

Jennifer Brooks Hutchinson
Senior Counsel
PPL Services Corporation
JHutchinson@pplweb.com;

280 Melrose Street
Providence, RI 02907
Phone 401-316-7429



April 4, 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 Nos. 3628 & 3476 – The Narragansett Electric Company d/b/a Rhode Island Energy Electric and Gas Service Quality Plans Responses to PUC Joint Data Requests – Set 1

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 responses to the Public Utilities Commission’s First Set of Joint Data Requests in the above-referenced dockets.

This filing contains a Motion for Protective Treatment of Confidential Information in accordance with 810-RICR-00-00-1-1.3(H)(3) (Rule 1.3(H)) of the PUC’s Rules of Practice and Procedure and R.I. Gen. Laws § 38-2-2(4)(B). Rhode Island Energy seeks protection from public disclosure of customer information in response to data request PUC 1-22, which is confidential and privileged information. In compliance with Rule 1.3(H), the Company has provided the PUC with the unredacted copy of the confidential response to PUC 1-22 in an envelope marked, “**CONTAINS CONFIDENTIAL INFORMATION - DO NOT RELEASE.**” The Company is also providing a redacted version of its response to PUC 1-22 for posting to the Commission’s website in the above-referenced dockets.

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. 3476 Service List
Docket No. 3628 Service List

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

INTERROGATORIES ISSUED JOINTLY IN THE)	
NARRAGANSETT ELECTRIC COMPANY D/B/A)	Docket No. 3628
RHODE ISLAND ENERGY SERVICE QUALITY PLAN)	
(ELECTRIC OPERATIONS) AND GAS SERVICE)	Docket No. 3476
QUALITY PLAN)	
)	

**MOTION OF THE NARRAGANSETT ELECTRIC COMPANY D/B/A
RHODE ISLAND ENERGY FOR PROTECTIVE TREATMENT OF
CONFIDENTIAL INFORMATION**

The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”) hereby respectfully requests that the Public Utilities Commission (“PUC” or “Commission”) grant protection from public disclosure certain confidential information submitted by the Company in the above referenced docket. The reasons for the protective treatment are set forth herein. The Company also requests that, pending entry of that finding, the PUC preliminarily grant the Company’s request for confidential treatment pursuant to 810-RICR-00-00-1.3(H)(2).

I. BACKGROUND

On April 4, 2025, Rhode Island filed with the PUC its responses to the PUC’s first set of data requests in the above-referenced dockets. Data Request PUC 1-22 and the Company’s response includes customer specific electric and gas account numbers and addresses associated with those accounts. The Company requests protective treatment of its response to Data Request PUC 1-22 in accordance with 810-RICR-00-00-1.3(H) and R.I. Gen. Laws §§ 38-2-2(4)(A)(I)(b) and 38-2-2(4)(B).

II. LEGAL STANDARD

For matters before the PUC, a claim for protective treatment of information is governed by the policy underlying the Access to Public Records Act (“APRA”), R.I. Gen. Laws § 38-2-1 et seq. See 810-RICR-00-00-1.3(H)(1). Under APRA, any record received or maintained by a state

or local governmental agency in connection with the transaction of official business is considered public unless such record falls into one of the exemptions specifically identified by APRA. See R.I. Gen. Laws §§ 38-2-3(a) and 38-2-2(4). Therefore, if a record provided to the PUC falls within one of the designated APRA exemptions, the PUC is authorized to deem such record confidential and withhold it from public disclosure.

III. BASIS FOR CONFIDENTIALITY

The Company's response to Data Request PUC 1-22, which is the subject of this Motion, is exempt from public disclosure pursuant to R.I. Gen. Laws §§ 38-2-2(4)(A)(I)(b) and 38-2-2(4)(B) as it contains "other personal individually identifiable records otherwise deemed confidential by federal or state law or regulation, or the disclosure of which would constitute a clearly unwarranted invasion of personal privacy pursuant to 5 U.S.C. § 552 et seq." and "[t]rade secrets and commercial or financial information obtained from a person, firm, or corporation that is of a privileged or confidential nature." The Rhode Island Supreme Court has held that this confidential information exemption applies where the disclosure of information is likely either (1) to impair the government's ability to obtain necessary information in the future; or (2) to cause substantial harm to the competitive position of the person from whom the information was obtained. *Providence Journal v. Convention Center Authority*, 774 A.2d 40 (R.I. 2001). The first prong of the test is satisfied when information is provided to the governmental agency and that information is of a kind that would customarily not be released to the public by the person from whom it was obtained. *Providence Journal*, 774 A.2d at 47.

Confidential Data Request PUC 1-22 contains the electric and gas account numbers of a single customer and the addresses for the premises associated with those accounts. Customer account information is sensitive financial information and the type of information that has

historically been maintained as confidential when provided in PUC filings. Confidential Data Request PUC 1-22 seeks confirmation of certain customer account information, which the Company has provided to fulfill its regulatory responsibilities. The Company would customarily not release this information to the public. Public disclosure of the confidential customer account information would impede on the confidentiality and privacy rights of those customers. Therefore, this information satisfies the exception found in R.I. Gen. Laws §§ 38-2-2(4)(A)(I)(b) and 38-2-2(4)(B).

IV. CONCLUSION

For the foregoing reasons, the Company respectfully requests that the PUC grant this motion for protective treatment of the Confidential Data Request PUC 1-22.

Respectfully submitted,

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

By its attorney,



Jennifer Brooks Hutchinson (#6176)
Rhode Island Energy
280 Melrose Street
Providence, RI 02907
(401) 316-7429

Dated: April 4, 2025

In Re: Electric Service Quality and Gas Service Quality Plans
Responses to the Commission’s First Set of Joint Data Requests
Issued March 14, 2025

PUC 1-1
Meter Reads

Request:

In a single table, report the percent of meters read each month beginning September 2024. Please use two rows to show residential and non-residential electric customers and two rows to show residential and non-residential gas customers.

Request:

Please see the table below for the percent of meters read each month beginning September 2024.

	(a)	(b)	(c)	(d)	(e)	(f)	(g)
	<u>% Meters Read by Month</u>	<u>Sep-24</u>	<u>Oct-24</u>	<u>Nov-24</u>	<u>Dec-24</u>	<u>Jan-25</u>	<u>Feb-25</u>
1	RESIDENTIAL ELECTRIC	99.29%	99.28%	99.04%	99.09%	99.27%	99.35%
2	NON-RESIDENTIAL ELECTRIC	97.31%	97.15%	96.86%	96.74%	96.69%	96.61%
3	RESIDENTIAL GAS	98.87%	99.03%	98.99%	98.99%	98.97%	99.04%
4	NON-RESIDENTIAL GAS	98.08%	98.04%	98.39%	98.32%	98.18%	98.47%

Note: This data is pulled from the billing system (“CSS”), which is a different data source than the FieldNet data source used for meter reading performance data reported in the Company’s Annual Service Quality Report (Docket No. 3628). The reason for using the billing system is because the FieldNet data source does not provide granularity for residential versus non-residential meter read performance.

PUC 1-2
Charge Accuracy

Request:

Please describe the process followed for the Company to issue an accurate monthly bill, including a description of the systems and software processes. Please identify each step that could cause an inaccurate bill to be issued.

Response:

The steps are summarized as follows:

Step 0: Account initialization

Prior to issuing an accurate monthly bill, the Company must set up an account. Setting up an account requires meter location, customer information, supplier information, and assignment of rate class and bill cycle.

- If any of these fields is incorrect or missing, the Company may inadvertently issue an incorrect bill or not issue a bill at all.

Step 1: Meter reading performance

The Company assigns each meter to a meter-read route so that a technician can pull data from that meter on a planned schedule. Technicians input meter usage data to the Company's Meter Data Management System (called "FieldNet"), which then automatically uploads data to the Company's billing system (referred to as "CSS").

- If a meter is not read, the cause is either an administrative error (the meter was not assigned to a read route) or a physical/mechanical error (the meter is not functioning). If a meter is not read (for either of these reasons), the Company will estimate usage, and this estimation may be found to be inaccurate.
- If usage data is input to FieldNet incorrectly, then that error transfers into the usage data in CSS. The Company conducts quality control on supplier information and all usage data (referred to as "validation, editing, and estimation (VEE)"). Through these quality checks, CSS will flag any usage entries that appear abnormal for further investigation and potential estimation. Although the VEE process reduces incorrect bills, it does not eliminate errors. Results of VEE may lead to incorrect bills or may lead to the Company not issuing a bill while further investigation occurs.

PUC 1-2, page 2
Charge Accuracy

- In some instances, a calculation is required to obtain the correct value of usage. If this calculation is completed incorrectly, the Company may inadvertently issue an incorrect bill.

Step 2: Calculate bill charges

Given accurate set up of rates and tariffs in CSS, the Company calculates bill charges using the usage from Step 1 and the rate class from Step 0. Some additional quality checks may occur. Additional billing functions may occur for some accounts (e.g., budget billing).

- If a calculation is incorrect, then it may result in an incorrect bill.
- If either the usage or the rate class is incorrect, then it may result in an incorrect bill.
- If a quality check flags an abnormality for further investigation, then the Company may not issue a bill on schedule.

Step 3: Bill production

The Company produces bills using CSS. Production involves transferring usage, rate information, customer information, and bill calculations to the graphic bill format.

- Any errors from prior steps may be carried through to bill production.
- Changing bill graphical formatting requires coding within CSS; anytime a bill graphic format is changed (e.g., when our new bill design went into effect), there is a risk that the information is incorrectly displayed.

Step 4: Bill issuance

The Company defines a bill as being issued as that bill being posted to a customer's online portal (if the customer is a Paperless Billing customer) or that physical bill leaving the Company's mailing facility.

- It is possible that an error occurring in this stage could result in a bill not being issued at all, but it is not possible for an otherwise correct bill to become incorrect during this Step.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket Nos. 3628 and 3476
(RIPUC Docket No. 25-08-GE)

In Re: Electric Service Quality and Gas Service Quality Plans
Responses to the Commission's First Set of Joint Data Requests
Issued March 14, 2025

PUC 1-3
Charge Accuracy

Request:

How does RIE become aware that a bill was incorrectly calculated?

Response:

Please see the Company's response to PUC 1-2, which details the meter-to-bill process and process of checking bill accuracy prior to issuance. In addition, Rhode Island Energy becomes aware that a bill was incorrectly calculated when responding to customer complaints and bill disputes.

In Re: Electric Service Quality and Gas Service Quality Plans
Responses to the Commission’s First Set of Joint Data Requests
Issued March 14, 2025

PUC 1-4
Charge Accuracy

Request:

Using the same format as for 1-1 (breaking out the response for gas and electric by residential and non-residential in a single table), please provide the number of bills each month that are known to have been incorrectly calculated.

Format 1-1:

In a single table, please use two rows to show residential and non-residential electric customers and two rows to show residential and non-residential gas customers.

Response:

Please see the table below for the number of bills each month that are known to have been incorrectly calculated.

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
	<u>Total number of bills not correctly calculated</u>	<u>Aug-24</u>	<u>Sept-24</u>	<u>Oct-24</u>	<u>Nov-24</u>	<u>Dec-24</u>	<u>Jan-25</u>	<u>Feb-25</u>
1	RESIDENTIAL ELECTRIC	454	90	454	692	3443 ¹	157	406
2	NON-RESIDENTIAL ELECTRIC	552	233	278	246	369	221	358
3	RESIDENTIAL GAS	76	29	62	84	69	46	43
4	NON-RESIDENTIAL GAS	54	18	64	29	56	36	46

¹ In December 2024, the Company realized a bill calculation error stemming from a specific file related to suppliers not being received during the August 2024 migration from National Grid's billing system to PPL's billing system (this file is referred to as a "supplier in flight" file). This error affected bills for August through December for a subset of accounts. The Company canceled the affected bills, corrected the error, and reissued corrected bills in December 2024.

PUC 1-5
Charge Accuracy

Request:

Using the same format as for 1-1, please provide the number of customers known to have been placed in the incorrect rate class.

Format 1-1:

In a single table, report the percent of meters read each month beginning September 2024. Please use two rows to show residential and non-residential electric customers and two rows to show residential and non-residential gas customers.

Response:

Please see the table below for the number of customers believed to have been placed in the incorrect rate class. Rate changes are made in the system for reasons other than rate class errors. The figures provided in this response represent an upper bound of the scale of aggregate rate class changes because of an error, e.g., Last Resort Service (“LRS”) to Purchase of Receivables (“POR”), POR to LRS, Residential Low Income to Non-Low Income, and Non-Low Income to Residential Low Income.

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
	<u>Rate Class Changes</u>	<u>Aug-24</u>	<u>Sep-24</u>	<u>Oct-24</u>	<u>Nov-24</u>	<u>Dec-24</u>	<u>Jan-25</u>	<u>Feb-25</u>
1	RESIDENTIAL ELECTRIC	55	93	112	95	113	141	107
2	NON-RESIDENTIAL ELECTRIC	51	11	10	8	12	22	13
3	RESIDENTIAL GAS	6	12	4	8	7	6	6
4	NON-RESIDENTIAL GAS	688 ¹	10	13	5	16	20	9

¹ Note that non-residential gas customers were subject to a change in rate class in August 2024 in accordance with RIPUC NG-GAS No. 101 (“Gas Tariff”) Section 1, Schedule A, Section 7.0, Sheet 8.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket Nos. 3628 and 3476
(RIPUC Docket No. 25-08-GE)

In Re: Electric Service Quality and Gas Service Quality Plans
Responses to the Commission's First Set of Joint Data Requests
Issued March 14, 2025

PUC 1-6
Charge Accuracy

Request:

Using the same format as for 1-1, please provide the number of customers known to have been assigned to the wrong energy supplier.

Format 1-1:

In a single table, report the percent of meters read each month beginning September 2024. Please use two rows to show residential and non-residential electric customers and two rows to show residential and non-residential gas customers.

Response:

Rhode Island Energy is not able to determine which supplier changes were in error versus updated by the suppliers' Electronic Data Interchange ("EDI") transactions. Suppliers control their enrollments and disenrollments. Suppliers receive responses that either their enrollments were processed or rejected (i.e., if not within the rules in the R.I.P.U.C. No. 2249). Please refer to the Company's response to PUC 1-2 (footnote 1) for a description of bills that were canceled because of a "supplier in flight" file not being received. The Company canceled and rebilled affected customers so the affected customers could pay the correct supplier Purchase of Receivable ("POR") price rather than the incorrect Last Resort Service price.

PUC 1-7
Charge Accuracy

Request:

Using the same format as for 1-1, please provide the number of customers known to have been incorrectly credited for RE Growth PBIs.

Format 1-1:

In a single table please use two rows to show residential and non-residential electric customers and two rows to show residential and non-residential gas customers.

Response:

The table below provides the number of accounts for customers participating in RE Growth that have been either cancelled and subsequently rebilled or not billed at all during at least one month from August 2024-March 2025. Limitations in billing system data prevent the Company from providing a disaggregation of why these bills associated with RE Growth accounts were canceled/rebilled or not billed at all within this response. The cancel/rebill or no bill may have been related to either an incorrect RE Growth PBI or an incorrect RE Growth cash payment or another reason unrelated to RE Growth participation. At this time, the Company cannot distinguish what proportion of the counts provided in the table below are due to which cause (incorrect PBI or incorrect cash payment or something else). The figures provided in this response represent an upper bound of the scale of aggregate incorrect PBI and cash payments.

Note that any issues associated with the RE Growth program are applicable to electric accounts only; gas accounts are marked as not applicable (“N/A”).

	(a)	(b)
	<u>Number of Customers Incorrectly Credited</u>	<u>RE Growth Program</u>
1	RESIDENTIAL ELECTRIC	475
2	NON-RESIDENTIAL ELECTRIC	47
3	RESIDENTIAL GAS	N/A
4	NON-RESIDENTIAL GAS	N/A

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket Nos. 3628 and 3476
(RIPUC Docket No. 25-08-GE)

In Re: Electric Service Quality and Gas Service Quality Plans
Responses to the Commission's First Set of Joint Data Requests
Issued March 14, 2025

PUC 1-8
Charge Accuracy

Request:

Using the same format as for 1-1, please provide the number of customers known to have been incorrectly credited for RE Growth cash payments.

Format 1-1:

In a single table, please use two rows to show residential and non-residential electric customers and two rows to show residential and non-residential gas customers.

Response:

Please See the Company's response to PUC 1-7.

In Re: Electric Service Quality and Gas Service Quality Plans
Responses to the Commission’s First Set of Joint Data Requests
Issued March 14, 2025

PUC 1-9
Charge Accuracy

Request:

Using the same format as for 1-1, please provide the number of customers known to have been incorrectly credited for Renewable Net Metering Credits or Excess Renewable Net Metering Credits.

Format 1-1:

In a single table please use two rows to show residential and non-residential electric customers and two rows to show residential and non-residential gas customers.

Response:

The table below provides the number of accounts for customers participating in Renewable Net Metering that have been either cancelled and subsequently rebilled or not billed at all during at least one month from August 2024-March 2025. Limitations in billing system data prevent the Company from providing a disaggregation of why these bills associated with Renewable Net Metering accounts were canceled/rebilled or not billed at all within this response. The cancel/rebill or no bill may have been related to either an incorrect crediting for Renewable Net Metering Credits or Renewable Net Metering Excess Credits or another reason unrelated to Renewable Net Metering participation. At this time, the Company cannot distinguish what proportion of the counts provided in the table below are due to which cause (incorrect Renewable Net Metering Credits or Excess Renewable Net Metering Credits or something else). The figures provided in this response represent an upper bound of the scale of aggregate incorrect Net Metering Credits or Excess Renewable Net Metering Credits.

Note that any issues associated with the Renewable Net Metering program are applicable to electric accounts only; gas accounts are marked as not applicable (“N/A”).

	(a)	(b)
	<u>Number of Customers Incorrectly Credited For Net Metering Credits/Excess Credits</u>	<u>Net Metering Program</u>
1	RESIDENTIAL ELECTRIC	528
2	NON-RESIDENTIAL ELECTRIC	326
3	RESIDENTIAL GAS	N/A
4	NON-RESIDENTIAL GAS	N/A

PUC 1-10
Charge Accuracy

Request:

Using the same format as for 1-1, please provide the number of RE Growth customers and Net Metering customers that should have received some generation-related credits but whose bills did not record credits.

Format 1-1:

In a single table please use two rows to show residential and non-residential electric customers and two rows to show residential and non-residential gas customers.

Response:

The table below provides the number of accounts for customers participating in RE Growth and Net Metering that have been either cancelled and subsequently rebilled or not billed at all during at least one month from August 2024-March 2025. Please also see the Company's responses to Data Requests PUC 1-7 through PUC 1-9 regarding the limitations in the Company's billing system that prevent the Company from providing a disaggregation of why these bills associated with RE Growth and Net Metering accounts were canceled/rebilled or not billed at all within this response.

At the time the Company performed the cancel and rebill, the Company experienced issues that resulted in needing to reverse extra credits. In some instances, certain customers did not receive credits because they were coded as a "No Bill" on accounts. As a result, certain customers who should have received some generation-related credits did not receive those credits on their bill. Notwithstanding and as discussed in the Company's responses to Data Requests PUC 1-7 through PUC 1-9, the cancel/rebill or no bill may have been related to either an incorrect crediting of generation-related credits or another reason unrelated to RE Growth or Net Metering participation. At this time, the Company cannot distinguish what proportion of the counts provided in the table below are due to which cause (incorrect generation-related credits or something else). The figures provided in this response represent an upper bound of the scale of aggregate incorrect generation-related credits.

Note that any issues associated with the RE Growth program are applicable to electric accounts only; gas accounts are marked as not applicable ("N/A").

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket Nos. 3628 and 3476
(RIPUC Docket No. 25-08-GE)

In Re: Electric Service Quality and Gas Service Quality Plans
Responses to the Commission's First Set of Joint Data Requests
Issued March 14, 2025

PUC 1-10, page 2

	(a)	(b)	(c)
	<u>Number of Customers Who Did Not Receive Credits</u>	<u>RE Growth Program</u>	<u>Net Metering Program</u>
1	RESIDENTIAL ELECTRIC	475	528
2	NON-RESIDENTIAL ELECTRIC	47	326
3	RESIDENTIAL GAS	N/A	N/A
4	NON-RESIDENTIAL GAS	N/A	N/A

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket Nos. 3628 and 3476
(RIPUC Docket No. 25-08-GE)

In Re: Electric Service Quality and Gas Service Quality Plans
Responses to the Commission’s First Set of Joint Data Requests
Issued March 14, 2025

PUC 1-11
Bill Issuance

Request:

Using the same format as for 1-1, provide the percent of bills successfully issued as a percent of the total number of bills that should have been issued in each month.

Table Format 1-1

In a single table, please use two rows to show residential and non-residential electric customers and two rows to show residential and non-residential gas customers.

Response:

Please see the tables below that provide the percent of bills successfully issued as a percent of the total number of bills that should have been issued in each month.

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
	<u>% Successful Bills</u>	<u>Aug 2024</u>	<u>Sept 2024</u>	<u>Oct 2024</u>	<u>Nov 2024</u>	<u>Dec 2024</u>	<u>Jan 2025</u>	<u>Feb 2025</u>
1	RESIDENTIAL ELECTRIC	99.1%	98.4%	98.8%	98.9%	99.2%	99.5%	99.2%
2	NON-RESIDENTIAL ELECTRIC	99.6%	98.4%	98.9%	98.9%	99.5%	100.6%	99.5%
3	RESIDENTIAL GAS	99.1%	98.5%	98.7%	98.9%	98.9%	99.0%	99.2%
4	NON-RESIDENTIAL GAS	99.2%	99.0%	98.7%	98.9%	99.3%	99.2%	99.4%

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket Nos. 3628 and 3476
(RIPUC Docket No. 25-08-GE)

In Re: Electric Service Quality and Gas Service Quality Plans
Responses to the Commission’s First Set of Joint Data Requests
Issued March 14, 2025

PUC 1-12
Bill Issuance

Request:

Using the same format as for 1-1, provide the number of accounts that received estimated bills.

Format: 1-1

In a single table, report the percent of meters read each month beginning September 2024.
Please use two rows to show residential and non-residential electric customers and two rows to show residential and non-residential gas customers.

Response:

Please see below table for number of accounts that received estimated bills:

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
	<u>Estimated Bills - All Estimates</u>	<u>Aug-24</u>	<u>Sep-24</u>	<u>Oct-24</u>	<u>Nov-24</u>	<u>Dec-24</u>	<u>Jan-25</u>	<u>Feb-25</u>
1	RESIDENTIAL ELECTRIC	7,886	3,326	2,270	3,243	2,735	2,241	1,503
2	NON-RESIDENTIAL ELECTRIC	1,838	1,084	1,188	1,299	1,377	1,442	1,329
3	RESIDENTIAL GAS	16,728	3,108	2,228	2,137	2,144	2,286	2,081
4	NON-RESIDENTIAL GAS	1,144	376	386	309	294	339	265

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket Nos. 3628 and 3476
(RIPUC Docket No. 25-08-GE)

In Re: Electric Service Quality and Gas Service Quality Plans
Responses to the Commission’s First Set of Joint Data Requests
Issued March 14, 2025

PUC 1-13
Bill Issuance

Request:

Using the same format as for 1-1, provide the number of estimated bills sent for which the meter was ***not*** read.

Format 1-1:

In a single table, report the percent of meters read each month beginning September 2024. Please use two rows to show residential and non-residential electric customers and two rows to show residential and non-residential gas customers.

Response:

Please see the table below for the number of estimated bills for which the meter was not read:

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
	<u>Estimated Bills - Without Reads</u>	<u>Aug-24</u>	<u>Sep-24</u>	<u>Oct-24</u>	<u>Nov-24</u>	<u>Dec-24</u>	<u>Jan-25</u>	<u>Feb-25</u>
1	RESIDENTIAL ELECTRIC	2,038	1,827	1,758	2,996	2,513	1,962	1,392
2	NON-RESIDENTIAL ELECTRIC	1,212	854	1,018	1,165	1,260	1,286	1,198
3	RESIDENTIAL GAS	13,608	2,178	1,860	1,976	1,976	2,115	1,953
4	NON-RESIDENTIAL GAS	1,004	309	349	280	272	314	241

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket Nos. 3628 and 3476
(RIPUC Docket No. 25-08-GE)

In Re: Electric Service Quality and Gas Service Quality Plans
Responses to the Commission's First Set of Joint Data Requests
Issued March 14, 2025

PUC 1-14
Bill Issuance

Request:

Using the same format as for 1-1, provide the number of estimated bills sent for which the meter ***was*** read.

Format 1-1:

In a single table, please use two rows to show residential and non-residential electric customers and two rows to show residential and non-residential gas customers.

Response:

Please see below tables for number of estimated bills for which the meter was read:

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
	Estimated Bills - With Reads	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25
1	RESIDENTIAL ELECTRIC	5,848	1,499	512	247	222	279	111
2	NON-RESIDENTIAL ELECTRIC	626	230	170	134	117	156	131
3	RESIDENTIAL GAS	3,120	930	368	161	168	171	128
4	NON-RESIDENTIAL GAS	140	67	37	29	22	25	24

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket Nos. 3628 and 3476
(RIPUC Docket No. 25-08-GE)

In Re: Electric Service Quality and Gas Service Quality Plans
Responses to the Commission's First Set of Joint Data Requests
Issued March 14, 2025

PUC 1-15
Bill Issuance

Response:

If all instances of estimated meter reads do not fall into the read/not read categories in 1-13 and 1-14, please explain and provide the count of this category using the same format as for 1-1.

Response:

All estimated meter reads fall into the read/not read categories included in the Company's responses to Joint PUC 1-13 and Joint PUC 1-14.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket Nos. 3628 and 3476
(RIPUC Docket No. 25-08-GE)

In Re: Electric Service Quality and Gas Service Quality Plans
Responses to the Commission’s First Set of Joint Data Requests
Issued March 14, 2025

PUC 1-16
Bill Issuance

Request:

Please provide a table with four rows: residential electric, non-residential electric, residential gas, and non-residential gas. For each row, please report in columns the number of customers that did not receive a bill for 1 month, 2 months, 3 months, 4 months, 5 months, and 6 months.

Response:

Please see the table below that details the number of customers that did not receive a bill for 1 month, 2 months, 3 months, 4 months, 5 months, and 6 months and greater than 6 months.

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
	<u>Number of No Bills</u>	<u>1 month</u>	<u>2 months</u>	<u>3 months</u>	<u>4 months</u>	<u>5 months</u>	<u>6 months</u>	<u>>6 months</u>
1	RESIDENTIAL ELECTRIC	462	536	205	196	134	83	598
2	NON-RESIDENTIAL ELECTRIC	117	244	96	33	54	47	328
3	RESIDENTIAL GAS	129	95	27	12	10	5	103
4	NON-RESIDENTIAL GAS	23	23	16	2	3	3	56

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket Nos. 3628 and 3476
(RIPUC Docket No. 25-08-GE)

In Re: Electric Service Quality and Gas Service Quality Plans
Responses to the Commission’s First Set of Joint Data Requests
Issued March 14, 2025

PUC 1-17
Bill Issuance

Request:

Please provide the same as for 1-16, but for customers that received 1 to 6 months of estimated bills.

Table Format 1-1

In a single table, please use two rows to show residential and non-residential electric customers and two rows to show residential and non-residential gas customers.

Response:

Please see the below table for customers that received 1 month to greater than 6 months of estimated bills.

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
	<u>Consecutive Estimates</u>	<u>1 month</u>	<u>2 months</u>	<u>3 months</u>	<u>4 months</u>	<u>5 months</u>	<u>6 months</u>	<u>> 6 months</u>
1	RESIDENTIAL ELECTRIC	163	144	75	57	62	51	67
2	NON-RESIDENTIAL ELECTRIC	169	110	73	65	167	98	78
3	RESIDENTIAL GAS	238	170	188	224	211	245	308
4	NON-RESIDENTIAL GAS	35	29	17	20	17	33	33

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket Nos. 3628 and 3476
(RIPUC Docket No. 25-08-GE)

In Re: Electric Service Quality and Gas Service Quality Plans
Responses to the Commission’s First Set of Joint Data Requests
Issued March 14, 2025

PUC 1-18
Bill Issuance

Request:

Using the same format as for 1-1, provide the number of customers with incorrect billing cycles (days missing between two cycles or days overlapping between two cycles).

Table Format 1-1

In a single table, please use two rows to show residential and non-residential electric customers and two rows to show residential and non-residential gas customers.

Response:

Please see the table below for data on accounts that went through a bill cycle change during a specific month. The bill cycle changes were done following new account set up and/or a physical meter route change, and they did not cause a missing bill or longer than expected bill. The Company does not track the specific reason for the bill cycle change and, therefore, cannot break out the number of customers with incorrect billing cycles.

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
	<u>Bill Group Changes</u>	<u>Aug-24</u>	<u>Sept-24</u>	<u>Oct-24</u>	<u>Nov-24</u>	<u>Dec-24</u>	<u>Jan 2025</u>	<u>Feb-25</u>	<u>Mar-25</u>
1	RESIDENTIAL ELECTRIC	0	1	8	21	32	40	59	0
2	NON-RESIDENTIAL ELECTRIC	0	0	21	26	59	101	110	0
3	RESIDENTIAL GAS	0	4	17	15	34	47	45	0
4	NON-RESIDENTIAL GAS	0	1	2	4	7	12	15	0

In Re: Electric Service Quality and Gas Service Quality Plans
Responses to the Commission’s First Set of Joint Data Requests
Issued March 14, 2025

PUC 1-19
Bill Issuance

Request:

Using the same format as for 1-1, provide the number of customers who were incorrectly dropped from auto-pay. Were customers notified that their auto-pay was dropped? If so, how were they notified?

Table Format 1-1

In a single table, please use two rows to show residential and non-residential electric customers and two rows to show residential and non-residential gas customers.

Response:

Please see the table below for the number of customers who were incorrectly dropped from autopay.

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
	<u>Auto Pay Bill Drops</u>	<u>Aug 24</u>	<u>Sept 24</u>	<u>Oct 24</u>	<u>Nov 24</u>	<u>Dec 24</u>	<u>Jan 25</u>	<u>Feb 25</u>	<u>Mar 25</u>
1	RESIDENTIAL ELECTRIC	0	0	0	0	3127	1502	629	136
2	NON-RESIDENTIAL ELECTRIC	0	0	0	0	382	301	61	26
3	RESIDENTIAL GAS	0	0	0	0	1743	829	335	40
4	NON-RESIDENTIAL GAS	0	0	0	0	207	109	24	4

Note: March 2025 contains customer counts as of 3/24/2025 and may increase by the end of March 2025.

The first incident of a customer incorrectly dropped from autopay occurred in December 2024.

Customers who were incorrectly dropped from autopay were notified by letters. If a customer’s Email address was available within the customer’s profile, the customer was also notified by Email.

PUC 1-20
Customer Contact

Request:

Does the company log customers' calls related to billing and payment in its customer relationship management system by reason? If so, please provide the categories used to classify these calls (for example, issues such as payment disputes, payment extensions, billing errors, etc.)? For each reason, please provide the number of calls logged for the period between August 2024 and February 2025, broken down by month and category, using the same format as 1-1.

Format 1-1:

In a single table, please use two rows to show residential and non-residential electric customers and two rows to show residential and non-residential gas customers.

Response:

Yes, the Company logs customers' calls related to billing and payment, in its customer relationship management system (also known as the "IVR"), by reason. The categories used to classify these calls, based on the initial selection made by the customer in the IVR are as follows:

AMP - Budget Billing RI
AMP - Pay Assist RI
AMP - Automatic Bill Pay RI
Commercial - Billing RI
Commercial - Automatic Bill Pay RI
Commercial - Pay Assist RI
General - Automatic Bill Pay RI
General - Billing RI
General - Pay Assist RI

Please see the table below for the number of calls logged for the period between August 2024 and February 2025, broken down by month and category.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket Nos. 3628 and 3476
(RIPUC Docket No. 25-08-GE)

In Re: Electric Service Quality and Gas Service Quality Plans
Responses to the Commission’s First Set of Joint Data Requests
Issued March 14, 2025

PUC 1-20, page 2
Customer Contact

	(a) Call Categories	(b) Aug-24	(c) Sep-24	(d) Oct-24	(e) Nov-24*	(f) Dec-24	(g) Jan-25	(h) Feb-25
1	RESIDENTIAL ELECTRIC							
2	AMP - Budget Billing RI	1	0	0	1	0	2	1
3	AMP - Pay Assist RI	114	159	178	165	172	171	160
4	AMP - Automatic Bill Pay RI	0	1	0	0			
5	General - Automatic Bill Pay RI	156	262	292	262	327	458	443
6	General - Billing RI	1288	3450	3410	3679	5114	7297	6440
7	General - Pay Assist RI	7144	13044	13942	12702	16450	17799	16533
8	RESIDENTIAL GAS							
9	AMP - Budget Billing RI	0	3	0	0	0	0	1
10	AMP - Pay Assist RI	165	275	290	185	109	107	98
11	AMP - Automatic Bill Pay RI	1	2	3	0			
12	General - Automatic Bill Pay RI	271	494	463	276	182	335	305
13	General - Billing RI	3222	7552	7342	4260	2372	4111	3910
14	General - Pay Assist RI	14673	25454	25764	15447	9428	11814	11125
15	NON-RESIDENTIAL ELECTRIC							
16	Automatic Bill Pay RI	40	146	233				
17	Billing RI	5	11	16	278	397	609	688
18	Pay Assist RI	209	497	285				
19	NON-RESIDENTIAL GAS							
20	Automatic Bill Pay RI	58	187	600	380	10	18	15
21	Billing RI	15	24	34	62	160	222	233
22	Pay Assist RI	458	817	828	482	233	404	521

*In November updates were made to the to better manage call routing.

In Re: Electric Service Quality and Gas Service Quality Plans
Responses to the Commission’s First Set of Joint Data Requests
Issued March 14, 2025

PUC 1-21
Customer Contact

Response:

Please identify any billing or payment related issues that affected more than 1000 accounts, explain the issue, the time period over which the issue affected customers, the status of resolution, the actions taken to implement the resolution (i.e., manual solutions, software changes, etc.), whether the resolution was permanent or needs to be repeated on a recurring basis, and for any resolved issues describe the resolution action.

Response:

Please see the table and explanation below for the following billing or payment related issues that affected more than 1000 accounts:

Issue		Time Period	Number of Accounts	Status of Resolution		Actions Taken ¹	Permanent/ Recurring Resolution
1	Aged “No Bills” from National Grid	Range of 1 month to several years	1631	<i>Corrected</i>	<i>Remaining</i>	<ul style="list-style-type: none"> Data Repairs Manual Billed Forward Contacted Customers 	Permanent
				778	853		
2	Missing “supplier in flight” file	8/19/2023 to March 31, 2025	7388	<i>Corrected</i>	<i>Remaining</i>	<ul style="list-style-type: none"> Data Repairs Manual Billed Forward Bi-weekly updates to Suppliers 	Permanent
				7184	204		
3	Customers incorrectly dropped from Auto Bill Pay	December 2024 to March 31, 2025	9455	<i>Corrected</i>	<i>Remaining</i>	<ul style="list-style-type: none"> Contacted Customers Re-Enrolled 	Permanent
				9455	0		
4	Non-Aged “No Bills” -Other	8/19/2024 to current	4508	<i>Corrected</i>	<i>Remaining</i>	<ul style="list-style-type: none"> Data Repairs Manual Billed Forward Contacted Customers New Service Activations 	Recurring

¹ This column includes actions taken to implement the resolution and to resolve the corrected issues. The Company does not track each resolution action separately.

PUC 1-21, page 2
Customer Contact

1. Aged 'No Bills' from National Grid are accounts that had not been receiving a bill for at least one billing cycle prior to migration from National Grid's billing system to PPL's billing system.
2. See footnote 1 in the Company's response to 1-2.
3. Customers were incorrectly dropped from Auto Bill Pay are those customers with accounts that had been correctly enrolled in automatic bill pay but were inadvertently and incorrectly disenrolled the following month; this issue was caused by an incorrect file.
4. "Non-Aged 'No Bills'" are accounts that were billing prior to August 2024 but have at least 1 or more months of no bills from 8/19/2024 through 3/31/2025. Of the remaining 3,023 "no bills" there is overlap with the remaining 204 "no bills" in item 2. "supplier in-flight". Another area of overlap is in the distributed generation "no bill" area, which are included in the Company's responses to PUC 1-7 through 1-10.

Redacted

PUC 1-22

Customer Information

Response:

These questions pertain to a single customer with an electric account of [REDACTED] and a gas account of [REDACTED].

- a. Confirm the electric premise address in RIE's billing system is:
[REDACTED]
- b. Confirm the gas premise address in RIE's billing system is:
[REDACTED]
- c. Please confirm whether these are the addresses listed for the customer when National Grid was last executing billing. If the billing addresses are different, please explain if either National Grid or RIE's systems were in error, and how the error occurred, if known.
- d. Would the electric address (including a pole number) prevent the customer from receiving a mailed bill?
- e. Would the gas address (included an apartment number of "ALL" and a town name of "GAS NORTH KINGSTOWN") prevent the customer from receiving a mailed bill?
- f. Why would a single customer have two different addresses for their premise?
- g. If it is not provided in responses above, using the same format as 1-1, please provide the number of customers with incorrect mailing addresses.

Response:

- a. The Company confirms the electric premise address in the Rhode Island Energy's billing system is [REDACTED].
- b. The Company confirms the gas premise address in the Rhode Island Energy's billing system is [REDACTED].

Redacted

PUC 1-22, page 2

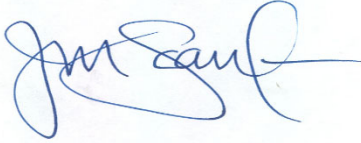
Customer Information

- c. The Company confirms the addresses listed were both in the National Grid billing system as well as Rhode Island Energy's billing systems.
- d. The Company cannot state with certainty whether the electric address (including a pole number) prevented the customer from receiving a mailed bill because the Company does not have a way to track whether the customer received their bills. The Company can confirm that the customer made multiple full payments while the account was using this address. This account is not enrolled in autopay. Thus, the Company assumes that the address did not prevent the customer from receiving their bill.
- e. The Company cannot state with certainty whether the gas address (including an apartment number of "ALL" and a town name of "GAS NORTH KINGSTOWN") prevented the customer from receiving a mailed bill because the Company does not have a way to track whether the customer received their bills. The Company can confirm that the customer made multiple full payments while the account was using this address. This account is not enrolled in autopay. Thus, the Company assumes that the address did not prevent the customer from receiving their bill.
- f. At the time of construction, the 911 address might not yet be established from the town or city, thus the Company uses a generic address so as to not hold up permits and construction activities. Once the customer takes occupancy of the premises, they are to obtain the 911 address and contact Rhode Island Energy, so the Company can update its records in its systems. There is no record that this occurred.
- g. The Company monitors return mail to address errors that caused the return to the Company. The Company has not tracked the number of returned bills.

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 4, 2025

Date

Rhode Island Energy – Electric Service Quality Plan – Docket 3628 Service List Updated 3/14/2025

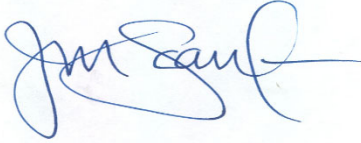
Name	E-mail Distribution List	Phone
The Narragansett Electric Company d/b/a Rhode Island Energy Jennifer Brooks Hutchinson, Esq. Andrew Marcaccio, Esq. 280 Melrose Street Providence, RI 02907-1438	JHutchinson@pplweb.com ;	401-784-7288
	AMarcaccio@pplweb.com ;	
	COBrien@pplweb.com ;	
	JScanlon@pplweb.com ;	
	ASTurgeon@pplweb.com ;	
	NABegnal@RIEnergy.com ;	
	SMToronto@RIEnergy.com ;	
	KLDeSousa@RIEnergy.com ;	
	CJStarr@RIEnergy.com ;	
Adam M. Ramos, Esq. Hinckley, Allen & Snyder LLP 100 Westminster Street, Suite 1500 Providence, RI 02903-2319	aramos@hinckleyallen.com ;	
	agiron@hinckleyallen.com ;	
Leticia C. Pimentel, Esq. Steven J. Boyajian, Esq. Robinson & Cole LLP One Financial Plaza, 14 th Floor Providence, RI 02903	LPimentel@rc.com ;	401-709-3337
	SBoyajian@rc.com ;	

Division of Public Utilities Leo Wold, Esq. Division of Public Utilities & Carriers 89 Jefferson Boulevard Warwick, RI 02888	Leo.wold@dpuc.ri.gov ;	
	Christy.Hetherington@dpuc.ri.gov ;	
	John.bell@dpuc.ri.gov ;	
	Robert.Bailey@dpuc.ri.gov ;	
	Joseph.Shilling@dpuc.ri.gov ;	
	Machaela.Seaton@dpuc.ri.gov ;	
	Al.contente@dpuc.ri.gov ;	
	mark.a.simpkins@dpuc.ri.gov ;	
	kyle.j.lynch@dpuc.ri.gov ;	
	Margaret.L.Hogan@dpuc.ri.gov ;	
	gregory.schultz@dpuc.ri.gov ;	
Ellen.golde@dpuc.ri.gov ;		
Gregory L. Booth, PLLC 14460 Falls of Neuse Rd. Suite 149-110 Raleigh, N. C. 27614	gboothpe@gmail.com ;	919-441-6440
Linda Kushner:	lkushner33@gmail.com ;	
Bill Watson	wfwatson924@gmail.com ;	
Office of Energy Resources Adam Fague, Esq. Department of Administration One Capitol Hill Providence, RI 02908	adam.fague@doa.ri.gov ;	
	Christopher.Kearns@energy.ri.gov ;	
	William.owen@energy.ri.gov ;	
	Shauna.Beland@energy.ri.gov ;	
	Nancy.Russolino@doa.ri.gov ;	
Office of Attorney General Nick Vaz, Esq. 150 South Main St. Providence, RI 02903	nvaz@riag.ri.gov ;	401-274-4400 x 2297
	mbedell@riag.ri.gov ;	
George Wiley Center Jennifer L. Wood Executive Director R.I. Center for Justice 1 Empire Plaza, Suite 410 Providence, RI 02903	jwood@centerforjustice.org ;	401-491-1101
Original & 9 copies file w/ PUC: Stephanie De La Rosa, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Stephanie.DeLaRosa@puc.ri.gov ;	401-780-2107
	Todd.bianco@puc.ri.gov ;	
	Cynthia.WilsonFrias@puc.ri.gov ;	
	Alan.nault@puc.ri.gov ;	

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 4, 2025
Date

**Docket No. 3476 – Rhode Island Energy Gas - Service Quality Plan
Service list updated on 3/14/2025**

Name/Address	E-mail Distribution List	Phone
The Narragansett Electric Company d/b/a Rhode Island Energy Andrew Marcaccio, Esq. Celia B. O’Brien, Esq. 280 Melrose St. Providence, RI 02907	AMarcaccio@pplweb.com ;	401-784-4263
	CObrien@pplweb.com ;	
	JScanlon@pplweb.com ;	
	NKocon@RIEnergy.com ;	
	PLaFond@RIEnergy.com ;	
	MVLeone@RIEnergy.com ;	
	JMOBrien@RIEnergy.com ;	
	KLDeSousa@RIEnergy.com ;	
Leticia Pimentel, Esq. Steven Boyajian, Esq. Robinson & Cole LLP One Financial Plaza, 14th Floor Providence, RI 02903	LPimentel@rc.com ;	401-709-3337
	SBoyajian@rc.com ;	
	HSeddon@rc.com ;	
Leo Wold, Esq. Division of Public Utilities & Carriers 89 Jefferson Boulevard Warwick, RI 02888	Leo.wold@dpuc.ri.gov ;	401-780-2177
	Linda.george@dpuc.ri.gov ;	
	Margaret.L.Hogan@dpuc.ri.gov ;	
	Mark.A.Simpkins@dpuc.ri.gov ;	
	Kyle.J.Lynch@dpuc.ri.gov ;	
	gregory.schultz@dpuc.ri.gov ;	
	Al.mancini@dpuc.ri.gov ;	
John.bell@dpuc.ri.gov ;		

	Robert.bailey@dpuc.ri.gov ;	
	Donald.Ledversis.CTR@dpuc.ri.gov ;	
	Ellen.golde@dpuc.ri.gov ;	
File an original & 5 copies w/ PUC: Stephanie De La Rosa, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	stephanie.delarosa@puc.ri.gov ;	401-780-2107
	Patricia.lucarelli@puc.ri.gov ;	
	Alan.nault@puc.ri.gov ;	
	Todd.bianco@puc.ri.gov ;	