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October 4, 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  
Responses to PUC Data Requests – Set 3**

Dear Ms. De La Rosa:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”), enclosed please find the Company’s responses to the Third Set of Data Requests issued by the Public Utilities Commission concerning the Company’s Fiscal Year 2024 Electric Infrastructure, Safety, and Reliability Plan Reconciliation in the above-referenced docket.

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 No. 22-53-EL Service List

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 22-53-EL  
In Re: FY 2024 Electric Infrastructure, Safety and Reliability Plan  
Reconciliation Filing  
Responses to the Commission's Third Set of Data Requests  
Issued on September 30, 2024

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PUC 3-1

Request:

Referring to the AMF-related schedules filed on September 25, 2024, and the schedule entitled "Calculation of Net O&M Costs through March 31, 2024 (FY 2024),"

- a. Please confirm that the reason why line 1 does not identify any O&M Expense is because no O&M expenses related to the AMF deployment have yet been incurred through the period commencing with the Commission's Open Meeting Decision in Docket 22-49-EL on September 27, 2023 and ending March 31, 2024.
- b. However, if O&M expenses related to the AMF deployment have been incurred during that period, please provide a schedule that identifies such expenses and nets those AMF-related O&M expenses against the accumulated MRP Credits, consistent with the Commission's decision (Motion #8) in Docket 22-49-EL.
- c. The Company included the following on the schedule: (No O&M Reconciliation; Company retains 100% Opex Benefits and Company retains 100% MRP Rate Credits Prior to New Base Rates from Rate Case). Please confirm that the Company understands that it would not retain 100% MRP Rate Credits absent any spending on AMF O&M. In other words, if the actual O&M Spend is less than 100% of the accumulated MRP rate credits, the Company would not retain the funds, but would have to return them to customers.

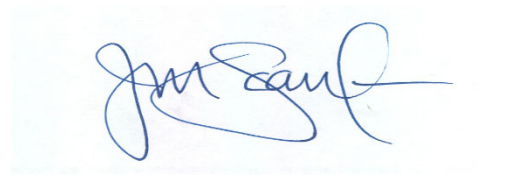
Response:

- a. Yes it is correct that Line 1 is zero because no AMF related O&M expenses had been incurred through March 31, 2024.
- b. Please see the response to subpart (a).
- c. The Company understands that if the actual AMF related O&M costs were less than the accumulated MRP rate credits related to AMF, then the Company could return the difference to customers or other alternatives approved by the Commission such as offsetting other costs.

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.



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Joanne M. Scanlon

October 4, 2024  
Date

**Docket No. 22-53-EL – RI Energy’s Electric ISR Plan FY 2024**  
**Service List as of 9/26/2024**

<b>Name/Address</b>	<b>E-mail Distribution</b>	<b>Phone</b>
<b>The Narragansett Electric Company</b> <b>d/b/a Rhode Island Energy</b> Andrew Marcaccio, Esq. 280 Melrose St. Providence, RI 02907  Adam S. Ramos, Esq. <b>Hinckley Allen</b> 100 Westminster Street, Suite 1500 Providence, RI 02903-2319  Stephanie Briggs Nicole A. Gooding Susan M. Toronto Alan LaBarre Ryan Constable Kathy Castro Jeffrey Oliveira	<a href="mailto:amarcaccio@pplweb.com">amarcaccio@pplweb.com</a> ;	401-784-4263
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