

January 6, 2025

VIA HAND DELIVERY & ELECTRONIC MAIL

Stephanie De La Rosa, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: Docket No. 22-05-EE - Investigation of Misconduct or Fraud by The Narragansett Electric Co. d/b/a Rhode Island Energy Relating to Past Payment of Shareholder Incentive
Responses to Division Data Requests – Set 10 (Batch 1)

Dear Ms. De La Rosa:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”), I have enclosed the Company’s responses to the Division of Public Utilities and Carriers’ (the “Division”) Tenth Set of Data Requests (Batch 1) in the above-referenced docket. The Company has requested an extension of time to file its response to Data Request Division 10-11.

Please note that each and every response provided herewith is subject to the following hypothetical assumptions that prefaced the Division’s Tenth Set of Data Requests:

1. In Q-4 of each energy efficiency year from 2012 through 2021, the Company either directed, allowed, or expressly permitted the practice of withholding energy efficiency invoices in Q-4 (hereinafter referred to as “accrual year”), in the manner that has been described by the Company’s March 2023 report in Docket 22-05-EE.
2. In each of these years, in each of the gas and electric portfolios, the withheld invoices were from a total of 5 customers and totaled \$250,000 in energy efficiency expenditures.
3. In Q-1 of the calendar year following the “accrual year”, the withheld energy efficiency invoices were processed for payment and were recorded as energy efficiency program

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- expenses in Q-1 of this subsequent calendar year (hereafter referred to as “recorded year”).
4. The Company filed 1st, 2nd, 3rd, and 4th quarterly reports in each energy efficiency program year from 2012 through 2021.
 5. The figures reported in the Q-1 report of each energy efficiency program were included, without change, in each of the subsequent quarterly reports.
 6. The Company filed Year-End reports in each energy efficiency program year from 2012 through 2021 which incorporated the information reported in the unchanged Q-1 reports.
 7. The PUC became aware of the withheld energy efficiency invoices and directed the Company to correct the filings to accurately record the energy efficiency invoices in the “accrual year” reports instead of the “recorded year report.

Thank you for your attention to this matter. If you have any questions, please contact me at (401) 709-3359.

Very truly yours,



Steven J. Boyajian

Enclosure

cc: Docket 22-05-EE Service List

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate were 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.

Heidi J. Seddon

January 6, 2025

Date

Docket No. 22-05-EE – PUC Investigation of Utility Misconduct or Fraud by The Narragansett Electric Co. Service list updated 9/10/2024

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The Narragansett Electric Company
d/b/a Rhode Island Energy
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Division 10-1

Request:

Docket 4295 - EE Program Plan for 2012

<https://ripuc.ri.gov/sites/g/files/xkgbur841/files/eventsactions/docket/4295-NGrid-2012YrEnd-Rept%285-30-13%29.pdf>

- (a) Referring to Table E-1 of Attachment 1 of the 2012 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4295, please identify which columns (1-14) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the electric energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-14 would not change, please explain why.
- (b) Referring to Table E-3 of Attachment 1 of the 2012 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4295, please identify which columns (1-6) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the electric energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-6 would not change, please explain why.
- (c) Referring to Table E-4 of Attachment 1 of the 2012 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4295, please identify which columns (1-10) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the electric energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-10 would not change, please explain why.
- (d) Referring to Table G-1 of Attachment 2 of the 2012 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4295, please identify which columns (1-11) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the gas energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-11 would not change, please explain why.

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- (e) Referring to Table G-3 of Attachment 2 of the 2012 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4295, please identify which columns (1-6) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the gas energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-6 would not change, please explain why.
- (f) Referring to Table G-4 of Attachment 2 of the 2012 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4295, please identify which columns (1-10) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the gas energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-10 would not change, please explain why.

Response:

- (a) On Table E-1 of Attachment 1 of the 2012 Year-End Report referred to in this request, the total figures provided in columns 11 and 12 would change due to the reallocation to 2012 of spending from 2013. The figures in columns 1, 4 and 7 are pre-established targets and would not be impacted by any shift in spending from 2013 to 2012. The assumptions provided do not provide sufficient information to allow the Company to state whether any figures in columns 2, 3, 5, 6, 8, 9, or 13 would change.
- (b) On Table E-3 of Attachment 1 of the 2012 Year-End Report, the total figure in column 3 would change due to the reallocation of spending from 2013 to 2012. The assumptions provided do not provide sufficient information to allow the Company to state whether any figures in columns 1, 2, 4, 5 or 6 would change as the assumptions do not indicate any level of savings associated with the reallocated spending.
- (c) On Table E-4 of Attachment 1 of the 2012 Year-End Report, the total amounts in columns 3a and 3b would change due to a reallocation of spending from 2013 to 2012. The assumptions provided do not provide sufficient information to allow the Company to state whether the amounts in any other columns would change because the assumptions do not indicate the type of invoices that were moved from 2013 to 2012 or the savings associated with the spending reflected in the invoices.

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- (d) On Table G-1 of Attachment 2 of the 2012 Year-End Report the totals in columns 8 and 9 would change due to a reallocation of spending from 2013 to 2012. Columns 1, 4 and 7 are pre-established targets and would not be impacted by any shift in spending from 2013 to 2012. The assumptions provided do not provide sufficient information to allow the Company to state whether the figures reported in other columns would change.
- (e) On Table G-3 of Attachment 2 of the 2012 Year-End Report, the total figure in column 3 would change due to the reallocation of spending from 2013 to 2012. The assumptions provided do not provide sufficient information to allow the Company to state whether any figures in columns 1, 2, 4, 5 or 6 would change as the assumptions do not indicate any level of savings associated with the reallocated spending.
- (f) On Table G-4 of Attachment 2 of the 2012 Year-End Report, the total amounts in columns 3a and 3b would change due to a reallocation of spending from 2013 to 2012. The assumptions provided do not provide sufficient information to allow the Company to state whether any the amounts in any other columns would change because the assumptions do not indicate the type of invoices that were moved from 2013 to 2012 or the savings associated with the spending reflected in the invoices.

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Division 10-2

Request:

Docket 4366 - EE Program Plan for 2013

<https://ripuc.ri.gov/sites/g/files/xkgbur841/files/eventsactions/docket/4366-NGrid-YERept-Revised%2810-24-14%29.pdf>

- (a) Referring to Table E-1 of Attachment 1 of the 2013 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4366, please identify which columns (1-14) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the electric energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-14 would not change, please explain why.
- (b) Referring to Table E-3 of Attachment 1 of the 2013 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4366, please identify which columns (1-6) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the electric energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-6 would not change, please explain why.
- (c) Referring to Table E-4 of Attachment 1 of the 2013 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4366, please identify which columns (1-9) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the electric energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-9 would not change, please explain why.
- (d) Referring to Table G-1 of Attachment 2 of the 2013 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4366, please identify which columns (1-11) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the gas energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-11 would not change, please explain why.

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- (e) Referring to Table G-3 of Attachment 2 of the 2013 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4366, please identify which columns (1-6) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the gas energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-6 would not change, please explain why.
- (f) Referring to Table G-4 of Attachment 2 of the 2013 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4366, please identify which columns (1-9) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the gas energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-9 would not change, please explain why.

Response:

(a) through (f):

The assumptions provided do not provide sufficient detail to permit a non-speculative response to this data request. If it is assumed, as requested, that "invoices...from a total of 5 customers and total[ing] \$250,000 in energy efficiency expenditures," are reallocated from each program year from 2012 to 2021 to the prior program year, then none of the Company's reported spending, actual to budget spending ratios or customer count figures for program years 2013 through 2020 would show any difference as the reallocations would net to zero. The assumptions provided do not provide any information regarding savings attributable to the measures reflected in the hypothetical invoices and, therefore, no conclusions can be drawn as to potential changes to savings, benefit cost ratios, evaluation expenses, customer contributions or incentives.

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Division 10-3

Request:

Docket 4451 - EE Program Plan for 2014

<https://ripuc.ri.gov/sites/g/files/xkgbur841/files/eventsactions/docket/4451-NGrid-Year-End-Rept%285-1-15%29.pdf>

- (a) Referring to Table E-1 of Attachment 1 of the 2014 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4451, please identify which columns (1-14) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the electric energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-14 would not change, please explain why.
- (b) Referring to Table E-3 of Attachment 1 of the 2014 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4451, please identify which columns (1-6) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the electric energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-6 would not change, please explain why.
- (c) Referring to Table E-4 of Attachment 1 of the 2014 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4451, please identify which columns (1-9) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the electric energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-9 would not change, please explain why.
- (d) Referring to Table G-1 of Attachment 2 of the 2014 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4451, please identify which columns (1-11) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the gas energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-11 would not change, please explain why.

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- (e) Referring to Table G-3 of Attachment 2 of the 2014 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4451, please identify which columns (1-6) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the gas energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-6 would not change, please explain why.
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Response:

(a) through (f):

The assumptions provided do not provide sufficient detail to permit a non-speculative response to this data request. If it is assumed, as requested, that "invoices...from a total of 5 customers and total[ing] \$250,000 in energy efficiency expenditures," are reallocated from each program year from 2012 to 2021 to the prior program year, then none of the Company's reported spending, actual to budget spending ratios or customer count figures for program years 2013 through 2020 would show any difference as the reallocations would net to zero. The assumptions provided do not provide any information regarding savings attributable to the measures reflected in the hypothetical invoices and, therefore, no conclusions can be drawn as to potential changes to savings, benefit cost ratios, evaluation expenses, customer contributions or incentives.

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Division 10-4

Request:

Docket 4527 - EE Program Plan for 2015

<https://ripuc.ri.gov/sites/g/files/xkgbur841/files/eventsactions/docket/4527-NGrid-YrEndRept%285-2-16%29.pdf>

- (a) Referring to Table E-1 of Attachment 1 of the 2015 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4527, please identify which columns (1-14) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the electric energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-14 would not change, please explain why.
- (b) Referring to Table E-3 of Attachment 1 of the 2015 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4527, please identify which columns (1-5) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the electric energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-5 would not change, please explain why.
- (c) Referring to Table E-4 of Attachment 1 of the 2015 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4527, please identify which columns (Energy Incentive 1-9) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the electric energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns (Energy Incentive)1-9 would not change, please explain why.
- (d) Referring to Table G-1 of Attachment 2 of the 2015 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4527, please identify which columns (1-11) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the gas energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from

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expenses and five customers and explain why that column would be impacted. If any of the columns 1-11 would not change, please explain why.

- (e) Referring to Table G-3 of Attachment 2 of the 2015 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4527, please identify which columns (1-5) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the gas energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-5 would not change, please explain why.
- (f) Referring to Table G-4 of Attachment 2 of the 2015 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4527, please identify which columns (1-9) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the gas energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-9 would not change, please explain why.

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(a) through (f):

The assumptions provided do not provide sufficient detail to permit a non-speculative response to this data request. If it is assumed, as requested, that "invoices...from a total of 5 customers and total[ing] \$250,000 in energy efficiency expenditures," are reallocated from each program year from 2012 to 2021 to the prior program year, then none of the Company's reported spending, actual to budget spending ratios or customer count figures for program years 2013 through 2020 would show any difference as the reallocations would net to zero. The assumptions provided do not provide any information regarding savings attributable to the measures reflected in the hypothetical invoices and, therefore, no conclusions can be drawn as to potential changes to savings, benefit cost ratios, evaluation expenses, customer contributions or incentives.

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Division 10-5

Request:

Docket 4580 - EE Program Plan for 2016

<https://ripuc.ri.gov/sites/g/files/xkgbur841/files/eventsactions/docket/4580-NGrid-2016AnnualRept%285-1-17%29.pdf>

- (a) Referring to Table E-1 of Attachment 1 of the 2016 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4580, please identify which columns (1-14) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the electric energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-14 would not change, please explain why.
- (b) Referring to Table E-3 of Attachment 1 of the 2016 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4580, please identify which columns (1-5) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the electric energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-5 would not change, please explain why.
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d/b/a Rhode Island Energy
RIPUC Docket No. 22-05-EE
In Re: Investigation of Misconduct by
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expenses and five customers and explain why that column would be impacted. If any of the columns 1-11 would not change, please explain why.

- (e) Referring to Table G-3 of Attachment 2 of the 2016 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4580, please identify which columns (1-5) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the gas energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-5 would not change, please explain why.
- (f) Referring to Table G-4 of Attachment 2 of the 2016 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4580, please identify which columns (1-9) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the gas energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-9 would not change, please explain why.

Response:

(a) through (f):

The assumptions provided do not provide sufficient detail to permit a non-speculative response to this data request. If it is assumed, as requested, that "invoices...from a total of 5 customers and total[ing] \$250,000 in energy efficiency expenditures," are reallocated from each program year from 2012 to 2021 to the prior program year, then none of the Company's reported spending, actual to budget spending ratios or customer count figures for program years 2013 through 2020 would show any difference as the reallocations would net to zero. The assumptions provided do not provide any information regarding savings attributable to the measures reflected in the hypothetical invoices and, therefore, no conclusions can be drawn as to potential changes to savings, benefit cost ratios, evaluation expenses, customer contributions or incentives.

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Division 10-6

Request:

Docket 4654 EE Program Plan for 2017

https://ripuc.ri.gov/sites/g/files/xkgbur841/files/eventsactions/docket/4654-NGrid-YearEndRept2017_5-1-18.pdf

- (a) Referring to Table E-1 of Attachment 1 of the 2017 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4654, please identify which columns (1-14) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the electric energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-14 would not change, please explain why.
- (b) Referring to Table E-3 of Attachment 1 of the 2017 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4654, please identify which columns (1-5) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the electric energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-5 would not change, please explain why.
- (c) Referring to Table E-4 of Attachment 1 of the 2017 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4654, please identify which columns (Energy Incentive 1-9) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the electric energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns (Energy Incentive)1-9 would not change, please explain why.
- (d) Referring to Table G-1 of Attachment 2 of the 2017 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4654, please identify which columns (1-11) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the gas energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from

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expenses and five customers and explain why that column would be impacted. If any of the columns 1-11 would not change, please explain why.

- (e) Referring to Table G-3 of Attachment 2 of the 2017 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4654, please identify which columns (1-5) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the gas energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-5 would not change, please explain why.
- (f) Referring to Table G-4 of Attachment 2 of the 2017 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4654, please identify which columns (1-9) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the gas energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-9 would not change, please explain why.

Response:

(a) through (f):

The assumptions provided do not provide sufficient detail to permit a non-speculative response to this data request. If it is assumed, as requested, that "invoices...from a total of 5 customers and total[ing] \$250,000 in energy efficiency expenditures," are reallocated from each program year from 2012 to 2021 to the prior program year, then none of the Company's reported spending, actual to budget spending ratios or customer count figures for program years 2013 through 2020 would show any difference as the reallocations would net to zero. The assumptions provided do not provide any information regarding savings attributable to the measures reflected in the hypothetical invoices and, therefore, no conclusions can be drawn as to potential changes to savings, benefit cost ratios, evaluation expenses, customer contributions or incentives.

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Division 10-7

Request:

Docket 4755- EE Program Plan for 2018

<https://ripuc.ri.gov/sites/g/files/xkgbur841/files/eventsactions/docket/4755-NGrid-Year-End-Report-2018-%285-15-19%29.pdf>

- (a) Referring to Table E-1 of Attachment 1 of the 2018 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4755, please identify which columns (1-14) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the electric energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-14 would not change, please explain why.
- (b) Referring to Table E-3 of Attachment 1 of the 2018 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4755, please identify which columns (1-5) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the electric energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-5 would not change, please explain why.
- (c) Referring to Table E-4 of Attachment 1 of the 2018 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4755, please identify which columns (Energy Incentive 1-9) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the electric energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns (Energy Incentive)1-9 would not change, please explain why.
- (d) Referring to Table G-1 of Attachment 2 of the 2018 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4755, please identify which columns (1-11) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the gas energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from

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expenses and five customers and explain why that column would be impacted. If any of the columns 1-11 would not change, please explain why.

- (e) Referring to Table G-3 of Attachment 2 of the 2018 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4755, please identify which columns (1-5) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the gas energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-5 would not change, please explain why.
- (f) Referring to Table G-4 of Attachment 2 of the 2018 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4755, please identify which columns (1-9) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the gas energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-9 would not change, please explain why.

Response:

(a) through (f):

The assumptions provided do not provide sufficient detail to permit a non-speculative response to this data request. If it is assumed, as requested, that "invoices...from a total of 5 customers and total[ing] \$250,000 in energy efficiency expenditures," are reallocated from each program year from 2012 to 2021 to the prior program year, then none of the Company's reported spending, actual to budget spending ratios or customer count figures for program years 2013 through 2020 would show any difference as the reallocations would net to zero. The assumptions provided do not provide any information regarding savings attributable to the measures reflected in the hypothetical invoices and, therefore, no conclusions can be drawn as to potential changes to savings, benefit cost ratios, evaluation expenses, customer contributions or incentives.

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Division 10-8

Request:

Docket 4888- EE Program Plan for 2019

<https://ripuc.ri.gov/sites/g/files/xkgbur841/files/eventsactions/docket/4888-NGird-Year-End-Report-2019-%285-15-20%29.pdf>

- (a) Referring to Table E-1 of Attachment 1 of the 2019 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4888, please identify which columns (1-17) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the electric energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-17 would not change, please explain why.
- (b) Referring to Table E-3 of Attachment 1 of the 2019 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4888, please identify which columns (1-5) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the electric energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-5 would not change, please explain why.
- (c) Referring to Table E-4 of Attachment 1 of the 2019 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4888, please identify which columns (Energy Incentive 1-9) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the electric energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns (Energy Incentive)1-9 would not change, please explain why.
- (d) Referring to Table G-1 of Attachment 2 of the 2019 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4888, please identify which columns (1-11) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the gas energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from

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expenses and five customers and explain why that column would be impacted. If any of the columns 1-11 would not change, please explain why.

- (e) Referring to Table G-3 of Attachment 2 of the 2019 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4888, please identify which columns (1-5) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the gas energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-5 would not change, please explain why.
- (f) Referring to Table G-4 of Attachment 2 of the 2019 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4888, please identify which columns (1-9) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the gas energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-9 would not change, please explain why.

Response:

(a) through (f):

The assumptions provided do not provide sufficient detail to permit a non-speculative response to this data request. If it is assumed, as requested, that "invoices...from a total of 5 customers and total[ing] \$250,000 in energy efficiency expenditures," are reallocated from each program year from 2012 to 2021 to the prior program year, then none of the Company's reported spending, actual to budget spending ratios or customer count figures for program years 2013 through 2020 would show any difference as the reallocations would net to zero. The assumptions provided do not provide any information regarding savings attributable to the measures reflected in the hypothetical invoices and, therefore, no conclusions can be drawn as to potential changes to savings, benefit cost ratios, evaluation expenses, customer contributions or incentives.

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Division 10-9

Request:

Docket 4979- EE Program Plan for 2020

<https://ripuc.ri.gov/sites/g/files/xkgbur841/files/eventsactions/docket/4888-NGird-Year-End-Report-2019-%285-15-20%29.pdf>

- (a) Referring to Table E-1 of Attachment 1 of the 2020 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4979, please identify which columns (1-17) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the electric energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-17 would not change, please explain why.
- (b) Referring to Table E-3 of Attachment 1 of the 2020 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4979, please identify which columns (1-5) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the electric energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-5 would not change, please explain why.
- (c) Referring to Table E-4 of Attachment 1 of the 2020 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4979, please identify which columns (Energy Incentive 1-9) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the electric energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns (Energy Incentive)1-9 would not change, please explain why.
- (d) Referring to Table G-1 of Attachment 2 of the 2020 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4979, please identify which columns (1-11) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the gas energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from

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expenses and five customers and explain why that column would be impacted. If any of the columns 1-11 would not change, please explain why.

- (e) Referring to Table G-3 of Attachment 2 of the 2020 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4979, please identify which columns (1-5) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the gas energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-5 would not change, please explain why.
- (f) Referring to Table G-4 of Attachment 2 of the 2020 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 4979, please identify which columns (1-9) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the gas energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-9 would not change, please explain why.

Response:

(a) through (f):

The assumptions provided do not provide sufficient detail to permit a non-speculative response to this data request. If it is assumed, as requested, that "invoices...from a total of 5 customers and total[ing] \$250,000 in energy efficiency expenditures," are reallocated from each program year from 2012 to 2021 to the prior program year, then none of the Company's reported spending, actual to budget spending ratios or customer count figures for program years 2013 through 2020 would show any difference as the reallocations would net to zero. The assumptions provided do not provide any information regarding savings attributable to the measures reflected in the hypothetical invoices and, therefore, no conclusions can be drawn as to potential changes to savings, benefit cost ratios, evaluation expenses, customer contributions or incentives.

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Division 10-10

Request:

Docket 5076 - EE Program Plan for 2021

<https://ripuc.ri.gov/sites/g/files/xkgbur841/files/2022-06/5076-NGrid-Year-End%20Report%202021%20%28PUC%206-1-22%29.pdf>

- (a) Referring to Table E-1 of Attachment 1 of the 2021 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 5076, please identify which columns (1-17) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the electric energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-17 would not change, please explain why.
- (b) Referring to Table E-3 of Attachment 1 of the 2021 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 5076, please identify which columns (1-5) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the electric energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-5 would not change, please explain why.
- (c) Referring to Table G-1 of Attachment 2 of the 2021 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 5076, please identify which columns (1-15) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the gas energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-15 would not change, please explain why.
- (d) Referring to Table G-3 of Attachment 2 of the 2021 Year-End Report (provided at the link above), as admittedly filed by the Company in Docket 5076, please identify which columns (1-5) would have to be adjusted to accurately reflect the PUC's directive to remove \$250,000 from expenses and five customers in the gas energy efficiency programs. Include in this answer any columns that would be impacted from the removal of \$250,000 from expenses and five customers and explain why that column would be impacted. If any of the columns 1-5 would not change, please explain why.

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Response:

(a) through (d):

The assumptions provided do not provide sufficient detail to permit a non-speculative response to this data request. If it is assumed, as requested, that “invoices...from a total of 5 customers and total[ing] \$250,000 in energy efficiency expenditures,” are reallocated from each program year from 2012 to 2022 to the prior program year, then none of the Company’s reported spending, actual to budget spending ratios or customer count figures for program years 2013 through 2021 would show any difference as the reallocations would net to zero. The assumptions provided do not provide any information regarding savings attributable to the measures reflected in the hypothetical invoices and, therefore, no conclusions can be drawn as to potential changes to savings, benefit cost ratios, evaluation expenses, customer contributions or incentives.

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Division 10-12

Request:

Referring to each of the foregoing referenced Energy Efficiency Year-End Reports for 2012 through 2021, please confirm that the cumulative totals reported at year-end incorporated the Q-1 report filed in the same docket? If any of the Year-End reports did not incorporate the Q-1 totals as reported, please identify which Year-End report did not incorporate the reported Q-1 totals and explain why.

Response:

The Company does not have any record of quarterly reports for the Energy Efficiency program being submitted in 2012, 2013 or 2014.¹ In 2015, the Company filed its first and second quarter Energy Efficiency program reports together in August 2015 and those results were incorporated into the year-end report for 2015. In 2016, the Company filed its first, second and third quarter Energy Efficiency program reports together in December 2016 and those results were incorporated into the year-end report for 2016. In 2017, the Company filed its first and second quarter Energy Efficiency program reports together in August 2017 and those results were incorporated into the year-end report for 2017. The Company does not have a record of a first quarter report being filed for the Energy Efficiency program in 2018. In 2019, the Company filed its first and second quarter Energy Efficiency program reports together in August 2019 and those results were incorporated into the year-end report for 2019. In 2020, the Company filed its first and second quarter Energy Efficiency program reports together in August 2020 and those results were incorporated into the year-end report for 2020. In 2021, the Company filed its first quarter Energy Efficiency program report June 15, 2021 and those results were incorporated into the year-end report for 2021.

¹ Please note that the Company filed a compilation of preliminary quarterly results for all four quarters of program year 2014 on April 2, 2015. This compilation of preliminary results was filed after the close of the related program year and while the Company was preparing its year-end report which was filed on May 1, 2015.