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April 23, 2025

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. 25-08-GE – The Narragansett Electric Company d/b/a Rhode Island Energy
PUC’s Inquiry Into Rhode Island Energy’s Billing Systems Practices and Performance
Response to PUC Joint Data Request – Set 3**

Dear Ms. De La Rosa:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”), I am enclosing the Company’s response to data request PUC 3-1 issued in the Public Utilities Commission’s Third Set of Joint Data Requests in the above-referenced docket.

In response to data request PUC 3-1, the Company is providing the Excel files labeled as Attachments PUC 3-1-a through PUC 3-1-f. Due to the very large electronic file sizes associated with these Excel files, the Company is providing Attachments PUC 3-1-a through PUC 3-1-f via a separate link.

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

Enclosure

cc: Docket No. 25-08-GE Service List

PUC 3-1¹

Request:

Please produce the Company's response in a live Excel workbook with tabs for each subpart.

- a. In histograms, please plot the electric usage of each A-16 customer for the following periods:
- i. August 2023;
 - ii. August 2024;
 - iii. September 2023;
 - iv. September 2024;
 - v. October 2023;
 - vi. October 2024;
 - vii. November 2023;
 - viii. November 2024;
 - ix. December 2023;
 - x. December 2024;
 - xi. January 2024;
 - xii. January 2025;
 - xiii. February 2024; and
 - xiv. February 2025.

Please allocate the observed data into 25 kWh bins. Please provide a table indicating the number of observations in each bin, as well as the proportion of each bin relative to the population.

- b. Please repeat the processes in PUC 3-1(a), but for each gas customer in the R12 rate class for the following periods:
- i. December 2023;
 - ii. December 2024;
 - iii. January 2024;
 - iv. January 2025;
 - v. February 2024; and
 - vi. February 2025.

Please allocate the observed data into 10 therm bins. Please provide a table indicating the number of observations in each bin, as well as the proportion of each bin relative to the population.

¹ The Company's response begins on page 3.

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- c. In histograms, please plot the difference in each A-16 customer's electric usage for the following periods:
- i. August 2024, as compared to August 2023;
 - ii. September 2024, as compared to September 2023;
 - iii. October 2024, as compared to October 2023;
 - iv. November 2024, as compared to November 2023;
 - v. December 2024, as compared to December 2023;
 - vi. January 2025, as compared to January 2024; and
 - vii. February 2025, as compared to February 2024.

Please allocate the observed data into 25 kWh bins. Please provide a table indicating the number of observations in each bin, as well as the proportion of each bin relative to the population.

- d. Please repeat the processes in 3-1(c), but for each gas customer in the R12 rate class for the following periods:
- i. December 2024, as compared to December 2023;
 - ii. January 2025, as compared to January 2024; and
 - iii. February 2025, as compared to February 2024.

Please allocate the observed data into 10 therm bins. Please provide a table indicating the number of observations in each bin, as well as the proportion of each bin relative to the population.

- e. In histograms, please plot the percentage change of each A-16 customer's electric usage for the following periods:
- i. August 2024, as compared to August 2023;
 - ii. September 2024, as compared to September 2023;
 - iii. October 2024, as compared to October 2023;
 - iv. November 2024, as compared to November 2023;
 - v. December 2024, as compared to December 2023;
 - vi. January 2025, as compared to January 2024; and
 - vii. February 2025, as compared to February 2024.

Please allocate the observed data into 5% bins. Please provide a table indicating the number of observations in each bin, as well as the proportion of each bin relative to the population.

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- f. Please repeat the processes in 3-1(e), but for each gas customer in the R12 rate class for the following periods:
- i. December 2024, as compared to December 2023;
 - ii. January 2025, as compared to January 2024; and
 - iii. February 2025, as compared to February 2024.

Please allocate the observed data into 5% bins. Please provide a table indicating the number of observations in each bin, as well as the proportion of each bin relative to the population.

- g. Please briefly describe any uncontrollable or confounding variables, such as weather, that may influence the data requested above. Are there any controls or adjustments that the Company implements to account for those variables? If so, please repeat the processes in PUC 3-1(a)-(f), but using appropriate controls or adjustments that the Company believes will account for any uncontrollable or confounding variables. Please describe any controls or adjustments employed and the effects observed on the dataset.

Response:

Notes for responses to (a) to (f): Data sets include only accounts with one bill corresponding to the month (or months) in each subpart. Accounts that received multiple bills corresponding to the month (or months) stated in the subpart (such as accounts that have one or more rebills sent in that month (those months)) are excluded from the response.

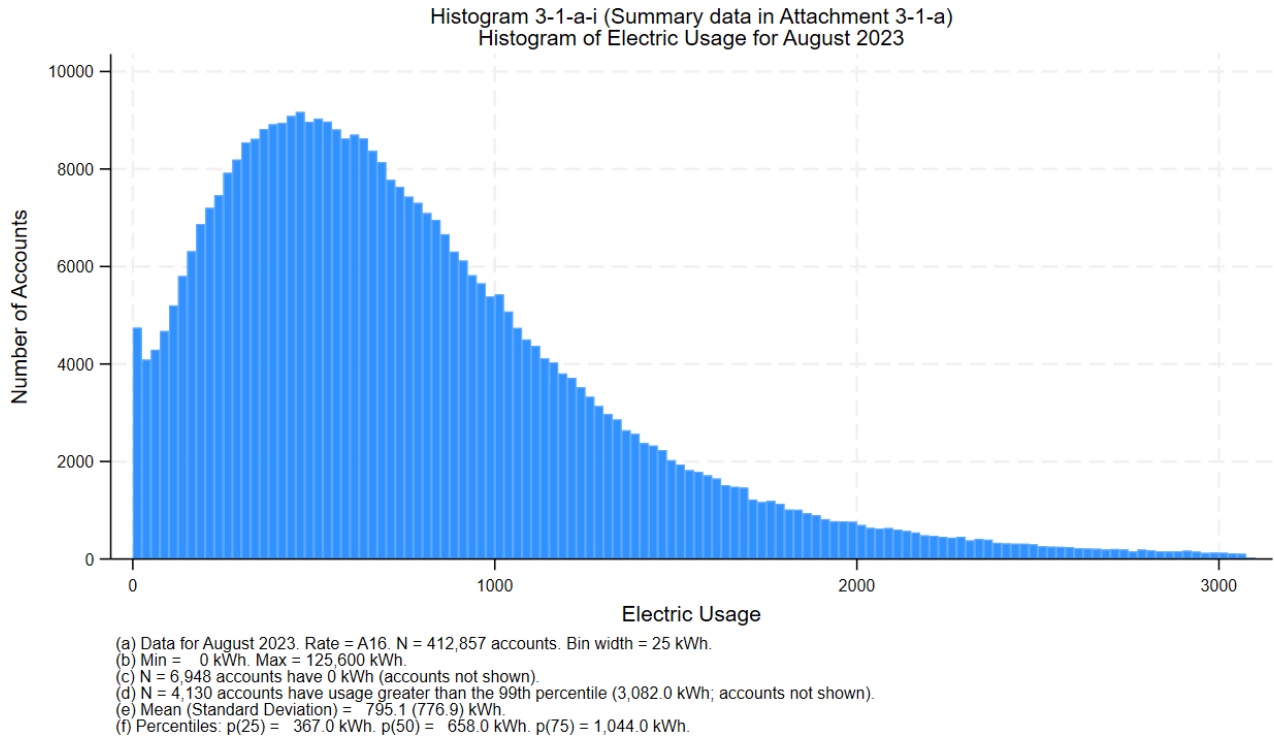
- a. Please see Attachment PUC-3-1-a for a live Excel workbook with each tab corresponding to subparts (i) through (xiv) below.

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i. August 2023;

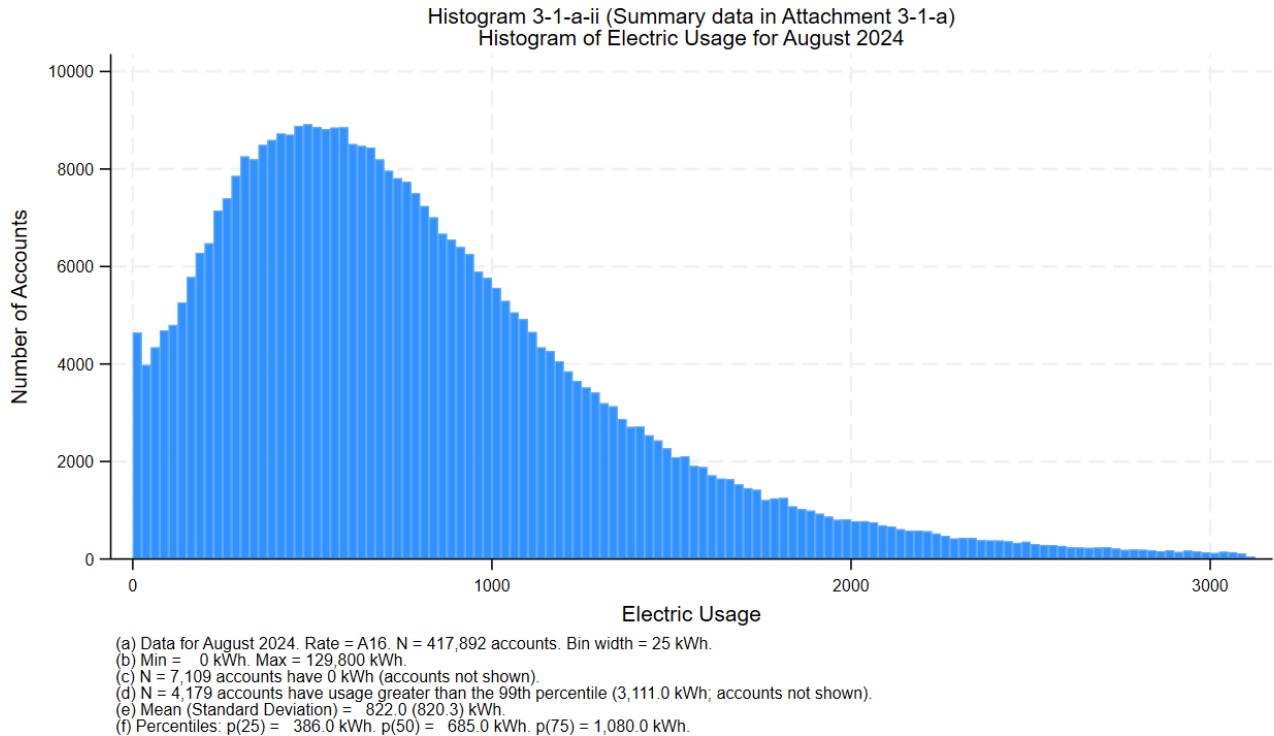


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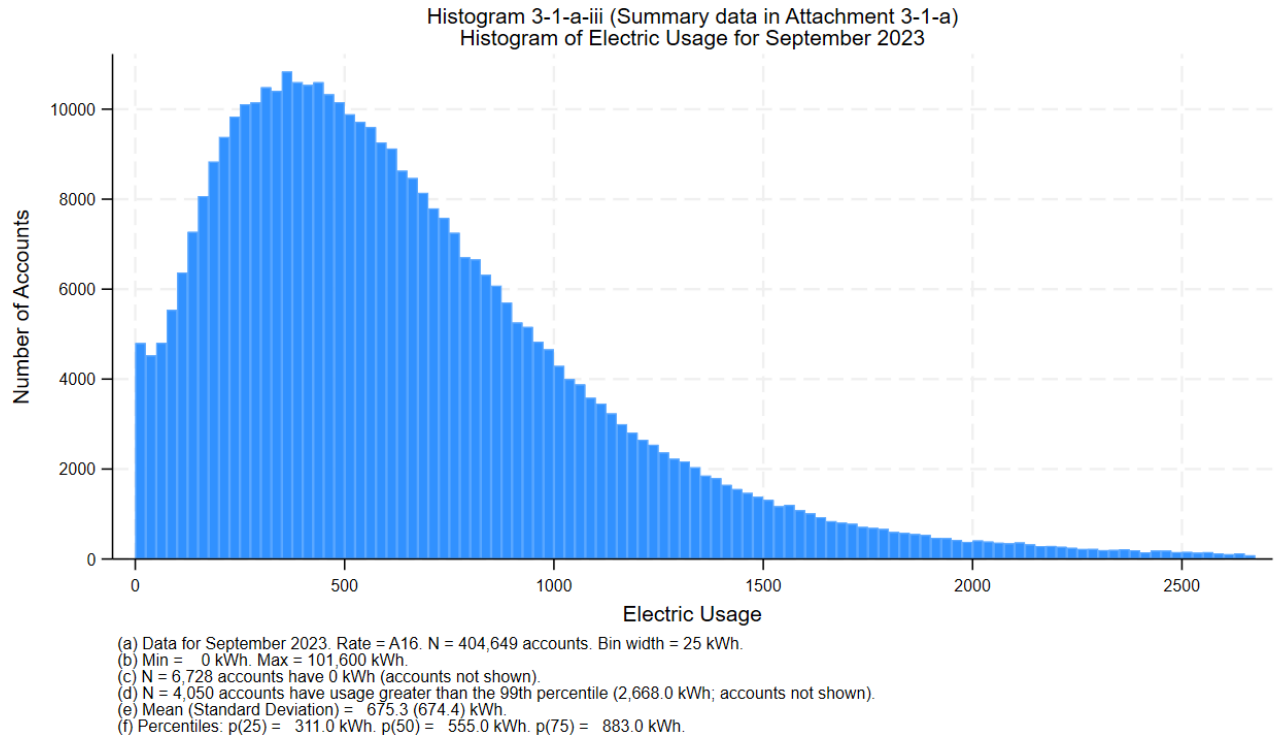
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ii. August 2024;



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iii. September 2023;

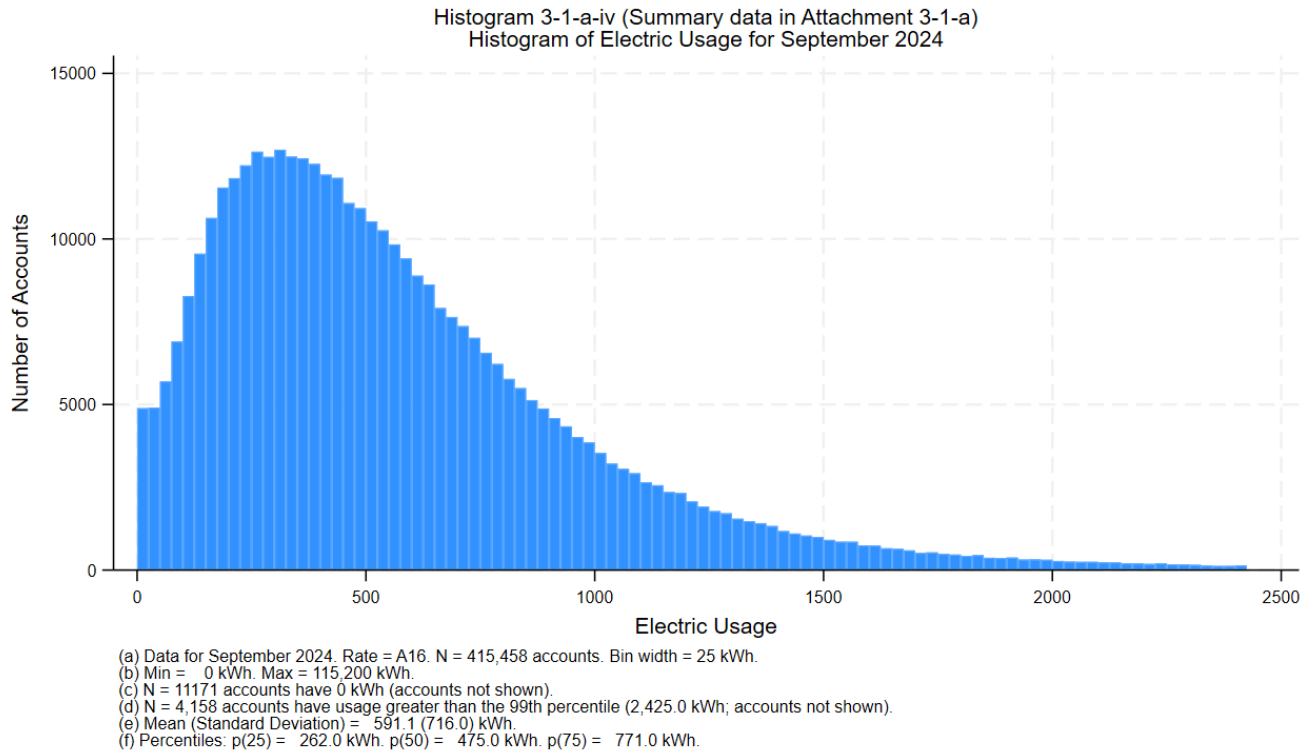


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iv. September 2024;

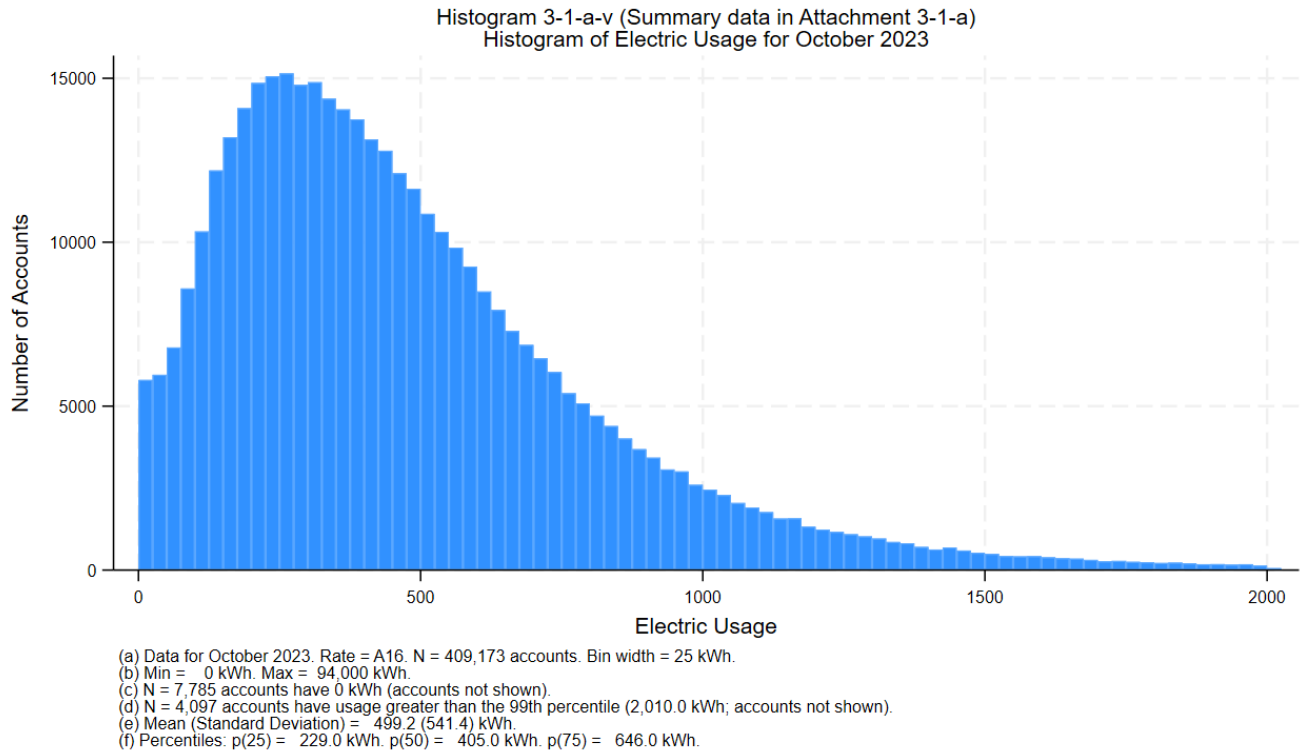


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v. October 2023;

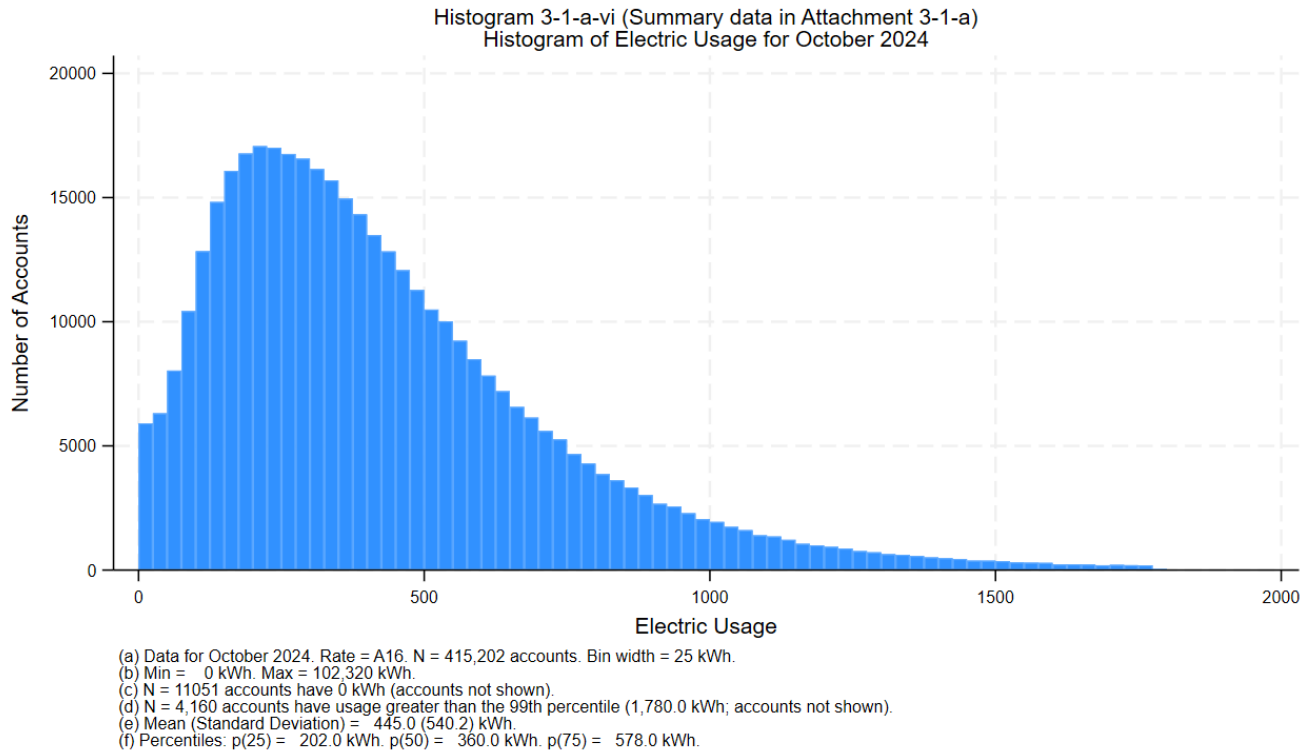


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vi. October 2024;

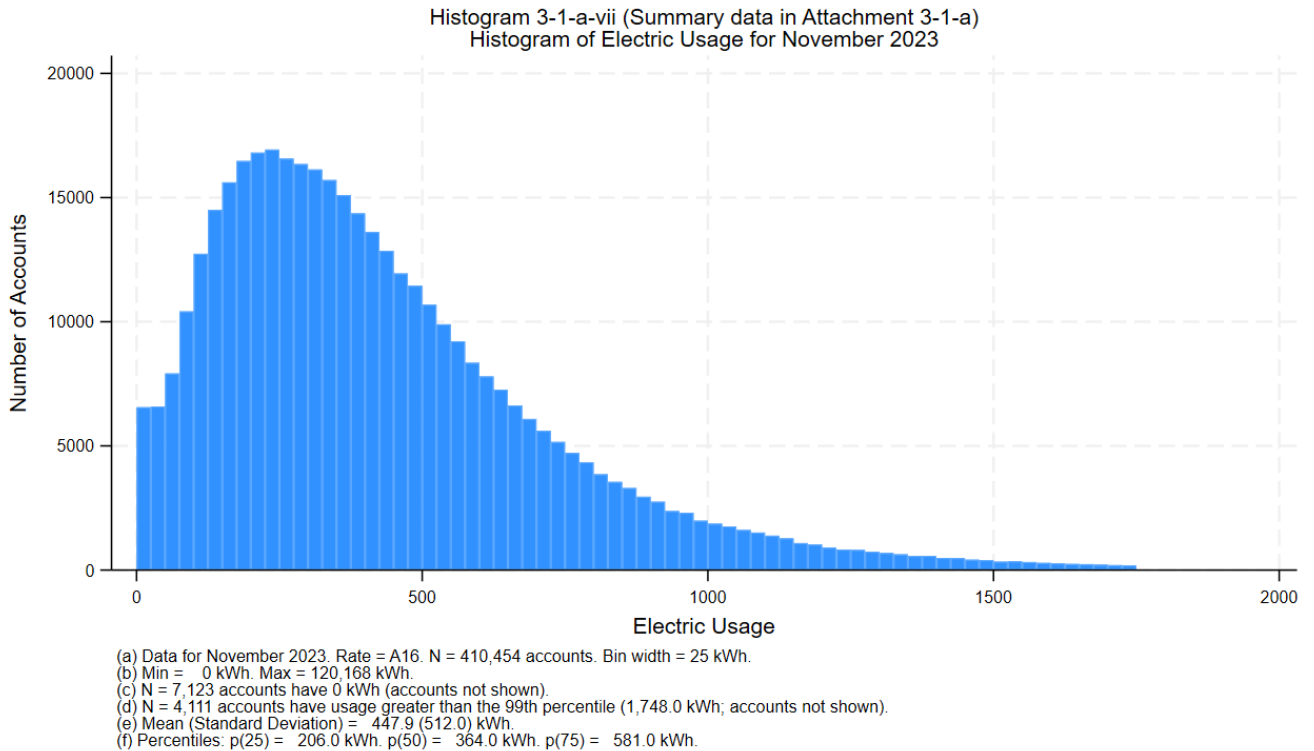


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vii. November 2023;

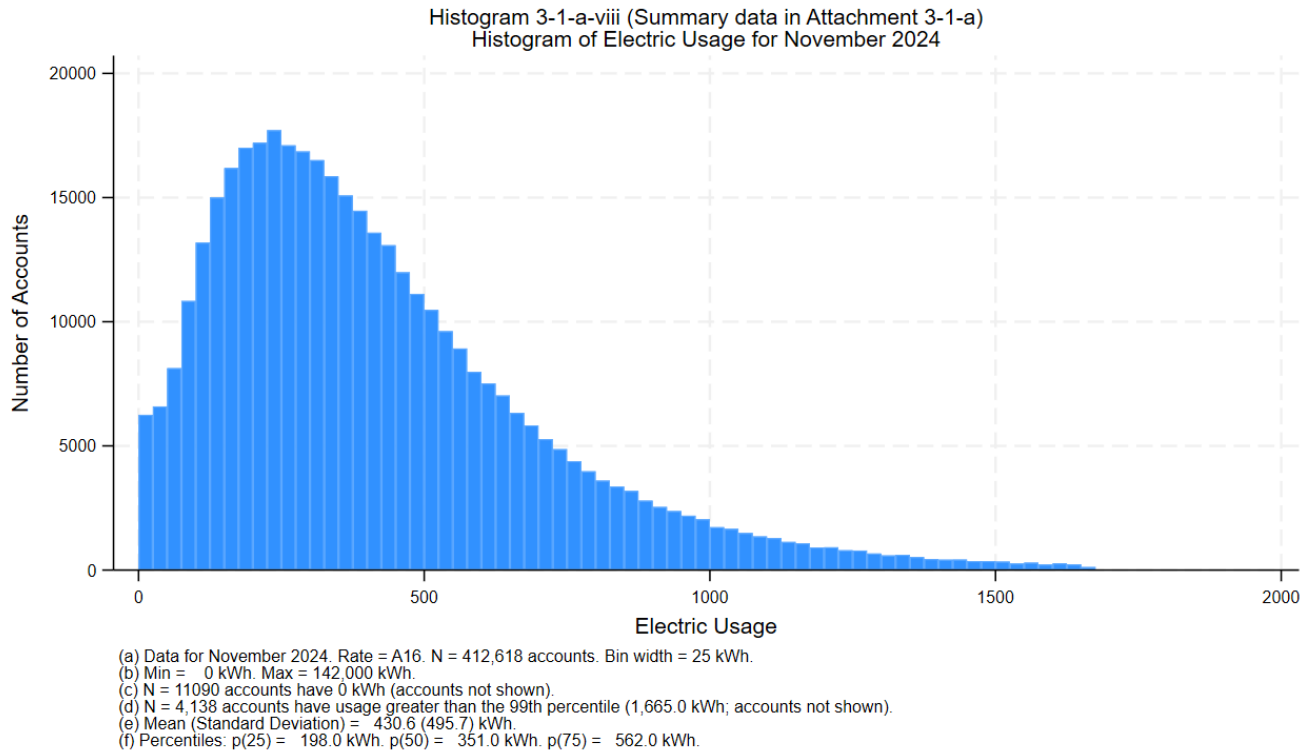


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viii. November 2024;

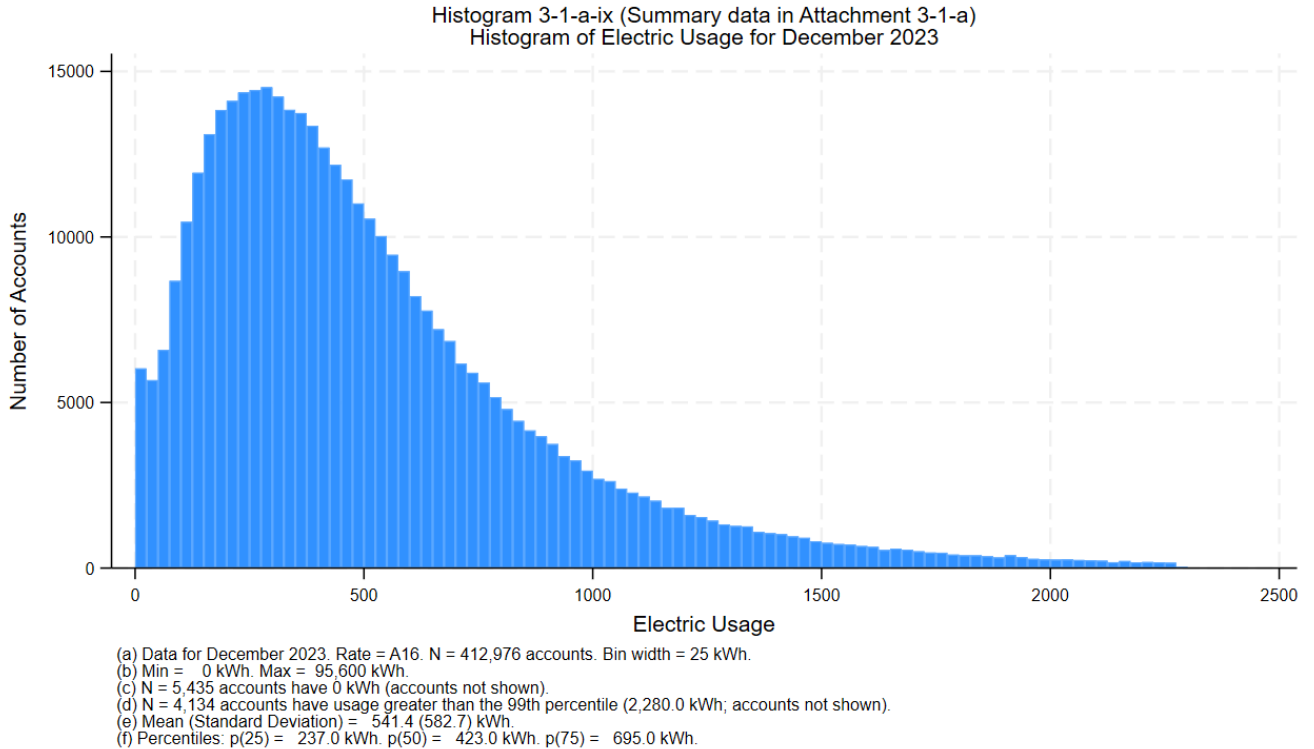


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ix. December 2023;

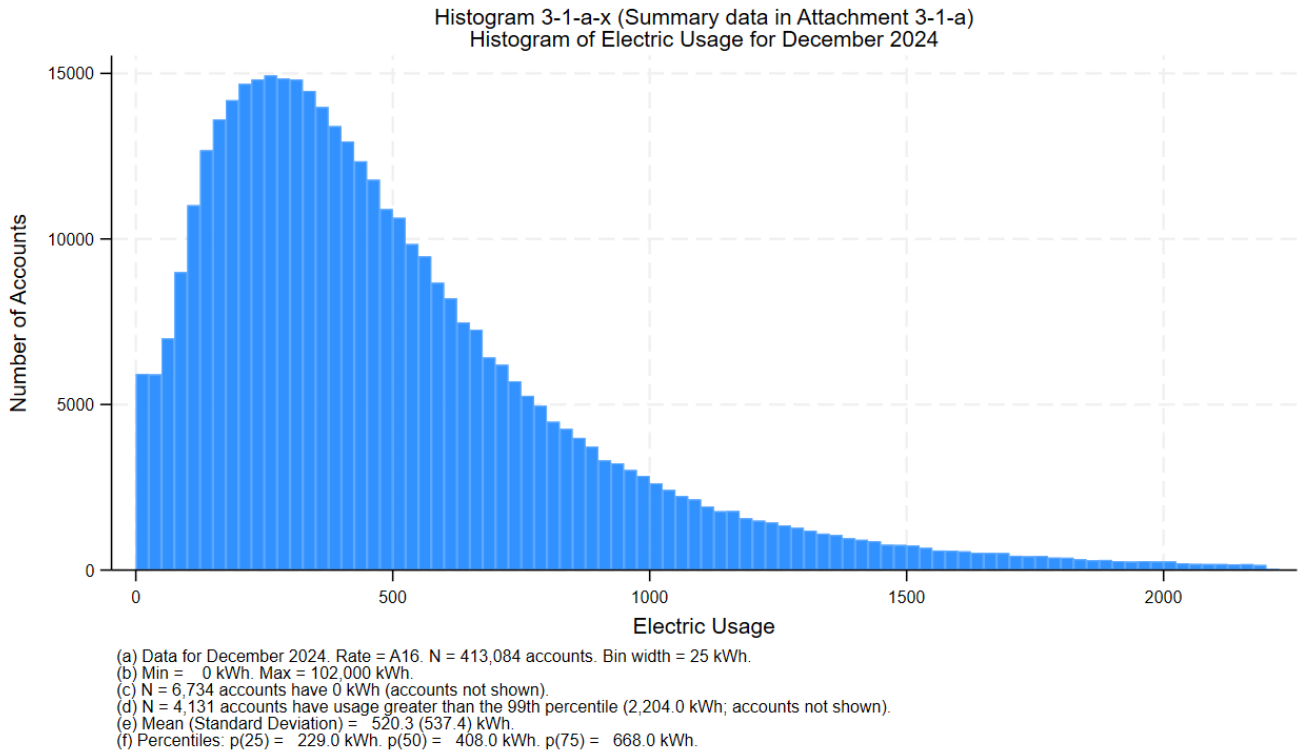


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x. December 2024;

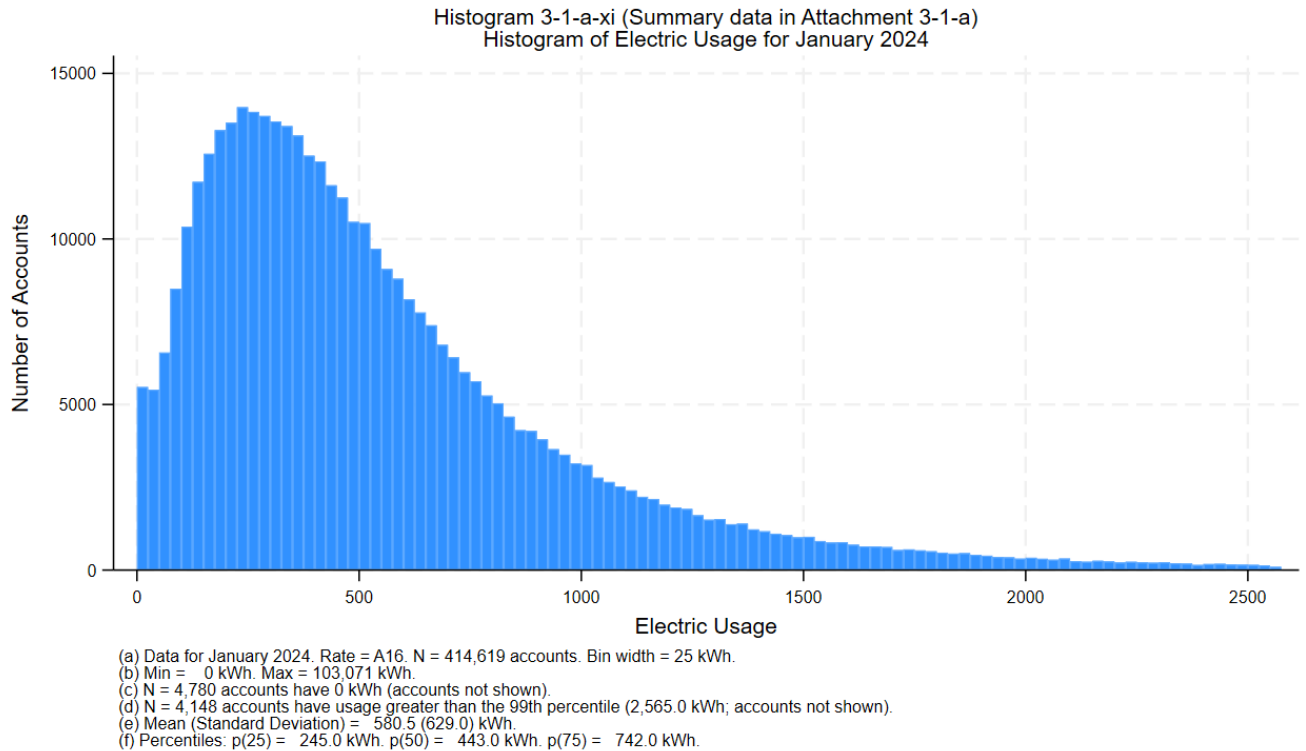


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xi. January 2024;

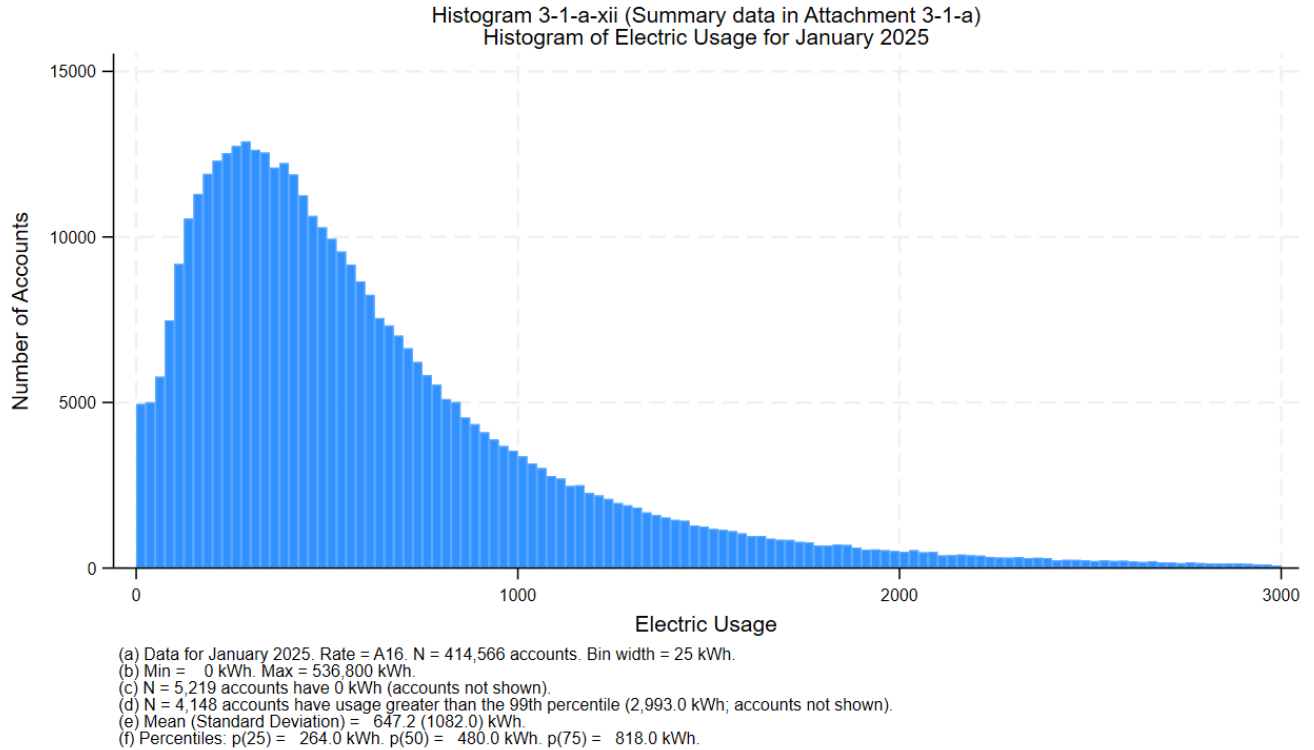


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xii. January 2025;

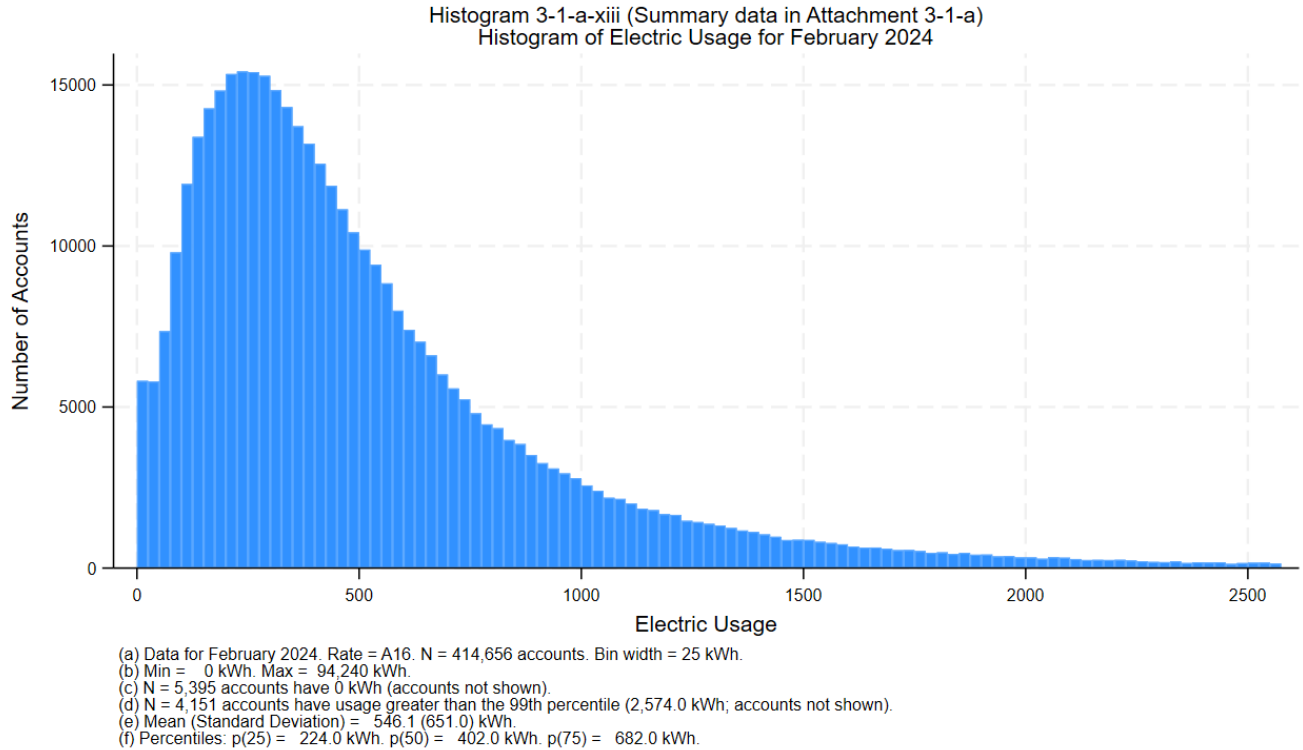


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xiii. February 2024; and

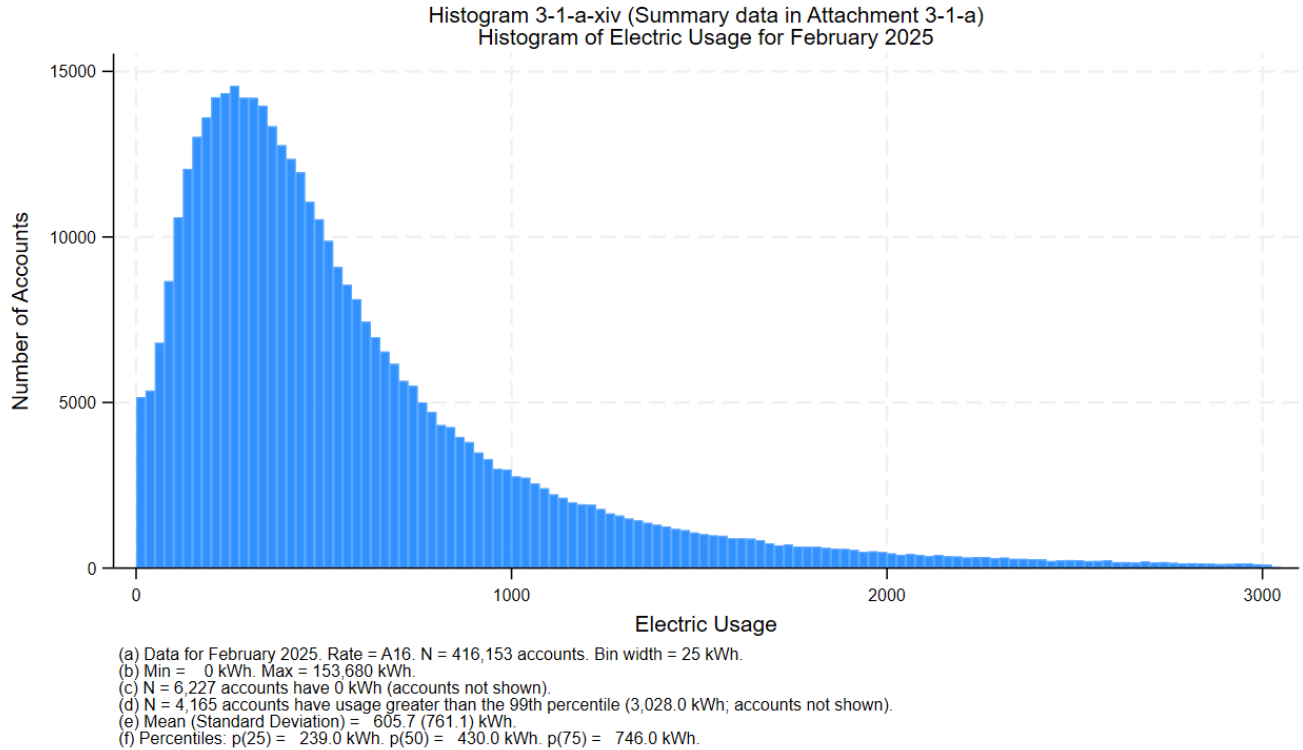


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xiv. February 2025.



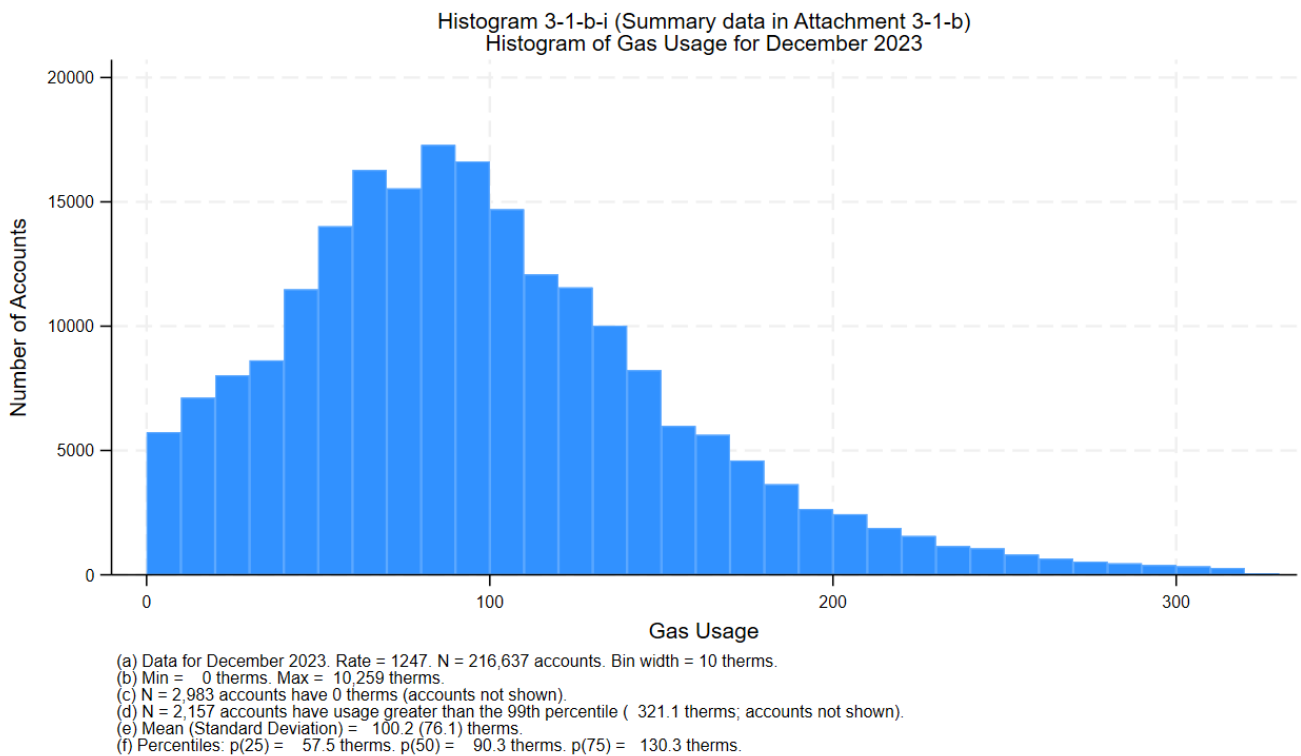
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b. Please see Attachment PUC-3-1-b for a live Excel workbook with each tab corresponding to subparts (i) through (vi) below.

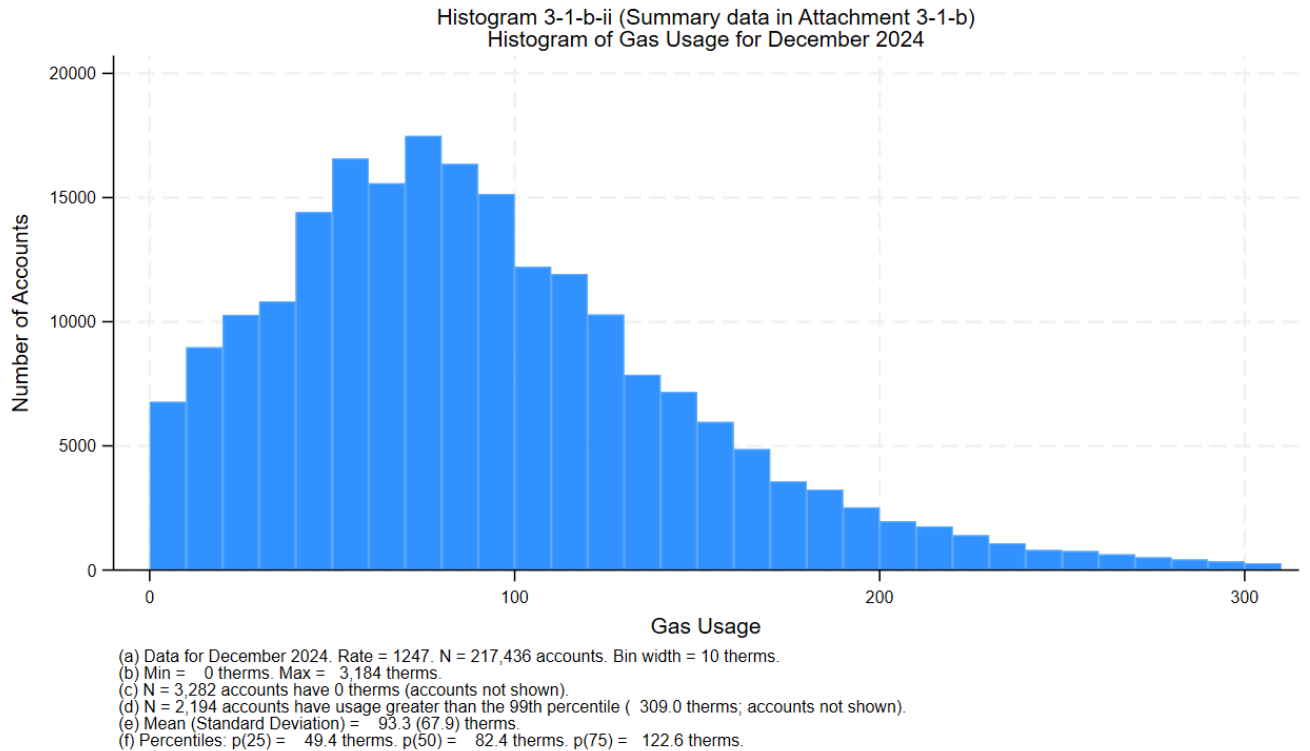
i. December 2023;



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ii. December 2024;

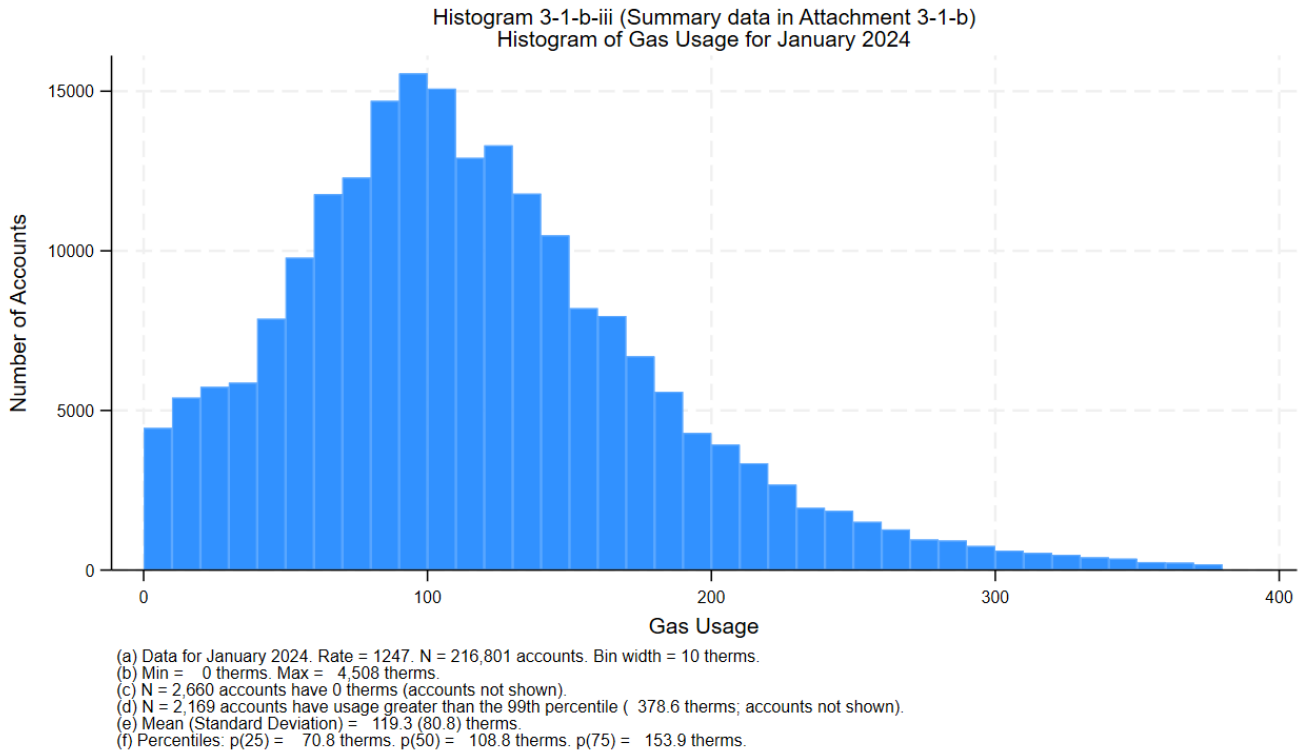


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iii. January 2024;

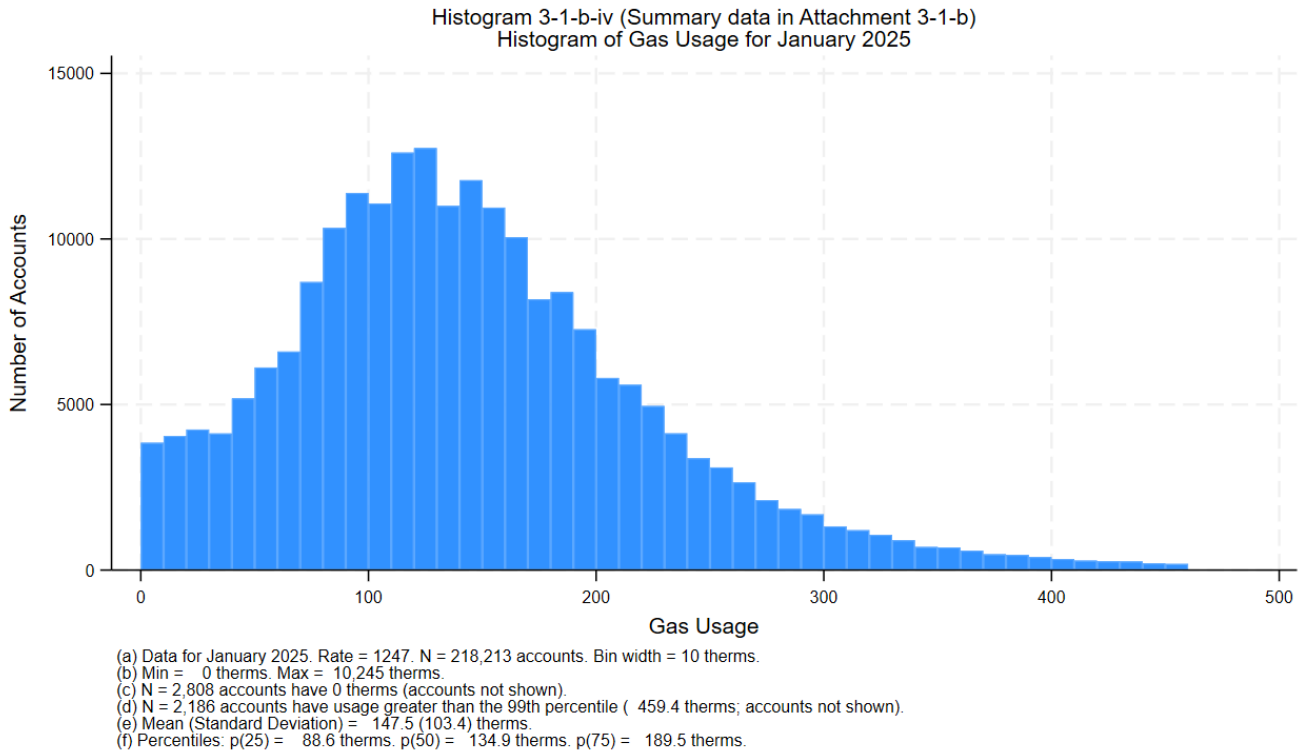


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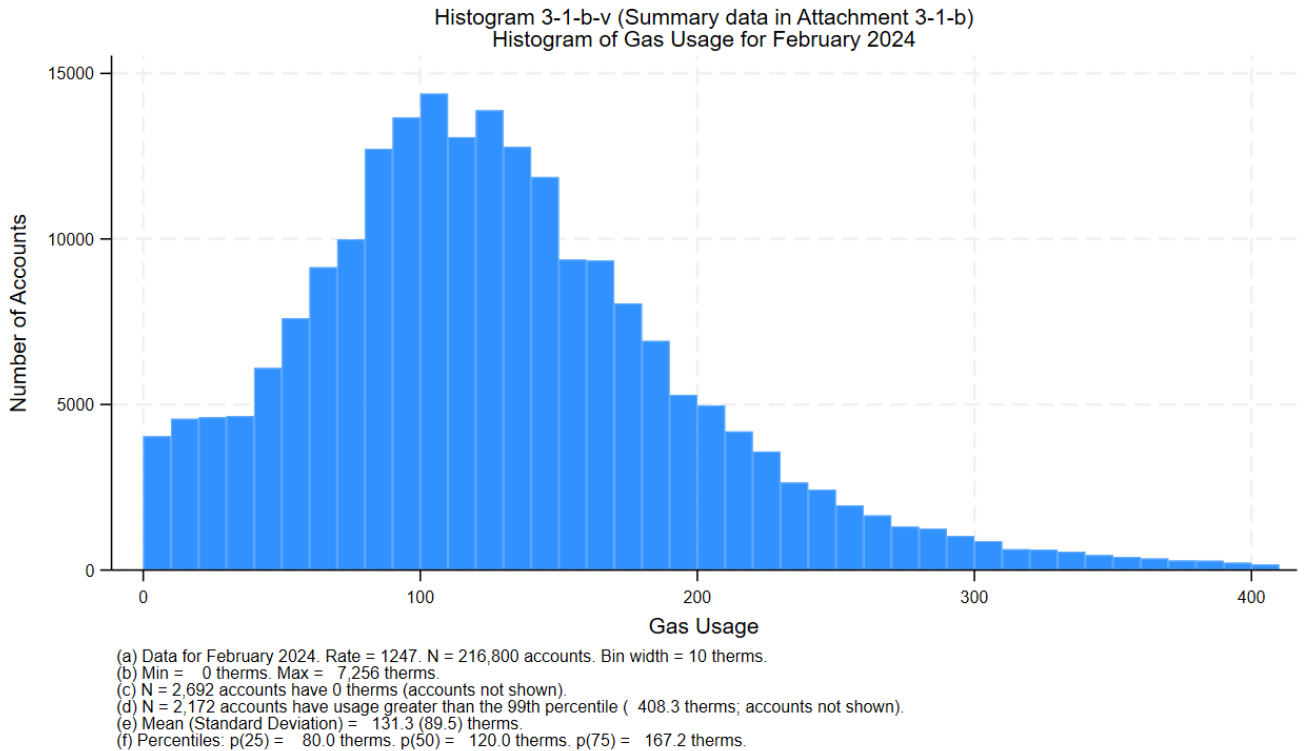
iv. January 2025;



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v. February 2024; and

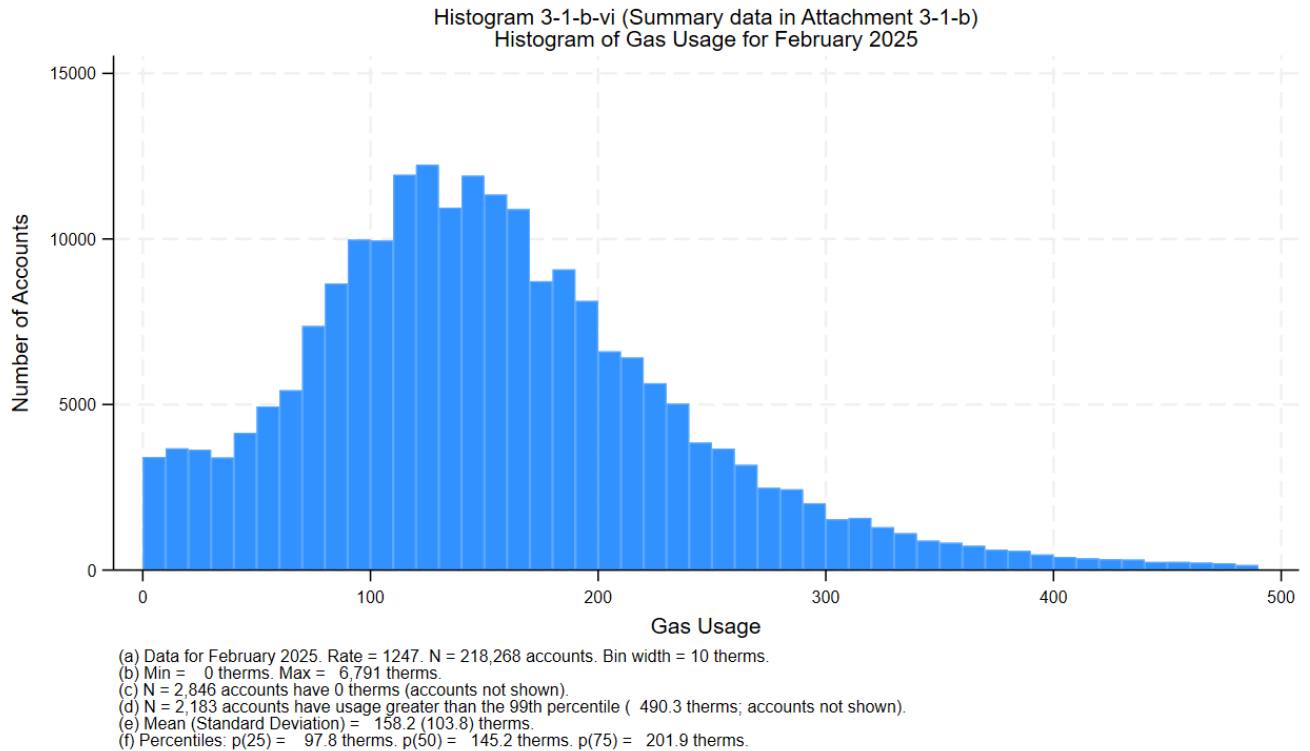


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vi. February 2025.



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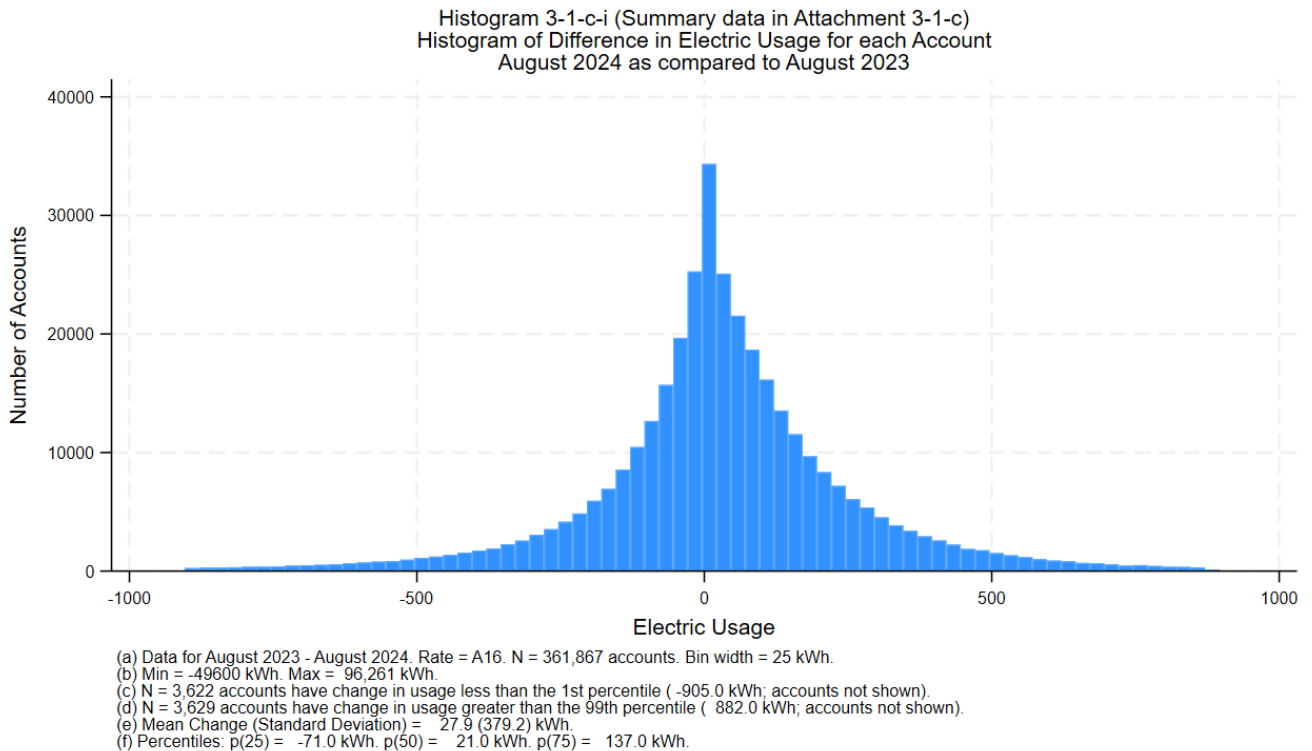
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Notes for responses to (c) to (f): Data sets include only accounts with non-zero usage in both months in the subpart. Accounts that were only active in one, but not both, months of the subpart are excluded. Accounts that have zero usage in either of the months of the subpart are excluded.

- c. Please see Attachment PUC-3-1-c for a live Excel workbook with each tab corresponding to subparts (i) through (vii) below.

- i. August 2024, as compared to August 2023;

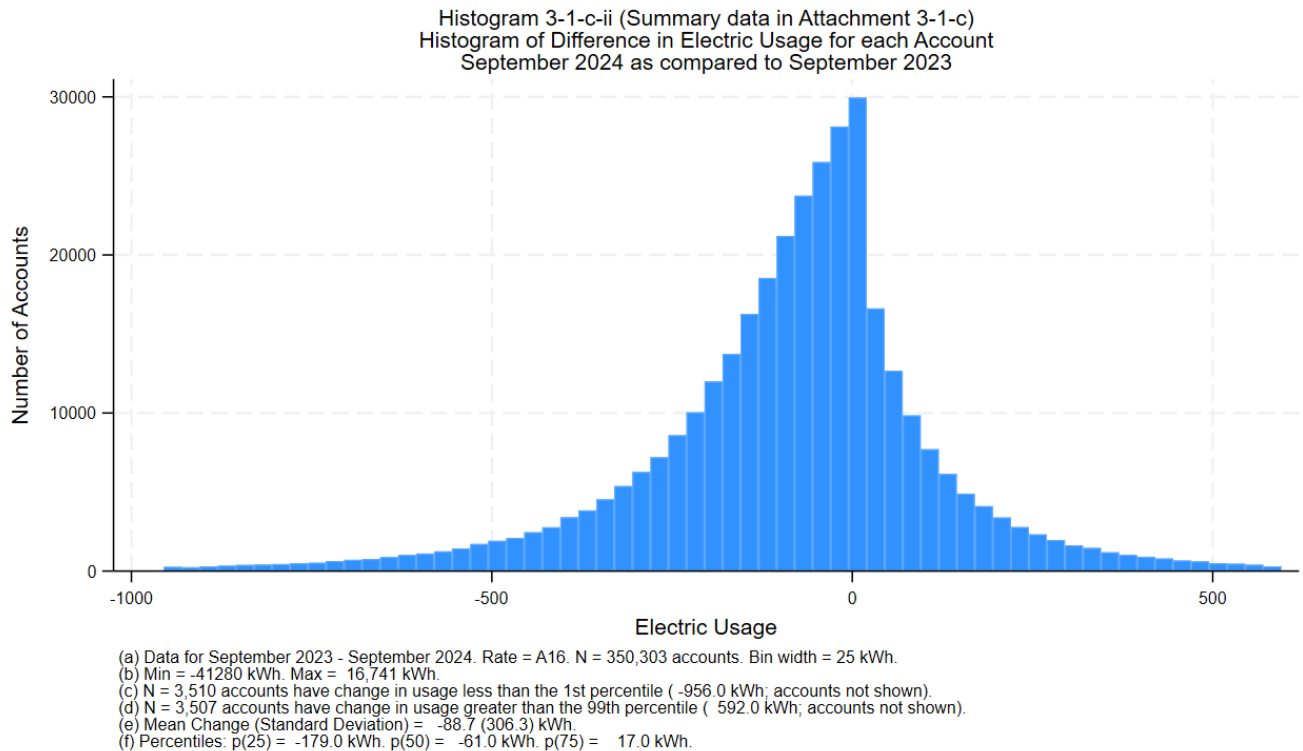


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ii. September 2024, as compared to September 2023;

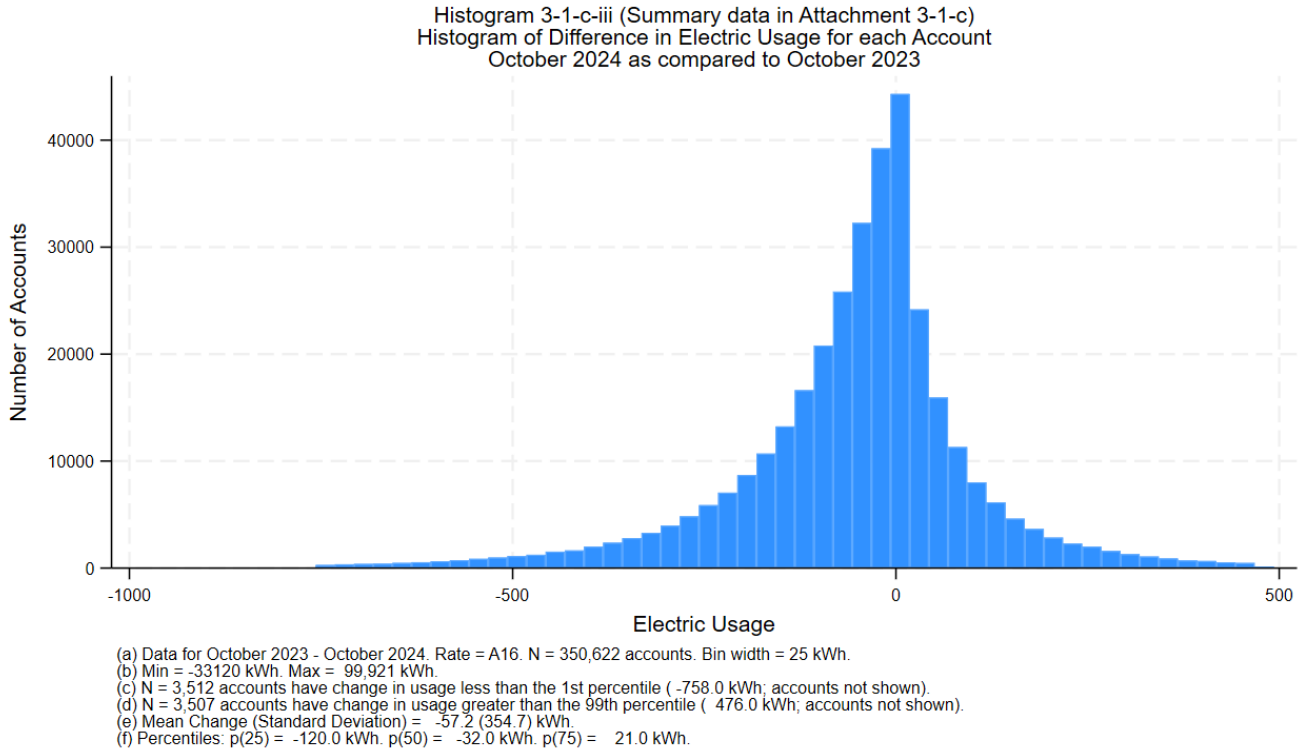


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iii. October 2024, as compared to October 2023;

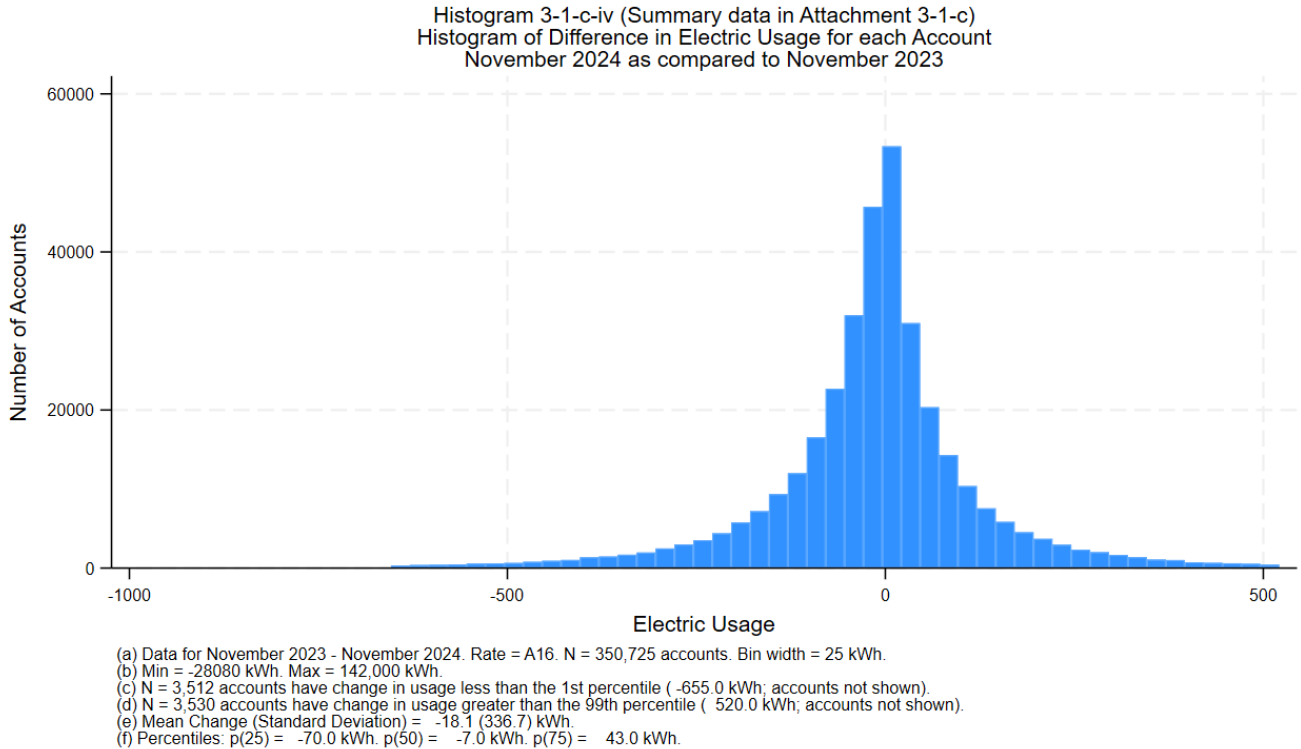


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iv. November 2024, as compared to November 2023;

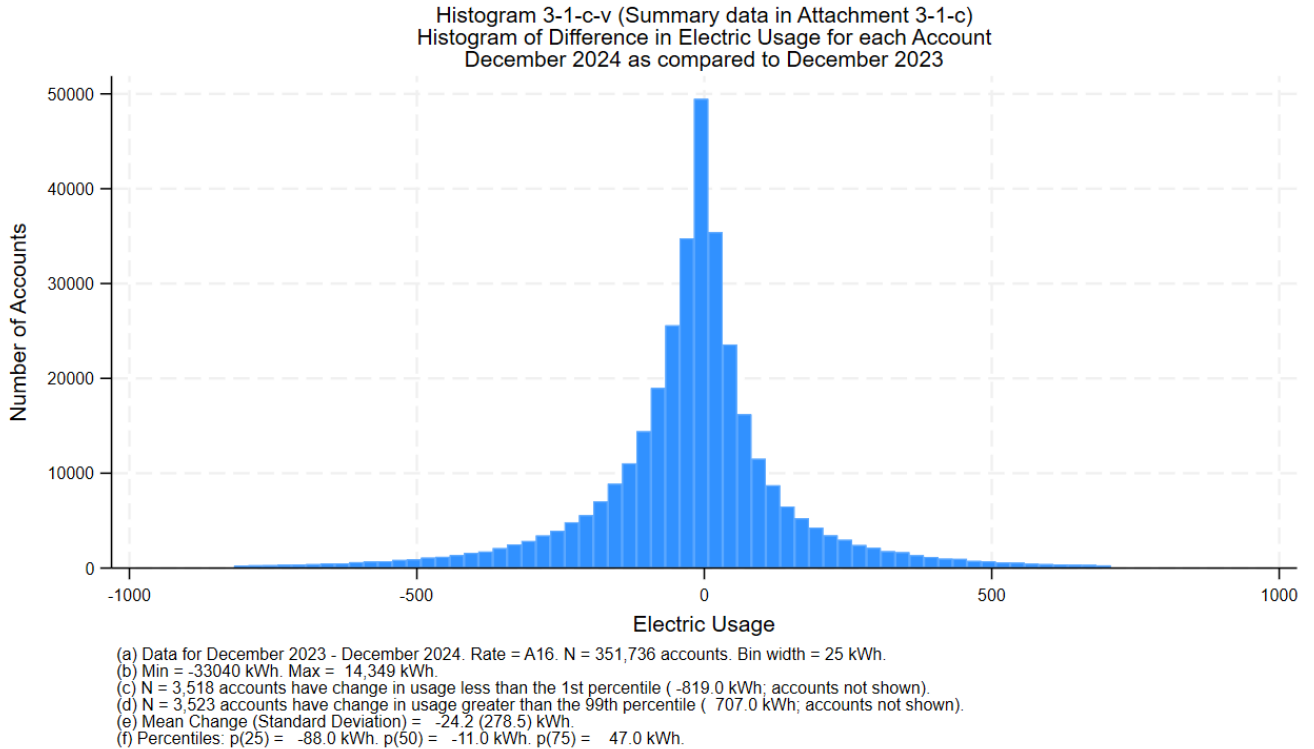


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v. December 2024, as compared to December 2023;

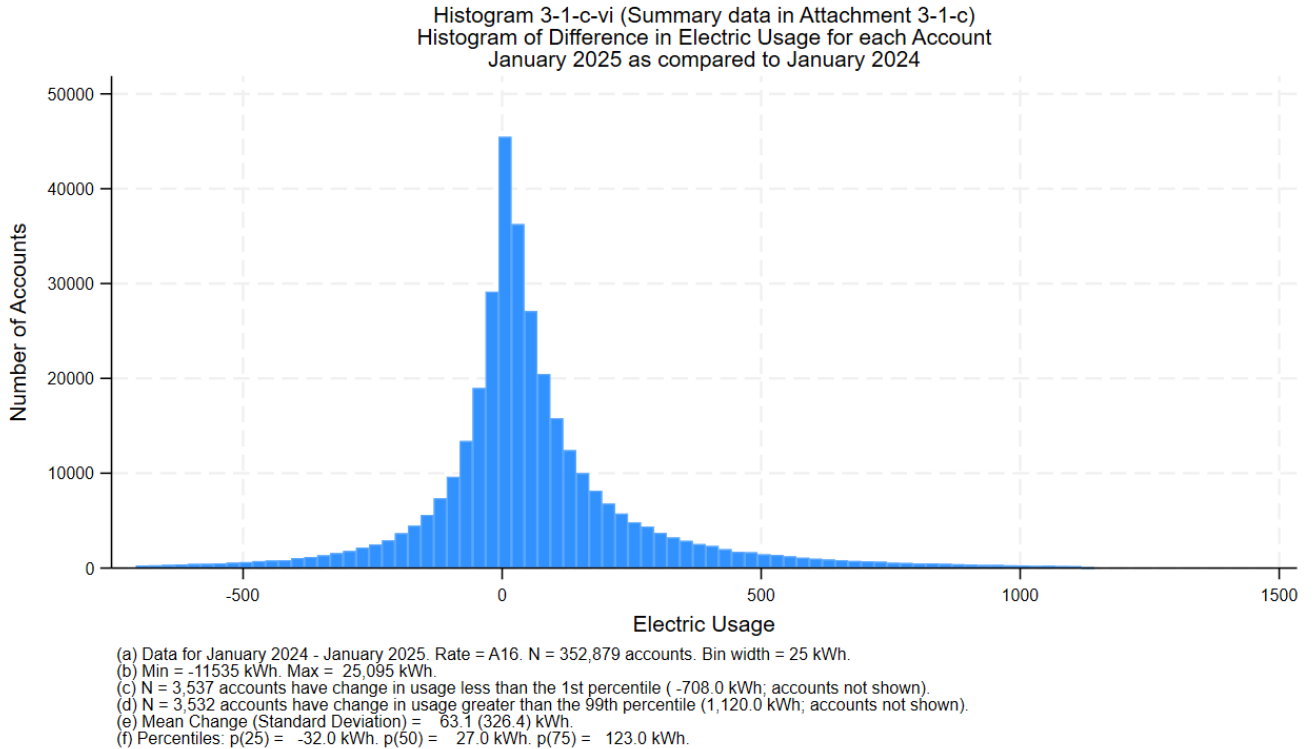


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vi. January 2025, as compared to January 2024; and

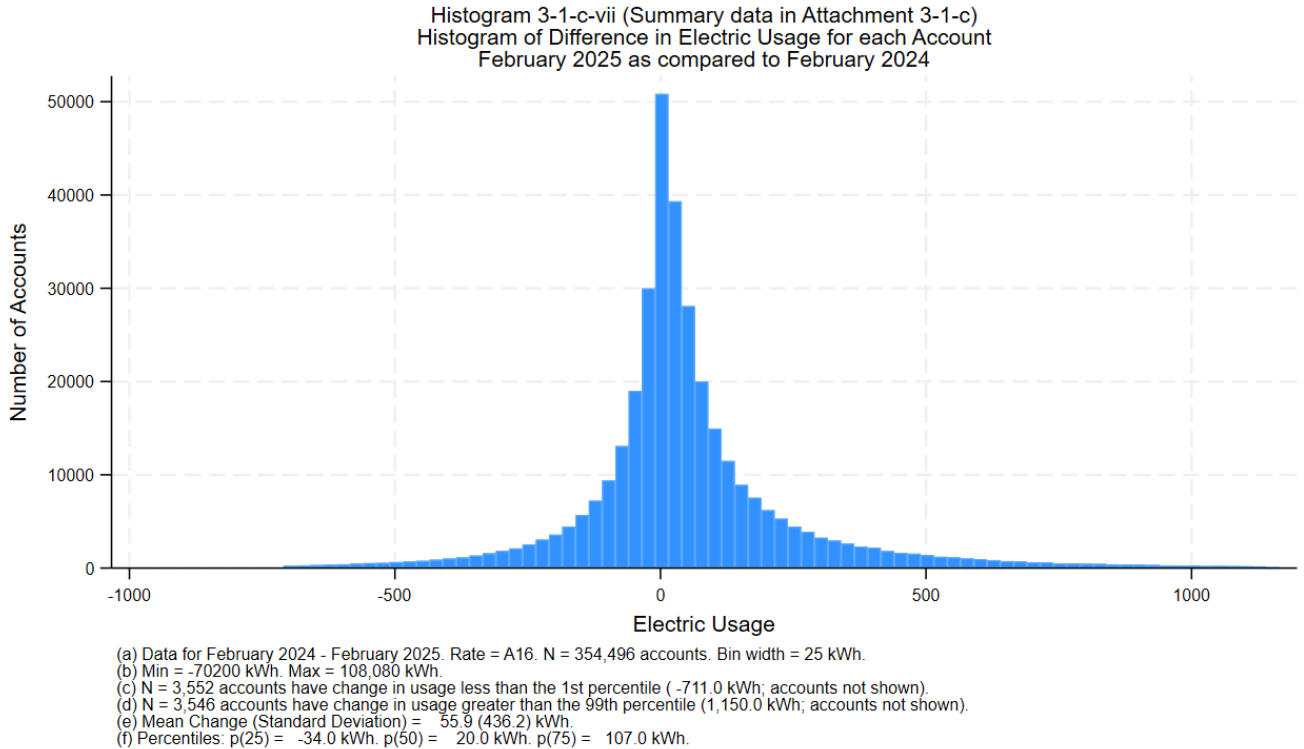


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vii. February 2025, as compared to February 2024.



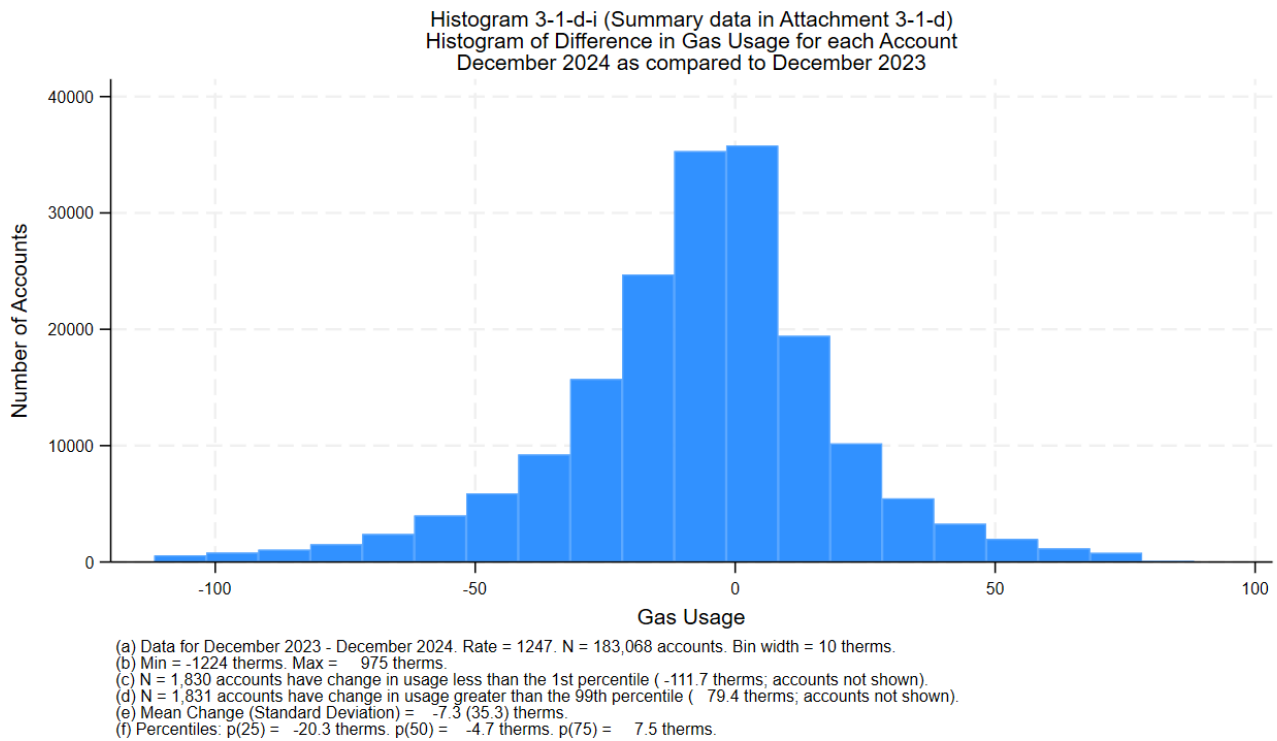
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d. Please see Attachment PUC-3-1-d for a live Excel workbook with each tab corresponding to subparts (i) through (iii) below.

i. December 2024, as compared to December 2023;

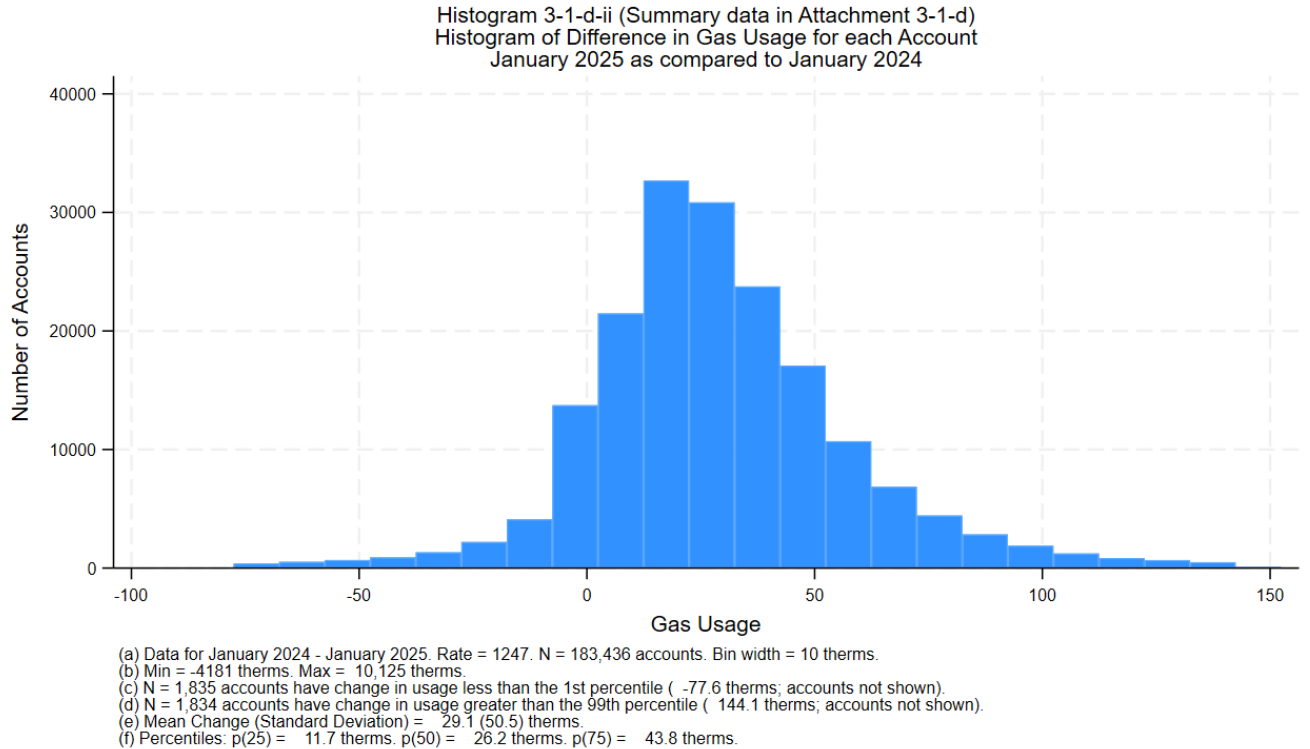


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ii. January 2025, as compared to January 2024; and

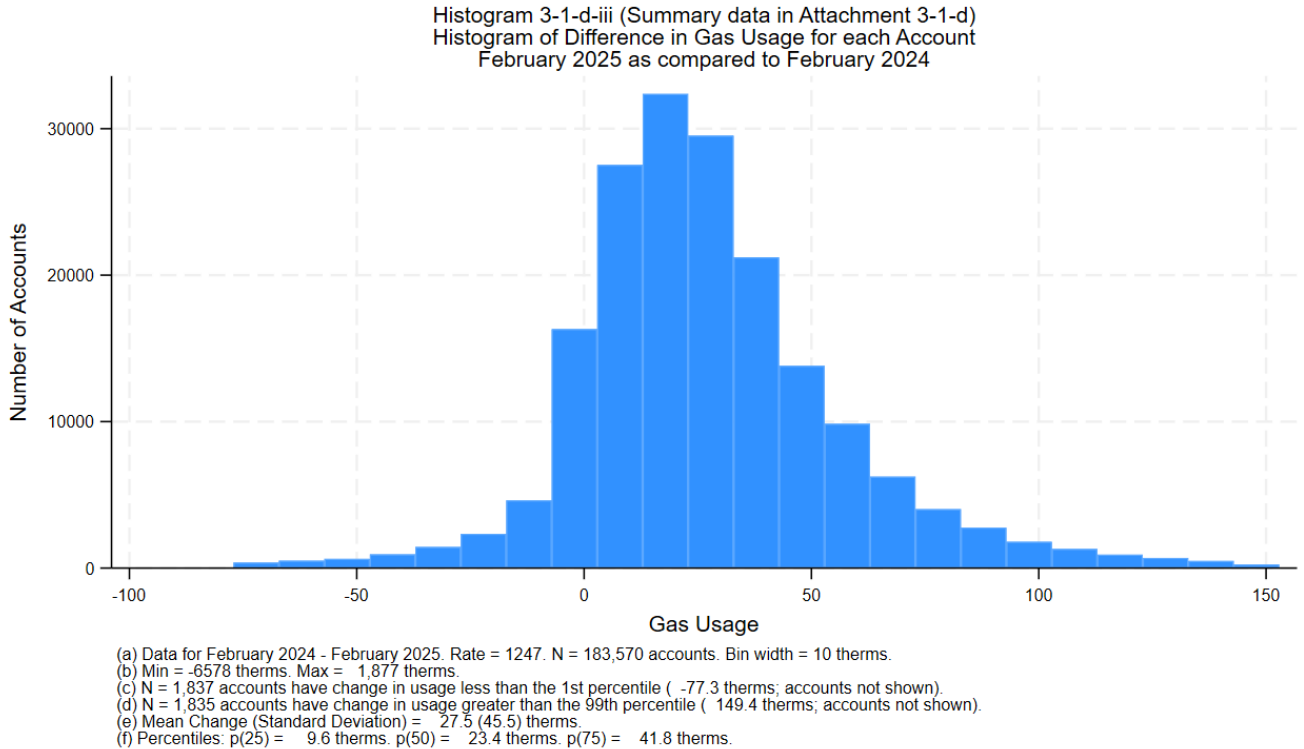


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iii. February 2025, as compared to February 2024.

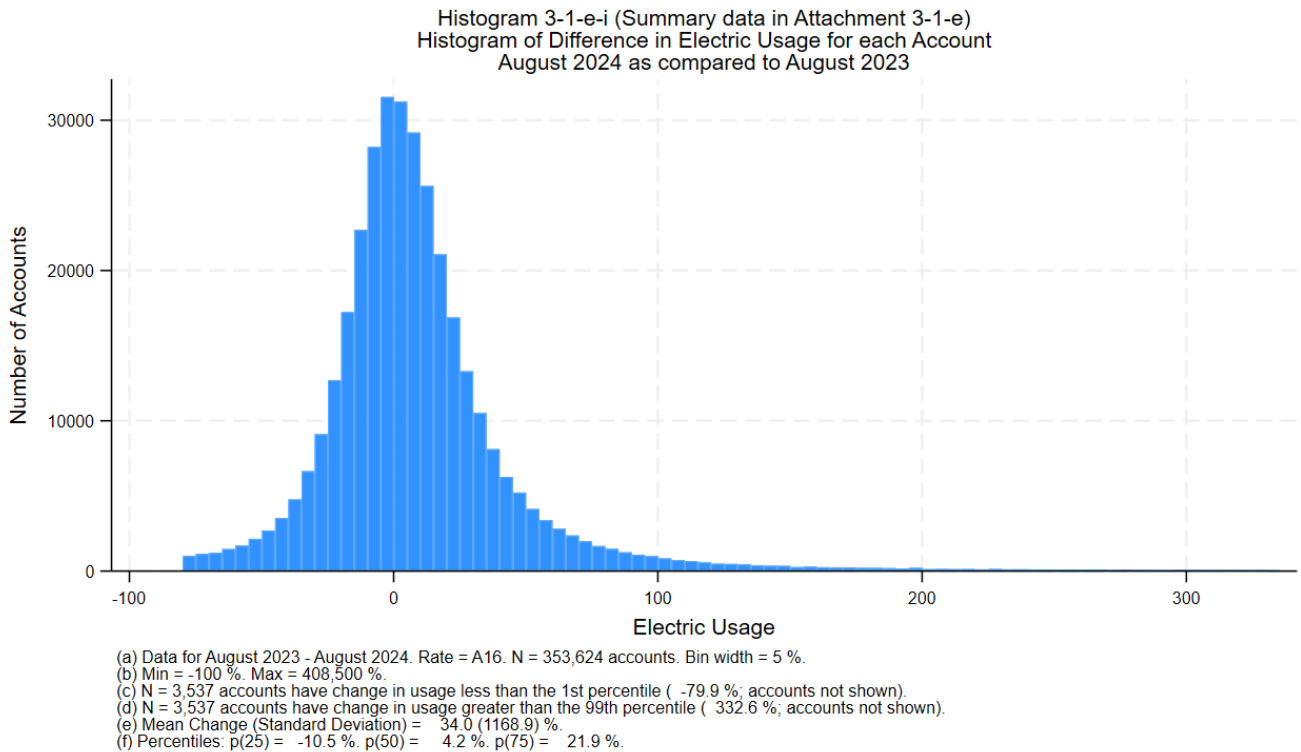


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- e. Please see Attachment PUC-3-1-e for a live Excel workbook with each tab corresponding to subparts (i) through (vii) below.
- i. August 2024, as compared to August 2023;

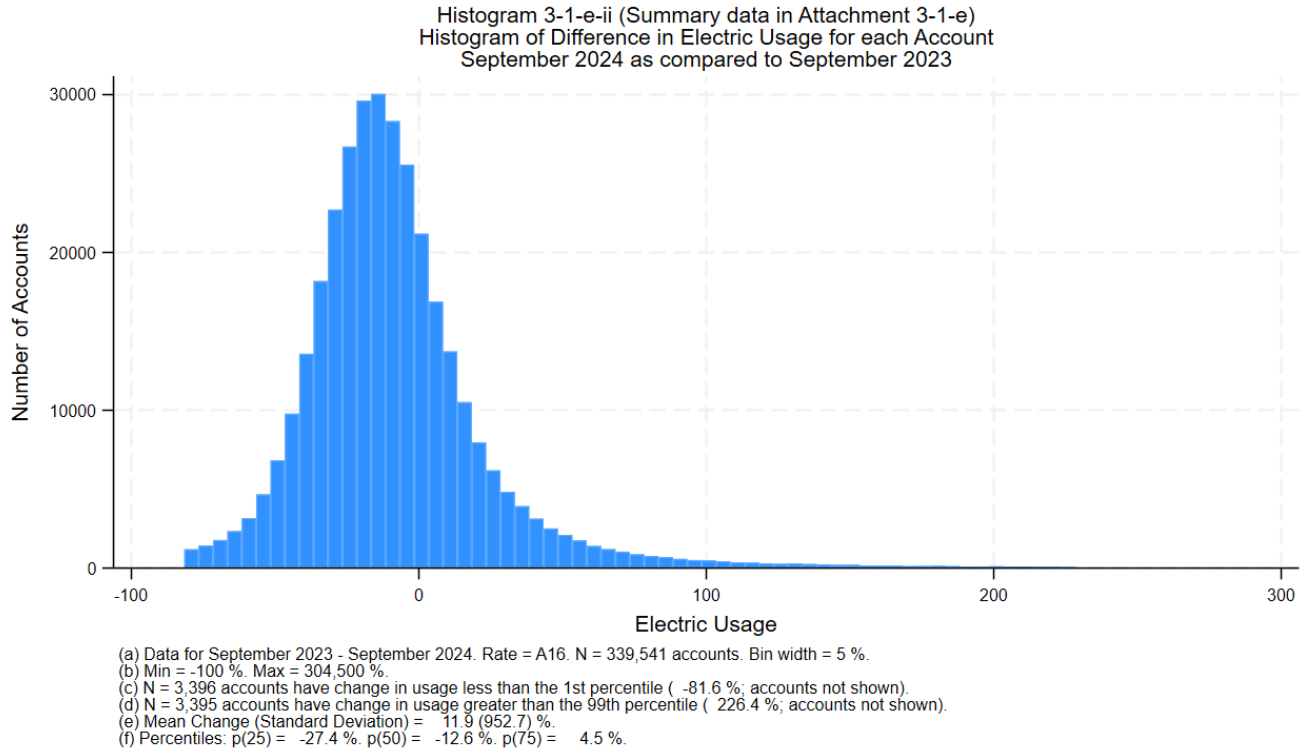


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ii. September 2024, as compared to September 2023;

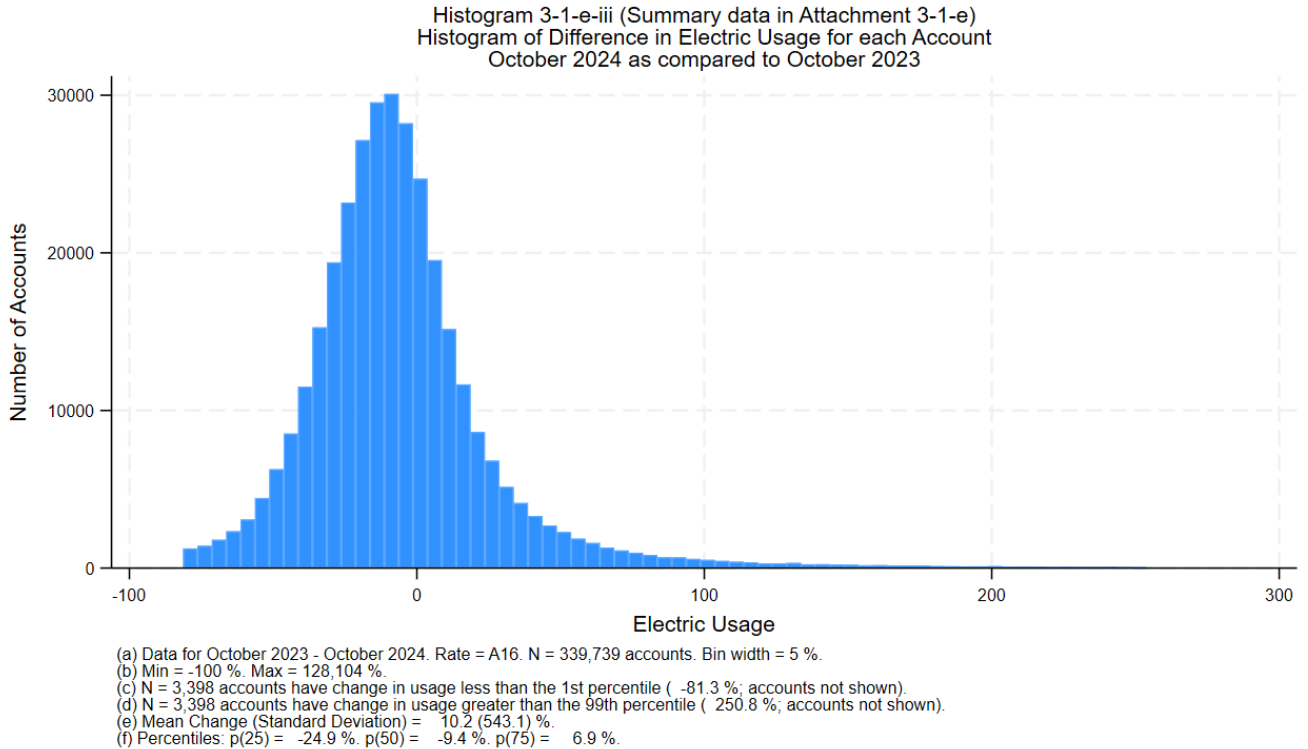


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iii. October 2024, as compared to October 2023;

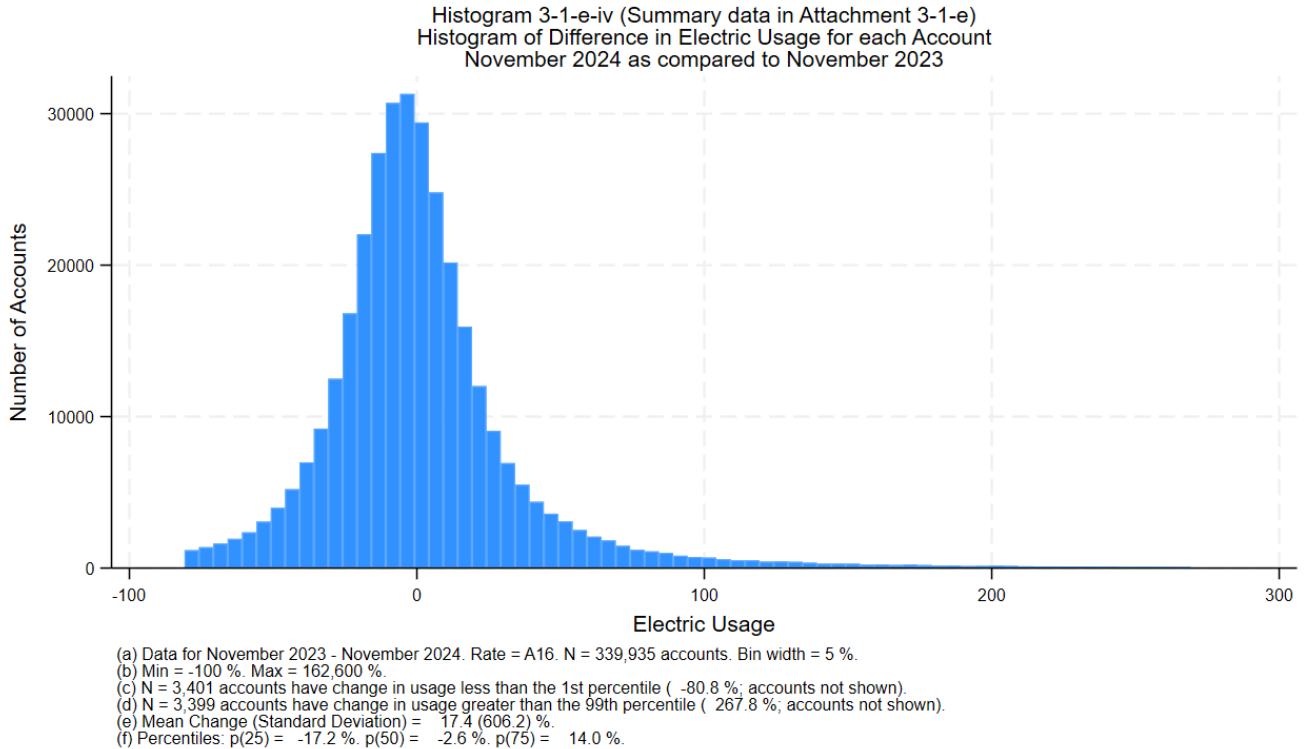


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iv. November 2024, as compared to November 2023;

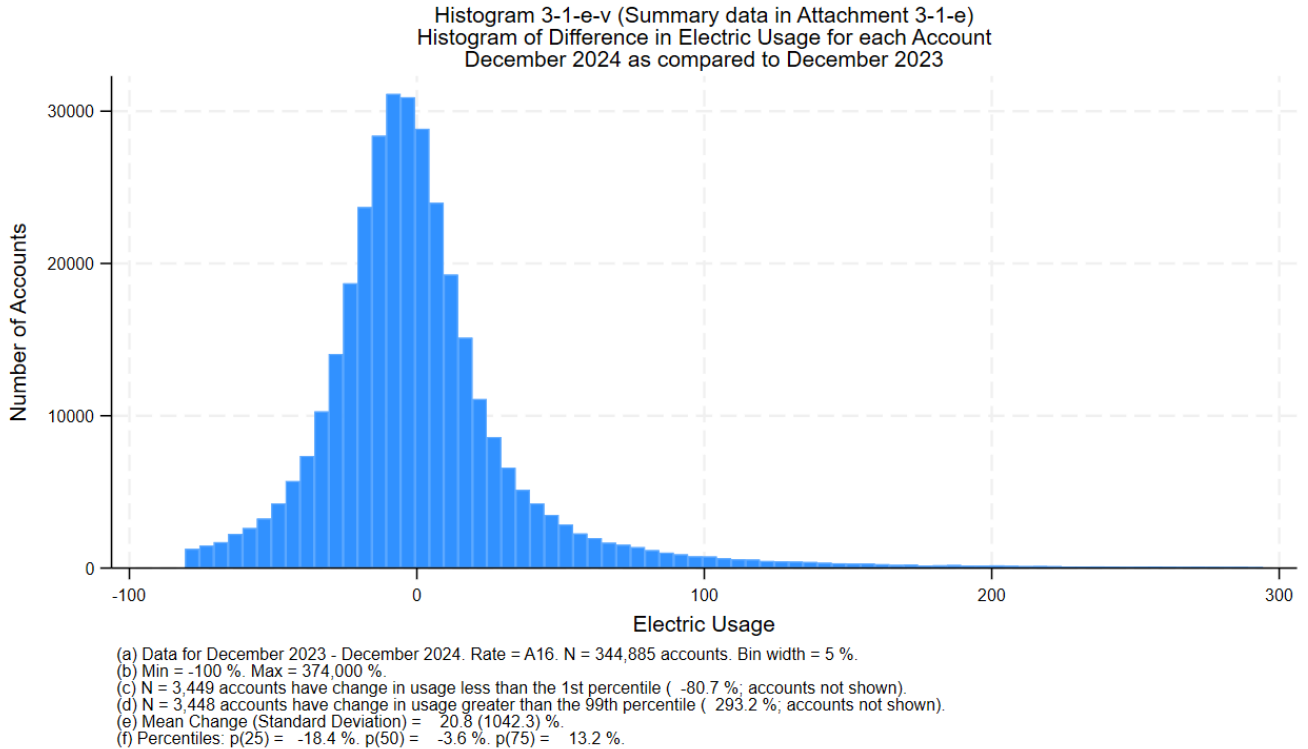


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v. December 2024, as compared to December 2023;

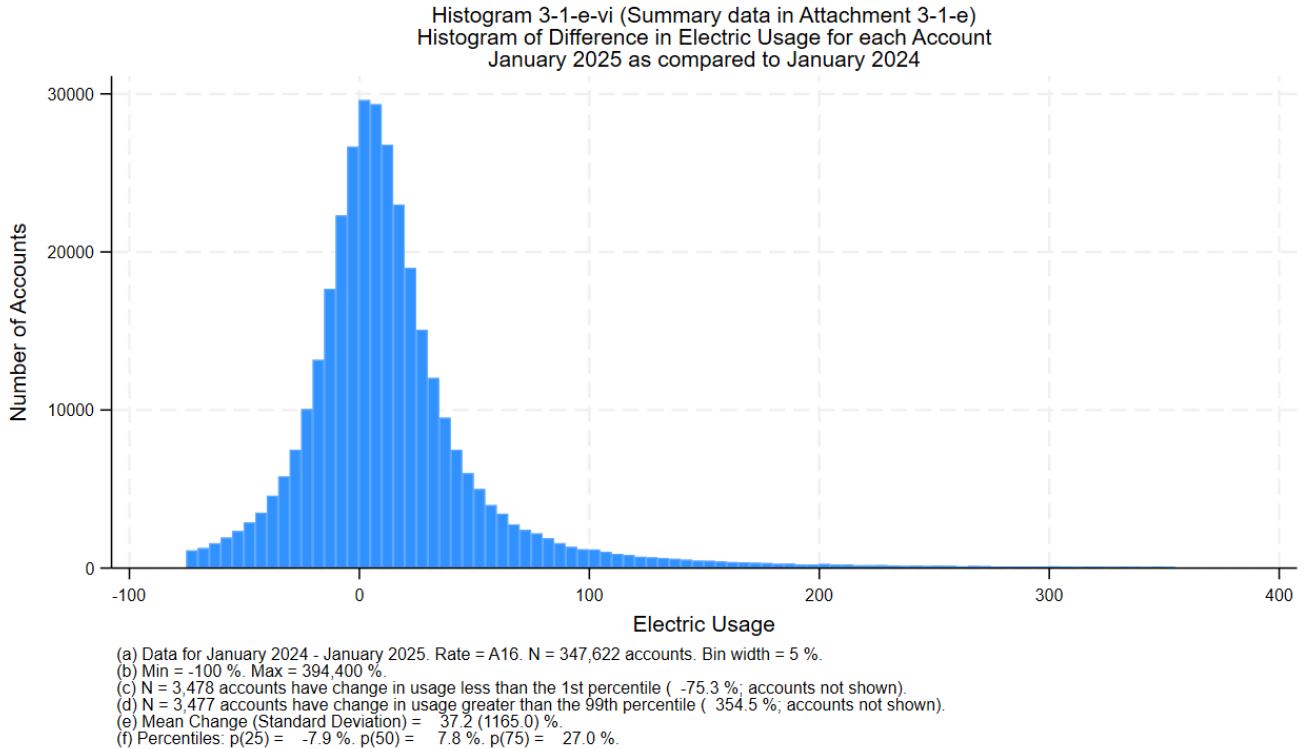


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vi. January 2025, as compared to January 2024; and

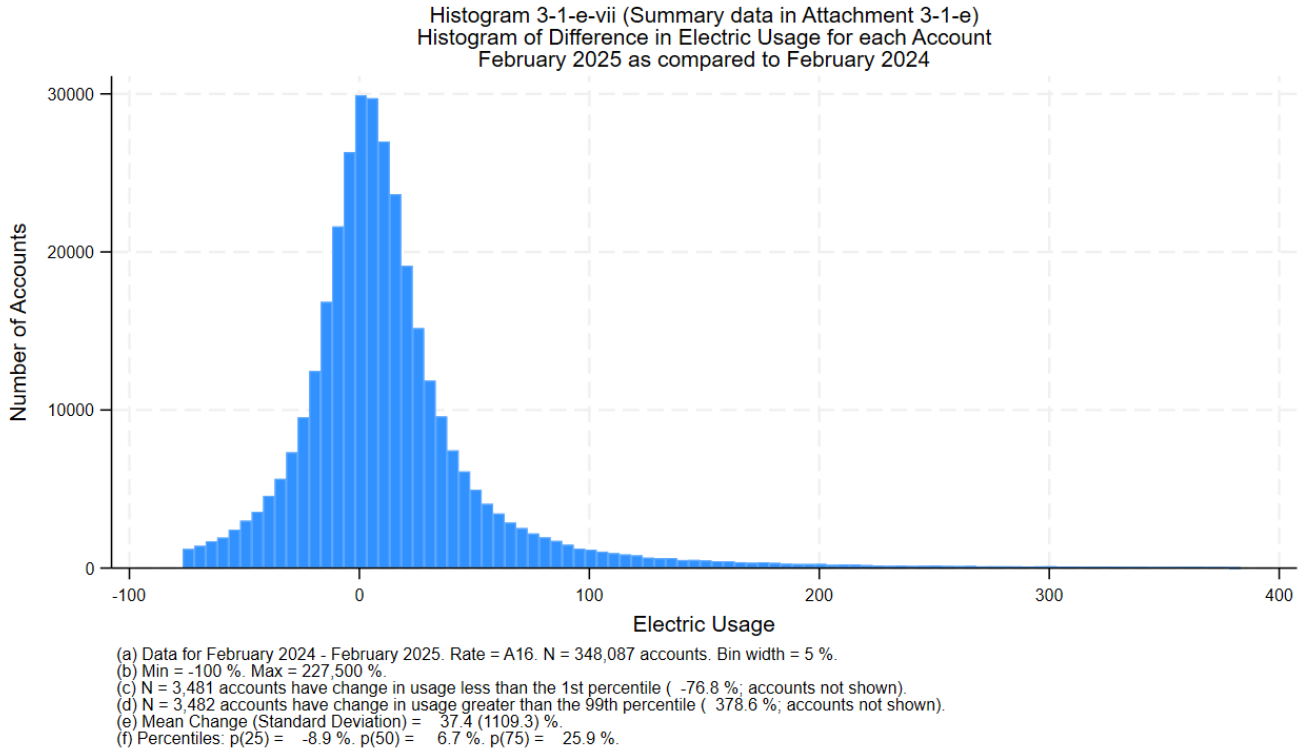


The Narragansett Electric Company
d/b/a Rhode Island Energy
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vii. February 2025, as compared to February 2024.



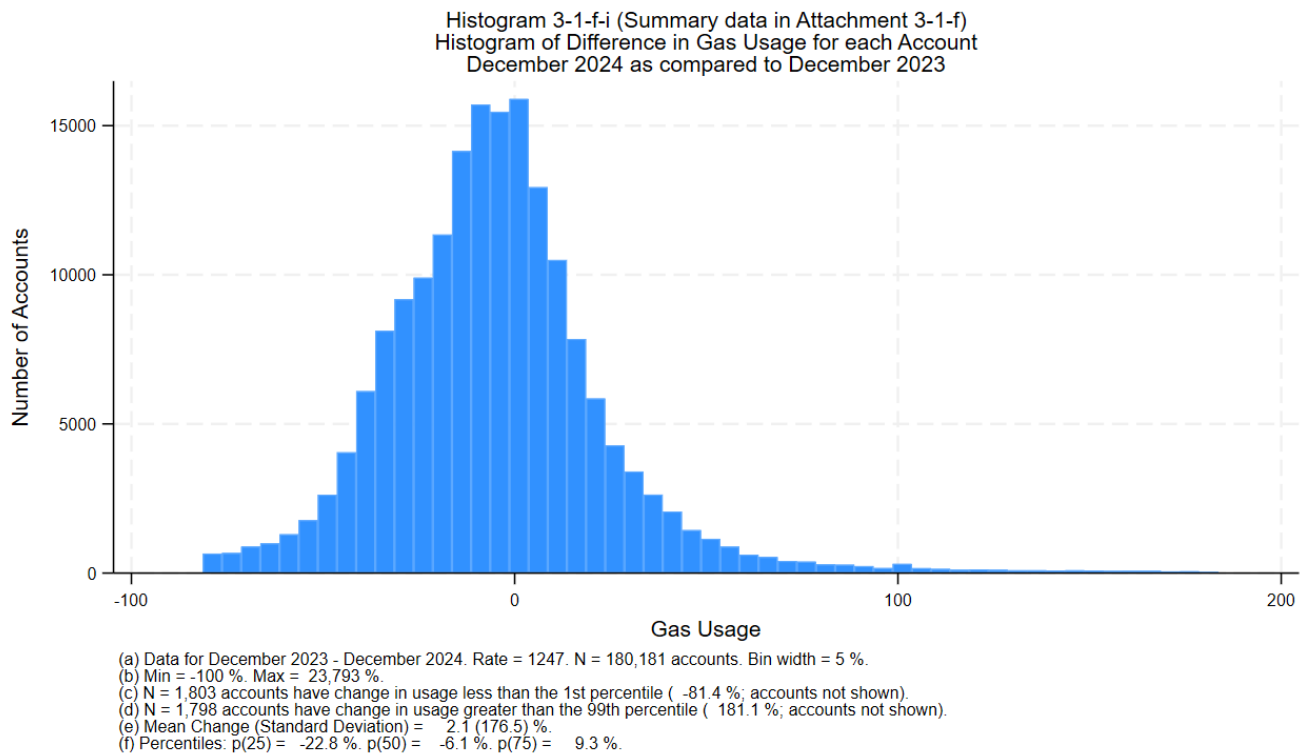
The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 25-08-GE

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f. Please see Attachment PUC-3-1-f for a live Excel workbook with each tab corresponding to subparts (i) through (iii) below.

i. December 2024, as compared to December 2023;

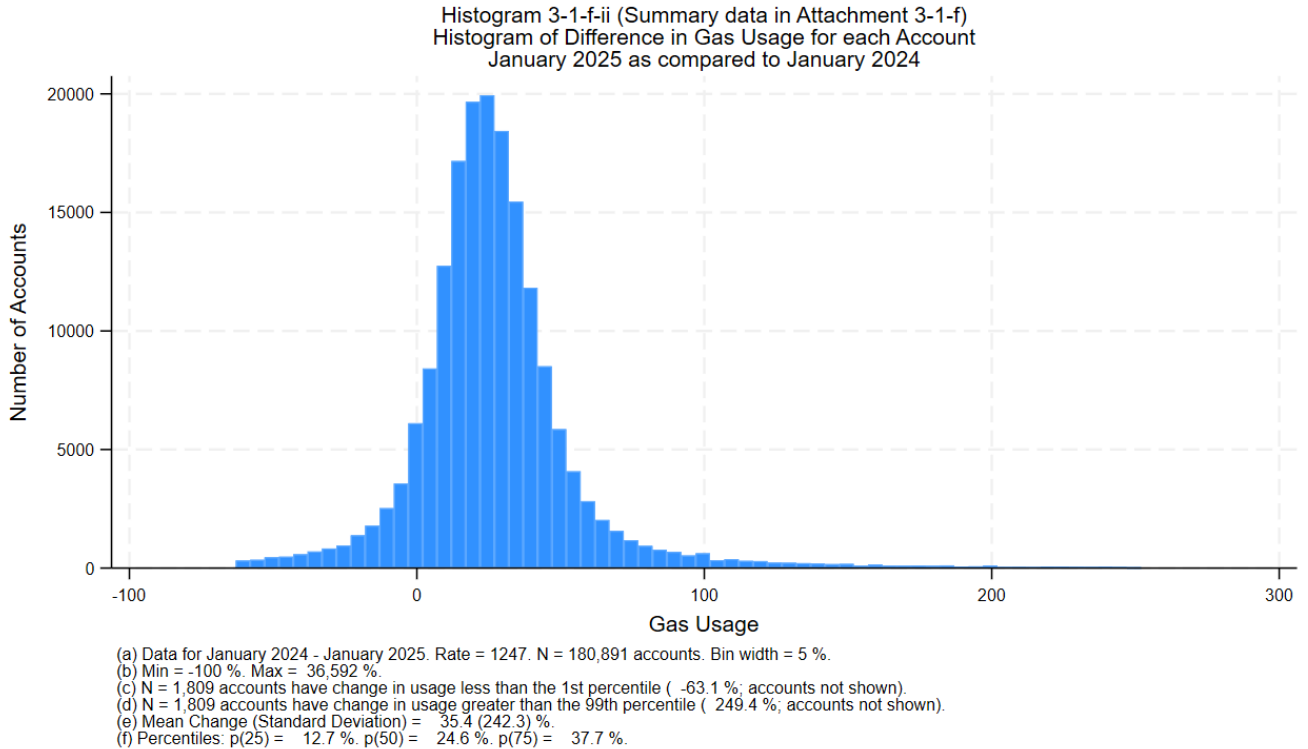


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ii. January 2025, as compared to January 2024; and

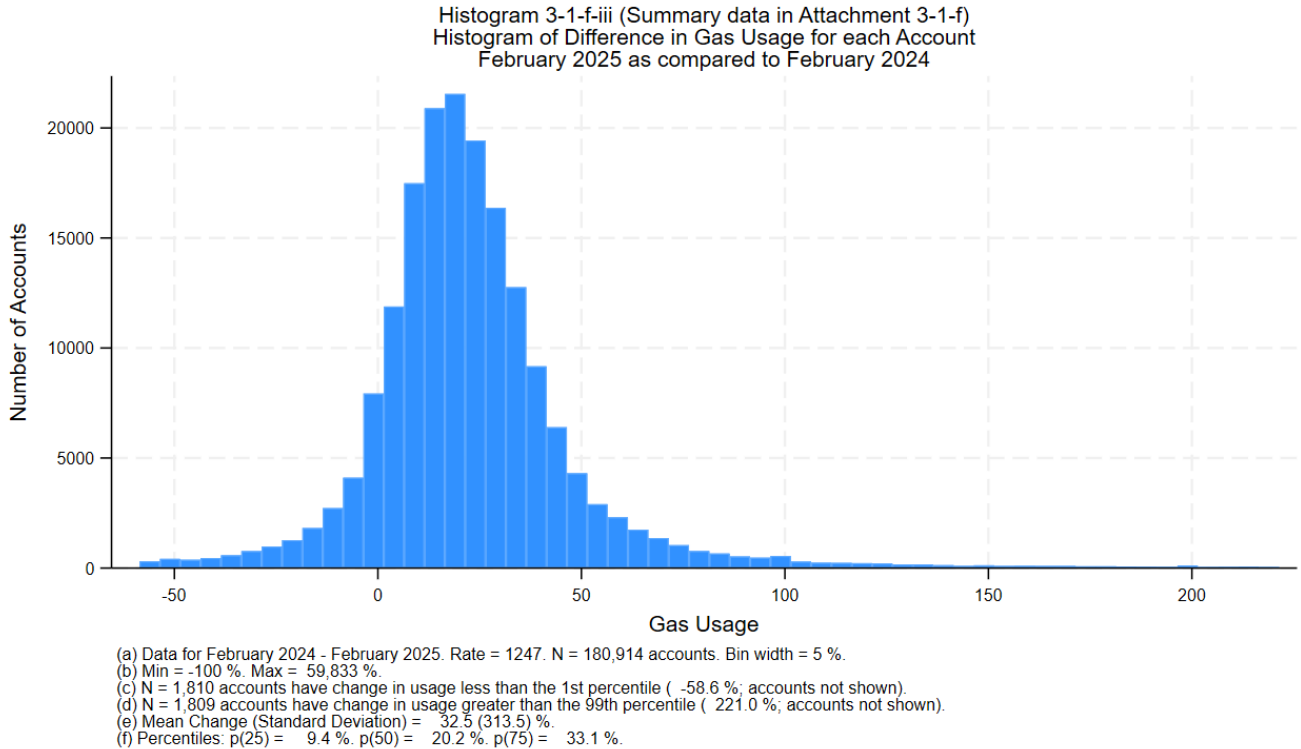


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iii. February 2025, as compared to February 2024.



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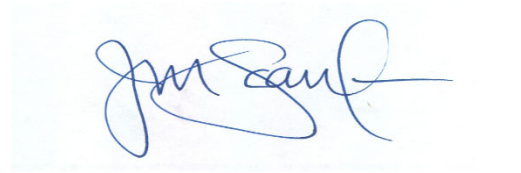
- g. The Company infers that the intent of this part is to show that change in usage (i.e., subparts c through f) is equally distributed about a mean of zero when controlling for all factors that influence usage. If the histograms are not equally distributed about a mean of zero, then it is possible that there is another factor contributing to the change in usage for that month year-over-year. The Company cautions that the data available is not appropriate for this methodological approach.

Factors that the Company considers when deriving its gas and electric forecasts include weather-normalized historical usage data at the system level, economic factors that influence long-term aggregate usage patterns, and overall trends in technology adoption and efficiency. The dataset used to produce the histograms in parts a through f is based on usage per bill month at the account level; normalizing this data for state-wide weather, state-wide economic factors, and/or other trends generally applicable to the customer base would not fully explain changes in usage at the customer level. Thus, the Company is not able to implement the requested controls or adjustments to account for these variables in the dataset used in parts a through f.

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

April 23, 2025
Date

Docket No. 25-08-GE – PUC’s Inquiry Into Rhode Island Energy’s Billing Systems Practices and Performance
Service list updated on 4/22/2025

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