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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. 24-38-GE - Rhode Island Energy Tariff Advice Filing to Amend Terms and Conditions for Distribution Service, R.I.P.U.C. No. 2243 Electric AMR/AMF Meter Opt-Out 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 are 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 401-316-7429.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Jennifer Brooks Hutchinson", with a long horizontal flourish extending to the right.

Jennifer Brooks Hutchinson

cc: Docket No. 24-38-GE Service List

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 24-38-GE
Amendments to Electric and Gas Tariffs

In Re: Advanced Meter Functionality and Automated Meter Reading Opt-Out
Responses to the Commission's First Set of Data Requests
Issued on September 30, 2024

PUC 1-1

Request:

Regarding the Company's proposal to substitute a manually read, non-communicating meter for residential customers who opt out of AMF or AMR:

- a. Please identify the type of non-communicating meters that the Company proposes to install for residential customers who opt out, and describe the functionality of such meters, as compared to the AMF meters, including an explanation of any limitations (other than inability to communicate remotely without a manual read).
- b. Please explain how the meter reader will "manually read" the meter. In other words, please explain whether the manual read would involve a meter reader visually recording meter data or using some type of probe which allows meter data to be transferred electronically into a recording device.
- c. If, in the future, the Company proposes, and the Commission approves, time-of-use rates for residential customers, will the Company be able to install manually read, non-communicating meters capable of recording usage based on time of use? Would there be any limitations on implementing time-of-use rates with customers who have opted out? Please explain.

Response:

- a. The Company intends to leave the existing AMR or manual meter, as applicable, in place and transition it to a manual read process. Customers who choose to opt-out will be placed into a manual read route, removing the account from any further drive by read requests or communications with the AMR system. This manual read route will follow the existing billing cycle for the customer account. At the completion of AMF meter deployment, except for large C&I meters on the MV-90 system, a customer's meter will work through the new AMF head-end system or be read manually. Manual, non-communicating electric meters will be read monthly and thus only provide once monthly usage data for billing purposes. It will provide no additional functionality. AMF meters, conversely, have the ability to provide near-real time interval data, enabling a host of functionalities as outlined in the AMF Business Case.

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PUC 1-1, page 2

- b. To perform a manual read the meter reading technician will follow the Company's existing process for manual meter reading. The meter reader will arrive at the customer's location during the billing cycle window. Utilizing existing handheld technology, the meter reader will visually verify and manually enter the meter read data into the device. This handheld device is brought back to the Company offices daily where it is uploaded into the meter data management system for further processing to billing.
- c. No, the current meters, which will transition to being manually read if a customer opts out from AMF, will not be capable of time-of-use rates. Non-AMF meters lack the ability to capture the necessary interval data usage. Interval usage is a requirement to calculate time of use. It is possible to install the current AMF meter or an alternate meter with interval data capture capabilities for time of use via a manual read. A more detailed analysis would need to be conducted on the feasibility of manual read time-of-use functionality and the process to enable and capture the data.

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PUC 1-2

Request:

Referring to Attachment 3,

- a. Please provide a more detailed explanation (showing calculations) of how the Company estimated the 14 minutes of travel time.
- b. Does the Company have reliable information to distinguish and estimate the average time it takes for meter readers to visit residential customers, based on the general area and/or municipality in which groups of customers reside? Please explain.

Response:

- a. The Company utilized the opt out calculation of travel time from Docket No. 4342 to arrive at the 14 minutes. See table titled, "Company Cost to Service Opt-out Non-AMR Meters" in the Company's Report on AMR Opt-Out Customers and Meter Reading Costs, dated February 3, 2014 in Docket No. 4342, page 8 of 8. The Company's current assumption considers that a potential 1% AMF opt out population of customers would be reasonably evenly distributed across the state and that no material changes to speed limits and, or road access have occurred since the 2014 figure was determined.
- b. The Company's estimate of 7 minutes for job time / wrench time is derived from the same calculations in Docket No. 4342 as referenced in Response 1-2a. above. The estimate considers, on average, meter accessibility, indoor vs. outdoor, physical location and other conditions.

Going forward, the Company will have the ability to distinguish and estimate the average times it takes to visit customer premises and manually read meters based on read routes, which are designed to cover a general geographic area.

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PUC 1-3

Request:

The existing tariff limits the right to opt-out of AMR meters to residential customers, but the proposed tariff strikes the term “residential” from the option, leaving all customers the option.

- a. Why is the Company now proposing to expand the right to opt out of AMF to non-residential customers?
- b. Would the exercise of the opt out option by C-06 customers affect the ability of the Company to require time-of-use pricing for non-residential customers in the future in that rate class? Please explain.

Response:

- a. The proposed tariff language strikes the term “residential” to be consistent with the Rhode Island Energy Advanced Metering Functionality Business Case. The Business Case included the option for all customers scheduled to receive an AMF meter, both residential and commercial, to opt out from receiving an AMF meter. This approach is also consistent with the opt-out approach at the Company's Kentucky affiliate.
- b. Yes, the exercise of the opt-out option by C-06 customers would affect the ability of the Company to require time-of-use pricing for non-residential customers in the future in that rate class. The implementation of time-of-use pricing will require a meter capable of providing interval usage. The meter that will be in place on a C-06 customer who chooses to opt-out will only record monthly kWh, and therefore, it will not have the capability to obtain interval usage needed for time-of-use pricing.

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PUC 1-4

Request:

Is the Company proposing to retain an inventory of non-AMF meters in order to meet opt out requests? If so, please provide an estimate of the meter inventory that will be retained and provide an estimate of the annual revenue requirement associated with that inventory, once the AMF program is fully deployed.

Response:

Yes, the Company is proposing to retain an inventory of non-AMF meters, post AMF deployment, to meet anticipated future opt-out requests and/or AMR meter failures during deployment.

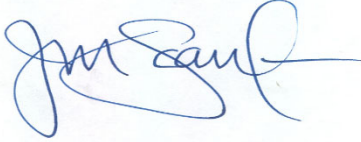
The estimated meter inventory planned to be retained is 1 percent of the electric meter population. This equates to approximately 5,300 meters. These meters will be retained in inventory from meters taken out of service during the AMF deployment. The intent is to avoid purchasing new meters for opt-out customers and to ensure there is sufficient non-communicating meters on hand to mitigate potential lead time and or supply chain issues. This quantity will be re-evaluated post AMF deployment when the final opt out number is known.

To provide an illustrative annual revenue requirement of the estimated 5,300 (or 1%) non-AMF meters to be retained in inventory, the Company calculated the revenue requirement using an estimated cost to purchase those meters today of \$325,000, as the Company cannot calculate the actual cost of the specific meters that will be retained. Using the ISR model to calculate the revenue requirement, this results in a full year revenue requirement of approximately \$39,000. Please note that this is an estimate based on the first full year and the annual revenue requirement will decrease slightly each subsequent year over the life of the assets. As these are meters that the Company has already purchased, the revenue requirement for these assets is currently included in base distribution rates or the annual ISR factor. As indicated above, the Company's intent is to avoid purchasing new meters for opt-out which would result in avoiding incremental revenue requirement.

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

**The Narragansett Electric Company d/b/a Rhode Island Energy
Docket No. 24-38-GE Tariff Advice Filing to Amend Electric Automated Meter Reading (AMR)/Advanced Meter Functionality (AMF) and Gas Automated Meter Reading (AMR) Meter Opt-Out
Service list updated 9/24/2024**

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