

# KEEGAN WERLIN LLP

ATTORNEYS AT LAW

99 HIGH STREET, Suite 2900

BOSTON, MASSACHUSETTS 02110

---

(617) 951-1400

TELECOPIER:

(617) 951-1354

August 15, 2024

## VIA HAND DELIVERY AND ELECTRONIC MAIL

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

**RE: Docket No. 24-32-GE – The Narragansett Electric Company d/b/a Rhode Island Energy  
Petition for Temporary Waiver or Other Relief From Tariff Requirements During  
System Conversion**

Dear Ms. De La Rosa:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”), enclosed for filing is the Company’s petition for temporary waiver or other relief from certain requirements under the Company’s gas and electric tariffs as a result of the conversion of the Information Technology (“IT”) system from National Grid USA’s system to PPL Corporation’s system, filed pursuant to 810-RICR-00-00-1.11(A) and (B) (the “Petition”).

As discussed in detail in the Petition, the Company requests temporary waiver or other relief from the following tariff requirements as a result of the IT system conversion that will occur on August 19, 2024:

1. Applying late payment charges pursuant to the electric Terms and Conditions for Distribution Service, R.I.P.U.C. No. 2243 (“Electric Terms and Conditions”), Section 13, Sheet 4; and the gas tariff, RIPUC NG-GAS No. 101 (“Gas Tariff”), Section 1, Schedule A, Part 7.0, Sheet 7; and
2. Providing paperless bills and automated paperless bill credits for summary accounts that request electronic bills pursuant to the Electric Terms and Conditions, Section 33, Sheets 9-10; and the Gas Tariff, Section 1, Schedule A, Part 7.0, Sheet 7.

Also included in this filing is the pre-filed direct testimony of Chris Ann Rossi, Senior Manager, Billing and Credit and Collections for PPL Services Corporation, in support of the Company’s waiver request in the Petition.

Stephanie De La Rosa, Commission Clerk  
Docket No. 24-32-GE – Petition for Temporary Waiver or Other Relief From  
Tariff Requirements During System Conversion  
August 15, 2024  
Page 2 of 2

Please do not hesitate to contact Celia O'Brien at 401-578-2700 or me at 617-951-1400 if you have any questions. Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'RH', with a long horizontal flourish extending to the right.

Robert J. Humm

Enclosures

cc: Docket No. 24-32-GE Service List  
Linda George, Division Administrator

**STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

---

The Narragansett Electric Company d/b/a	)	
Rhode Island Energy’s Petition for	)	Docket No. 24-32-GE
Temporary Waiver or Other Relief from	)	
Tariff Requirements During System	)	
Conversion	)	

---

**PETITION OF THE NARRAGANSETT ELECTRIC COMPANY D/B/A  
RHODE ISLAND ENERGY FOR TEMPORARY WAIVER OR OTHER RELIEF  
FROM TARIFF REQUIREMENTS DURING SYSTEM CONVERSION**

Pursuant to 810-RICR-00-00-1.11(A) and (B), The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company” or “Rhode Island Energy”) respectfully requests that the Rhode Island Public Utilities Commission (the “Commission”) temporarily waive, or grant other relief from, the following requirements under the Company’s gas and electric tariffs as a result of the conversion of the Information Technology (“IT”) system from National Grid USA’s (“National Grid”) system to PPL Corporation’s (“PPL”) system:

- Applying late payment charges pursuant to the electric Terms and Conditions for Distribution Service, R.I.P.U.C. No. 2243 (“Electric Terms and Conditions”), Section 13, Sheet 4; and the gas tariff, RIPUC NG-GAS No. 101 (“Gas Tariff”), Section 1, Schedule A, Part 7.0, Sheet 7; and
- Providing paperless bills and automated paperless bill credits for summary accounts that request electronic bills pursuant to the Electric Terms and Conditions, Section 33, Sheets 9-10; and the Gas Tariff, Section 1, Schedule A, Part 7.0, Sheet 7.

This Petition identifies known billing differences that will result at the time of, and immediately following, the IT systems cutover from the National Grid system to the PPL system and require a temporary waiver or other relief from tariff requirements.

The Company's waiver request is supported by the pre-filed direct testimony of Chris Ann Rossi, Senior Manager, Billing and Credit and Collections for PPL Services Corporation. In support of this request, the Company states as follows:

**I. BACKGROUND**

**A. IT System Transition from National Grid Systems to PPL Systems**

1. On May 25, 2022, PPL Rhode Island Holdings, LLC, a wholly owned indirect subsidiary of PPL, acquired 100 percent of the outstanding shares of common stock of The Narragansett Electric Company ("Narragansett") from National Grid (the "Acquisition").

2. The Acquisition created a change of control of Narragansett; however, the tariffs governing the Company's provision of service remained substantively unchanged after the Acquisition, and the Company continued operating under the existing terms and conditions of service, including under the Gas Tariff, Electric Terms and Conditions, and other tariffs.

3. As part of the Acquisition, beginning May 25, 2022, National Grid USA Service Company, Inc. ("National Grid Service Company") has been providing numerous "Transition Services" to the Company across a broad range of functional areas under a Transition Services Agreement ("TSA"). The TSA is comprised of 135 individual Transition Services, with initial durations ranging from two months to 24 months. Many of the Transition Services are dependent on the timing of numerous complex IT system transitions.

4. The PPL IT team has worked closely with the National Grid IT team over the past several months to finalize the schedule for the final IT systems cutover from National Grid's platform to the new PPL systems. PPL and National Grid have collaborated to schedule the final IT systems target cutover date to August 19, 2024 (also referred to as "Day 1"). To

accommodate the final IT systems cutover, the Company and National Grid Service Company extended the date to exit all Transition Services to September 30, 2024.

5. The final cutover of the IT system on August 19, 2024, will include customer-facing applications and all integrated systems, including the customer billing system. The Company's new billing system is the Customer Service System ("CSS"). National Grid Service Company will continue to provide services for the Company through IT Transition Services pursuant to the TSA through the end of August 2024.

6. The Company has worked diligently to promptly address any known billing differences, but some known billing differences will require additional work to update following the IT systems cutover. For the known billing differences that do not have an anticipated date by which they will be resolved, the Company has included these items as part of its "Fast Follow" work following the IT systems cutover, meaning that the items are deemed priority work that the Company will endeavor to resolve within the first three to six months following Day 1.

7. As a result of the IT systems cutover, two known billing differences require a temporary waiver or other relief from the Commission from the Company's tariff requirements: (1) applying late payment charges; and (2) providing paperless bills and automated paperless bill credits for summary accounts that request electronic bills.<sup>1</sup>

---

<sup>1</sup> In addition to the two known billing differences for which the Company is seeking a temporary waiver or other relief from the Commission, the Company is submitting a separate petition to the Division of Public Utilities and Carriers (the "Division") seeking a temporary waiver or other relief with respect to a requirement under the Division's Standards for Gas Utilities, Master Meter Systems and Jurisdictional Propane Systems, 815-RICR-20-00-00-1. Specifically, as a result of the IT system cutover, the Company will be unable to clearly mark on customer bills the meter multiplier constant for gas customers with meters requiring a correcting instrument and/or meter multiplier pursuant to 815-RICR-20-00-1.4(E)(1).

**B. Late Payment Charges Are Suspended**

8. The Company’s Electric Terms and Conditions include the following requirement with respect to late payment charges:

All bills shall be due and payable upon receipt. Bills rendered to customers, other than individually metered residential customers, on which payment has not been received by the “Please Pay By” date as shown on the bill, shall bear interest, at the rate of 1¼% per month on any unpaid balance, including any outstanding interest charges, from the date of receipt until the date of payment. . . . Bills disputed in good faith by a Customer will not be subject to the late payment charge until after the dispute is resolved.

Electric Terms and Conditions, Section 13, Sheet 4. The Company uses the terms “interest charges” and “late payment charge” interchangeably.

9. Similarly, the Company’s Gas Tariff includes the following requirement with respect to late payment charges:

All bills are due within 25 days from the date of the bill. A late payment charge shall accrue on non-residential bills after 25 days in accordance with regulations of the PUC and the Division.

Gas Tariff, Section 1, Schedule A, Item 7.0, Sheet 7.

10. When the IT system cutover from the National Grid system to the PPL system occurs on August 19, 2024, the Company’s CSS will not apply late payment charges as required by the Electric Terms and Conditions and the Gas Tariff.

11. The Company anticipates that this issue will exist for the first 30 to 60 days following Day 1. As a result, the Company currently anticipates that this issue will impact one or two months of customer bills.

12. This issue is expected to impact approximately 5,700 combined electric and gas customers per month, such that late payment charges will not be applied to the accounts for these

customers. This could result in a financial impact to the Company of approximately \$62,000 per month.

13. The Company will forgo the collection of these unapplied late payment charges, such that customers will not have to pay any late payment charges during the time period that the Company's CSS is unable to apply the late payment charges. In other words, the Company does not plan to back bill customers for the unapplied late payment charges.

**C. Summary Accounts Unable to Receive Paperless Bills and Automated Paperless Bill Credits**

14. The Company's Electric Terms and Conditions include the following requirement with respect to paperless bills:

Customers may elect to receive and pay their bill electronically. Such customers electing to receive their bills electronically will receive a paperless billing credit of \$0.37 per account, per billing period.

Electric Terms and Conditions, Section 33, Sheet 9.

15. Similarly, the Company's Gas Tariff includes the following requirement with respect to paperless bills:

Customers receiving bills may elect to receive their bill electronically. Customers electing to receive their bills electronically will receive a paperless billing credit as identified in Section 1, Schedule A, Item 12.0.

Gas Tariff, Section 1, Schedule A, Item 7.0, Sheet 7. The referenced Section 1, Schedule A, Item 12.0 in the Gas Tariff provides for a paperless billing credit of \$0.37 per bill per month.

16. Customers who have several, and sometimes many, different accounts may elect to receive one "summary account" or "master account" bill as opposed to many different bills. For example, a college may have 20 buildings, each with a separate meter and/or account, and the college will elect to receive a single bill with the summary detail for all 20 meters rather than

20 separate bills. A total of 97 customers receive summary account bills, which cover a combined 3,549 subordinate accounts, or “sub-accounts.”

17. Thirty-seven electric and gas customers who receive summary account bills have elected to receive and pay their bills electronically and receive a paperless billing credit of \$0.37 per month.

18. When the IT system converts from the National Grid system to the PPL system on August 19, 2024, the new CSS will be temporarily unable to provide electronic bills for summary accounts. In turn, this will impact the Company’s ability to automatically apply the paperless billing credit for these 37 customers, which places the Company at risk of not properly providing the paperless bill credits to these customers pursuant to the Electric Terms and Conditions and the Gas Tariff during the IT system conversion.

19. The Company has identified this issue as a priority “Fast Follow” item that currently is anticipated to be resolved within three to six months following Day 1. The inability to automatically apply the \$0.37 in paperless credits per summary account per month during this period could result in a total impact of \$1.11 to \$2.22 per customer.

20. The Company does not plan to retroactively credit customers the paperless bill credits for the time period the Company is unable to provide the paperless bills and paperless bill credits.

**D. Notice of Other Known Billing Differences from IT System Conversion Not Requiring Waiver or Other Relief**

21. In addition, through separate transmittals to the Commission and to the Division, the Company is providing notice to the Commission and the Division of other known billing differences that will result following the IT system cutover on August 19, 2024, but that do not require waiver or other relief from the Company’s tariff, regulatory, or legal requirements.



Therefore, these additional billing differences are not part of the Company's request for a temporary waiver or other relief.

22. These additional known billing differences involve the following issues, which are summarized in more detail in the separate transmittal: (1) Arrearage Management Program Bills With Prior Arrears; (2) Lighting Components Differences; (3) Non-Utility Billing Charges; (4) Tax Exemptions; (5) Summary Account Subaccount Details; (6) Renewable Energy Growth ("RE Growth") Program Difference in Pre-2020 Performance-Based Incentive ("PBI") Credits; (7) RE Growth Program PBI Credit Discount Rate Calculation; (8) Supplier Charges on Budget Billing Accounts; (9) Customer Charge for Accounts Cut for Non-Payment; and (10) Rate C-06 Customers on Unmetered Rate.

23. If, after review, the Commission or the Division believes any of these other billing differences require a waiver or other relief from a tariff, regulatory, or legal requirement, the Company reserves its right to include any such billing differences as part of this request for waiver or other relief.

24. The Company further reserves its right to amend this petition to include any other, currently unknown billing differences that may arise as a result from the IT system conversion as part of this request for waiver or other relief.

## **II. LEGAL STANDARD**

25. Petitions for relief under any authority delegated to the Commission shall be in writing, shall state clearly and concisely the petitioner's grounds of interest in the subject matter, the facts relief upon, and the relief sought, and shall cite by appropriate reference the authority relied upon for relief. 810-RICR-00-00-1.11(A). A petition for the waiver of a rule by the Commission shall, in addition to the specific waiver requested, state in detail with citations to

appropriate references, the reasons for the requested action. 810-RICR-00-00-1.11(B)(1). Upon submission of such a petition, the Commission will, within 30 days, either deny the petition in writing or initiate rulemaking procedures in accordance with R.I. Gen. Laws § 42-35-3. 810-RICR-00-00-1.11(B)(2).

### **III. BASIS FOR WAIVER**

26. The final cutover of the IT system on August 19, 2024, will result in the Company temporarily (1) not applying late payment charges pursuant to the Electric Terms and Conditions, Section 13, Sheet 4, and the Gas Tariff, Section 1, Schedule A, Part 7.0, Sheet 7; and (2) not providing paperless bills and automated paperless bill credits for summary accounts that request electronic bills pursuant to the Electric Terms and Conditions, Section 33, Sheets 9-10, and the Gas Tariff, Section 1, Schedule A, Part 7.0, Sheet 7.

27. Therefore, the Company respectfully requests that the Commission temporarily waive its requirements under the Electric Terms and Conditions and the Gas Tariff to (1) apply the late payment charges; and (2) provide paperless bills and paperless bill credits for summary accounts.

28. The suspension of the late payment charges for the first one or two months following the IT system cutover will not harm customers, and will in fact benefit customers, because the late payment charges to customers will not be applied during that time period. The Company will not back bill customers for the missed late payment charges during the time period they are not applied. Therefore, the Company requests that the Commission approve its request for a temporary waiver or other relief with respect to the application of the late payment charges following the IT system cutover on August 19, 2024.

29. The Company's inability to issue paperless bills and automated paperless bill credits to customers receiving summary account bills following the IT system cutover results in a nominal customer impact. A total of 37 electric and gas customers will be impacted by this issue, for an estimated period of up to three to six months. During this time, these customers will not be able to receive paperless bills under the tariffs. In addition, because the Company cannot provide automated paperless bill credits, there is risk that customers will not receive their paperless bill credits under the tariffs. This would result in a nominal impact to customers in the amount of \$0.37 per summary account per month, for a total of approximately three to six months (i.e., a **total** customer impact of \$1.11 to \$2.22 per summary account for the entire three to six months, respectively). The Company does not plan to retroactively apply the missed credit during this timeframe. Therefore, the Company requests that the Commission approve its request for a temporary waiver or other relief with respect to its inability to provide paperless bills and automated paperless bill credits following the IT system cutover on August 19, 2024.

#### **IV. CONCLUSION**

For the foregoing reasons, the Company respectfully requests that the Commission grant its petition for a temporary waiver or other relief from its tariff requirements with respect to applying late payment charges and providing paperless bills and paperless bill credits.

[Signature Page Follows]

Respectfully submitted,

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

By its attorneys,



---

Celia B. O'Brien, Esq.  
Associate General Counsel  
PPL Services Corporation  
280 Melrose Street  
Providence, Rhode Island 02907  
(401) 578-2700  
[cobrien@pplweb.com](mailto:cobrien@pplweb.com)



---

Robert J. Humm, Esq.  
Keegan Werlin LLP  
99 High Street, Suite 2900  
Boston, Massachusetts 02110  
(617) 951-1400  
[rhummm@keeganwerlin.com](mailto:rhummm@keeganwerlin.com)

Dated: August 15, 2024

**THE NARRAGANSETT ELECTRIC COMPANY  
d/b/a RHODE ISLAND ENERGY  
RIPUC DOCKET NO. 24-32-GE  
PETITION FOR TEMPORARY WAIVER OR OTHER RELIEF  
FROM TARIFF REQUIREMENTS DURING SYSTEM CONVERSION  
WITNESS: ROSSI**

---

**PRE-FILED DIRECT TESTIMONY**

**OF**

**CHRIS ANN ROSSI**

**August 15, 2024**

**THE NARRAGANSETT ELECTRIC COMPANY  
d/b/a RHODE ISLAND ENERGY  
RIPUC DOCKET NO. 24-32-GE  
PETITION FOR TEMPORARY WAIVER OR OTHER RELIEF  
FROM TARIFF REQUIREMENTS DURING SYSTEM CONVERSION  
WITNESS: ROSSI**

---

**Table of Contents**

<b>I.</b>	<b>Introduction.....</b>	<b>1</b>
<b>II.</b>	<b>Purpose of Testimony .....</b>	<b>3</b>
<b>III.</b>	<b>Conversion of IT System from National Grid System to PPL System.....</b>	<b>4</b>
<b>IV.</b>	<b>Late Payment Charges Suspended .....</b>	<b>9</b>
<b>V.</b>	<b>Summary Accounts Unable to Receive Paperless Bills and Automated Paperless Bill Credits.....</b>	<b>12</b>

1   **I.    Introduction**

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

3   A.    My name is Chris Ann Rossi. My business address is 1595 Mendon Road, Cumberland,  
4        Rhode Island 02864.

6   **Q.    By whom are you employed and in what capacity?**

7   A.    I am employed by PPL Services Corporation (“Services Corporation”) as Senior  
8        Manager, Billing and Credit and Collections for The Narragansett Electric Company  
9        d/b/a Rhode Island Energy (the “Company” or “Rhode Island Energy”). The Services  
10       Corporation is a subsidiary of PPL Corporation (“PPL”) and provides engineering,  
11       financial, administrative, and other technical support to the subsidiary companies of PPL,  
12       including the Company.

14   **Q.    What are your principal responsibilities in your position?**

15   A.    In my position, I am responsible for overseeing the Billing and Credit and Collections  
16        teams for Rhode Island Energy. For much of the last two years, my role has included the  
17        buildout of the system requirements for the migration of the Rhode Island Customer  
18        Service System (“CSS”), which is the Company’s billing system. In particular, I help to  
19        ensure that the Company’s new CSS processes will comply with Rhode Island laws,  
20        rules, regulations, and the Company’s tariffs and terms and conditions for distribution  
21        service.

THE NARRAGANSETT ELECTRIC COMPANY  
d/b/a RHODE ISLAND ENERGY  
RIPUC DOCKET NO. 24-32-GE  
PETITION FOR TEMPORARY WAIVER OR OTHER RELIEF  
FROM TARIFF REQUIREMENTS DURING SYSTEM CONVERSION  
WITNESS: ROSSI  
PAGE 2 OF 15

---

1 **Q. Please describe your educational background and professional experience.**

2 A. I graduated from Pennsylvania State University in 2007 with a Bachelor degree in  
3 Business Management. Previously, I received an Associate’s degree in Business  
4 Administration from Pennsylvania State University. From August 2000 to May 2022, I  
5 worked for UGI Utilities, Inc. in Pennsylvania, where I held roles of increasing  
6 responsibility in the Customer, Credit and Collections, and Regulatory Compliance areas,  
7 including most recently as Senior Manager, Credit and Collections and Regulatory  
8 Compliance from 2018 to May 2022. In June 2022, I joined the Services Corporation in  
9 my current role as Senior Manager, Billing and Credit and Collections for Rhode Island  
10 Energy.

11

12 **Q. Have you previously testified before the Rhode Island Public Utilities Commission**  
13 **(“Commission” or “PUC”) or any other regulatory commission?**

14 A. I have not previously submitted pre-filed testimony to the Commission; however, I  
15 sponsored responses to data requests and testified at the evidentiary hearings on behalf of  
16 the Company in Docket No. 4978 (Proposed Last Resort Service Rates for Residential,  
17 Commercial, and Industrial Customers for Effect October 2022), Docket No. 23-01-EL  
18 (Proposed Last Resort Service Rates for Residential, Commercial, and Industrial  
19 Customers for Effect October 2023), and Docket No. 23-05-EL (2023 Net Metering  
20 Excess Credits Tariff Advice).

21



1   **II.    Purpose of Testimony**

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

3   A.    The purpose of my testimony is to support the Petition of The Narragansett Electric  
4        Company d/b/a Rhode Island Energy for Temporary Waiver or Other Relief from Tariff  
5        Requirements During System Conversion (the “Petition”) by describing the known  
6        billing differences that will result at the time of, and immediately following, the  
7        conversion of the Information Technology (“IT”) system from National Grid USA’s  
8        (“National Grid”) system to PPL’s system that require a temporary waiver or other relief  
9        from tariff requirements. In particular, my testimony demonstrates the need for a  
10       temporary waiver or other relief for (1) applying late payment charges pursuant to the  
11       Company’s electric and gas tariffs; and (2) providing paperless bills and automated  
12       paperless bill credits for summary accounts that request electronic bills pursuant to the  
13       Company’s electric and gas tariffs. My testimony also identifies other known billing  
14       differences that will result upon the IT system conversion from National Grid’s system to  
15       PPL’s system, but that do not require waiver or other relief from the Company’s tariff,  
16       regulatory, or legal requirements.

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

2 A. My testimony is organized into the following sections. Sections I and II are the  
3 introductory sections of my testimony. Section III discusses the conversion of the IT  
4 systems from the National Grid system to the PPL system and identifies the billing  
5 differences from the National Grid billing system to the PPL CSS that the Company is  
6 aware may occur at the time of the IT system conversion, some of which require a waiver  
7 or other relief from the Company's tariff requirements. Section IV describes the need for  
8 a waiver of the Company's electric and gas tariff requirements related to applying late  
9 payment charges as a result of the IT system cutover. Section V describes the need for a  
10 waiver of the Company's electric and gas tariff requirements related to providing  
11 paperless bill credits to customers as a result of the IT system cutover. Section VI is the  
12 conclusion.

13

14 **III. Conversion of IT System from National Grid System to PPL System**

15 **Q. Please describe the IT system transition from the National Grid system to the PPL**  
16 **system.**

17 A. On May 25, 2022, PPL Rhode Island Holdings, LLC, a wholly owned indirect subsidiary  
18 of PPL, acquired 100 percent of the outstanding shares of common stock of The  
19 Narragansett Electric Company ("Narragansett") from National Grid (the "Acquisition").  
20 As part of the transition and integration from National Grid ownership of Narragansett to  
21 PPL ownership, the Company has worked diligently to implement new IT systems in

1 Rhode Island by converting from the current National Grid system to the new PPL  
2 system. The implementation of the new IT system in Rhode Island includes myriad IT  
3 services, applications, and capabilities, including CSS.

4  
5 **Q. When will the final IT system cutover from the National Grid system to the PPL**  
6 **system occur?**

7 A. The final IT system cutover date is August 19, 2024 (also referred to as “Day 1”). The  
8 PPL IT team has worked closely with the National Grid IT team over the past several  
9 months to finalize the schedule for the final IT systems cutover from National Grid’s  
10 current platform to the new PPL systems. The final cutover of the IT system on August  
11 19, 2024, will include customer-facing applications and all integrated systems, including  
12 the customer billing system.

13  
14 **Q. Is National Grid still providing Transition Services to the Company following the**  
15 **Acquisition?**

16 A. Yes. As part of the Acquisition, beginning May 25, 2022, National Grid USA Service  
17 Company, Inc. (“National Grid Service Company”) has been providing numerous  
18 “Transition Services” to the Company across a broad range of functional areas under a  
19 Transition Services Agreement (“TSA”). The TSA is comprised of 135 individual  
20 Transition Services, with initial durations ranging from two months to 24 months. Many  
21 of the Transition Services are dependent on the timing of numerous complex IT system

1 transitions. National Grid Service Company will continue to provide services for the  
2 Company through IT Transition Services pursuant to the TSA through the end of August  
3 2024. To accommodate the final IT systems cutover, the Company and National Grid  
4 Service Company extended the date to exit all Transition Services to September 30, 2024,  
5 at which point the TSA will terminate.

6  
7 **Q. Is the Company aware of any differences in the billing system under National Grid’s**  
8 **system that customers will experience under PPL’s new system as a result of the IT**  
9 **system conversion?**

10 A. Yes. The Company has worked diligently to promptly address any known billing  
11 differences, but some known billing differences will require additional work to update  
12 following the IT systems cutover. For the known billing differences that do not have an  
13 anticipated date by which they will be resolved, the Company has included these items as  
14 part of its “Fast Follow” work following the IT systems cutover, meaning that the items  
15 are deemed priority work that the Company will endeavor to resolve within the first three  
16 to six months following Day 1. The known billing differences, and other issues that may  
17 arise, will be further reviewed and addressed during the critical “hypercare” period  
18 following the IT system cutover, which is to ensure all issues and risks with respect to the  
19 IT system cutover have been identified and resolved.

20

THE NARRAGANSETT ELECTRIC COMPANY  
d/b/a RHODE ISLAND ENERGY  
RIPUC DOCKET NO. 24-32-GE  
PETITION FOR TEMPORARY WAIVER OR OTHER RELIEF  
FROM TARIFF REQUIREMENTS DURING SYSTEM CONVERSION  
WITNESS: ROSSI  
PAGE 7 OF 15

---

1 **Q. Did the Company’s tariffs under National Grid ownership remain in place through**  
2 **the transition and PPL’s ownership of the Company?**

3 A. Yes. The Acquisition crated a change of control of the Company; however, the tariffs  
4 governing the Company’s provision of service remained substantively unchanged after  
5 the Acquisition, and the Company continued operating under the existing terms and  
6 conditions of service, including under the gas tariff, RIPUC NG-GAS No. 101 (“Gas  
7 Tariff”); electric Terms and Conditions for Distribution Service, R.I.P.U.C. No. 2243  
8 (“Electric Terms and Conditions”); and other tariffs.

9  
10 **Q. Do any of the known billing differences require a waiver of the Company’s tariff**  
11 **requirements from the Commission?**

12 A. Yes. As a result of the IT systems cutover, two known billing differences require a  
13 temporary waiver or other relief from the Commission from the Company’s tariff  
14 requirements. First, the Company needs a waiver from its requirement to apply late  
15 payment charges pursuant to the Electric Terms and Conditions, Section 13, Sheet 4; and  
16 the Gas Tariff, Section 1, Schedule A, Part 7.0, Sheet 7. Second, the Company needs a  
17 waiver from its requirement to provide paperless bills and paperless bill credits for  
18 summary accounts that request electronic bills pursuant to the Electric Terms and  
19 Conditions, Section 33, Sheets 9-10; and the Gas Tariff, Section 1, Schedule A, Part 7.0,  
20 Sheet 7. My testimony describes these two issues in more detail below.

21

THE NARRAGANSETT ELECTRIC COMPANY  
d/b/a RHODE ISLAND ENERGY  
RIPUC DOCKET NO. 24-32-GE  
PETITION FOR TEMPORARY WAIVER OR OTHER RELIEF  
FROM TARIFF REQUIREMENTS DURING SYSTEM CONVERSION  
WITNESS: ROSSI  
PAGE 8 OF 15

---

1 In addition to the two known billing differences for which the Company is seeking a  
2 temporary waiver or other relief from the Commission, the Company is submitting a  
3 separate petition to the Division of Public Utilities and Carriers (the “Division”) seeking  
4 a temporary waiver or other relief with respect to a requirement under the Division’s  
5 Standards for Gas Utilities, Master Meter Systems and Jurisdictional Propane Systems.  
6 Specifically, as a result of the IT system cutover, the Company will be unable to clearly  
7 mark on customer bills the meter multiplier constant for gas customers with meters  
8 requiring a correcting instrument and/or meter multiplier pursuant to 815-RICR-20-00-  
9 1.4(E)(1).

10  
11 **Q. Are there any other known billing differences from the IT system conversion that do**  
12 **not require waiver or other relief?**

13 A. Yes. The Company is aware of the following additional billing differences that  
14 customers will experience following the IT system cutover on August 19, 2024: (1)  
15 Arrearage Management Program Bills With Prior Arrears; (2) Lighting Components  
16 Differences; (3) Non-Utility Billing Charges; (4) Tax Exemptions; (5) Summary Account  
17 Subaccount Details; (6) Renewable Energy Growth (“RE Growth”) Program Difference  
18 in Pre-2020 Performance-Based Incentive (“PBI”) Credits; (7) RE Growth Program PBI  
19 Credit Discount Rate Calculation; (8) Supplier Charges on Budget Billing Accounts; (9)  
20 Customer Charge for Accounts Cut for Non-Payment; and (10) Rate C-06 Customers on  
21 Unmetered Rate.

1           These other known billing differences do not require waiver or other relief from the  
2           Company’s tariff, regulatory, or legal requirements. Therefore, these additional known  
3           billing differences are not part of the Company’s request for a temporary waiver or other  
4           relief. Instead, through a separate transmittal the Company is providing notice to the  
5           Commission and the Division of these other known billing differences that will result  
6           following the IT system cutover on August 19, 2024.

7  
8   **IV. Late Payment Charges Suspended**

9   **Q.   What is the Company’s requirement under its tariffs regarding the application of**  
10   **late payment charges for customers who do not timely pay their bills?**

11   A.   The Company’s Electric Terms and Conditions include the following requirement with  
12   respect to late payment charges:

13           All bills shall be due and payable upon receipt. Bills rendered to  
14           customers, other than individually metered residential customers, on  
15           which payment has not been received by the “Please Pay By” date as  
16           shown on the bill, shall bear interest, at the rate of 1¼% per month on any  
17           unpaid balance, including any outstanding interest charges, from the date  
18           of receipt until the date of payment. . . . Bills disputed in good faith by a  
19           Customer will not be subject to the late payment charge until after the  
20           dispute is resolved.

21           Electric Terms and Conditions, Section 13, Sheet 4. The Company uses the terms  
22           “interest charges” and “late payment charge” interchangeably.

23

1           The Company's Gas Tariff is similar in that it includes the following requirement with  
2           respect to late payment charges:

3                     All bills are due within 25 days from the date of the bill. A late payment  
4                     charge shall accrue on non-residential bills after 25 days in accordance  
5                     with regulations of the PUC and the Division.

6           Gas Tariff, Section 1, Schedule A, Item 7.0, Sheet 7.

7

8   **Q.    How does the IT system cutover affect the application of late payment charges?**

9   A.    When the IT system cutover from the National Grid system to the PPL system occurs,  
10        CSS will not apply late payment charges as required by the Electric Terms and  
11        Conditions and the Gas Tariff. The Company anticipates that this issue will exist for the  
12        first 30 to 60 days following Day 1. As a result, the Company currently anticipates that  
13        this issue will impact one or two months of customer bills.

14        This issue is expected to impact approximately 5,700 combined electric and gas  
15        customers per month, such that late payment charges will not be applied to the accounts  
16        for these customers. This could result in a financial impact to the Company of  
17        approximately \$62,000 per month.

18

19   **Q.    Will the Company seek to collect the unapplied late payment charges from**  
20        **customers?**

21   A.    No, the Company does not plan to back bill customers to collect the unapplied late  
22        payment charges. The Company will forgo the collection of these unapplied late



1           payment charges, such that customers will not have to pay any late payment charges  
2           during the time period that the Company's CSS does not apply the late payment charges.

3  
4   **Q.    Why does the Company need a waiver of the tariff requirement to apply late**  
5   **payment charges to customers who do not timely pay their bills?**

6   A.    The final cutover of the IT system on August 19, 2024, will result in the Company  
7           temporarily not applying late payment charges pursuant to the Electric Terms and  
8           Conditions and the Gas Tariff. Therefore, the Company filed the Petition seeking a  
9           temporary waiver of its tariff requirements to apply the late payment charges.

10          The suspension of the late payment charges for the first one or two months following the  
11          IT system cutover will not harm customers, and will in fact benefit customers, because  
12          the late payment charges will not be applied to customers during that time period. The  
13          Company will not back bill customers for the missed late payment charges. Therefore,  
14          the Company's Petition requests that the Commission approve its request for a temporary  
15          waiver or other relief with respect to the application of late payment charges on customer  
16          bills following the IT system cutover on August 19, 2024.

17

1 **V. Summary Accounts Unable to Receive Paperless Bills and Automated Paperless**  
2 **Bill Credits**

3  
4 **Q. What is a summary account?**

5 A. Customers who have several, and sometimes many, different accounts may elect to  
6 receive one “summary account” or “master account” bill as opposed to many different  
7 bills. For example, a college may have 20 buildings, each with a separate meter and/or  
8 account, and the college will elect to receive a single bill with the summary detail for all  
9 20 meters rather than 20 separate bills.

10

11 **Q. How many of the Company’s customers receive their bills as a summary account?**

12 A. A total of 97 customers receive summary account bills, which cover a combined 3,549  
13 subordinate accounts, or “sub-accounts.”

14

15 **Q. What is the Company’s requirement under its tariffs to provide paperless bills and**  
16 **paperless bill credits to customers?**

17 A. The Company’s Electric Terms and Conditions include the following requirement with  
18 respect to paperless bills:

19           Customers may elect to receive and pay their bill electronically. Such  
20           customers electing to receive their bills electronically will receive a  
21           paperless billing credit of \$0.37 per account, per billing period.

22           Electric Terms and Conditions, Section 33, Sheet 9.

23

THE NARRAGANSETT ELECTRIC COMPANY  
d/b/a RHODE ISLAND ENERGY  
RIPUC DOCKET NO. 24-32-GE  
PETITION FOR TEMPORARY WAIVER OR OTHER RELIEF  
FROM TARIFF REQUIREMENTS DURING SYSTEM CONVERSION  
WITNESS: ROSSI  
PAGE 13 OF 15

---

1 Similarly, the Company's Gas Tariff includes the following requirement with respect to  
2 paperless bills:

3 Customers receiving bills may elect to receive their bill electronically.  
4 Customers electing to receive their bills electronically will receive a  
5 paperless billing credit as identified in Section 1, Schedule A, Item 12.0.

6 Gas Tariff, Section 1, Schedule A, Item 7.0, Sheet 7. The referenced Section 1, Schedule  
7 A, Item 12.0 in the Gas Tariff provides for a paperless billing credit of \$0.37 per bill per  
8 month.

9  
10 **Q. How many summary accounts have elected to receive their bills electronically?**

11 A. Thirty-seven electric and gas customers who receive summary account bills have elected  
12 to receive and pay their bills electronically and receive a paperless billing credit of \$0.37  
13 per month.

14  
15 **Q. How does the IT system cutover affect paperless billing for summary accounts?**

16 A. When the IT system converts from the National Grid system to the PPL Corporation  
17 system on August 19, 2024, the new CSS will be temporarily unable to provide electronic  
18 bills for summary accounts. In turn, this will impact the Company's ability to  
19 automatically apply the paperless billing credit for these 37 customers, which places the  
20 Company at risk of not properly providing the paperless bill credits to these customers  
21 pursuant to the Electric Terms and Conditions and the Gas Tariff during the IT system  
22 conversion. The Company has identified this issue as a priority "Fast Follow" item that

1           currently is anticipated to be resolved within three to six months following Day 1. The  
2           inability to automatically apply the \$0.37 in paperless credits per summary account per  
3           month during this period could result in a total impact of \$1.11 to \$2.22 per customer  
4           over the anticipated three to six months.

5  
6   **Q.   Does the Company plan to credit the paperless bill credits that are not provided to**  
7   **customers during the IT system conversion?**

8   A.   No, the Company does not plan to retroactively credit customers the paperless bill credits  
9           for the time period the Company is unable to provide the paperless bills and automated  
10          paperless bill credits.

11  
12   **Q.   Why does the Company need a waiver of the tariff requirement to provide paperless**  
13   **bill credits to customers have elected to receive electronic bills?**

14   A.   The final cutover of the IT system on August 19, 2024, will result in the Company  
15          temporarily being unable to provide paperless bills and automated paperless bill credits  
16          for summary accounts that request electronic bills pursuant to the Electric Terms and  
17          Conditions and the Gas Tariff. Therefore, the Company filed the Petition seeking a  
18          temporary waiver of its tariff requirement to provide paperless bills and paperless bill  
19          credits for summary accounts.

20

THE NARRAGANSETT ELECTRIC COMPANY  
d/b/a RHODE ISLAND ENERGY  
RIPUC DOCKET NO. 24-32-GE  
PETITION FOR TEMPORARY WAIVER OR OTHER RELIEF  
FROM TARIFF REQUIREMENTS DURING SYSTEM CONVERSION  
WITNESS: ROSSI  
PAGE 15 OF 15

---

1       The Company's inability to issue paperless bills and automated paperless bill credits to  
2       customers receiving summary account bills following the IT system cutover results in a  
3       nominal customer impact. A total of 37 customers will be impacted by this issue, for an  
4       estimated period of up to three to six months. During this time, these customers will not  
5       be able to receive paperless bills under the tariffs. In addition, because the Company  
6       cannot provide automated paperless bill credits, there is risk that customers will not  
7       receive their paperless bill credits under the tariffs. This would result in a nominal  
8       impact to customers in the amount of \$0.37 per summary account per month, for a total  
9       of approximately three to six months (i.e., a *total* customer impact of \$1.11 to \$2.22 per  
10      summary account for the entire three to six months, respectively). The Company does  
11      not plan to retroactively apply the missed credit during this timeframe. Therefore, the  
12      Company's Petition requests that the Commission approve its request for a temporary  
13      waiver or other relief with respect to its inability to provide paperless bills and automated  
14      paperless bill credits following the IT system cutover on August 19, 2024.

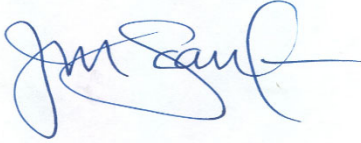
15  
16   **Q.    Does this conclude your testimony?**

17   **A.    Yes.**

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 15, 2024  
Date

**Docket No. 24-32-GE – The Narragansett Electric Company d/b/a Rhode Island Energy – Petition for Temporary Waiver From Tariff Requirements During System Conversion - Service List 8/15/2024**

<b>Name/Address</b>	<b>E-mail Distribution</b>	<b>Phone</b>
<b>The Narragansett Electric Company d/b/a Rhode Island Energy</b> Celia B. O'Brien, Esq. 280 Melrose Street Providence, RI 02907	<a href="mailto:COBrien@pplweb.com">COBrien@pplweb.com</a> ;	401-578-2700
	<a href="mailto:ASTurgeon@pplweb.com">ASTurgeon@pplweb.com</a>	
	<a href="mailto:JScanlon@pplweb.com">JScanlon@pplweb.com</a> ;	
	<a href="mailto:EMcCord@RIEnergy.com">EMcCord@RIEnergy.com</a>	
	<a href="mailto:CARossi@RIEnergy.com">CARossi@RIEnergy.com</a>	
Robert J. Humm, Esq. <b>Keegan Werlin LLP</b> 99 High Street, Suite 2900 Boston, MA 02110	<a href="mailto:rhum@keeganwerlin.com">rhum@keeganwerlin.com</a>	617-941-1400
	<a href="mailto:arendell-baker@keeganwerlin.com">arendell-baker@keeganwerlin.com</a> ;	
<b>Division of Public Utilities &amp; Carriers</b> Leo Wold, Esq. 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:John.bell@dpuc.ri.gov">John.bell@dpuc.ri.gov</a> ;	401-780-2177
	<a href="mailto:Al.mancini@dpuc.ri.gov">Al.mancini@dpuc.ri.gov</a> ;	
	<a href="mailto:Christy.Hetherington@dpuc.ri.gov">Christy.Hetherington@dpuc.ri.gov</a> ;	
	<a href="mailto:Margaret.l.hogan@dpuc.ri.gov">Margaret.l.hogan@dpuc.ri.gov</a> ;	
	<a href="mailto:Leo.Wold@dpuc.ri.gov">Leo.Wold@dpuc.ri.gov</a> ;	
	<a href="mailto:ellen.golde@dpuc.ri.gov">ellen.golde@dpuc.ri.gov</a> ;	

<b>File an original and nine (9) copies</b> Stephanie De La Rosa, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:stephanie.delarosa@puc.ri.gov">stephanie.delarosa@puc.ri.gov</a> ;	401-780-2107
	<a href="mailto:patricia.lucarelli@puc.ri.gov">patricia.lucarelli@puc.ri.gov</a> ;	
	<a href="mailto:John.Harrington@puc.ri.gov">John.Harrington@puc.ri.gov</a> ;	
	<a href="mailto:Todd.bianco@puc.ri.gov">Todd.bianco@puc.ri.gov</a> ;	
	<a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov</a> ;	