

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

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



September 5, 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. 24-31-EL – Last Resort Service Winter Rates for Effect October 1, 2024
Responses to CLF Data Requests – Set 1**

Dear Ms. De La Rosa:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company” or “Rhode Island Energy”), attached please find the Company’s responses to the Conservation Law Foundation’s (“CLF”) First Set of Data requests in the above-referenced matter.

Thank you for your attention to this filing. If you have any questions concerning this matter, please do not hesitate to contact me at 401-784-4263.

Sincerely,

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

Andrew S. Marcaccio

Enclosures

cc: Docket No. 24-31-EL Service List

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 24-31-EL
In Re: Last Resort Service Rates for Effect October 1, 2024
Responses to Conservation Law Foundation's First Set of Data Requests
Issued August 23, 2024

CLF 1-1

Request:

Please provide the month-to-month fuel mix for Last Resort Service for the most recent calendar year available.

Response:

A month-to-month fuel mix is not currently available. The Last Resort Service Disclosure Label with the fuel mix is published quarterly. Each quarterly LRS Disclosure Label contains the previous 12 months of data. The latest four quarters are attached in Attachment CLF 1-1.

Disclosure Label November 2023



Rhode Island Energy™
a PPL company

Do you know where your power comes from?

Here is some information that can help you make the best decision for your energy needs.

As required by the Rhode Island Public Utilities Commission, we provide customers with a disclosure label. This label enables you to look at the energy sources and air emissions of the power used to serve your needs. You can then compare energy labels from other electric suppliers to make the best choice based on your energy needs.

Our customers are served by an integrated power grid, not particular generating units. The information provided is based on the most recent available information provided by our suppliers via the NEPOOL Generation Information System.

Rhode Island Energy procures its electricity supply for Last Resort Service, on behalf of its customers, from system power contracts, not from specific generating units.

For additional information, you may contact Rhode Island Energy at **1-855-RIE-1101 (1-855-743-1101)**, RIEnergy.com, the Rhode Island Office of Energy Resources at **401-574-9100** or the Rhode Island Public Utilities Commission and Division of Public Utilities and Carriers at **401-941-4500**.

Electricity Facts

Last Resort Service for
Rhode Island Energy
Customers in Rhode Island

NOTES

- Electricity customers in New England are served by an integrated power grid, not particular generating units. The above information is based on the most recently available information provided by the Company's suppliers via the NEPOOL Generation Information System. Rhode Island Energy procures its electricity supply for Last Resort Service, on behalf of its customers, from system power contracts, not from specific generating units.
- You may call Rhode Island Energy at **1-855-RIE-1101 (1-855-743-1101)**, the Rhode Island Office of Energy Resources at **401-574-9100**, or the Rhode Island Public Utilities Commission and Division of Public Utilities and Carriers at **401-941-4500** for additional information.

Power Sources

Demand for this electricity product in the period 4/1/2022 - 3/31/2023 was assigned generation from the following sources:

Power Source	Resource Mix
Biomass	0.1%
Biogas	0.0%
Coal	0.2%
Diesel	1.3%
Digester gas	0.0%
Efficient resource (Maine)	0.0%
Energy storage	0.1%
Fuel cell	0.0%
Hydroelectric/Hydropower	5.0%
Jet	0.0%
Landfill gas	6.0%
Municipal solid waste	0.0%
Natural gas	52.6%
Nuclear	3.7%
Oil	5.5%
Solar photovoltaic	5.0%
Imported power	14.0%
Trash-to-energy	0.0%
Wind	6.5%
Wood	0.0%
Total	100.0%

Air Emissions

Air emissions from the electric power resources used to serve Rhode Island Energy's Last Resort Service customers are compared to the New England regional average air emissions for all power resources in the period 4/1/2022 – 3/31/2023.

Power Source	Pounds per MWh	Resource Mix Air Emissions as a % of NEPOOL System Mix
Carbon dioxide	643.6891	105.5%
Carbon monoxide	1.2952	107.0%
Mercury	0.00001	2.6%
Nitrogen oxides	143.6803	1133.6%
Particulates	0.2599	133.1%
Fine particulates	0.2110	121.3%
Sulphur dioxides	0.3820	118.7%
Organic compounds	0.0407	119.5%

Disclosure Label February 2024



Rhode Island Energy™
a PPL company

Do you know where your power comes from?

Here is some information that can help you make the best decision for your energy needs.

As required by the Rhode Island Public Utilities Commission, we provide customers with a disclosure label. This label enables you to look at the energy sources and air emissions of the power used to serve your needs. You can then compare energy labels from other electric suppliers to make the best choice based on your energy needs.

Our customers are served by an integrated power grid, not particular generating units. The information provided is based on the most recent available information provided by our suppliers via the NEPOOL Generation Information System.

Rhode Island Energy procures its electricity supply for Last Resort Service, on behalf of its customers, from system power contracts, not from specific generating units.

For additional information, you may contact Rhode Island Energy at **1-855-RIE-1101 (1-855-743-1101)**, RIEnergy.com, the Rhode Island Office of Energy Resources at **401-574-9100** or the Rhode Island Public Utilities Commission and Division of Public Utilities and Carriers at **401-941-4500**.

Electricity Facts

Last Resort Service for
Rhode Island Energy
Customers in Rhode Island

NOTES

1. Electricity customers in New England are served by an integrated power grid, not particular generating units. The above information is based on the most recently available information provided by the Company's suppliers via the NEPOOL Generation Information System. Rhode Island Energy procures its electricity supply for Last Resort Service, on behalf of its customers, from system power contracts, not from specific generating units.
2. You may call Rhode Island Energy at **1-855-RIE-1101 (1-855-743-1101)**, the Rhode Island Office of Energy Resources at **401-574-9100**, or the Rhode Island Public Utilities Commission and Division of Public Utilities and Carriers at **401-941-4500** for additional information.

RIE4391 (02/24) RI-E

Power Sources

Demand for this electricity product in the period 7/1/2022 - 6/30/2023 was assigned generation from the following sources:

Power Source	Resource Mix
Biomass	0.1%
Biogas	0.0%
Coal	0.2%
Diesel	1.1%
Digester gas	0.0%
Efficient resource (Maine)	0.0%
Energy storage	0.1%
Fuel cell	0.0%
Hydroelectric/Hydropower	5.0%
Jet	0.0%
Landfill gas	7.7%
Municipal solid waste	0.0%
Natural gas	51.9%
Nuclear	3.6%
Oil	5.6%
Solar photovoltaic	5.3%
Imported power	12.8%
Trash-to-energy	0.0%
Wind	6.6%
Wood	0.0%
Total	100.0%

Air Emissions

Air emissions from the electric power resources used to serve Rhode Island Energy's Last Resort Service customers are compared to the New England regional average air emissions for all power resources in the period 7/1/2022 – 6/30/2023.

Power Source	Pounds per MWh	Resource Mix Air Emissions as a % of NEPOOL System Mix
Carbon dioxide	808.4491	132.8%
Carbon monoxide	1.3302	1.9%
Mercury	0.0004	18.8%
Nitrogen oxides	0.5912	111.2%
Particulates	0.2577	129.2%
Fine particulates	0.2051	13.3%
Sulphur dioxides	0.3893	118.9%
Organic compounds	0.0406	116.8%

Disclosure Label May 2024



Rhode Island Energy™
a PPL company

Do you know where your power comes from?

Here is some information that can help you make the best decision for your energy needs.

As required by the Rhode Island Public Utilities Commission, we provide customers with a disclosure label. This label enables you to look at the energy sources and air emissions of the power used to serve your needs. You can then compare energy labels from other electric suppliers to make the best choice based on your energy needs.

Our customers are served by an integrated power grid, not particular generating units. The information provided is based on the most recent available information provided by our suppliers via the NEPOOL Generation Information System.

Rhode Island Energy procures its electricity supply for Last Resort Service, on behalf of its customers, from system power contracts, not from specific generating units.

For additional information, you may contact Rhode Island Energy at **1-855-RIE-1101 (1-855-743-1101)**, RIEnergy.com, the Rhode Island Office of Energy Resources at **401-574-9100** or the Rhode Island Public Utilities Commission and Division of Public Utilities and Carriers at **401-941-4500**.

Electricity Facts

Last Resort Service for
Rhode Island Energy
Customers in Rhode Island

NOTES

1. Electricity customers in New England are served by an integrated power grid, not particular generating units. The above information is based on the most recently available information provided by the Company's suppliers via the NEPOOL Generation Information System. Rhode Island Energy procures its electricity supply for Last Resort Service, on behalf of its customers, from system power contracts, not from specific generating units.
2. You may call Rhode Island Energy at **1-855-RIE-1101 (1-855-743-1101)**, the Rhode Island Office of Energy Resources at **401-574-9100**, or the Rhode Island Public Utilities Commission and Division of Public Utilities and Carriers at **401-941-4500** for additional information.

RIE4391 (03/24) RI-E

Power Sources

Demand for this electricity product in the period 10/1/2022 - 9/30/2023 was assigned generation from the following sources:

Power Source	Resource Mix
Biomass	0.2%
Biogas	0.0%
Coal	0.2%
Diesel	0.9%
Digester gas	0.0%
Efficient resource (Maine)	0.0%
Energy storage	0.1%
Fuel cell	0.0%
Hydroelectric/Hydropower	6.2%
Jet	0.0%
Landfill gas	6.1%
Municipal solid waste	0.0%
Natural gas	52.1%
Nuclear	3.7%
Oil	6.0%
Solar photovoltaic	5.1%
Imported power	11.8%
Trash-to-energy	0.1%
Wind	7.5%
Wood	0.0%
Total	100.0%

Air Emissions

Air emissions from the electric power resources used to serve Rhode Island Energy's Last Resort Service customers are compared to the New England regional average air emissions for all power resources in the period 10/1/2022 – 9/30/2023.

Power Source	Pounds per MWh	Resource Mix Air Emissions as a % of NEPOOL System Mix
Carbon dioxide	779.3713	129.3%
Carbon monoxide	0.6343	115.7%
Mercury	0.0005	22.5%
Nitrogen oxides	0.5774	110.4%
Particulates	0.2564	130.6%
Fine particulates	0.2066	13.2%
Sulphur dioxides	0.3838	125.0%
Organic compounds	0.0400	115.8%

Disclosure Label August 2024



Rhode Island Energy™
a PPL company

Do you know where your power comes from?

Here is some information that can help you make the best decision for your energy needs.

As required by the Rhode Island Public Utilities Commission, we provide customers with a disclosure label. This label enables you to look at the energy sources and air emissions of the power used to serve your needs. You can then compare energy labels from other electric suppliers to make the best choice based on your energy needs.

Our customers are served by an integrated power grid, not particular generating units. The information provided is based on the most recent available information provided by our suppliers via the NEPOOL Generation Information System.

Rhode Island Energy procures its electricity supply for Last Resort Service, on behalf of its customers, from system power contracts, not from specific generating units.

For additional information, you may contact Rhode Island Energy at **1-855-RIE-1101 (1-855-743-1101)**, RIEnergy.com, the Rhode Island Office of Energy Resources at **401-574-9100** or the Rhode Island Public Utilities Commission and Division of Public Utilities and Carriers at **401-941-4500**.

Electricity Facts

Last Resort Service for
Rhode Island Energy
Customers in Rhode Island

NOTES

- Electricity customers in New England are served by an integrated power grid, not particular generating units. The above information is based on the most recently available information provided by the Company's suppliers via the NEPOOL Generation Information System. Rhode Island Energy procures its electricity supply for Last Resort Service, on behalf of its customers, from system power contracts, not from specific generating units.
- You may call Rhode Island Energy at **1-855-RIE-1101 (1-855-743-1101)**, the Rhode Island Office of Energy Resources at **401-574-9100**, or the Rhode Island Public Utilities Commission and Division of Public Utilities and Carriers at **401-941-4500** for additional information.

Power Sources

Demand for this electricity product in the period 1/1/2023 - 12/31/2023 was assigned generation from the following sources:

Power Source	Resource Mix
Biomass	0.2%
Biogas	0.0%
Coal	0.2%
Diesel	1.0%
Digester gas	0.0%
Efficient resource (Maine)	0.0%
Energy storage	0.1%
Fuel cell	0.0%
Hydroelectric/Hydropower	2.8%
Jet	0.0%
Landfill gas	6.6%
Municipal solid waste	0.1%
Natural gas	56.1%
Nuclear	0.0%
Oil	6.8%
Solar photovoltaic	6.4%
Imported power	12.0%
Trash-to-energy	0.1%
Wind	7.6%
Wood	0.0%
Total	100.0%

Air Emissions

Air emissions from the electric power resources used to serve Rhode Island Energy's Last Resort Service customers are compared to the New England regional average air emissions for all power resources in the period 1/1/2023 – 12/31/2023.

Power Source	Pounds per MWh	Resource Mix Air Emissions as a % of NEPOOL System Mix
Carbon dioxide	821.7714	134.9%
Carbon monoxide	0.6678	120.6%
Mercury	0.0007	32.8%
Nitrogen oxides	0.5961	115.7%
Particulates	0.2915	136.1%
Fine particulates	0.2299	14.6%
Sulphur dioxides	0.3839	136.5%
Organic compounds	0.0431	119.7%

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 24-31-EL
In Re: Last Resort Service Rates for Effect October 1, 2024
Responses to Conservation Law Foundation's First Set of Data Requests
Issued August 23, 2024

CLF 1-2

Request:

Please provide expected greenhouse gas emissions (GHG) associated with the generation of a MW of electricity from each type of fuel identified in response to 1-1. Please note if the Company uses this expected GHG emission measurement in its own planning, if it uses an alternate figure, or if it has no model at all.

Response:

The available greenhouse gas emissions (GHG) associated with 1 MWh of electricity are published quarterly within the Last Resort Service Disclosure Label. Each quarterly LRS Disclosure Label contains the previous 12 months of data. The latest four quarters are attached in Attachment CLF 1-1. The Company does not use the GHG emission measurements or modeling in its planning for LRS procurement.

CLF 1-3

Request:

Referring to page 3 of Attachment 1 of the Company's initial rate filing, line (4) indicates "Projected Total Company Residential Group kWhs." Please describe how this forecast is derived, including any factors that are considered in preparing the forecast.

Response:

The Company's (RIE) electric deliveries and customer count forecasts are developed from econometric models relating historical monthly deliveries and class of service to regional economic and/or demographic variables, weather, and other explanatory variables. The models estimate the historical relationship between deliveries and these variables. The total residential and residential electric heating models are specified as energy use-per-customer models. Separate models are developed for customer counts. The use-per-customer model results are multiplied by the customer count model results to determine overall energy deliveries.

All energy models are specified after reconstituting the historical deliveries for Distributed Energy Resources (DER). That is, after adding back the impacts of these DERs to the historical input dataset. The DERs being considered include energy efficiency (EE), solar photovoltaics (PV), electric vehicles (EV), and electric heat pumps (EH). The model produced GWh delivery forecast results are then adjusted to reflect projected cumulative DER impacts.

Class of service deliveries and customer forecasts are allocated to rate classes based on historical trends.

All models are checked for overall goodness of fit, statistical validity and reasonable results.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 24-31-EL
In Re: Last Resort Service Rates for Effect October 1, 2024
Responses to Conservation Law Foundation's First Set of Data Requests
Issued August 23, 2024

CLF 1-4

Request:

Please provide examples of any modeling or forecasting done by the Company that is adjusted based upon cost of service and/or cost of supply. For example, does the Company forecast different electricity demand dependent upon what distribution rate the Commission approves? Dependent upon the supply rate the Commission approves? Different forecasts based upon supply rates derived from LRS auctions? These samples should not be considered the exclusive price variations to be considered if the Company's practice is to adjust demand models based on other price variables.

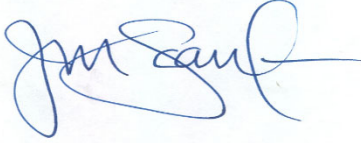
Response:

The Company (RIE) does not forecast electricity demand based on varying supply rates. Average retail electricity price as reported by the EIA is one variable included in development of the annual forecast however no additional versions of the forecast are prepared as prices or price variables change or are approved by the Commission. Forecasts are produced annually based on current variables at the time the forecast is developed.

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

September 5, 2024

Date

**Docket No. 24-31-EL – Narragansett Electric Co. d/b/a Rhode Island Energy
– Last Resort Service Rates 2024
Service List updated 8/22/24**

Name/Address	E-mail Distribution	Phone
The Narragansett Electric Company d/b/a Rhode Island Energy Andrew Marcaccio, Esq. Celia B. O’Brien, Esq. 280 Melrose Street Providence, RI 02907	AMarcaccio@pplweb.com;	401-784-4263
	ASTurgeon@pplweb.com;	
	COBrien@pplweb.com;	
	JHutchinson@pplweb.com;	
	JScanlon@pplweb.com;	
	ACastanaro@pplweb.com;	
	SBriggs@pplweb.com;	
	JOliveira@pplweb.com;	
	NSUcci@RIEnergy.com;	
JWBausch@pplweb.com;		
National Grid	James.Ruebenacker@nationalgrid.com; James.Calandra@nationalgrid.com;	
Division of Public Utilities Gregory S. Schultz, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	gSchultz@riag.ri.gov;	401-274-4400
	Christy.Hetherington@dpuc.ri.gov;	
	Margaret.L.Hogan@dpuc.ri.gov;	
	John.Bell@dpuc.ri.gov;	
	Al.Mancini@dpuc.ri.gov;	
	Al.Contente@dpuc.ri.gov;	
	Paul.Roberti@dpuc.ri.gov;	
	Machaela.Seaton@dpuc.ri.gov;	
Thomas.kogut@dpuc.ri.gov;		

	Ellen.Golde@dpuc.ri.gov ;	
Office of Energy Resources Albert Vitali, Esq. Division of Legal Services One Capitol Hill, Fourth Floor Providence, RI 02908 Christopher Kearns	Albert.vitali@doa.ri.gov ;	401-724-3600
	Christopher.Kearns@energy.ri.gov ;	
	steven.chybowski@energy.ri.gov ;	
	jkeoughjr@keoughsweeney.com ;	
	Nancy.Russolino@doa.ri.gov ;	
	jdalton@poweradvisoryllc.com ;	
RI Attorney General Office Nicholas Vaz, Esq. 150 South Main St. Providence, RI 02903	nvaz@riag.ri.gov ;	
	mbedell@riag.ri.gov ;	
George Wiley Center Jennifer L. Wood, Executive Director R.I. Center for Justice 1 Empire Plaza, Suite 410 Providence, RI 02903	jwood@centerforjustice.org ;	
	georgewileycenterri@gmail.com ;	
	camiloviveiros@gmail.com ;	
Conservation Law Foundation James Rhodes, Esq.	jrhodes@clf.org ;	
Good Energy, L.P. Laura S. Olton, Esq.	laura@lsoenergyadvisors.com ;	
File an original & 9 copies w/: Stephanie De La Rosa, Commission Clerk John Harrington, Counsel Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	stephanie.delarosa@puc.ri.gov ;	401-780-2017
	Alan.Nault@puc.ri.gov ;	
	Emma.Rodvien@puc.ri.gov ;	
	Todd.Bianco@puc.ri.gov ;	
	John.Harrington@puc.ri.gov ;	
	Christopher.Caramello@puc.ri.gov ;	
INTERESTED PARTIES:		
Victoria Scott, Governor's Office	Victoria.Scott@governor.ri.gov ;	
Marc Hanks, Direct Energy	Marc.Hanks@directenergy.com ;	