

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

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

ORDER

On Thursday, August 15, 2024 at 6:42 pm, the Narragansett Electric Company d/b/a Rhode Island Energy (Company) filed a “Petition for Temporary Waiver or Other Relief from Tariff Requirements During System Conversion” (Petition). The Petition identified two known billing differences that could not be resolved by the time that the IT system conversion was scheduled on the following Monday, August 19, 2024.¹ Although the Company identified two known billing differences that would not be resolved by August 19, 2024, it did not have an anticipated date of when they would be resolved but indicated it would endeavor to do so within three to six months.

The first of the two known billing differences was the Company’s application of late payment charges, for which certain non-residential customers accrue interest at a rate of 1¼% per month for balances that remain unpaid past their due date.² The Company expects this to affect approximately 5,700 combined electric and gas customers per month for at least one or two months and anticipates a cost of \$62,000 per month that the Company will absorb and not seek to collect subsequently from customers. The second known billing difference relates to customers who have different accounts but elect to electronically receive one paperless summary or master account bill

¹ The IT conversion relates to the acquisition of The Narragansett Electric Company by PPL Corporation from National Grid. PPL has been using National Grid systems during a post-acquisition transition period. This conversion relates to the transfer of certain functions to a new IT system that will allow PPL to end these IT-related transition services being provided by National Grid. Petition at 2.

² Residential customers are not subject to late payment charges.

instead of separate bills for each account and a \$0.37 credit for foregoing a paper bill. Of the Company's 97 customers that receive summary account bills, 37 gas and electric customers have chosen electronic billing. The Company indicated that when the IT conversion occurs, the system will be unable to provide paperless billing and the credit to the 37 customers who have chosen that option resulting in an impact of approximately \$1.11 to \$2.22 per customer which the Company does not plan to reimburse once it is able to provide electronic summary bills.

In addition to the Petition, the Company filed a letter which it labels as a "Notice of Other Known Billing Differences from IT System Conversion" (Notice). This was filed the day after the waiver request, on Friday, August 16. The filing discloses ten other billing differences. But the letter maintains that none of these require a waiver. The ten issues relate to: (1) arrearage management program bills with prior errors, (2) the bill presentation of lighting components, (3) non-utility billing charges, (4) tax exemptions, (5) summary account sub-account details, (6) Renewable Energy Growth Program differences relating to incentive bill credits, (7) Renewable Energy Growth Program bill credits for low-income discount calculations, (8) supplier charges on budget billing accounts, (9) customer charges for accounts that have been disconnected, and (10) customer charges on certain unmetered C-06 accounts. While the Company maintains that the ten issues do not require a waiver, the letter nevertheless states: "If, after review, the Commission believes any of these known 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 its request for a temporary waiver or other relief in Docket 24-32-GE."

Decision

The Company has been working on this this project to convert its IT system for well over a year. In performing a conversion of this type, the Company has a duty to anticipate issues that may arise that conflict with obligations under its approved tariffs. It is understandable that system changes are challenging and result in unexpected effects. If the Company had made a filing months ago with the Commission and identified the issues, and described a plan for how the Company would be addressing them, the Company's request might be viewed differently. But this filing was made by the Company after business hours on the Thursday evening before the weekend when the process for conversion was commencing and was scheduled for active implementation on that next Monday. The timing of these filings provided no time for the Commission to review the request and disclosures before the project was launched. Thus, it was far too late to change course.

The two admitted violations and the list of ten matters may turn out to be inconsequential to customers. Nevertheless, the Company's request is essentially asking the Commission to grant it immunity from any consequences that might flow out of tariff violations. In other words, granting the request would insulate the Company from claims by any customers who might be harmed by any violation because it would provide the Company with the ability to avoid accountability. Certainly, the two issues identified in the Petition appear to be relatively insignificant.³ However, the ten issues disclosed in the accompanying letter may have other effects, the significance of which are not determinable from the "Notice" letter alone. While the

³ The Company stated that it would forego any late payment charges. While the financial impact of the paperless billing credit appears *de minimis*, the filing did not assess other inconveniences that might occur when customers accustomed to paperless billing go unbilled or receive a paper bill that is not properly processed.

Commission appreciates the fact that the Company is disclosing the ten issues in the “Notice,” the timing is questionable as well, being filed on the eve of the conversion.

The Commission finds that the waiver petition and Notice letter reserving the right to add to the petition are untimely. Moreover, if this Commission granted the waiver being sought, it could unfairly deprive customers of the right to seek relief should harm occur from a tariff violation. Accordingly, the Commission dismisses the Petition.

Accordingly, it is hereby

(25140) ORDERED:

1. The Petition for Temporary Waiver or Other Relief from Tariff Requirements During System Conversion is dismissed.

EFFECTIVE AT WARWICK, RHODE ISLAND ON AUGUST 28, 2024 PURSUANT TO AN OPEN MEETING DECISION ON AUGUST 28, 2024. WRITTEN ORDER ISSUED AUGUST 29, 2024.

PUBLIC UTILITIES COMMISSION



Ronald T. Gerwatowski, Chairperson



Abigail Anthony, Commissioner



John C. Revens, Jr., Commissioner

NOTICE OF RIGHT OF APPEAL: Pursuant to R.I. Gen. Laws § 39-5-1, any person aggrieved by a decision or order of the PUC may, within seven days from the date of the order, petition the Supreme Court for a Writ of Certiorari to review the legality and reasonableness of the decision or order.