

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

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



October 15, 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. 24-20-EL - The Narragansett Electric Company d/b/a
Rhode Island Energy's 2025 Last Resort Service Procurement Plan
Responses to PUC Data Requests – Set 1**

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 Public Utilities Commission's First Set of Data Requests in the above-referenced matter.

Thank you for your attention to this matter. If you have any questions, please contact me at 401-784-4263.

Sincerely,

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

Andrew S. Marcaccio

Enclosures

cc: Docket No. 24-20-EL Service List

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 24-20-EL
In Re: 2025 Last Resort Service Procurement Plan
Responses to the Commission's First Set of Data Requests
Issued on October 8, 2024

PUC 1-1

Request:

Please compare the Gantt chart for the LRS procurement schedule to the current expected implementation of advanced meters in Rhode Island. Identify any period in the procurement plan that extends beyond full implementation and integration of the advanced meters.

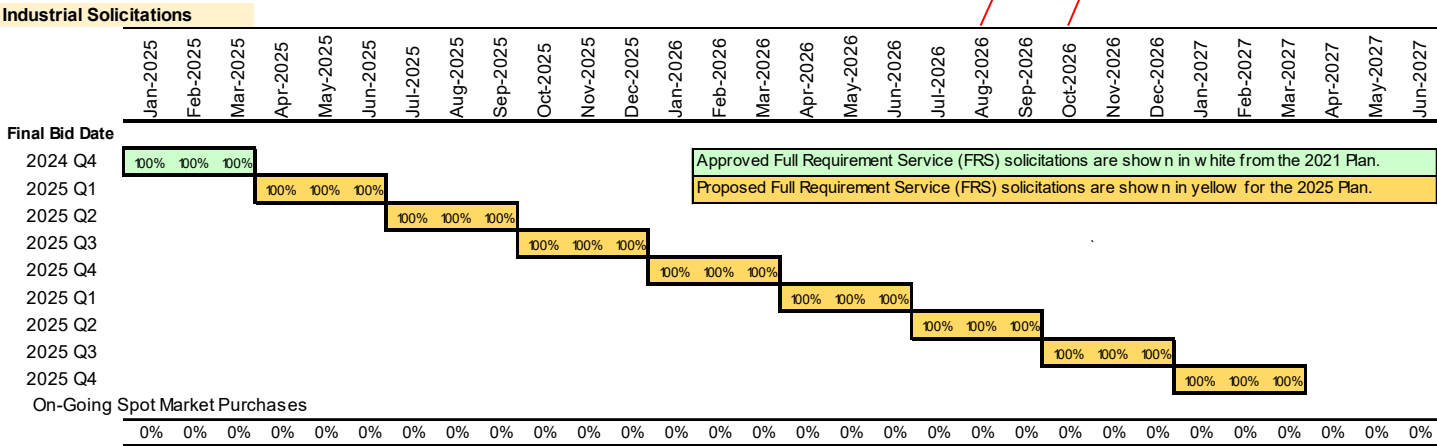
Response:

The Company expects advanced meters to be fully implemented by October 2026. Please see Attachment PUC 1-1 for the updated LRS Procurement Plan charge indicating the anticipated advanced meter implementation.

2025 LRS Plan
Industrial Customers

The last meter installed by August 2026

AMF deployment ends October 2026



PUC 1-2

Request:

Considering the full requirement services contracts and spot market purchases RIE uses in its LRS Procurement Plan, please provide a description of how PPL Electric procures for its default service product and compare the two processes.

Response:

PPL Electric procures default service for its customers using a ladder and layered approach like with LRS. The current PPL Electric Default Service Plan No. 5 ("DSP V") plan segregates customers into three customer groups: Residential, Small (Commercial & Industrial) C&I, and Large (Commercial & Industrial) C&I. As with LRS, the Residential and Small C&I are on similar procurement schedules. PPL Electric's current DSP V supply is procured via semi-annual auctions in April and October, unlike LRS which is procured quarterly. Both April and October auctions procure 12-month and 6-month Fixed Price Full Requirements products. Contrastingly, LRS procures 6-month, 12-month, 18-month and 24-month products. Furthermore, PPL Electric supplier Fixed Price Full Requirements products include capacity while LRS does not. DSP V also has two 50MW block products for Residential default service which were procured in April 2021 and October 2021. These products are both 5 years in length. The Large C&I procurements for PPL Electric are procured via annual auctions in April for 12-month Spot Market products. Contrastingly, the LRS Industrial customers procure 3-month Fixed Price Full Requirements products quarterly. The Spot Market procurement for Large C&I in DSP V is procured in the Real-Time energy ("RT") market. Whereas Spot market procurements for LRS are bid into the Day Ahead ("DA") market. For DSP VI, the Company proposed 12-month and 24-month Full Requirements terms for Residential and Small C&I. If approved, procurements will occur in February and July. Furthermore a 10-year long-term block for up to 150 MW energy only, and a 20-year Pennsylvania solar Alternative Energy Credit ("AEC") contract for 30,000 AECs were proposed. No changes were made for the Large C&I customer class.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 24-20-EL
In Re: 2025 Last Resort Service Procurement Plan
Responses to the Commission's First Set of Data Requests
Issued on October 8, 2024

PUC 1-3

Request:

Confirm that in PPL's Pennsylvania territory (PPL Electric) electric customers are only able to participate in PPL's time-of-use rate offering if the customer also takes energy supply from PPL Electric's default service and not a competitive supplier. Specifically confirm whether PPL Electric offers a time-of-use rate for delivery charges, or some other time-varying rate that is independent of PPL Electric's default service product.

Response:

Confirmed, PPL Electric customers are only able to participate in the time-of-use ("TOU") offering if they are on PPL Electric's default supply rate. There is not currently a TOU rate for delivery charges.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 24-20-EL
In Re: 2025 Last Resort Service Procurement Plan
Responses to the Commission's First Set of Data Requests
Issued on October 8, 2024

PUC 1-4

Request:

When did PPL Electric begin offering at least one time-of-use option to default service customers.

Response:

PPL Electric first implemented time-of-use in 2010 under PPL's Competitive Bridge Plan.

PUC 1-5

Request:

Please explain whether and how the option for time-of-use rates is considered in PPL Electric's default service procurement plan (for example, as a separately bid default product).

Response:

Pennsylvania law mandates that electric distribution companies ("EDCs") offer time-of-use rates to Residential and Small C&I customers. Originally PPL Electric held auctions to procure separate TOU products. However, those auctions failed for lack of supplier participation. To offer a TOU rate, PPL Electric utilizes a formula to calculate on-peak and off-peak multipliers from its Price to Compare.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 24-20-EL
In Re: 2025 Last Resort Service Procurement Plan
Responses to the Commission's First Set of Data Requests
Issued on October 8, 2024

PUC 1-6

Request:

If the procurement plan does consider the option of time-of-use rates, please explain if there was a transition from the procurement plan before such option was possible, and how and when the transition was executed in the procurement plan.

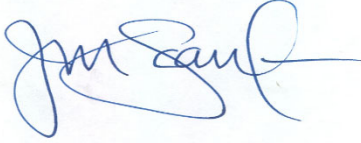
Response:

The Company did not consider time of use ("TOU") in the plan because the timing of full implementation for advanced metering was close to the end of the planning period and the Company would not have enough data to properly implement TOU rates. Once the new data is available the Company can analyze usage patterns to make the best judgements in exploring various TOU rate options.

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 15, 2024

Date

**Docket No. 24-20-EL – The Narragansett Electric Co. d/b/a Rhode Island Energy – 2025 Last Resort Service Procurement Plan
Service List updated 10/3/2024**

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
	COBrien@pplweb.com ;	
	JHutchinson@pplweb.com ;	
	JScanlon@pplweb.com ;	
	JWBausch@pplweb.com ;	
	SBriggs@pplweb.com ;	
	ACastanaro@pplweb.com ;	
	JOliveira@pplweb.com ;	
Division of Public Utilities Margaret L. Hogan, Esq.	Margaret.L.Hogan@dpuc.ri.gov ;	401-274-4400
	leo.wold@dpuc.ri.gov ;	
	Christy.Hetherington@dpuc.ri.gov ;	
	John.Bell@dpuc.ri.gov ;	
	Al.Mancini@dpuc.ri.gov ;	
	Al.Contente@dpuc.ri.gov ;	
	Machaela.Seaton@dpuc.ri.gov ;	
	Ellen.Golde@dpuc.ri.gov ;	
James Rouland Kathleen Kelly Aliea Afnan Daymark Energy Advisors	jrouland@daymarkea.com ;	
	kkelly@DaymarkEA.com ;	
	aafnan@daymarkea.com ;	
File an original & 9 copies w/: Stephanie DeLaRosa Commission Clerk Public Utilities Commission	Stephanie.DeLaRosa@puc.ri.gov ;	401-780-2017
	Alan.Nault@puc.ri.gov ;	
	John.Harrington@puc.ri.gov ;	

89 Jefferson Blvd. Warwick, RI 02888	Todd.Bianco@puc.ri.gov ;	
	Christopher.Caramello@puc.ri.gov ;	
	Kristen.L.Masse@puc.ri.gov	
INTERESTED PARTIES:		
Victoria Scott, Governor's Office	Victoria.Scott@governor.ri.gov ;	
Marc Hanks, Direct Energy	Marc.Hanks@directenergy.com ;	
Good Energy, Inc. Laura S. Olton, Esq. Patrick Roche	laura@lsoenergyadvisors.com ;	
	patrick@goodenergy.com ;	
Conservation Law Foundation James Rhodes, Esq.	jrhodes@clf.org ;	
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 ;	
	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 ;;	