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Rhode Island Energy™
a PPL company

August 6, 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. 3628 – The Narragansett Electric Company d/b/a Rhode Island Energy's Proposed Revisions to the Electric Service Quality Plan
Responses to Record Requests (Complete Set)

Dear Ms. De La Rosa:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy[1] attached is Rhode Island Energy's complete set of responses to the record requests issued during the Public Utilities Commission's evidentiary hearing on July 23, 2024 in the above-referenced matter.

This transmittal contains the Company's response to Record Request No. 2 and completes the Company's responses to the record requests issued in this matter.

Thank you for your time and attention to this matter. If you have any questions, please contact me at 401-316-7429.

Very truly yours,

Jennifer Brooks Hutchinson

Enclosures

cc: Docket No. 3628 Service List

[1] The Narragansett Electric Company d/b/a Rhode Island Energy ("Rhode Island Energy" or the "Company").

Record Request No. 1, page 1

Request:

Referring to the Meter Reading and Billing service quality adjustment, please describe the current way the meters are deemed to have been read successfully and how that is that similar or different to the Company's proposal.

Response:

Summary

In summary, meters are deemed to have been read successfully based on whether or not there is updated usage data for that meter in a system called the "head end system." The current method is the same as the method proposed by the Company to be implemented at TSA exit. There is a slight variation in this method once AMF deployment begins, but this method is more stringent in how it deems meter reads to be successful. Below, the Company provides a more fulsome discussion of the meter reading and billing systems, and how those systems work together currently, and will function at TSA exit, and prior to, during and after AMF deployment. In addition, the Company also discusses how successful meter reading relates to billing quality and the Company's proposed Meter Reading and Billing service quality mechanism.

I. Additional detail and background information

Generally, there are three types of systems involved in meter reading and billing: (1) head end system; (2) meter data management system; and (3) customer service system.

(1) The head end system is responsible for collecting raw usage data from customer meters. The head end system the Company uses prior to TSA-exit is referred to as the National Grid Field Collection System. The head end system the Company will use following TSA exit is called the Rhode Island Energy Field Network System. These systems are responsible for collecting usage data from AMR meters via drive-by data collection and for manual meter readings by technicians. Both of these systems contain a binary data field that flags whether each meter's usage data has been updated. This flag, which indicates the meter has been "read" or "not read" is the data field used in assessing percent meters read each month as reported in the Company's annual service quality report and as proposed in the Company's Meter Reading and Billing service quality mechanism.

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As the Company deploys advanced meters, a new head end system, referred to as the Rhode Island Energy Advanced Metering Head End System, will be responsible for collecting usage data from AMF meters. This system will transfer usage data to the meter data management system for further processing.

(2) The meter data management system will be responsible for calculating customer usage data for the purpose of retail settlement with ISO-NE. The meter data management system also validates usage data for the small subset of large commercial and industrial customers that send their data to the MV-90 head-end system.

For AMF meters, the percent of meters read each month will be produced by a reporting function within the meter data management system called "billing performance." This reporting function is more stringent than the binary "read/not-read" flag from the current head end system because the "billing performance" reporting function imposes additional validation to ensure the usage data is both updated and reasonable. When AMF meters begin to be deployed, the Company will use the "billing performance" reporting function of the meter data management system instead of the "read/not-read" flag from the head end system for the purpose of assessing percent meters read.

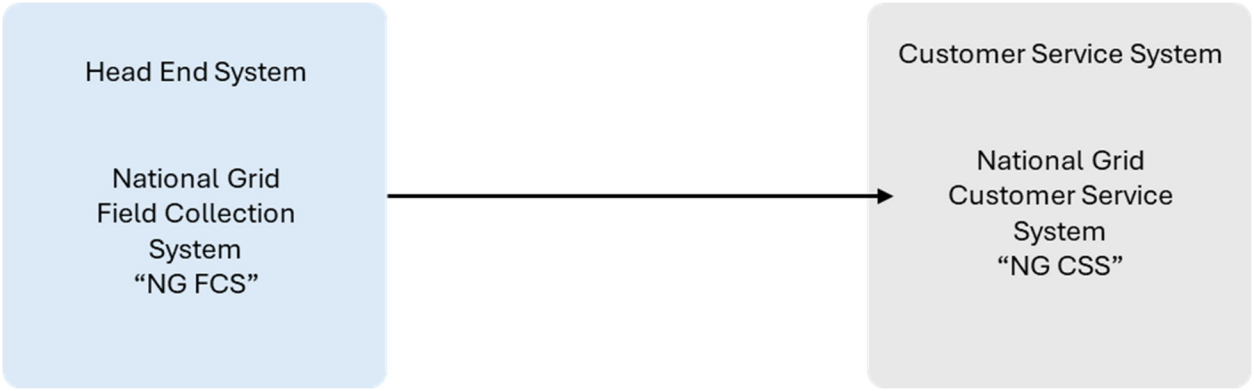
(3) The customer service system is responsible for translating customer usage data into customer bills. In translating usage data into bills, the customer service system automatically performs additional checks on the usage data to validate that the usage is reasonable for the customer's rate class and that the bill charge makes sense. The customer service system also tracks how many bills are issued relative to the population of bills that are scheduled to be issued on any given day. The Company's proposal does not include any data from its current customer service system pre-TSA exit (called the National Grid Customer Service System) or from its new customer service system post-TSA exit (called the Rhode Island Energy Customer Service System). However, the Company includes the customer service system in this response with the objective of providing a more holistic overview of the types of data that could be used to inform a Meter Reading and Billing service quality adjustment.

The way in which meters are deemed to have been read successfully, both currently and as proposed, is illustrated through the diagrams and described in the notes below. In these figures, each box represents a system. The generic name of that type of system is the name provided at the top of the box. The specific name of the system that we can use to refer to the specific system is at the bottom of the box. For example, "National Grid Field Collection System" and "Rhode

Record Request No. 1, page 3

Island Energy Field Network System" are two distinct types of "head end system." The arrows between the boxes (systems) represent the flow of data from one system to another (referred to as "system architecture"). A box that is blue instead of gray indicates that that is the system from which Rhode Island Energy pulls the data about percent meters read, the metric proposed to be responsive to assess performance relative to target for the Meter Reading and Billing Service Quality Adjustment, as filed.

II. Current method, pre-TSA exit/pre-AMF deployment



National Grid's head end system, called the Field Collection System (referred to for simplicity as the "NG FCS" in this response), receives meter data from meters that are read, either via drive-by (AMR meters) or manually by a meter reading tech. The NG FCS contains a data field for each meter that is a binary flag for "read" or "not read" based on whether or not there is updated usage data for that meter in the NG FCS. The meter usage data is transferred from the NG FCS to National Grid's customer service system, referred to as the "NG CSS" in this response. The NG CSS validates that the usage data is reasonable, matches the customer meter to the customer rate class, calculates the charges on the customer bill based on usage and rate class, and then issues the bill to the customer.

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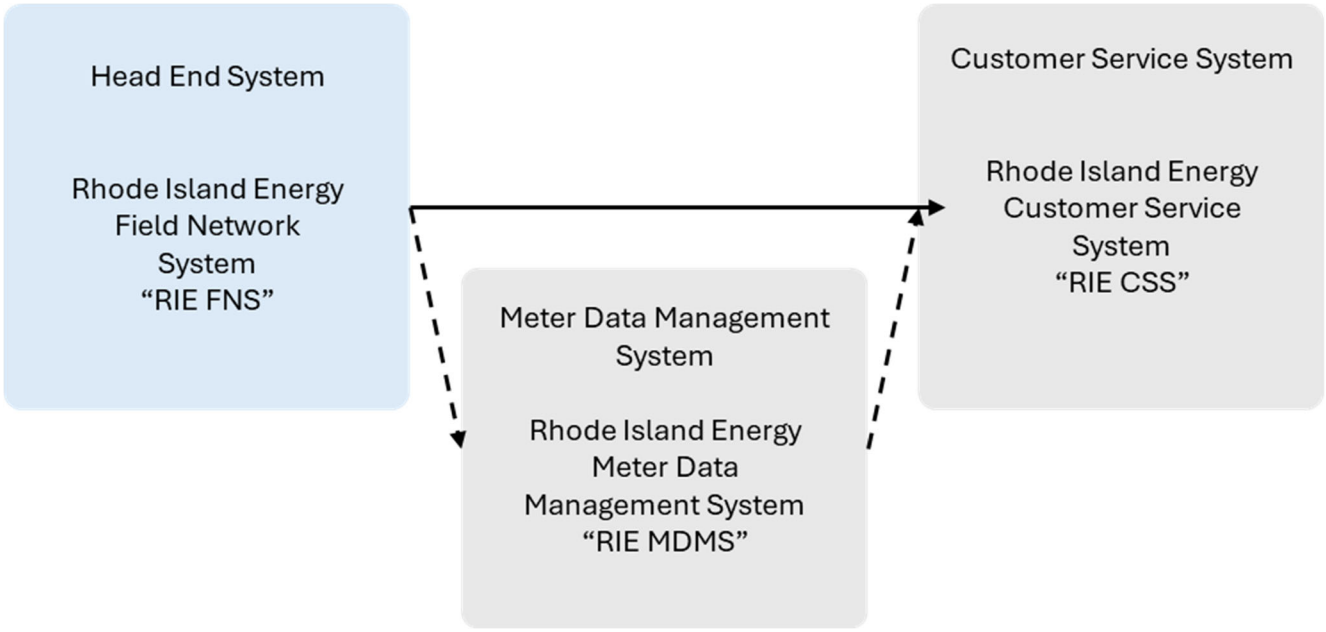
III. Post-TSA exit, pre-AMF deployment



Following TSA exit, Rhode Island Energy will use a new head end system, called the Rhode Island Energy Field Network System, referred to as "RIE FNS" in this response. The RIE FNS has the same data field ("read/not-read" binary flag) as the NG FCS. Rhode Island Energy will pull the percent meter read data from the RIE FNS. Specifically, Rhode Island Energy will determine the meter read rate in the same approach as done prior to TSA Exit. Although (i) the head end system is changing and (ii) the meter read flag data is being collected from a different system, the way the meters are deemed to have been read successfully is identical to the current way (pre-TSA exit).

The RIE FNS will then transfer usage data to the RIE CSS and the RIE Meter Data Management System ("RIE MDMS") in parallel. The usage data sent to the RIE MDMS will only be used for retail settlement calculations and not for customer billing, with the sole exception of validating usage data from MV-90 meters, prior to transferring that validated usage data to the RIE CSS for further processing (indicated by the dashed arrows in the figure).

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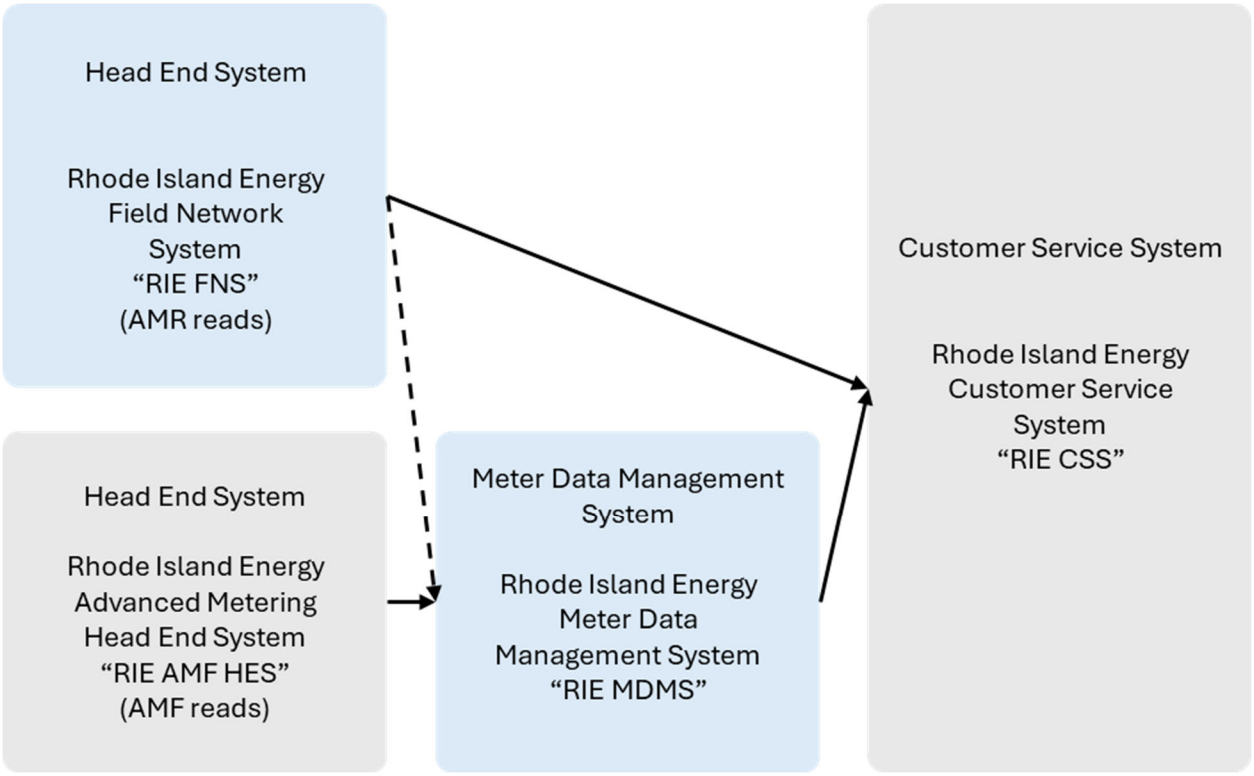
IV. Post-TSA exit, during and following commencement of AMF deployment



As advanced meters are deployed beginning March 2025, data from those meters will be collected through a second head end system, referred to as the Rhode Island Energy Advanced Metering Head End System ("RIE AMF HES"). The RIE AMF HES will transfer usage data to the RIE MDMS, which will perform validation for the purpose of retail settlement, and then to the RIE CSS for the purpose of issuing customer bills.

Data for customers with non-AMF meters will continue to be collected by the RIE FNS and sent to the RIE CSS during AMF deployment.

Once AMF deployment commences, the Company will combine data from two sources to report on percent meter read, as proposed in the Company's filing. The two sources are (1) the binary "read/not-read" flag from the RIE FNS for non-AMF meters and (2) a "billing performance" report from the RIE MDMS, which reports the number of AMF meters read divided by the total

population of AMF meters. The Company will combine these two data sources by calculating a weighted average based on the proportion of AMF meters deployed; this weighted average of the two sources is equal to the total percent meters read across the population of meters in the Company's customer base. Although the data sources are not identical to the current data sources, this metric will be functionally identical to the current percent meter read metric.

V. Relationship of meter reading to billing

There are three dimensions of billing success:

1. Usage is reported accurately
2. The charge is calculated accurately
3. The bill is issued to the customer.

Pre- and post-TSA exit, the binary "read/not-read" flag from the head end system is considered to imply that those meters were read successfully; on average, more meters read means fewer meters estimated, which leads to more accurate usage, and therefore charges, on bills. Although the Company considers the binary "read/not-read" flag to imply usage accuracy, this flag does not provide any insight into the results of usage validation from either the NG CSS, the RIE MDMS, or the RIE CSS. The meter "read/not-read" flag also does not provide any insight into whether the bill is issued to the customer.

Following the commencement of AMF deployment, the RIE MDMS will account for the results of its validation of usage data in its "billing performance" report; a meter's usage data that does not pass validation will not count toward the percent meter read metric. Therefore, the Company considers the percent meter read metric to imply the dimension of accurate usage for customers with AMF following the commencement of AMF deployment. Although the percent meter read metric may correlate to the other dimensions of billing success, charge accuracy and bill issuance, the data itself does not embed insight into these dimensions.

To measure the dimensions of charge accuracy and bill issuance, the Company would need to pull corresponding data from the RIE CSS.

VI. Proposed modifications to Meter Reading and Billing metric

The Company is amenable to proposing modifications to its proposed Meter Reading and Billing service quality metric to consider additional dimensions of billing quality (i.e., charge accuracy and bill issuance), if directed by the Commission, as a compliance filing.

Prepared by or under the supervision of: Phil Walnock (as to the Summary and Sections I through V of the response) and Carrie Gill (as to Section VI of the response)

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For example, a more holistic approach could assess performance relative to target for multiple metrics (e.g., percent meter read and charge accuracy and bill issuance), where the target and threshold for each metric would be determined using the common service quality adjustment structure (target = central tendency using prior data, deadband = target +/- 1 standard deviation or other measure of natural variability, thresholds for maximum penalty/offset = target +/- 2.5 standard deviations) and the penalty assessed (offset earned) would be averaged across performance relative to target for all metrics.

The Company welcomes guidance from the Commission on which (or whether all) dimensions of billing quality should be prioritized in such a service quality adjustment proposal, if directed.

Prepared by or under the supervision of: Phil Walnock (as to the Summary and Sections I through V of the response) and Carrie Gill (as to Section VI of the response)

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 3628
In Re: Proposed Revisions to the Electric Service Quality Plan
Responses to Record Requests Issued at the
Commission's Evidentiary Hearing
on July 23, 2024

Record Request No. 2

Request:

Referring to the Trouble Non-Outage service quality adjustment, please explain whether solar inverter calls related to solar inverter outages are counted as trouble non-outage calls.

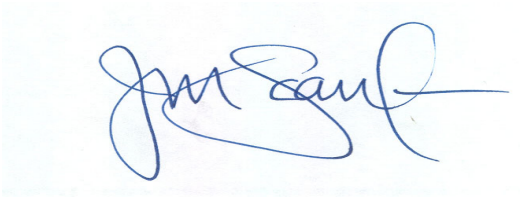
Response:

Behind the meter solar inverter calls are classified as power quality issues and, therefore, are counted as a trouble non-outage call for the Trouble Non-Outage service quality adjustment.

Prepared by or under the supervision of: Christopher Starr

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.



Joanne M. Scanlon

August 6, 2024
Date

Rhode Island Energy – Electric Service Quality Plan – Docket 3628 Service List Updated 8/6/2024

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