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October 24, 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. 23-05-EL – The Narragansett Electric Company d/b/a Rhode Island Energy
Tariff Advice to Amend the Net Metering Provision - Proposal for Administration
of Excess Net Metering Credits
Extension to Comply with PUC Order No. 25052**

Dear Ms. De La Rosa:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”), enclosed is the Company’s motion for an extension to comply with PUC Order No. 25052 in the above-referenced docket. Specifically, the Company is requesting an extension to November 8, 2024 to provide net metering host customers with a Consumption Balance Report.

The Company reached out to counsel for the Division of Public Utilities and Carriers (“Division”), Revity Energy LLC (“Revity”), Office of Energy Resources (“OER”), and MassAmerican Energy LLC d/b/a Gridwealth Development (“Gridwealth”) (collectively, the “Parties”). The Parties did not have any objections to the requested extension except that OER counsel needed time to confirm with his client.

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

Enclosure

cc: Docket No. 23-05-EL Service List

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

In Re: The Narragansett Electric Company)	
d/b/a Rhode Island Energy Tariff Advice to)	Docket No. 23-05-EL
Amend Net Metering Provision)	
)	

**MOTION OF THE NARRAGANSETT ELECTRIC COMPANY
d/b/a RHODE ISLAND ENERGY FOR EXTENSION TO COMPLY WITH ORDER**

The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”) hereby respectfully requests that the Public Utilities Commission (“PUC”) grant the Company a 12-day extension to November 8, 2024, for the Company to provide net metering host customers with a Consumption Balance Report in compliance with PUC Order No. 25052, ¶ 11, in Docket No. 23-05-EL. The current due date is calculated as Sunday, October 27, 2024.¹ The Company is respectfully requesting a new due date of Friday, November 8, 2024. The Company reached out to counsel for the Division of Public Utilities and Carriers (“Division”), Revity Energy LLC (“Revity”), Office of Energy Resources (“OER”), and MassAmerican Energy LLC d/b/a Gridwealth Development (“Gridwealth”) (collectively, the “Parties”). The Parties did not have any objections to the requested extension except that OER counsel needed time to confirm with his client.

¹ Per Chris Ann Rossi, Senior Manager, Billing and Credit and Collections for the Company, the last bill group in September was billed on September 27, 2024. Thirty days from September 27, 2024, calculates to Sunday, October 27, 2024.

I. APPLICABLE ORDER

The order from which the Company seeks relief is PUC Order No. 25052, which was issued on May 10, 2024. Specifically, ¶ 11 is the applicable directive and reads as follows:

- (a) The Company is directed to provide a consumption-to-production balance report to each host account at the end of the third quarter of each year (“Consumption Balance Report”).
- (b) The Consumption Balance Report should provide the following:
 - i. Year-to-date consumption information for each satellite account listed on the Schedule B as of the end of the third quarter, reflecting total consumption through the September billing cycle of each customer listed on the Schedule B;
 - ii. The total net production recorded by the Company for the host account’s generation through the end of September;
 - iii. The total consumption that occurred in the prior calendar year from each of the satellite accounts listed (to the extent available) for the months of October through December; and
 - iv. A list of any accounts on the applicable Schedule B that also appear on other applicable Schedule B’s associated with other host projects.
- (c) The Consumption Balance Report shall be provided to the host account within 30 days of the last satellite/off-taker account billing cycle of September that is reflected in the report.
- (d) The host accounts will have 30 days from receipt of the Consumption Balance Report to amend the Schedule B which will be considered effective in the

calendar year for purposes of the Company executing the annual reconciliation.

- (e) The Company is directed to use the last effective Schedule B provided to the Company for the applicable calendar year as a measure of consumption when the annual reconciliation is performed for the host account.
- (f) The Company shall produce annual Consumption Balance Reports, including other terms relating to the reports as herein specified by the Commission.

II. LEGAL STANDARD

810-RICR-00-00-1.7(B)² provides that “... **whenever by any Commission** rule, regulation, or **order**, or any notice given thereunder, **an act is required** or allowed to be done at or **within a specified time**, the time fixed or the period of time prescribed **may, for good cause, be extended by the presiding officer** upon request made before expiration of the period originally prescribed or as previously extended...” Emphasis added. In this case, the Company is requesting an extension to comply with ¶ 11 of PUC Order No. 25052 for good cause, as explained herein.

III. GOOD CAUSE FOR REQUESTED EXTENSION

This is the first time the Company is preparing the Consumption Balance Reports. The process begins with running complex queries through the Company’s billing system to retrieve net metering billing data through September 2024. Once the billing data is retrieved, the Company runs calculations so that net metering host accounts have the necessary information

² 810-RICR-00-00-1 is the PUC’s Rules of Practice and Procedure.

from which they can make Schedule B adjustment decisions. Finally, the Company takes the necessary information and merges it into an e-mail and mailing, which will be sent to all net metering host customers. The process has been delayed as the Company establishes workable queries, calculations, and mail merges. The Company anticipates that, next year, with all of the workable queries, calculations, and mail merges already established, it will meet the due date as directed by the PUC's Order.

IV. NO IMPACTS ON CUSTOMER RESPONSE TIME

The Order states that: “The host accounts will have **30 days from receipt of the Consumption Balance Report** to amend the Schedule B which will be considered effective in the calendar year for purposes of the Company executing the annual reconciliation.” If the PUC were to grant the Company's request for an extension, net metering host customers will still have the scheduled 30 days from the date they receive the Report to reply to the Company. That 30-day time period will not be shortened because of the Company's delay. If customers receive the Report on November 8, 2024, they will have until Monday December 9, 2024, to submit amended Scheduled Bs to the Company. The Company will strive to get all accounts settled before the end of the calendar year. Even if the Company is delayed in processing, it will still run the reconciliation using the amended Schedule B as provided by the net metering customer before the expiration of the 30-day period.

V. CONCLUSION

For the foregoing reasons, the Company respectfully requests that the PUC grant this Motion for extension.

Respectfully submitted,

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

By its attorney,

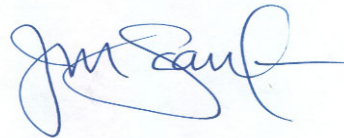


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280 Melrose Street
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(401) 784-4263

Dated: October 24, 2024

CERTIFICATE OF SERVICE

I hereby certify that on October 24, 2024, I delivered a true copy of the foregoing Motion via electronic mail to the parties on the Service List for Docket No. 23-05-EL.

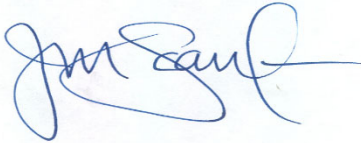


Joanne M. Scanlon

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

October 24, 2024
Date

**Docket No. 23-05-EL Rhode Island Energy – Net Metering Provision, RIPUC No. 2268
Service List updated 1/10/2024**

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