Tax Deduction	- Line 23 * (1-Line 1) / Line 1	3,152,792		
29	Cash Tax Benefit at 21%	Line 28 * Line 1	662,086		
30	Cash Tax Benefit Grossed Up	Line 29 / (1-Line 1)	838,084		

Note 1: There is a slight variation in the calculated hold harmless amount in the ISR filing due to the roundings that are used to calculate the WACC in the ISR files.

Average ISR Rate Base after Deferred Tax Proration

	Post-Acquisition (a)	Prorated (b)	Post-Acquisition After Proration (c)		No Acquisition (d)	Prorated (e)	No Acquisition After Proration (f)	
1 Plan Year 2024								
2 FY 2018	12,978,736	100%	12,978,736		13,538,805	100%	13,538,805	
3 FY 2019	25,408,484	100%	25,408,484		22,303,935	100%	22,303,935	
4 FY 2019 Intangible	1,230,535	100%	1,230,535		683,474	100%	683,474	
5 FY 2020	41,161,907	100%	41,161,907		36,887,190	100%	36,887,190	
6 FY 2021	65,898,687	100%	65,898,687		61,825,876	100%	61,825,876	
7 FY 2022	40,420,521	100%	40,420,521		35,430,551	100%	35,430,551	
8 FY 2023	28,580,046	100%	28,580,046		34,825,792	100%	34,825,792	
9 Total	<u>215,678,916</u>		<u>215,678,916</u>	Page 1, Line 13	<u>205,495,623</u>		<u>205,495,623</u>	Page 1, Line 14

**THE NARRAGANSETT ELECTRIC COMPANY
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ANNUAL RECONCILIATION FILING
WITNESS: NATALIE HAWK
ATTACHMENTS**

Attachment NH-2

True-Up Calculation for FY 2023
FY 2024 Electric Infrastructure, Safety and Reliability Reconciliation Hold Harmless

FY 2023 Impact of Elimination of ADIT and Hold Harmless Commitment
Plan Year 2023 - April 2022-March 2023 Revised

Inputs			
			Column (A)
1	Tax Rate		21.00%
2	Long Term Debt		48.350%
3	Short Term Debt		0.600%
4	Preferred Stock		0.100%
5	Debt Weighting	Lines 2+3+4	49.050%
6	Equity Weighting	1 - Line 5	50.950%
7	Long Term Debt Rate		4.620%
8	Short Term Debt Rate		1.760%
9	Cost of Debt	Line 2 / (Lines 2 + 3) * Line 7 +	4.585%
10	Cost of Equity	Line 3 / (Lines 2 + 3) * Line 8	9.275%
11	Revenue WACC (pre-tax)	Line 9 * Line 5 + (Line 10 / (1 - Line 1)) * Line 6	8.2300%
12	WACC (after-tax)	(Line 9 * Line 5) + (Line 10 * Line 6)	6.975%
13	Rate Base - PPL (after purchase)		\$ 198,878,472
14	Rate Base - NG (before sale)		\$ 200,202,923
15	Deferred Taxes / Hold Harmless	Lines 13 - 14	\$ (1,324,451)
Elimination of Deferred Taxes			
ROE Mechanics			

Notes:

- The sale of the business is treated as a sale of assets for income tax purposes causing the reversal of cumulative timing differences and a payment to the government of the amounts that had been recorded as deferred tax liabilities by National Grid ("NG").
- PPL does not assume the interest-free liability of ADIT from NG because NG paid this tax liability to the government as a result of the sales transaction. As such, PPL has to replace the no-cost capital with other capital. This calculation assumes that the substitute for the eliminated DTL is debt and equity in the same proportion as stated in Lines 5 and 6.
- The revenue credit for hold harmless is reflected on Line 23.
- Line 28 reflects the goodwill tax deduction needed to hold customers harmless from the increased revenue requirement due to the rate base increase from the elimination of deferred taxes. Any tax deduction lower than the amount reflected on this line will not provide enough of a tax benefit to share with customers.
- Line 29 reflects the cash tax benefit of the goodwill tax deduction and is recorded for GAAP reporting (not reflected for FERC reporting). There is not an income statement tax benefit since the goodwill tax deduction is a flip between current and deferred taxes. This amount grossed up for tax shown on Line 30 is the revenue credit reflected on Line 23.

		Post-Acquisition Results for ISR Capital Adjustments through the Date of Acquisition	Results for ISR Capital Adjustments through the Date of Acquisition as if the Acquisition did not occur	Difference		
		(a)	(b)	(c) = (a) - (b)	Difference per FY2023 Electric Reconciliation Filed in Docket 5209, Attachment NH-1	FY2023 Adjustment for FY2024 Reconciliation
		(d)	(e) = (c) - (d)			
16	Rate Base after Acquisition	Line 13	198,878,472	198,878,472	-	-
17	ADIT Adjustment	- Line 15	-	1,324,451	(1,324,451)	-
18	Adjusted Rate Base	Lines 16 + 17	198,878,472	200,202,923	(1,324,451)	(10,550,575)
19	Debt Return (4.576%)	Lines 18 * 5 * 9	4,472,608	4,502,394	(29,786)	(237,274)
20	Equity Return (9.275%)	Lines 18 * 6 * 10	9,398,226	9,460,814	(62,588)	(498,579)
21	Taxes on Equity (21%)	(Line 20 / (1 - Line 1)) * Line 1	2,498,263	2,514,900	(16,637)	(132,533)
22	Total Unadjusted Revenue	Sum of Lines 19 , 20, 21	16,369,096	16,478,108	(109,012)	(868,387)
23	Revenue Adjustment	- Line 15 * Line 11	109,002	-	109,002	868,312
24	Total Revenue	Lines 22 + 23	16,478,099	16,478,108	(9)	(74)
25	Interest Expense	Lines 18, Col (b) * 5 * 9	4,502,394	4,502,394	-	-
26	Tax Expense	(Lines 24 - 25) * Line 1	2,514,898	2,514,900	(2)	(16)
27	Net Income	Lines 24 - 25 - 26	9,460,807	9,460,814	(7)	(58)
Impact of Transaction						
28	Transaction-related Tax Deduction	- Line 23 * (1-Line 1) / Line 1	(410,056)			
29	Cash Tax Benefit at 21%	Line 28 * Line 1	(86,112)			
30	Cash Tax Benefit Grossed Up	Line 29 / (1-Line 1)	(109,002)			

Note 1: There is a slight variation in the calculated hold harmless amount in the ISR filing due to the roundings that are used to calculate the WACC in the ISR files.

Average ISR Rate Base after Deferred Tax Proration

	Post-Acquisition (a)	Prorated (b)	Post-Acquisition After Proration (c)		No Acquisition (d)	Prorated (e)	No Acquisition After Proration (f)	
1 Plan Year 2023								
2 FY 2018	13,921,065	100%	13,921,065		14,172,285	100%	14,172,285	
3 FY 2019	25,232,023	100%	25,232,023		23,649,292	100%	23,649,292	
4 FY 2019 Intangible	1,649,877	100%	1,649,877		1,076,584	100%	1,076,584	
5 FY 2020	41,394,719	100%	41,394,719		39,213,020	100%	39,213,020	
6 FY 2021	67,497,071	100%	67,497,071		65,347,535	100%	65,347,535	
7 FY 2022	40,213,686	100%	40,213,686		37,622,114	100%	37,622,114	
8 FY 2023	<u>8,970,031</u>	100%	<u>8,970,031</u>		<u>19,122,093</u>	100%	<u>19,122,093</u>	
9 Total	<u>198,878,472</u>		<u>198,878,472</u>	Page 1, Line 13	<u>200,202,923</u>		<u>200,202,923</u>	Page 1, Line 14

PRE-FILED DIRECT TESTIMONY

OF

TYLER G. SHIELDS

August 1, 2024

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I. Introduction and Qualifications

Q. Please state your name and business address.

A. My name is Tyler G. Shields, and my business address is 280 Melrose Street, Providence, Rhode Island 02907.

Q. Please state your position.

A. I am employed by the PPL Services Corporation (“Services Corporation”) as a Rates and Regulatory Specialist. My current duties primarily pertain to revenue requirement and pricing support for the Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”).

Q. Please describe your educational background.

A. I received a Bachelor of Arts degree in Economics from the University of Connecticut in 2013.

Q. Please describe your professional background.

A. In March 2015, I began my career as a pricing analyst at Granite Telecommunications in Quincy, Massachusetts. In February 2017, I was promoted to product pricing team lead. My responsibilities included auditing customer accounts and maintaining the pricing and billing databases to ensure accuracy. In January 2021, I was hired by Charles Stark Draper Laboratory as a Program Analyst where my duties included the creation of

1 pricing proposals for prospective clients and the validation of financial data for key
2 stakeholders on a weekly basis. In November 2022, I joined the Services Corporation in
3 my current role.

4
5 **Q. Have you testified previously before the Rhode Island Public Utilities Commission**
6 **(“PUC”)?**

7 A. Yes. I provided pre-filed testimony/and or testified at hearings before the PUC regarding
8 the Company’s Fiscal Year (“FY”) 2023 Electric Revenue Decoupling Mechanism
9 (“RDM”) Reconciliation filing in Docket No. 23-16-EL, the Company’s Gas RDM
10 Reconciliation filing in Docket No. 23-23-NG, the Company’s Distribution Adjustment
11 Charge (“DAC”) and Gas Cost Recovery (“GCR”) filings in Docket No. 23-23-NG, the
12 Company’s FY 2023 Electric Infrastructure, Safety, and Reliability (“ISR”) Plan Annual
13 Reconciliation Filing in Docket No. 5209, the Company’s proposed FY 2025 Gas ISR
14 Plan in Docket No. 23-49-NG, the Company’s proposed FY 2025 Electric ISR Plan
15 in Docket No. 23-48-EL, the Company’s 2024 Annual Retail Rate Filing in Docket No.
16 24-07-EL, the Company’s Fiscal Year 2024 Electric RDM Reconciliation filing in
17 Docket No. 24-18-EL, and the Company’s Gas RDM Reconciliation filing in Docket No.
18 24-29-NG.

II. Purpose of Testimony

Q. What is the purpose of your testimony?

A. My testimony presents the proposed CapEx and O&M Reconciling Factors, as those terms are defined in the Company's Infrastructure, Safety, and Reliability Provision, R.I.P.U.C. No. 2255 effective September 1, 2022 ("ISR Provision"), resulting from the reconciliation of actual costs and revenue associated with the Fiscal Year ("FY") 2024 ISR Plan ("ISR Plan" or "Plan"). In support of the proposed factors, my testimony presents the following:

- the results of the annual reconciliation of the actual FY 2024 capital investment ("CapEx") revenue requirement and the Operation and Maintenance ("O&M") expense to the actual revenue billed;
- the final status of the credit of the FY 2022 CapEx and O&M reconciliations;
- the status of the credit of the FY 2023 CapEx and O&M reconciliations;
- the calculation of the proposed CapEx and O&M Reconciling Factors to be effective October 1, 2024; and
- the typical bill impacts related to the proposed reconciling factors.

1 **Q. How is your testimony organized?**

2 **A. My testimony is organized as follows:**

- 3 • Section III presents the Summary of FY 2024 CapEx and O&M Reconciliations;
- 4 • Section IV presents the results of the FY 2024 CapEx Revenue and the Actual
- 5 CapEx Revenue Requirement Reconciliation, the calculation of the proposed
- 6 CapEx Reconciling Factors, and the final status of the return to customers of the FY
- 7 2022 CapEx net over-recovery reconciliation balance as well as the status of the
- 8 return to customers of the FY 2023 CapEx net over-recovery reconciliation balance;
- 9 • Section V presents the results of the FY 2024 O&M Revenue and Expense
- 10 Reconciliation, the calculation of the proposed O&M Reconciling Factor, and the
- 11 final status of the return to customers of the FY 2022 O&M over-recovery
- 12 reconciliation balance as well as the status of the recovery from customers of the
- 13 FY 2023 O&M under-recovery reconciliation balance; and
- 14 • Section VI presents the rate class bill impact analysis.

15

16 **III. Summary of FY 2024 Capex and O&M Reconciliations**

17 **Q. Please summarize the results of the FY 2024 CapEx and O&M reconciliations.**

18 **A. A summary of the results of the FY 2024 CapEx and O&M reconciliations is presented in**

19 Attachment TGS-1. Pursuant to the ISR Provision, the annual reconciliations compare

20 the actual revenue billed during the Plan year through the approved CapEx and O&M

21 Factors to the CapEx and O&M revenue requirement based on actual costs incurred. The

1 calculation of the revenue requirement is presented in the testimony of Company Witness
2 Jeffrey D. Oliveira. As reflected in Attachment TGS-1, the result of the CapEx
3 reconciliation is a net under-recovery of approximately \$0.5 million; the result of the
4 O&M reconciliation is a net under-recovery of approximately \$0.8 million.
5

6 **Q. Please briefly summarize the operation of the tariff provision that enables the**
7 **Company to recover certain costs through the ISR Plan.**

8 A. In accordance with the ISR Provision, the Company is allowed to recover the revenue
9 requirement related to capital investments through CapEx Factors and to recover certain
10 expenditures for Inspection and Maintenance (“I&M”) and Vegetation Management
11 (“VM”) activities through O&M Factors. In the ISR Plan filing for the upcoming year,
12 the Company determines the CapEx Factors, which are designed to recover the revenue
13 requirement on the forecasted capital investment for the ISR Plan’s investment year plus
14 cumulative capital investment in prior years’ ISR Plans, as well as the O&M Factors
15 based on the forecasted O&M expense for the Plan year. On an annual basis, the
16 Company is required to reconcile the annual CapEx revenue requirement on actual
17 cumulative ISR capital investment and the actual O&M expense incurred to actual billed
18 revenue generated from the CapEx Factors and the O&M Factors, respectively. The over
19 or under-recovered balances resulting from the CapEx and O&M reconciliations are
20

1 either credited to or recovered from customers through the CapEx Reconciling Factors
2 and the O&M Reconciling Factor, respectively.

3
4 **IV. Capex Reconciliation and Proposed Capex Reconciling Factors**

5 **Q. What is the result of the CapEx reconciliation for FY 2024?**

6 A. The FY 2024 CapEx reconciliation by rate class is presented in Attachment TGS-2,
7 page 1. Line (5) represents the CapEx revenue billed during the period April 1, 2023
8 through March 31, 2024 of approximately \$38.8 million. Line (4) reflects the CapEx
9 revenue requirement on actual cumulative ISR capital investment of approximately
10 \$39.4 million. Line (6) identifies the net under-recovery by rate class of the CapEx
11 revenue requirement, which totals approximately \$0.5 million.

12
13 **Q. Why has the Company prepared the CapEx reconciliation by rate class?**

14 A. The ISR Provision requires that the CapEx Reconciling Factors be calculated as class-
15 specific per-kWh factors designed to recover or credit the under- or over-recovery of the
16 actual Cumulative Revenue Requirement, as allocated to each rate class by the Rate Base
17 Allocator, for the prior fiscal year. The Rate Base Allocator is the percentage of total rate
18 base allocated to each rate class determined in the most recently approved allocated cost
19 of service study. Page 1, Line (4) of Attachment TGS-2 shows the allocation of the
20 CapEx revenue requirement to each rate class based upon the Rate Base Allocator
21 approved in the Company's 2017 general rate case in Docket No. 4770.

1 **Q. Please describe the results of the rate class reconciliation.**

2 A. As shown in Attachment TGS-2, page 1, the allocated FY 2024 revenue requirement on
3 actual cumulative capital investment (Line (4)) is subtracted from the CapEx Factor
4 revenue billed for each rate class (Line (5)), resulting in the net under-recovery of
5 approximately \$0.5 million (Line (6)). The detail of the CapEx revenue billed for each
6 rate class is provided in Attachment TGS-2, page 2.

7
8 **Q. Please describe the amounts included on Line (7) of Attachment TGS-2, Page 1.**

9 A. The amounts presented on Page 1 Line (7) reflect the final balance of the net over-
10 recovery resulting from the FY 2022 CapEx reconciliation. The net recovery of the FY
11 2022 CapEx reconciliation balance is presented on page 3. Of the \$4.7 million net over-
12 recovery for FY 2022 to be returned to customers via CapEx Reconciling Factors
13 approved by the PUC, the Company returned to customers \$4.5 million from October 1,
14 2022 through September 30, 2023. The remaining balance is a net over-recovery amount
15 of approximately \$0.2 million, as shown on Attachment TGS-2, Page 1, Line (7), Column
16 (a). As described in Docket No. 4682, the Company is including each rate class' residual
17 balance associated with the FY 2022 reconciliation as an adjustment to the FY 2024
18 CapEx reconciliation balance.

1 **Q. How is the Company proposing to recover the FY 2024 CapEx net under-recovery?**

2 A. The Company is proposing to implement a CapEx Reconciling Factor for each rate class
3 that is consistent with the results of the rate class reconciliation. The calculation of the
4 proposed CapEx Reconciling Factors is presented in Attachment TGS-2, page 1. The
5 over or under-recovery by rate class on Line (8) is divided by each rate class' forecasted
6 kWh deliveries for the period October 1, 2024 through September 30, 2025 on Line (9).
7 The class-specific CapEx Reconciling Factors are shown on Line (10).

8
9 **Q. Is the Company providing the status of the net over-recovery from the FY 2023**
10 **CapEx reconciliation?**

11 A. Yes. The status of the FY 2023 CapEx reconciliation net over-recovery balance is
12 presented in Attachment TGS-2, page 4. As of June 30, 2024, the balance reflects a
13 remaining net over-recovery of approximately \$3.1 million, which the Company will
14 continue to return to customers through September 30, 2024.

15
16 **V. O&M Reconciliation and Proposed O&M Reconciling Factor**

17 **Q. What is the result of the O&M reconciliation for FY 2024?**

18 A. The O&M reconciliation for FY 2024 is presented in Attachment TGS-3, page 1.
19 Line (1) shows the actual O&M expense for FY 2024 of approximately \$14.9 million,
20 which is supported in the testimony of Company Witness Jeffrey D. Oliveira. Line (2)
21 shows O&M revenue billed through the O&M Factors from April 1, 2023 through

1 March 31, 2024 of approximately \$14.1 million. Line (3) shows the difference of
2 approximately \$0.8 million, representing an under-recovery of actual O&M expense.
3

4 **Q. Please describe the amount included on Line (4).**

5 A. The amount presented on Line (4) reflects the remaining balance resulting from the
6 FY 2022 O&M reconciliation of \$0. The over-recovered balance for FY 2022 of \$69,828
7 was too small to generate a billable factor and so the Company carried this over-recovery
8 amount forward and included it as an adjustment to the FY 2023 O&M reconciliation
9 balance. Consequently, a final reconciliation of the FY 2022 O&M reconciliation over-
10 recovery in this filing is not necessary since it was already included as an adjustment to
11 the FY 2023 O&M reconciliation balance.¹
12

13 **Q. Is the Company providing the O&M Factor revenue?**

14 A. Yes. Attachment TGS-3, page 2 presents the O&M Factor revenue billed by month.
15

¹ Refer to the Company's FY 2023 Electric ISR Plan Annual Reconciliation Filing (Docket No. 5209), the Direct Testimony of Tyler G. Shields, Page 11, Line 17, to Page 12, Line 5: "Pursuant to the ISR Provision, the amount approved for recovery or crediting through the O&M Reconciling Factor is subject to reconciliation. Therefore, the Company would typically present the final reconciliation of the balance from the FY 2022 O&M reconciliation in the FY 2024 ISR Reconciliation Filing and include the residual balance of the FY 2022 O&M reconciliation with the results of the FY 2024 O&M reconciliation and would propose an O&M Reconciling Factor on the total. In this instance, however, the Company is proposing to include the carry forward FY 2022 over-recovery balance as an adjustment to the FY 2023 O&M reconciliation balance. Consequently, this treatment of the FY 2022 over-recovery balance effectively serves as a final reconciliation of this balance."

1 **Q. What is the proposed O&M Reconciling Factor?**

2 A. The proposed O&M Reconciling Factor is calculated on Attachment TGS-3, page 1.
3 The total amount to be recovered from customers of \$808,366 on Line (5) is divided by
4 the forecasted kWh during the period October 1, 2024 through September 30, 2025, on
5 Line (6), resulting in a charge of 0.010¢ per kWh on Line (7). Pursuant to the ISR
6 Provision, the O&M Reconciling Factor is a uniform per-kWh factor.

7
8 **Q. Is the Company providing the status of the FY 2023 O&M reconciliation under-**
9 **recovery?**

10 A. Yes. The status of the balance from the FY 2023 O&M reconciliation is presented in
11 Attachment TGS-3, page 4. As of June 30, 2024, there is a remaining under-recovery
12 balance of approximately \$0.8 million, which the Company will continue to recover from
13 customers through September 30, 2024.

14
15 **Q. How does the Company propose to credit or recover the residual balance at**
16 **September 30, 2024?**

17 A. Pursuant to the ISR Provision, the amount approved for recovery or crediting through the
18 O&M Reconciling Factor is subject to reconciliation. Therefore, the Company will
19 present the final reconciliation of the balance from the FY 2023 O&M reconciliation in

the FY 2025 ISR Reconciliation Filing and include the residual balance of the FY 2023 O&M reconciliation with the results of the FY 2025 O&M reconciliation and will propose an O&M Reconciling Factor on the total.

VI. Typical Bill Analysis

Q. Is the Company providing a typical bill analysis to illustrate the impact of the proposed rates on each of the Company's rate classes?

A. Yes. The typical bill analysis illustrating the monthly bill impact of the proposed rate changes for each rate class is provided in Attachment TGS-4. The impact of the proposed CapEx Reconciling Factor of \$0.00020 per kWh and the proposed O&M Reconciling Factor of \$0.00010 per kWh on a typical residential customer receiving Last Resort Service and using 500 kWh per month is an increase of \$0.86, or approximately 0.6%, from \$137.54 to \$138.40.

VII. Summary of Retail Delivery Rates

Q. Is the Company providing a proposed Summary of Retail Delivery Rates, R.I.P.U.C. No. 2095, reflecting the reconciling factors proposed in this filing?

A. No, not at this time. The Company will also be submitting its Pension and Post-retirement Benefits Other than Pension Adjustment Factor ("PAF") filing in August 2024 in which the Company will propose a PAF, effective October 1, 2024. The Company will file a

1 Summary of Retail Delivery Rates tariff reflecting all rates proposed for October 1, 2024
2 in compliance with the PUC's orders in this proceeding and the PAF proceedings.

3
4 **VIII. Conclusion**

5 **Q. Does this conclude your testimony?**

6 **A. Yes.**

**THE NARRAGANSETT ELECTRIC COMPANY
d/b/a RHODE ISLAND ENERGY
RIPUC DOCKET NO. 22-53-EL
FY 2024 ELECTRIC INFRASTRUCTURE, SAFETY, AND RELIABILITY PLAN
ANNUAL RECONCILIATION FILING
WITNESS: TYLER G. SHIELDS
ATTACHMENTS**

List of Attachments

Attachment TGS-1	FY 2024 ISR Plan Annual Reconciliation Summary
Attachment TGS-2	CapEx Reconciliations and Proposed CapEx Reconciling Factors
Attachment TGS-3	O&M Reconciliations and Proposed O&M Reconciling Factor
Attachment TGS-4	Typical Bill Analysis

**THE NARRAGANSETT ELECTRIC COMPANY
d/b/a RHODE ISLAND ENERGY
RIPUC DOCKET NO. 22-53-EL
FY 2024 ELECTRIC INFRASTRUCTURE, SAFETY, AND RELIABILITY PLAN
ANNUAL RECONCILIATION FILING
WITNESS: TYLER G. SHIELDS
ATTACHMENTS**

Attachment TGS-1

FY 2024 ISR Plan Annual Reconciliation Summary

FY 2024 ISR Plan Annual Reconciliation Summary

		<u>CapEx</u>	<u>O&M</u>	<u>Total</u>
		(a)	(b)	(c)
(1) Actual Revenue Requirement	\$	39,352,303	\$14,929,779	\$54,282,082
(2) Revenue Billed		<u>\$38,822,110</u>	<u>\$14,121,413</u>	<u>\$52,943,523</u>
(3) Total Over/(Under) Recovery		(\$530,193)	(\$808,366)	(\$1,338,559)

- (1) Column (a): Attachment JDO-1, Page 1 of 36:
Line (15), Column (b): Total Capital Investment Component of Revenue Requirement \$ 39,026,367
Line (17) + (18), Column (b): Per Tax Hold Harmless Adjustment \$ 30,228
Line (20), Column (b): Adjustment for DG Project Review \$ 295,707
Total Net Capital Investment Component of Revenue Requirement \$ 39,352,303
Column (b): Attachment JDO-1, Page 1 of 36, Line (4), Column (b)
- (2) Column (a): Attachment TGS-2, page 1, Line (5)
Column (b): Attachment TGS-3, page 1, line (2)
- (3) Line (2) - Line (1)
- (c) Sum of Columns (a) and (b)

**THE NARRAGANSETT ELECTRIC COMPANY
d/b/a RHODE ISLAND ENERGY
RIPUC DOCKET NO. 22-53-EL
FY 2024 ELECTRIC INFRASTRUCTURE, SAFETY, AND RELIABILITY PLAN
ANNUAL RECONCILIATION FILING
WITNESS: TYLER G. SHIELDS
ATTACHMENTS**

Attachment TGS-2

CapEx Reconciliations and Proposed CapEx Reconciling Factors

Proposed CapEx Reconciling Factors
For Fiscal Year 2024 ISR Plan
For the Recovery/(Refund) Period October 1, 2024 through September 30, 2025

	<u>Total</u> (a)	<u>Residential</u> <u>A-16 / A-60</u> (b)	<u>Small C&I</u> <u>C-06</u> (c)	<u>General C&I</u> <u>G-02</u> (d)	<u>200 kW</u> <u>Demand</u> <u>B-32 / G-32</u> (e)	<u>Lighting</u> <u>S-05/S-06</u> <u>S-10/S-14</u> (f)	<u>Propulsion</u> <u>X-01</u> (g)
(1) Actual FY2024 Capital Investment Revenue Requirement	\$39,352,303						
(2) Total Rate Base (\$000s)	\$729,512	\$404,995	\$75,009	\$117,155	\$123,849	\$8,296	\$208
(3) Rate Base as Percentage of Total	100.00%	55.52%	10.28%	16.06%	16.98%	1.14%	0.03%
(4) Allocated Actual FY2024 Capital Investment Revenue Requirement	\$39,352,303	\$21,846,777	\$4,046,235	\$6,319,730	\$6,680,827	\$447,514	\$11,220
(5) CapEx Revenue Billed	<u>\$38,822,110</u>	<u>\$21,039,238</u>	<u>\$3,480,300</u>	<u>\$6,599,942</u>	<u>\$7,406,642</u>	<u>\$280,049</u>	<u>\$15,939</u>
(6) Total Over/(Under) Recovery for FY 2024	(\$530,193)	(\$807,539)	(\$565,935)	\$280,212	\$725,815	(\$167,465)	\$4,719
(7) Remaining Over/(Under) For FY 2022	<u>\$154,599</u>	<u>\$161,178</u>	<u>(\$7,345)</u>	<u>\$15,310</u>	<u>(\$2,010)</u>	<u>(\$12,092)</u>	<u>(\$442)</u>
(8) Total Over/(Under) Recovery	(\$375,594)	(\$646,361)	(\$573,280)	\$295,522	\$723,805	(\$179,557)	\$4,277
(9) Forecasted kWhs - October 1, 2024 through September 30, 2025	7,349,669,060	3,191,926,845	702,752,577	1,197,421,358	2,204,275,097	36,020,966	17,272,218
(10) Proposed Class-specific CapEx Reconciling Factor Charge/(Credit) per kWh		\$0.00020	\$0.00081	(\$0.00024)	(\$0.00032)	\$0.00498	(\$0.00024)

- (1) Column (a): Attachment JDO-1, Page 1 of 36:
Line (15), Column (b): Total Capital Investment Component of Revenue Requirement \$ 39,026,367
Line (17) + (18), Column (b): Per Tax Hold Harmless Adjustment \$ 30,228
Line (20), Column (b): Adjustment for DG Project Review \$ 295,707
Total Net Capital Investment Component of Revenue Requirement \$ 39,352,303
- (2) per R.I.P.U.C. Docket No. 4770/4780, Compliance Attachment 6, (Schedule 1A), Page 1, Line 9
- (3) Line (2) ÷ Line (2), Column (a)
- (4) Line (1) x Line (3)
- (5) per Page 2
- (6) Line (5) - Line (4)
- (7) per Page 3
- (8) Line (6) + Line (7)
- (9) per Company forecast
- (10) -1 x (Line (8) ÷ Line (9)), truncated to 5 decimal places

Fiscal Year 2024 CapEx Reconciliation
For the Period April 1, 2023 through March 31, 2024
For the Recovery/Refund Period October 1, 2024 through September 30, 2025

CapEx Revenue By Rate Class:

Month	Residential A-16 / A-60			Small C&I C-06			General C&I G-02			Demand B-32 / G-32		
	Total Revenue (a)	CapEx Rec Factor Revenue (b)	Base Revenue (c)	Total Revenue (a)	CapEx Rec Factor Revenue (b)	Base Revenue (c)	Total Revenue (a)	CapEx Rec Factor Revenue (b)	Base Revenue (c)	Total Revenue (a)	CapEx Rec Factor Revenue (b)	Base Revenue (c)
(1) Apr-23	\$ 569,998.00	\$ (82,913)	\$652,911	\$ 64,512.00	\$ (1,874)	\$66,386	\$ 192,622.00	\$ (29,424)	\$222,046	\$ 58,169.00	\$ (37,653)	\$95,822
May-23	\$ 1,154,197.00	\$ (165,623)	\$1,319,820	\$ 238,474.00	\$ (3,708)	\$242,182	\$ 480,572.00	\$ (68,068)	\$548,640	\$ 539,131.00	\$ (84,030)	\$623,161
Jun-23	\$ 1,248,455.00	\$ (179,054)	\$1,427,509	\$ 254,279.00	\$ (4,144)	\$258,423	\$ 471,640.00	\$ (67,006)	\$538,646	\$ 519,665.00	\$ (82,955)	\$602,620
Jul-23	\$ 1,904,722.00	\$ (273,099)	\$2,177,821	\$ 302,674.00	\$ (4,546)	\$307,220	\$ 494,091.00	\$ (78,769)	\$572,860	\$ 555,038.00	\$ (88,851)	\$643,889
Aug-23	\$ 2,139,479.00	\$ (306,720)	\$2,446,199	\$ 333,490.00	\$ (5,146)	\$338,636	\$ 504,964.00	\$ (84,713)	\$589,677	\$ 593,129.00	\$ (100,262)	\$693,391
Sep-23	\$ 1,876,540.00	\$ (269,031)	\$2,145,571	\$ 314,438.00	\$ (4,637)	\$319,075	\$ 550,546.00	\$ (87,549)	\$638,095	\$ 554,599.00	\$ (92,067)	\$646,666
Oct-23	\$ 1,342,037.00	\$ (254,141)	\$1,596,178	\$ 268,824.00	\$ (17,441)	\$286,265	\$ 462,700.00	\$ (97,209)	\$559,909	\$ 543,600.00	\$ (119,930)	\$663,530
Nov-23	\$ 1,141,786.00	\$ (301,993)	\$1,443,779	\$ 231,264.00	\$ (32,933)	\$264,197	\$ 372,481.00	\$ (119,504)	\$491,985	\$ 422,401.00	\$ (148,612)	\$571,013
Dec-23	\$ 1,286,096.00	\$ (340,515)	\$1,626,611	\$ 240,465.00	\$ (32,867)	\$273,332	\$ 340,691.00	\$ (122,061)	\$462,752	\$ 421,920.00	\$ (151,810)	\$573,730
Jan-24	\$ 1,553,418.00	\$ (411,304)	\$1,964,722	\$ 271,302.00	\$ (36,606)	\$307,908	\$ 387,396.00	\$ (136,427)	\$523,823	\$ 448,582.00	\$ (155,605)	\$604,187
Feb-24	\$ 1,354,384.00	\$ (358,600)	\$1,712,984	\$ 260,763.00	\$ (36,529)	\$297,292	\$ 407,361.00	\$ (138,987)	\$546,348	\$ 417,914.00	\$ (148,274)	\$566,188
Mar-24	\$ 1,294,803.00	\$ (342,923)	\$1,637,726	\$ 263,486.00	\$ (37,443)	\$300,929	\$ 445,338.00	\$ (147,268)	\$592,606	\$ 442,312.00	\$ (159,697)	\$602,009
Apr-24	\$ 698,677.00	\$ (188,730)	\$887,407	\$ 194,718.00	\$ (23,737)	\$218,455	\$ 231,718.00	\$ (80,837)	\$312,555	\$ 431,390.00	\$ (89,046)	\$520,436
Total	\$17,564,592	\$ (3,474,646)	\$21,039,238	\$3,238,689	\$ (241,611)	\$3,480,300	\$5,342,120	\$ (1,257,822)	\$6,599,942	\$5,947,850	\$ (1,458,792)	\$7,406,642

Lighting
S-05/S-06/S-10/S-14

Propulsion
X-01

Month	Total Revenue (a)	CapEx Rec Factor Revenue (b)	Base Revenue (c)	Total Revenue (a)	CapEx Rec Factor Revenue (b)	Base Revenue (c)
(1) Apr-23	\$ (5,353.00)	\$ 356	\$ (5,709)	\$ 444.00	\$ (117)	\$561
May-23	\$ (673.00)	\$ (212)	\$ (461)	\$ 1,031.00	\$277	\$754
Jun-23	\$ 43,378.00	\$1,589	\$41,789	\$ 1,027.00	\$ (277)	\$1,304
Jul-23	\$ 8,389.00	\$221	\$8,168	\$ 1,046.00	\$ (282)	\$1,328
Aug-23	\$ 26,556.00	\$888	\$25,668	\$ 1,133.00	\$ (305)	\$1,438
Sep-23	\$ 37,981.00	\$1,274	\$36,707	\$ 1,093.00	\$ (294)	\$1,387
Oct-23	\$ 33,919.00	\$ (417)	\$34,336	\$ 1,064.00	\$ (455)	\$1,519
Nov-23	\$ 32,330.00	\$ (2,668)	\$34,998	\$ 785.00	\$ (788)	\$1,573
Dec-23	\$ 43,453.00	\$ (3,648)	\$47,101	\$ 733.00	\$ (779)	\$1,512
Jan-24	\$ 38,596.00	\$ (3,187)	\$41,783	\$ 616.00	\$ (654)	\$1,270
Feb-24	\$ 29,462.00	\$ (2,433)	\$31,895	\$ 666.00	\$ (708)	\$1,374
Mar-24	\$ (17,310.00)	\$1,476	\$ (18,786)	\$ 562.00	\$ (597)	\$1,159
Apr-24	\$ 2,355.00	\$ (205)	\$2,560	\$ 368.00	\$ (392)	\$760
Total	\$273,083	\$ (6,966)	\$280,049	\$10,568	\$ (5,371)	\$15,939

(1) Reflects revenue associated with consumption on and after April 1

(2) Reflects revenue associated with consumption prior to April 1

(a) From monthly revenue reports

(b) per Page 3 and Page 4

(c) Column (a) - Column (b)

Fiscal Year 2022 CapEx Reconciliation of Over Recovery
For the Period April 1, 2021 through March 31, 2022
For the Recovery/Refund Period October 1, 2022 through September 30, 2023

	Residential A-16 / A-60			Small C&I C-06			General C&I G-02			200 kW Demand B-32 / G-32		
	Total (a)	(b)	(c)	(b)	(c)	(b)	(b)	(c)	(b)	(c)	(c)	
(1) Beginning Over/(Under) Recovery	\$4,708,093		\$2,779,938		\$42,790			\$895,217			\$1,011,808	
(2) CapEx Reconciling Factors			(\$0.00089)		(\$0.00007)			(\$0.00072)			(\$0.00045)	
(3)												
		kWhs	CapEx Reconciling Factor Revenue	kWhs	CapEx Reconciling Factor Revenue	kWhs	CapEx Reconciling Factor Revenue	kWhs	CapEx Reconciling Factor Revenue	kWhs	CapEx Reconciling Factor Revenue	
Oct-22	(\$148,743)	85,204,022	(\$75,832)	23,107,529	(\$1,618)	49,398,923	(\$35,567)	80,351,734	(\$36,158)			
Nov-22	(\$332,338)	205,825,860	(\$183,185)	52,434,803	(\$3,670)	96,756,177	(\$69,664)	170,085,475	(\$76,538)			
Dec-22	(\$352,405)	222,707,568	(\$198,210)	51,238,186	(\$3,587)	92,848,832	(\$66,851)	187,064,579	(\$84,179)			
Jan-23	(\$405,015)	279,075,594	(\$248,377)	59,757,823	(\$4,183)	102,366,040	(\$73,704)	177,799,964	(\$80,010)			
Feb-23	(\$346,654)	233,200,351	(\$207,548)	56,902,348	(\$3,983)	95,904,722	(\$69,051)	149,557,169	(\$67,301)			
Mar-23	(\$356,407)	226,935,035	(\$201,972)	58,631,401	(\$4,104)	95,944,730	(\$69,080)	182,947,833	(\$82,327)			
Apr-23	(\$352,518)	216,593,423	(\$192,768)	62,227,398	(\$4,356)	95,012,227	(\$68,409)	194,534,902	(\$87,541)			
May-23	(\$321,364)	186,093,205	(\$165,623)	52,966,249	(\$3,708)	94,538,877	(\$68,068)	186,734,153	(\$84,030)			
Jun-23	(\$331,847)	201,183,955	(\$179,054)	59,195,688	(\$4,144)	93,063,487	(\$67,006)	184,344,967	(\$82,955)			
Jul-23	(\$445,326)	306,852,306	(\$273,099)	64,942,433	(\$4,546)	109,401,871	(\$78,769)	197,447,175	(\$88,851)			
Aug-23	(\$496,258)	344,628,663	(\$306,720)	73,508,219	(\$5,146)	117,657,523	(\$84,713)	222,803,962	(\$100,262)			
Sep-23	(\$452,304)	302,281,792	(\$269,031)	66,244,412	(\$4,637)	121,595,922	(\$87,549)	204,592,816	(\$92,067)			
Oct-23	(\$212,315)	131,843,567	(\$117,341)	35,047,617	(\$2,453)	57,605,961	(\$41,476)	114,665,256	(\$51,599)			
(4)												
(5) Total	(\$4,553,494)		(\$2,618,760)		(\$50,135)		(\$879,907)		(\$1,013,818)			
Ending Over/(Under) Recovery	\$154,599		\$161,178		(\$7,345)		\$15,310		(\$2,010)			

- (1) Docket No. 5209, Attachment TGS-5, Page 1, Line (20)
(2) Docket No. 5098, Attachment PRB-2, Page 1, Line (10)
(3) Prorated for usage on and after October 1, 2022
(4) Prorated for usage prior to October 1, 2023
(5) Sum of kWhs & revenue
(6) Line (1) + Line (5)

	Lighting S-05/S-06/S-10/S-14		Propulsion X-01	
	(b)	(c)	(b)	(c)
(1) Beginning Over/(Under) Recovery		(\$23,974)		\$2,314
(2) CapEx Reconciling Factors		\$0.00040		(\$0.00014)

- (a) Sum of Column (b) from each rate
(b) From Company revenue report
(c) Column (b) x Line (2) CapEx Reconciling Factor

	Lighting S-05/S-06/S-10/S-14		Propulsion X-01	
	(b)	(c)	(b)	(c)
(3)				
	kWhs	CapEx Reconciling Factor Revenue	kWhs	CapEx Reconciling Factor Revenue
Oct-22	1,344,699	\$538	760,670	(\$106)
Nov-22	2,452,601	\$981	1,868,983	(\$262)
Dec-22	1,810,938	\$724	2,156,486	(\$302)
Jan-23	3,765,334	\$1,506	1,765,773	(\$247)
Feb-23	3,743,421	\$1,497	1,912,668	(\$268)
Mar-23	3,314,688	\$1,326	1,785,069	(\$250)
Apr-23	2,070,163	\$828	1,946,335	(\$272)
May-23	(530,232)	(\$212)	(1,979,583)	\$277
Jun-23	3,972,139	\$1,589	1,975,517	(\$277)
Jul-23	553,643	\$221	2,011,995	(\$282)
Aug-23	2,220,895	\$888	2,179,480	(\$305)
Sep-23	3,185,673	\$1,274	2,101,679	(\$294)
Oct-23	1,805,142	\$722	1,202,665	(\$168)
Total		\$11,882		(\$2,756)
(5) Ending Over/(Under) Recovery		(\$12,092)		(\$442)

Fiscal Year 2023 CapEx Reconciliation of Over Recovery
For the Period April 1, 2022 through March 31, 2023
For the Recovery/Refund Period October 1, 2023 through September 30, 2024

	Total (a)	Residential A-16 / A-60		Small C&I C-06		General C&I G-02		200 kW Demand B-32 / G-32	
		(b)	(c)	(b)	(c)	(b)	(c)	(b)	(c)
(1) Beginning Over/(Under) Recovery	\$8,705,175		\$ 4,684,528		\$434,665		\$1,657,926		\$1,888,003
(2) CapEx Reconciling Factors			(\$0.00148)		(\$0.00061)		(\$0.00138)		(\$0.00085)
(3)		kWhs	CapEx Reconciling Factor Revenue	kWhs	CapEx Reconciling Factor Revenue	kWhs	CapEx Reconciling Factor Revenue	kWhs	CapEx Reconciling Factor Revenue
Oct-23	(\$277,278)	92,432,176	(\$136,800)	24,570,994	(\$14,988)	40,386,076	(\$55,733)	80,388,898	(\$68,331)
Nov-23	(\$606,498)	204,049,146	(\$301,993)	53,987,946	(\$32,933)	86,596,772	(\$119,504)	174,837,917	(\$148,612)
Dec-23	(\$651,680)	230,077,905	(\$340,515)	53,880,784	(\$32,867)	88,450,180	(\$122,061)	178,599,427	(\$151,810)
Jan-24	(\$743,783)	277,908,357	(\$411,304)	60,009,074	(\$36,606)	98,860,158	(\$136,427)	183,064,155	(\$155,605)
Feb-24	(\$685,531)	242,297,438	(\$358,600)	59,883,395	(\$36,529)	100,715,355	(\$138,987)	174,439,855	(\$148,274)
Mar-24	(\$686,452)	231,704,413	(\$342,923)	61,382,696	(\$37,443)	106,715,629	(\$147,268)	187,878,826	(\$159,697)
Apr-24	(\$646,324)	214,911,942	(\$318,070)	63,773,838	(\$38,902)	99,283,813	(\$137,012)	178,038,655	(\$151,333)
May-24	(\$611,389)	196,741,787	(\$291,178)	58,259,578	(\$35,538)	94,423,094	(\$130,304)	179,329,490	(\$152,430)
Jun-24	(\$692,881)	227,541,098	(\$336,761)	63,285,551	(\$38,604)	106,226,075	(\$146,592)	198,134,621	(\$168,414)
Jul-24	\$0	-	\$0	-	\$0	-	\$0	-	\$0
Aug-24	\$0	-	\$0	-	\$0	-	\$0	-	\$0
Sep-24	\$0	-	\$0	-	\$0	-	\$0	-	\$0
Oct-24	\$0	-	\$0	-	\$0	-	\$0	-	\$0
Total	(\$5,601,816)		(\$2,838,144)		(\$304,410)		(\$1,133,888)		(\$1,304,506)
(6) Ending Over/(Under) Recovery	\$3,103,359		\$1,846,384		\$130,255		\$524,038		\$583,497

(1) Docket No. 5209, Attachment TGS-2, Page 1 of 4, line (8)
(2) Docket No. 5209, Attachment TGS-2, Page 1 of 4, line (10)
(3) Prorated for usage on and after October 1, 2023
(4) Prorated for usage prior to October 1, 2024
(5) Sum of kWhs & revenue
(6) Line (1) + Line (5)

(a) Sum of Column (b) from each rate
(b) From Company revenue report
(c) Column (b) x Line (2) CapEx Reconciling Factor

	Total (a)	Lighting S-05/S-06/S-10/S-14		Propulsion X-01		CapEx Reconciling Factor Revenue	
		(b)	(c)	(b)	(c)	(b)	(c)
(1) Beginning Over/(Under) Recovery			\$34,150		\$5,904		
(2) CapEx Reconciling Factors			(\$0.00090)		(\$0.00034)		
(3)		kWhs	CapEx Reconciling Factor Revenue	kWhs	CapEx Reconciling Factor Revenue	kWhs	CapEx Reconciling Factor Revenue
Oct-23		1,265,540	(\$1,139)	843,158	(\$287)		
Nov-23		2,964,561	(\$2,668)	2,317,257	(\$788)		
Dec-23		4,053,200	(\$3,648)	2,290,753	(\$779)		
Jan-24		3,540,882	(\$3,187)	1,923,642	(\$654)		
Feb-24		2,703,459	(\$2,433)	2,081,043	(\$708)		
Mar-24		(1,639,872)	\$1,476	1,755,762	(\$597)		
Apr-24		371,502	(\$334)	1,979,932	(\$673)		
May-24		1,295,076	(\$1,166)	2,274,093	(\$773)		
Jun-24		1,998,323	(\$1,798)	2,095,397	(\$712)		
Jul-24		-	\$0	-	\$0		
Aug-24		-	\$0	-	\$0		
Sep-24		-	\$0	-	\$0		
Oct-24		-	\$0	-	\$0		
Total			(\$14,897)		(\$5,971)		
(6) Ending Over/(Under) Recovery			\$19,253		(\$67)		

Attachment TGS-3

O&M Reconciliations and Proposed O&M Reconciling Factor

Fiscal Year 2023 Operation & Maintenance Reconciliation and Proposed Factor
Reconciliation of O&M Revenue and Actual O&M Revenue Requirement
For Fiscal Year 2024 ISR Plan
For the Recovery/(Refund) Period October 1, 2024 through September 30, 2025

	(a)	(b)
(1) Actual FY 2024 O&M Revenue Requirement		\$14,929,779
(2) O&M Revenue Billed		\$14,121,413
(3) Total Over/(Under) Recovery for FY 2024		(\$808,366)
(4) Remaining Over/(Under) For FY 2022		<u>\$0</u>
(5) Total Over/(Under) Recovery		<u>(\$808,366)</u>
(6) Forecasted kWhs - October 1, 2024 through September 30, 2025		<u>7,349,669,060</u>
(7) Proposed O&M Reconciling Factor Charge/(Credit) per kWh		\$0.00010

- (1) per Attachment TGS-1, Page 1, Line (1), Column (b)
- (2) per Page 2
- (3) Line (2) - Line (1)
- (4) per Page 3, Line (4)
- (5) Line (3) + Line (4)
- (6) per Company forecast
- (7) [Line (6) ÷ Line (7)] x -1, truncated to 5 decimal places

Fiscal Year 2023 Operations & Maintenance Reconciliation
For the Period April 1, 2023 through March 31, 2024
For the Recovery/Refund Period October 1, 2024 through September 30, 2025

O&M Factor Revenue:

	<u>Month</u>	<u>O&M Revenue</u> (a)	<u>Prior Period Reconciliation Factor Revenue</u> (b)	<u>Base O&M Revenue</u> (c)
(1)	Apr-23	\$418,525	\$0	\$418,525
	May-23	\$952,081	\$0	\$952,081
	Jun-23	\$1,059,995	\$0	\$1,059,995
	Jul-23	\$1,338,027	\$0	\$1,338,027
	Aug-23	\$1,515,528	\$0	\$1,515,528
	Sep-23	\$1,408,585	\$0	\$1,408,585
	Oct-23	\$1,172,157	\$38,382	\$1,133,775
	Nov-23	\$1,114,675	\$83,961	\$1,030,714
	Dec-23	\$1,213,857	\$89,176	\$1,124,681
	Jan-24	\$1,377,111	\$100,049	\$1,277,062
	Feb-24	\$1,257,297	\$93,139	\$1,164,158
	Mar-24	\$1,191,033	\$94,048	\$1,096,985
(2)	Apr-24	<u>\$653,253</u>	<u>51,956</u>	<u>\$601,297</u>
	Total	\$14,672,124	\$550,711	\$14,121,413

- (1) Reflects kWhs consumed on and after April 1
(2) Reflects kWhs consumed prior to April 1
- (a) From monthly revenue reports
(b) per Page 3 and Page 4
(c) Column (a) - Column (b)

Fiscal Year 2022 O&M Reconciliation of Over Recovery
For the Period April 1, 2021 through March 31, 2022
For the Recovery/Refund Period October 1, 2022 through September 30, 2023

		<u>Total</u>		
(1)	Over/(Under) Recovery	\$69,828		
(2)	O&M Reconciling Factor	\$0.00000		
		<u>Total kWhs</u> (a)	<u>Total Revenue</u> (b)	
(3)	Oct-22	240,167,576	\$0	
	Nov-22	529,423,899	\$0	
	Dec-22	557,826,589	\$0	
	Jan-23	624,530,528	\$0	
	Feb-23	541,220,679	\$0	
	Mar-23	569,558,756	\$0	
	Apr-23	572,384,448	\$0	
	May-23	517,822,669	\$0	
	Jun-23	543,735,753	\$0	
	Jul-23	681,209,423	\$0	
	Aug-23	762,998,742	\$0	
	Sep-23	700,002,294	\$0	
(4)	Oct-23	<u>342,170,209</u>	<u>\$0</u>	
(5)	Total	7,183,051,565	\$0	
(6)	Inclusion as Adjustment to FY 2023 O&M Reconciliation Balance		\$69,828	
(7)	Ending Over/(Under) Recovery		\$0	

- (1) Docket No. 5098, Attachment PRB-3 page 1, line (5)
(2) Docket No. 5098, Attachment PRB-3 page 1, line (7)
(3) Reflects kWhs consumed on and after October 1
(4) Reflects kWhs consumed prior to October 1
(5) Sum of kWhs & revenue
(7) Line (1) + Line (5) - Line (6)
- (a) per Company Records
(b) Line (2) x Column (a)

Fiscal Year 2023 O&M Reconciliation of Under Recovery
For the Period April 1, 2022 through March 31, 2023
For the Recovery/Refund Period October 1, 2023 through September 30, 2024

		<u>Total</u>		
(1)	Over/(Under) Recovery	(\$1,193,683)		
(2)	O&M Reconciling Factor	\$0.00016		
		<u>Total kWhs</u>	<u>Total Revenue</u>	
		(a)	(b)	
(3)	Oct-23	239,886,841	\$38,382	
	Nov-23	524,753,599	\$83,961	
	Dec-23	557,352,249	\$89,176	
	Jan-24	625,306,268	\$100,049	
	Feb-24	582,120,545	\$93,139	
	Mar-24	587,797,454	\$94,048	
	Apr-24	558,359,682	\$89,338	
	May-24	532,323,118	\$85,172	
	Jun-24	599,281,065	\$95,885	
	Jul-24	-	\$0	
	Aug-24	-	\$0	
	Sep-24	-	\$0	
(4)	Oct-24	-	<u>\$0</u>	
(5)	Total	4,807,180,821	\$769,150	
(6)	Ending Over/(Under) Recovery		(\$424,533)	

- (1) Docket No. 5209, Attachment TGS-3 page 1, line (6)
(2) Docket No. 5209, Attachment TGS-3 page 1, line (8)
(3) Reflects kWhs consumed on and after October 1
(4) Reflects kWhs consumed prior to October 1
(5) Sum of kWhs & revenue
(6) Line (1) + Line (5)
- (a) per Company Records
(b) Line (2) x Column (a)

**THE NARRAGANSETT ELECTRIC COMPANY
d/b/a RHODE ISLAND ENERGY
RIPUC DOCKET NO. 22-53-EL
FY 2024 ELECTRIC INFRASTRUCTURE, SAFETY, AND RELIABILITY PLAN
ANNUAL RECONCILIATION FILING
WITNESS: TYLER G. SHIELDS
ATTACHMENTS**

Attachment TGS-4

Typical Bill Analysis

Column (s): per Summary of Retail Delivery Service Rates, R.I.P.U.C. No. 2095 effective 7/1/2024, and Summary of Rates Last Resort Service tariff, R.I.P.U.C. No. 2096, effective 7/1/2024
 Column (t): Line (6) per Attachment TGS-3, Page 1, Line (8), Line (8) per Attachment TGS-2, Page 1, Line (10). All other rates per Summary of Retail Delivery Service Rates, R.I.P.U.C. No. 2095 effective 7/1/2024, and Summary of Rates Last Resort Service tariff, R.I.P.U.C. No. 2096 effective 7/1/2024.

The Narragansett Electric Company
Calculation of Monthly Typical Bill
Total Bill Impact of Proposed
Rates Applicable to A-60 Rate Customers

Monthly kWh	Rates Effective July 1, 2024					Proposed Rates Effective October 1, 2024					3 Increase (Decrease)					Increase (Decrease) % of Total Bill					Percentage of Customers
	Delivery Services (b)	Supply Services (c)	Low Income Discount (d) = [(b)+(c)] x .25	Total Discounted (e) = (b) + (c) + (d)	GET (f)	Total (g) = (e) + (f)	Delivery Services (h)	Supply Services (i)	Low Income Discount (j) = [(h)+(i)] x .25	Total Discounted (k) = (h) + (i) + (j)	GET (l)	Total (m) = (k) + (l)	Delivery Services [(n) = [(h)+(i)] - [(h)+(j)]]	Supply Services (o) = (i) - (j)	GET (p) = (l) - (f)	Total (q) = (n) + (o) + (p)	Delivery Services (r) = (n) / (g)	Supply Services (s) = (o) / (g)	GET (t) = (p) / (g)	Total (u) = (q) / (g)	
150	\$31.20	\$15.57	(\$11.69)	\$35.08	\$1.46	\$36.54	\$31.44	\$15.57	(\$11.75)	\$35.26	\$1.47	\$36.73	\$0.18	\$0.00	\$0.01	\$0.19	0.5%	0.0%	0.0%	0.5%	32.1%
300	\$51.58	\$31.13	(\$20.68)	\$62.03	\$2.58	\$64.61	\$52.08	\$31.13	(\$20.80)	\$62.41	\$2.60	\$65.01	\$0.38	\$0.00	\$0.02	\$0.40	0.6%	0.0%	0.0%	0.6%	15.4%
400	\$65.17	\$41.51	(\$26.67)	\$80.01	\$3.33	\$83.34	\$65.83	\$41.51	(\$26.84)	\$80.50	\$3.35	\$83.85	\$0.49	\$0.00	\$0.02	\$0.51	0.6%	0.0%	0.0%	0.6%	12.5%
500	\$78.76	\$51.89	(\$32.66)	\$97.99	\$4.08	\$102.07	\$79.59	\$51.89	(\$32.87)	\$98.61	\$4.11	\$102.72	\$0.62	\$0.00	\$0.03	\$0.65	0.6%	0.0%	0.0%	0.6%	9.6%
600	\$92.35	\$62.26	(\$38.65)	\$115.96	\$4.83	\$120.79	\$93.34	\$62.26	(\$38.90)	\$116.70	\$4.86	\$121.56	\$0.74	\$0.00	\$0.03	\$0.77	0.6%	0.0%	0.0%	0.6%	7.2%
700	\$105.94	\$72.64	(\$44.65)	\$133.93	\$5.58	\$139.51	\$107.10	\$72.64	(\$44.94)	\$134.80	\$5.62	\$140.42	\$0.87	\$0.00	\$0.04	\$0.91	0.6%	0.0%	0.0%	0.7%	16.4%
1,200	\$173.89	\$124.52	(\$74.60)	\$223.81	\$9.33	\$233.14	\$175.87	\$124.52	(\$75.10)	\$225.29	\$9.39	\$234.68	\$1.48	\$0.00	\$0.06	\$1.54	0.6%	0.0%	0.0%	0.7%	5.2%
2,000	\$282.61	\$207.54	(\$122.54)	\$367.61	\$15.32	\$382.93	\$285.91	\$207.54	(\$123.36)	\$370.09	\$15.42	\$385.51	\$2.48	\$0.00	\$0.10	\$2.58	0.6%	0.0%	0.0%	0.7%	1.6%
Line Item on Bill																					
(1) Distribution Customer Charge						(w) \$6.00															
(2) LIHEAP Enhancement Charge						\$0.79															
(3) Renewable Energy Growth Program Charge						\$0.79															
(4) Distribution Charge (per kWh)						\$0.04580															
(5) Operating & Maintenance Expense Charge						\$0.00227															
(6) Operating & Maintenance Expense Reconciliation Factor						\$0.00016															
(7) CapEx Factor Charge						\$0.00709															
(8) CapEx Reconciliation Factor						(\$0.00151)															
(9) Revenue Decoupling Adjustment Factor						\$0.00123															
(10) Pension Adjustment Factor						(\$0.00274)															
(11) Storm Fund Replenishment Factor						\$0.00788															
(12) Average Management Adjustment Factor						\$0.00009															
(13) Performance Incentive Factor						\$0.00000															
(14) Low Income Discount Recovery Factor						\$0.00000															
(15) LRS Adjustment Factor (Rates Effective April 1, 2023)						\$0.00000															
(16) Long-term Contracting for Renewable Energy Charge						\$0.00980															
(17) Net Metering Charge						\$0.01253															
(18) Base Transmission Charge						\$0.03686															
(19) Transmission Adjustment Factor						\$0.00421															
(20) Transmission Uncollectible Factor						\$0.00054															
(21) Base Transition Charge						\$0.00000															
(22) Transition Adjustment						\$0.00000															
(23) Energy Efficiency Program Charge						\$0.01169															
(24) Last Resort Service Base Charge						\$0.08908															
(25) LRS Adjustment Factor						\$0.00000															
(26) LRS Administrative Cost Adjustment Factor						\$0.00000															
(27) Renewable Energy Standard Charge						\$0.01200															
Line Item on Bill																					
(28) Customer Charge						\$6.00															
(29) LIHEAP Enhancement Charge						\$0.79															
(30) RE Growth Program						\$4.02															
(31) Transmission Charge						\$0.04161															
(32) Distribution Energy Charge						\$0.06027															
(33) Transition Charge						\$0.00000															
(34) Energy Efficiency Programs						\$0.00000															
(35) Base Transition Charge						\$0.00233															
(36) Supply Services Energy Charge						\$0.10377															
(37) Discount percentage						25%															

Column (w): per Summary of Retail Delivery Service Rates, R.I.P.U.C. No. 2095 effective 7/1/2024, and Summary of Rates Last Resort Service tariff, R.I.P.U.C. No. 2096 effective 7/1/2024
Column (x): Line (6) per Attachment TGS-3, Page 1, Line (8), Line (8) per Attachment TGS-2, Page 1, Line (10). All other rates per Summary of Retail Delivery Service Rates, R.I.P.U.C. No. 2095 effective 7/1/2024, and Summary of Rates Last Resort Service tariff, R.I.P.U.C. No. 2096 effective 7/1/2024.

The Narragansett Electric Company
Calculation of Monthly Typical Bill
Total Bill Impact of Proposed
Rates Applicable to C-06 Rate Customers

Monthly kWh (a)	Rates Effective July 1, 2024				Proposed Rates Effective October 1, 2024				\$ Increase (Decrease)				Increase (Decrease) % of Total Bill				Percentage of Customers (r)
	Delivery Services (b)	Supply Services (c)	GET (d)	Total (e) = (a) + (b) + (c)	Delivery Services (f)	Supply Services (g)	GET (h)	Total (i) = (f) + (g) + (h)	Delivery Services (j) = (f) - (b)	Supply Services (k) = (g) - (c)	GET (l) = (h) - (d)	Total (m) = (j) + (k) + (l)	Delivery Services (n) = (j) / (e)	Supply Services (o) = (k) / (e)	GET (p) = (l) / (e)	Total (q) = (m) / (e)	
250	\$46.58	\$24.66	\$2.97	\$74.21	\$46.93	\$24.66	\$2.98	\$74.57	\$0.35	\$0.00	\$0.01	\$0.36	0.5%	0.0%	0.0%	0.5%	56.3%
500	\$76.19	\$49.32	\$5.23	\$130.74	\$76.88	\$49.32	\$5.26	\$131.46	\$0.69	\$0.00	\$0.03	\$0.72	0.5%	0.0%	0.0%	0.6%	16.9%
1,000	\$135.39	\$98.64	\$9.75	\$243.78	\$136.78	\$98.64	\$9.81	\$245.23	\$1.39	\$0.00	\$0.06	\$1.45	0.6%	0.0%	0.0%	0.6%	8.1%
1,500	\$194.60	\$147.96	\$14.27	\$356.83	\$196.68	\$147.96	\$14.36	\$359.00	\$2.08	\$0.00	\$0.09	\$2.17	0.6%	0.0%	0.0%	0.6%	5.0%
2,000	\$253.80	\$197.28	\$18.80	\$469.88	\$256.58	\$197.28	\$18.91	\$472.77	\$2.78	\$0.00	\$0.11	\$2.89	0.6%	0.0%	0.0%	0.6%	13.6%

Rates Effective July 1, 2024

Proposed Rates Effective October 1, 2024

Line Item on Bill

(s)	(t)
(1) Distribution Customer Charge	
(2) LIHEAP Enhancement Charge	\$10.00
(3) Renewable Energy Growth Program Charge	\$0.79
(4) Distribution Charge (per kWh)	\$6.19
(5) Operating & Maintenance Expense Charge	\$0.04482
(6) Operating & Maintenance Expense Reconciliation Factor	\$0.00223
(7) Capex Factor Charge	\$0.00016
(8) Capex Reconciliation Factor	\$0.00595
(9) Revenue Decoupling Adjustment Factor	\$0.00064
(10) Pension Adjustment Factor	\$0.00123
(11) Storm Fund Replenishment Factor	\$0.00274
(12) Arrangement Management Adjustment Factor	\$0.00788
(13) Performance Incentive Factor	\$0.00009
(14) Low Income Discount Recovery Factor	\$0.00000
(15) LRS Adjustment Factor (Rates Effective April 1, 2023)	\$0.00277
(16) Long-term Contracting for Renewable Energy Charge	\$0.00000
(17) Net Metering Charge	\$0.00980
(18) Base Transmission Charge	\$0.01253
(19) Transmission Adjustment Factor	\$0.02668
(20) Transmission Uncollectible Factor	\$0.00427
(21) Base Transition Charge	\$0.00023
(22) Transition Adjustment	\$0.00000
(23) Energy Efficiency Program Charge	\$0.00000
(24) Last Resort Service Base Charge	\$0.01169
(25) LRS Adjustment Factor	\$0.08353
(26) LRS Administrative Cost Adjustment Factor	\$0.00000
(27) Renewable Energy Standard Charge	\$0.00311
Line Item on Bill	\$0.01200
(28) Customer Charge	\$10.00
(29) LIHEAP Enhancement Charge	\$0.79
(30) RE Growth Program	\$6.19
(31) Transmission Charge	\$0.02264
(32) Distribution Energy Charge	\$0.06175
(33) Transition Charge	\$0.00000
(34) Energy Efficiency Programs	\$0.01169
(35) Renewable Energy Distribution Charge	\$0.02233
(36) Supply Services Energy Charge	\$0.09864

Column (s): per Summary of Retail Delivery Service Rates, R.I.P.U.C. No. 2005 effective 7/1/2024, and Summary of Rates Last Resort Service tariff, R.I.P.U.C. No. 2006 effective 7/1/2024

Column (t): Line (6) per Attachment TGS-3, Page 1, Line (8), Line (8) per Attachment TGS-2, Page 1, Line (10), All other rates per Summary of Retail Delivery Service Rates, R.I.P.U.C. No. 2005 effective 7/1/2024, and Summary of Rates Last Resort Service tariff, R.I.P.U.C. No. 2006 effective 7/1/2024.

The Narragansett Electric Company
Calculation of Monthly Typical Bill
Total Bill Impact of Proposed
Rates Applicable to G-02 Rate Customers

Monthly Power Hours Use		Rates Effective July 1, 2024				Proposed Rates Effective October 1, 2024				\$ Increase (Decrease)				Increase (Decrease) % of Total Bill			
		Delivery Services (b)	Supply Services (c)	GET (d)	Total (e) = (a) + (b) + (c)	Delivery Services (f)	Supply Services (g)	GET (h)	Total (i) = (f) + (g) + (h)	Delivery Services (j) = (f) - (b)	Supply Services (k) = (g) - (c)	GET (l) = (h) - (d)	Total (m) = (j) + (k) + (l)	Delivery Services (n) = (j) / (e)	Supply Services (o) = (k) / (e)	GET (p) = (l) / (e)	Total (q) = (m) / (e)
20	200	\$621.24	\$394.56	\$42.33	\$1,058.13	\$625.64	\$394.56	\$42.51	\$1,062.71	\$4.40	\$0.00	\$0.18	\$4.58	0.4%	0.0%	0.0%	0.4%
50	200	\$1,371.54	\$986.40	\$98.25	\$2,456.19	\$1,382.54	\$986.40	\$98.71	\$2,467.65	\$11.00	\$0.00	\$0.46	\$11.46	0.4%	0.0%	0.0%	0.5%
100	200	\$2,622.04	\$1,972.80	\$191.45	\$4,786.29	\$2,644.04	\$1,972.80	\$192.37	\$4,809.21	\$23.00	\$0.00	\$0.92	\$23.92	0.5%	0.0%	0.0%	0.5%
150	200	\$3,872.54	\$2,959.20	\$284.66	\$7,116.40	\$3,902.54	\$2,959.20	\$286.03	\$7,150.77	\$33.00	\$0.00	\$1.37	\$34.37	0.5%	0.0%	0.0%	0.5%
20	300	\$732.84	\$591.84	\$35.20	\$1,379.88	\$739.44	\$591.84	\$35.47	\$1,386.75	\$6.60	\$0.00	\$0.27	\$6.87	0.5%	0.0%	0.0%	0.5%
50	300	\$1,650.54	\$1,479.60	\$130.42	\$3,260.56	\$1,667.04	\$1,479.60	\$131.11	\$3,277.75	\$16.50	\$0.00	\$0.69	\$17.19	0.5%	0.0%	0.0%	0.5%
100	300	\$3,180.04	\$2,959.20	\$255.80	\$6,395.04	\$3,213.04	\$2,959.20	\$257.18	\$6,429.42	\$33.00	\$0.00	\$1.38	\$34.38	0.5%	0.0%	0.0%	0.5%
150	300	\$4,709.54	\$4,438.80	\$381.18	\$9,529.52	\$4,759.04	\$4,438.80	\$383.24	\$9,581.08	\$49.50	\$0.00	\$2.06	\$51.56	0.5%	0.0%	0.0%	0.5%
20	400	\$844.44	\$789.12	\$68.07	\$1,701.63	\$853.24	\$789.12	\$68.43	\$1,710.79	\$8.80	\$0.00	\$0.36	\$9.16	0.5%	0.0%	0.0%	0.5%
50	400	\$1,929.54	\$1,972.80	\$162.60	\$4,064.94	\$1,951.54	\$1,972.80	\$163.51	\$4,087.85	\$22.00	\$0.00	\$0.91	\$22.91	0.5%	0.0%	0.0%	0.6%
100	400	\$3,738.04	\$3,945.60	\$320.15	\$8,003.79	\$3,782.04	\$3,945.60	\$321.99	\$8,049.63	\$44.00	\$0.00	\$1.84	\$45.84	0.5%	0.0%	0.0%	0.6%
150	400	\$5,546.54	\$5,918.40	\$477.71	\$11,942.65	\$5,612.54	\$5,918.40	\$480.46	\$12,011.40	\$66.00	\$0.00	\$2.75	\$68.75	0.6%	0.0%	0.0%	0.6%
20	500	\$956.04	\$986.40	\$80.94	\$2,023.38	\$967.04	\$986.40	\$81.39	\$2,034.83	\$11.00	\$0.00	\$0.45	\$11.45	0.5%	0.0%	0.0%	0.6%
50	500	\$2,208.54	\$2,466.00	\$194.77	\$4,869.31	\$2,236.04	\$2,466.00	\$195.92	\$4,897.96	\$27.50	\$0.00	\$1.15	\$28.65	0.6%	0.0%	0.0%	0.6%
100	500	\$4,296.04	\$4,932.00	\$384.50	\$9,612.54	\$4,351.04	\$4,932.00	\$386.79	\$9,669.83	\$55.00	\$0.00	\$2.29	\$57.29	0.6%	0.0%	0.0%	0.6%
150	500	\$6,383.54	\$7,398.00	\$574.23	\$14,355.77	\$6,466.04	\$7,398.00	\$577.67	\$14,441.71	\$82.50	\$0.00	\$3.44	\$85.94	0.6%	0.0%	0.0%	0.6%
20	600	\$1,067.64	\$1,183.68	\$93.81	\$2,345.13	\$1,080.84	\$1,183.68	\$94.36	\$2,358.88	\$13.20	\$0.00	\$0.55	\$13.75	0.6%	0.0%	0.0%	0.6%
50	600	\$2,487.54	\$2,459.20	\$226.95	\$5,173.69	\$2,520.54	\$2,459.20	\$228.32	\$5,208.06	\$33.00	\$0.00	\$1.37	\$34.37	0.6%	0.0%	0.0%	0.6%
100	600	\$4,854.04	\$5,918.40	\$448.85	\$11,221.29	\$4,920.04	\$5,918.40	\$451.60	\$11,290.04	\$66.00	\$0.00	\$2.75	\$68.75	0.6%	0.0%	0.0%	0.6%
150	600	\$7,220.54	\$8,877.60	\$670.76	\$16,768.90	\$7,319.54	\$8,877.60	\$674.88	\$16,872.02	\$99.00	\$0.00	\$4.12	\$103.12	0.6%	0.0%	0.0%	0.6%

Line Item on Bill

Proposed Rates Effective October 1, 2024

Rates Effective July 1, 2024

		(s)		(t)	
(1)	Distribution Customer Charge	\$145.00	\$145.00	\$145.00	
(2)	LIHEAP Enhancement Charge	\$0.79	\$0.79	\$0.79	
(3)	Renewable Energy Growth Program Charge	\$63.55	\$63.55	\$63.55	
(4)	Base Distribution Demand Charge (per kW > 10kW)	\$6.90	\$6.90	\$6.90	Customer Charge
(5)	CapEx Factor Demand Charge (per kW > 10kW)	\$1.93	\$1.93	\$1.93	LIHEAP Enhancement Charge
(6)	Distribution Charge (per kWh)	\$0.00476	\$0.00476	\$0.00476	RE Growth Program
(7)	Operating & Maintenance Expense Charge	\$0.00201	\$0.00201	\$0.00201	
(8)	Operating & Maintenance Expense Reconciliation Factor	\$0.00016	\$0.00016	\$0.00016	
(9)	CapEx Reconciliation Factor	\$0.00140	\$0.00140	\$0.00140	
(10)	Revenue Decoupling Adjustment Factor	\$0.00123	\$0.00123	\$0.00123	
(11)	Pension Adjustment Factor	\$0.00274	\$0.00274	\$0.00274	Distribution Energy Charge
(12)	Storm Fund Replenishment Factor	\$0.00788	\$0.00788	\$0.00788	
(13)	Average Management Adjustment Factor	\$0.00009	\$0.00009	\$0.00009	
(14)	Performance Incentive Factor	\$0.00000	\$0.00000	\$0.00000	
(15)	Low Income Discount Recovery Factor	\$0.00277	\$0.00277	\$0.00277	
(16)	LRS Adjustment Factor (Rates Effective April 1, 2023)	\$0.00000	\$0.00000	\$0.00000	Renewable Energy Distribution Charge
(17)	Long-term Contracting for Renewable Energy Charge	\$0.00980	\$0.00980	\$0.00980	
(18)	Net Metering Charge	\$0.01253	\$0.01253	\$0.01253	Transmission Demand Charge
(19)	Transmission Demand Charge	\$5.02	\$5.02	\$5.02	
(20)	Base Transmission Charge	\$0.01007	\$0.01007	\$0.01007	Transmission Adjustment
(21)	Transmission Adjustment Factor	\$0.00338	\$0.00338	\$0.00338	
(22)	Transmission Uncollectible Factor	\$0.00033	\$0.00033	\$0.00033	
(23)	Base Transition Charge	\$0.00000	\$0.00000	\$0.00000	Transition Charge
(24)	Transition Adjustment	\$0.00000	\$0.00000	\$0.00000	Energy Efficiency Programs
(25)	Energy Efficiency Program Charge	\$0.01169	\$0.01169	\$0.01169	
(26)	Last Resort Service Base Charge	\$0.08353	\$0.08353	\$0.08353	
(27)	LRS Adjustment Factor	\$0.00000	\$0.00000	\$0.00000	Supply Services Energy Charge
(28)	LRS Administrative Cost Adjustment Factor	\$0.00311	\$0.00311	\$0.00311	
(29)	Renewable Energy Standard Charge	\$0.01200	\$0.01200	\$0.01200	
Line Item on Bill					
(30)	Customer Charge	\$145.00	\$145.00	\$145.00	
(31)	LIHEAP Enhancement Charge	\$0.79	\$0.79	\$0.79	
(32)	RE Growth Program	\$63.55	\$63.55	\$63.55	
(33)	Transmission Adjustment	\$0.00702	\$0.00702	\$0.00702	
(34)	Distribution Energy Charge	\$0.01476	\$0.01476	\$0.01476	
(35)	Distribution Demand Charge	\$8.83	\$8.83	\$8.83	
(36)	Transmission Charge	\$5.02	\$5.02	\$5.02	
(37)	Energy Efficiency Programs	\$0.00000	\$0.00000	\$0.00000	
(38)	Renewable Energy Distribution Charge	\$0.01169	\$0.01169	\$0.01169	
(39)	Supply Services Energy Charge	\$0.02233	\$0.02233	\$0.02233	
(40)		\$0.09864	\$0.09864	\$0.09864	

Column (t): per Summary of Retail Delivery Service Rates, R.I.P.U.C. No. 2095 effective 7/1/2024, and Summary of Rates Last Resort Service tariff, R.I.P.U.C. No. 2096 effective 7/1/2024
Column (s): per Attachment TGS-3, Page 1, Line (8), Line (9) per Attachment TGS-2, Page 1, Line (10), All other rates per Summary of Retail Delivery Service Rates, R.I.P.U.C. No. 2095 effective 7/1/2024, and Summary of Rates Last Resort Service tariff, R.I.P.U.C. No. 2096 effective 7/1/2024.

The Narragansett Electric Company
Calculation of Monthly Typical Bill
Total Bill Impact of Proposed
Rates Applicable to G-2 Rate Customers

		Rates Effective July 1, 2024					Proposed Rates Effective October 1, 2024					\$ Increase (Decrease)					Increase (Decrease) % of Total Bill				
kw	Monthly Power Hours Use	kWh	Delivery Services (b)	Supply Services (c)	GET (d)	Total (e) = (a) + (b) + (c) + (d)	Delivery Services (f)	Supply Services (g)	GET (h)	Total (i) = (f) + (g) + (h)	Delivery Services (j) = (f) - (b)	Supply Services (k) = (g) - (c)	GET (l) = (h) - (d)	Total (m) = (j) + (k) + (l)	Delivery Services (n) = (j) - (b) / (e)	Supply Services (o) = (k) - (c) / (e)	GET (p) = (l) - (d) / (e)	Total (q) = (m) / (e)			
200	200	40,000	\$5,276.86	\$3,525.47	\$366.76	\$9,169.09	\$5,296.06	\$3,525.47	\$367.56	\$9,189.09	\$19.20	\$0.00	\$0.80	\$20.00	0.2%	0.0%	0.0%	0.2%			
750	200	150,000	\$19,288.66	\$13,220.50	\$1,354.55	\$33,863.71	\$19,360.66	\$13,220.50	\$1,357.55	\$33,938.71	\$72.00	\$0.00	\$3.00	\$75.00	0.2%	0.0%	0.0%	0.2%			
1,000	200	200,000	\$25,657.66	\$17,627.33	\$1,803.54	\$45,088.53	\$25,753.66	\$17,627.33	\$1,807.54	\$45,188.53	\$96.00	\$0.00	\$4.00	\$100.00	0.2%	0.0%	0.0%	0.2%			
1,500	200	300,000	\$38,395.66	\$26,441.00	\$2,701.53	\$67,538.19	\$38,539.66	\$26,441.00	\$2,707.53	\$67,688.19	\$144.00	\$0.00	\$6.00	\$150.00	0.2%	0.0%	0.0%	0.2%			
2,500	200	500,000	\$63,871.66	\$44,068.33	\$4,497.50	\$112,437.49	\$64,111.66	\$44,068.33	\$4,507.50	\$112,687.49	\$240.00	\$0.00	\$10.00	\$250.00	0.2%	0.0%	0.0%	0.2%			
3,500	200	1,000,000	\$121,251.66	\$88,136.67	\$8,987.43	\$224,685.76	\$123,041.66	\$88,136.67	\$9,007.43	\$225,187.66	\$720.00	\$0.00	\$20.00	\$750.00	0.2%	0.0%	0.0%	0.2%			
5,000	200	1,500,000	\$179,934.66	\$132,205.00	\$13,477.36	\$325,617.02	\$181,971.66	\$132,205.00	\$13,507.36	\$327,684.02	\$960.00	\$0.00	\$40.00	\$1,000.00	0.2%	0.0%	0.0%	0.2%			
7,500	200	2,000,000	\$349,441.66	\$176,273.33	\$17,967.29	\$543,682.28	\$351,971.66	\$176,273.33	\$18,007.29	\$546,248.28	\$1,920.00	\$0.00	\$80.00	\$2,000.00	0.2%	0.0%	0.0%	0.2%			
10,000	200	4,000,000	\$699,701.66	\$352,546.67	\$35,927.02	\$1,088,175.35	\$701,175.35	\$352,546.67	\$36,007.02	\$1,090,320.35	\$1,920.00	\$0.00	\$80.00	\$2,000.00	0.2%	0.0%	0.0%	0.2%			
750	300	150,000	\$19,288.66	\$13,220.50	\$1,354.55	\$33,863.71	\$19,320.66	\$13,220.50	\$1,358.27	\$33,912.71	\$32.00	\$0.00	\$4.00	\$76.00	0.2%	0.0%	0.0%	0.2%			
1,000	300	200,000	\$25,657.66	\$17,627.33	\$1,803.54	\$45,088.53	\$25,744.66	\$17,627.33	\$1,808.27	\$45,172.66	\$87.00	\$0.00	\$5.00	\$92.00	0.2%	0.0%	0.0%	0.2%			
1,500	300	300,000	\$38,395.66	\$26,441.00	\$2,701.53	\$67,538.19	\$38,472.66	\$26,441.00	\$2,705.27	\$67,693.66	\$137.00	\$0.00	\$7.00	\$144.00	0.2%	0.0%	0.0%	0.2%			
2,500	300	500,000	\$63,871.66	\$44,068.33	\$4,497.50	\$112,437.49	\$64,059.66	\$44,068.33	\$4,506.27	\$112,627.99	\$238.00	\$0.00	\$14.00	\$252.00	0.2%	0.0%	0.0%	0.2%			
3,500	300	1,000,000	\$121,251.66	\$88,136.67	\$8,987.43	\$224,685.76	\$122,027.66	\$88,136.67	\$9,015.27	\$225,143.33	\$776.00	\$0.00	\$30.00	\$786.00	0.2%	0.0%	0.0%	0.2%			
5,000	300	1,500,000	\$179,934.66	\$132,205.00	\$13,477.36	\$325,617.02	\$180,719.66	\$132,205.00	\$13,494.27	\$325,919.66	\$1,285.00	\$0.00	\$27.00	\$1,312.00	0.2%	0.0%	0.0%	0.2%			
7,500	300	2,250,000	\$237,924.66	\$198,307.50	\$18,176.32	\$454,407.98	\$239,004.66	\$198,307.50	\$18,212.32	\$457,527.98	\$1,080.00	\$0.00	\$45.00	\$1,125.00	0.2%	0.0%	0.0%	0.2%			
10,000	300	3,000,000	\$317,711.66	\$264,410.00	\$24,232.57	\$606,354.23	\$318,611.66	\$264,410.00	\$24,292.57	\$607,314.23	\$1,440.00	\$0.00	\$60.00	\$1,500.00	0.2%	0.0%	0.0%	0.2%			
20,000	300	6,000,000	\$634,161.66	\$528,820.00	\$48,457.57	\$1,211,439.23	\$637,041.66	\$528,820.00	\$48,577.57	\$1,214,439.23	\$2,880.00	\$0.00	\$120.00	\$3,000.00	0.2%	0.0%	0.0%	0.2%			
750	400	300,000	\$28,023.16	\$17,627.33	\$1,803.54	\$47,454.03	\$28,046.66	\$17,627.33	\$1,806.97	\$47,574.36	\$23.00	\$0.00	\$1.60	\$24.60	0.2%	0.0%	0.0%	0.2%			
1,000	400	400,000	\$38,033.66	\$23,546.67	\$3,056.60	\$64,636.93	\$38,076.66	\$23,546.67	\$3,060.34	\$64,703.66	\$43.00	\$0.00	\$2.60	\$45.60	0.3%	0.0%	0.0%	0.3%			
1,500	400	600,000	\$57,044.66	\$32,882.00	\$4,381.11	\$94,307.77	\$57,066.66	\$32,882.00	\$4,393.11	\$94,427.77	\$82.00	\$0.00	\$5.00	\$87.00	0.3%	0.0%	0.0%	0.3%			
2,500	400	1,000,000	\$94,886.66	\$48,136.67	\$7,600.14	\$150,123.47	\$94,906.66	\$48,136.67	\$7,610.14	\$150,237.77	\$220.00	\$0.00	\$12.00	\$232.00	0.3%	0.0%	0.0%	0.3%			
5,000	400	2,000,000	\$189,391.66	\$96,273.33	\$15,252.71	\$300,917.70	\$190,251.66	\$96,273.33	\$15,262.71	\$301,317.70	\$860.00	\$0.00	\$40.00	\$900.00	0.3%	0.0%	0.0%	0.3%			
7,500	400	3,000,000	\$284,296.66	\$144,410.00	\$22,875.28	\$451,581.94	\$285,086.66	\$144,410.00	\$22,895.28	\$451,981.94	\$1,690.00	\$0.00	\$60.00	\$1,750.00	0.3%	0.0%	0.0%	0.3%			
10,000	400	4,000,000	\$379,401.66	\$192,546.67	\$30,497.45	\$602,445.78	\$380,386.66	\$192,546.67	\$30,517.45	\$602,904.78	\$2,400.00	\$0.00	\$80.00	\$2,480.00	0.3%	0.0%	0.0%	0.3%			
20,000	400	8,000,000	\$758,803.66	\$385,093.33	\$60,994.90	\$1,204,991.93	\$762,461.66	\$385,093.33	\$61,144.63	\$1,206,708.12	\$3,840.00	\$0.00	\$160.00	\$4,000.00	0.3%	0.0%	0.0%	0.3%			
750	500	375,000	\$33,900.41	\$23,051.25	\$2,764.24	\$59,715.90	\$33,928.66	\$23,051.25	\$2,771.74	\$59,780.90	\$28.00	\$0.00	\$2.50	\$30.50	0.3%	0.0%	0.0%	0.3%			
1,000	500	500,000	\$44,526.66	\$34,668.33	\$3,683.12	\$82,878.11	\$44,566.66	\$34,668.33	\$3,693.12	\$82,928.11	\$40.00	\$0.00	\$3.00	\$43.00	0.3%	0.0%	0.0%	0.3%			
1,500	500	750,000	\$66,899.16	\$51,102.50	\$5,520.90	\$123,522.56	\$66,939.16	\$51,102.50	\$5,530.90	\$123,597.56	\$120.00	\$0.00	\$5.00	\$65.00	0.3%	0.0%	0.0%	0.3%			
2,500	500	1,250,000	\$110,441.16	\$88,136.67	\$9,196.46	\$207,774.29	\$110,481.16	\$88,136.67	\$9,206.46	\$207,836.45	\$240.00	\$0.00	\$12.00	\$252.00	0.3%	0.0%	0.0%	0.3%			
5,000	500	3,000,000	\$220,906.66	\$120,341.67	\$18,385.35	\$361,633.68	\$221,066.66	\$120,341.67	\$18,395.35	\$361,883.68	\$1,200.00	\$0.00	\$60.00	\$1,260.00	0.3%	0.0%	0.0%	0.3%			
7,500	500	4,500,000	\$331,269.16	\$180,512.50	\$27,574.24	\$539,355.90	\$331,609.16	\$180,512.50	\$27,584.24	\$539,624.90	\$1,800.00	\$0.00	\$90.00	\$1,890.00	0.3%	0.0%	0.0%	0.3%			
10,000	500	6,000,000	\$441,631.66	\$240,683.33	\$36,763.13	\$719,078.12	\$442,031.66	\$240,683.33	\$36,783.13	\$719,296.12	\$2,400.00	\$0.00	\$100.00	\$2,500.00	0.3%	0.0%	0.0%	0.3%			
20,000	500	12,000,000	\$883,261.66	\$481,366.67	\$73,518.69	\$1,438,146.02	\$883,681.66	\$481,366.67	\$73,618.69	\$1,438,578.12	\$4,800.00	\$0.00	\$200.00	\$5,000.00	0.3%	0.0%	0.0%	0.3%			
200	600	120,000	\$10,255.26	\$10,576.40	\$87.99	\$20,919.65	\$10,312.86	\$10,576.40	\$88.99	\$20,976.65	\$57.60	\$0.00	\$2.40	\$60.00	0.3%	0.0%	0.0%	0.3%			
750	600	450,000	\$37,957.66	\$32,341.13	\$3,234.13	\$73,532.29	\$38,037.66	\$32,341.13	\$3,243.13	\$73,617.29	\$216.00	\$0.00	\$12.00	\$228.00	0.3%	0.0%	0.0%	0.3%			
1,000	600	600,000	\$50,449.66	\$42,882.00	\$4,309.65	\$97,641.31	\$50,537.66	\$42,882.00	\$4,318.65	\$97,641.31	\$360.00	\$0.00	\$18.00	\$378.00	0.3%	0.0%	0.0%	0.3%			
1,500	600	900,000	\$75,733.66	\$64,102.50	\$6,460.69	\$146,296.95	\$75,820.66	\$64,102.50	\$6,470.65	\$146,296.95	\$540.00	\$0.00	\$27.00	\$567.00	0.3%	0.0%	0.0%	0.3%			
2,500	600	1,500,000	\$126,011.66	\$96,273.33	\$10,762.78	\$232,047.77	\$126,101.66	\$96,273.33	\$10,772.78	\$232,047.77	\$960.00	\$0.00	\$48.00	\$958.00	0.3%	0.0%	0.0%	0.3%			
5,000	600	3,000,000	\$252,021.66	\$144,410.00	\$21,517.99	\$417,949.65	\$252,111.66	\$144,410.00	\$21,527.99	\$417,949.65	\$1,800.00	\$0.00	\$90.00	\$1,890.00	0.3%	0.0%	0.0%	0.3%			
7,500	600	4,500,000	\$377,941.66	\$216,615.00	\$32,223.20	\$626,780.11	\$378,031.66	\$216,615.00	\$32,233.20	\$626,780.11	\$2,700.00	\$0.00	\$135.00	\$2,835.00	0.3%	0.0%	0.0%	0.3%			
10,000	600	6,000,000	\$497,841.66	\$288,820.00	\$43,518.44	\$830,180.10	\$497,931.66	\$288,820.00	\$43,528.44	\$830,180.10	\$3,600.00	\$0.00	\$180.00	\$3,780.00	0.3%	0.0%	0.0%	0.3%			
20,000	600	12,000,000	\$1,007,541.66	\$516,640.00	\$86,049.24	\$1,610,230.90	\$1,007,631.66	\$516,640.00	\$86,059.24	\$1,610,230.90	\$7,200.00	\$0.00	\$360.00	\$7,560.00	0.3%	0.0%	0.0%	0.3%			

Line Item on Bill

Proposed Rates Effective October 1, 2024

Rates Effective July 1, 2024

(1) Distribution Customer Charge	\$1,100.00	Customer Charge	\$1,100.00
(2) LIHEAP Enhancement Charge	\$0.79	LIHEAP Enhancement Charge	\$0.79
(3) Renewable Energy Growth Program Charge	\$522.87	RE Growth Program	\$522.87
(4) Base Distribution Demand Charge (per kW > 200kW)	\$52.30	Distribution Demand Charge	\$5.30
(5) CapEx Factor Demand Charge (per kW > 200kW)	\$1.91		\$1.91
(6) Distribution Charge (per kWh)	\$0.00430		\$0.00430
(7) Operating & Maintenance Expense Charge	\$0.00101		\$0.00101
(8) Operating & Maintenance Expense Reconciliation Factor	\$0.00016		\$0.00016
(9) Customer Service Charge	\$0.00123		\$0.00123
(10) Revenue Decoupling Adjustment Factor	\$0.00123		\$0.00123
(11) Pension Adjustment Factor	(\$0.00274)	Distribution Energy Charge	(\$0.00274)
(12) Storm Fund Replenishment Factor	\$0.00788		\$0.00788
(13) Arrangement Management Adjustment Factor	\$0.00009		\$0.00009
(14) Performance Incentive Factor	\$0.00000		\$0.00000
(15) Low Income Discount Recovery Factor	\$0.00277		\$0.00277
(16) LRS Adjustment Factor Rates Effective April 1, 2023	\$0.00000	Renewable Energy Distribution Charge	\$0.00000
(17) Long-term Contracting for Renewable Energy Charge	\$0.00000		\$0.00000
(18) Transmission Demand Charge	\$5.82	Transmission Demand Charge	\$5.82
(19) Base Transmission Charge	\$0.01288		\$0.01288
(20) Base Transmission Charge	\$0.00109	Transmission Adjustment	\$0.00109
(21) Transmission Adjustment Factor	\$0.00040		\$0.00040
(22) Transmission Uncollectible Factor	\$0.00000	Transition Charge	\$0.00000
(23) Base Transition Charge	\$0.00000		\$0.00000
(24) Transition Adjustment	\$0.00169	Energy Efficiency Programs	\$0.01169
(25) Energy Efficiency Program Charge	\$0.01277		\$0.01277
(26) Last Resort Service Base Charge	\$0.00000	Supply Services Energy Charge	\$0.00000
(27) LRS Adjustment Factor	\$0.00037		\$0.00037
(28) LRS Demand Charge Adjustment Factor	\$0.01200		\$0.01200
(29) Renewable Energy Standard Charge			
Line Item on Bill			
(30) Customer Charge	\$1,100.00		\$1,100.00
(31) LIHEAP Enhancement Charge	\$0.79		\$0.79
(32) RE Growth Program	\$522.87		\$522.87
(33) Transmission Adjustment	\$0.00109		\$0.00109
(34) Distribution Demand Charge	\$0.01384		\$0.01384
(35) Distribution Demand Charge	\$7.21		\$7.21
(36) Transmission Demand Charge	\$5.82		\$5.82
(37) Transition Charge	\$0.00000		\$0.00000
(38) Energy Efficiency Programs	\$0.01169		\$0.01169
(39) Renewable Energy Distribution Charge	\$0.02233		\$0.02233
(40) Supply Services Energy Charge	\$0.08814		\$0.08814