

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

**INQUIRY INTO NARRAGANSETT ELECTRIC :
COMPANY D/B/A RHODE ISLAND ENERGY'S : DOCKET 25-08-GE
BILLING SYSTEMS PRACTICES AND :
PERFORMANCE :**

**Public Utilities Commissions' Fourth Set of Joint Data Requests
Directed to Rhode Island Energy - EDITED**

**(Issued May 9, 2025
Responses due May 29, 2025)**

Meter Read Performance

- 4-1. In RIE's response to PUC 1-1, RIE explains that the data in the response is sourced from the CSS rather than FieldNet (the MDMS). Please provide the data from field net and compare it to the cumulative data provided in PUC 1-1.
- 4-2. Referencing the data presented in response to PUC 1-1, the highest single-month achievement from non-residential electric is below the lowest single month score for the other three categories. If one exists, please provide RIE's analysis or explanation of why non-residential electric meter reads are under-performing compared to the other categories.
- 4-3. Please update the table provided in response to PUC 1-1.
- 4-4. Please compare the information in the table provided in response to PUC 1-1 and PUC 1-13. Why do the different data not trend (e.g., the number of non-reads of residential gas customer in August is the highest, but the percentage reads is not the lowest).

Meters

- 4-5. Did RIE implement any firmware updates to any meters currently deployed since completing the purchase (May 25, 2022) of Narragansett Electric?

Electric AMR Metering Data

- 4-6. Please list each AMR meter type currently in service broken out by rate class, and the number active from August 1, 2024 through March 31, 2024, if known.
- 4-7. For each AMR listed in 4-6 (broken out by rate class), please list each available register. For ease, the response can group different meters with the same registers.
- 4-8. For each AMR listed in 4-6 (broken out by rate class) please provide the transmission packet format. Please differentiate Cyclic Redundancy Check (CRC) models if they vary (i.e., CRC-8 Check versus CRC-16 Check). Please also provide the specific register listed in 4-7, if register types vary. For ease, the response can group different meters with the same packet structure.

- 4-9. For each group of AMR meters with the same transmission packet structure, please provide which packet data is stored (e.g., in FieldNet) and for how long. If data storage depends on logic or a model (e.g., data is deleted if there is a valid CRC check), please explain that.
- 4-10. Given the information provided in response to 4-9 and RIE's response to PUC 1-2, does the MDMS store raw or processed data related to causes for no read status (e.g., invalid CRC check, signal loss, not assigned, etc.).
- 4-11. Please confirm the pulse weights for all AMR meters and registers are applied before transmission.
- 4-12. For each meter type, and for each register, please provide the meter multiplier and indicate whether it is applied before data transmission, within FieldNet, or some other system layer.

Electric Remote Read Meter Data

- 4-13. Please provide the same as 4-6 through 4-12, but for the remote read electric meters.

MDMS (Electric only)

- 4-14. RIE's response to PUC 2-1 described Work Flow Manager (WFM) exceptions generated by the billing system (CSS). Are there also exceptions or flags generated by the validation, estimation, and editing (VEE) logic within the MDMS? If so, do these the exceptions or flags result in estimation and/or editing or some other outcome.
- 4-15. Which of the VEE logic exceptions, if any, are passed to the CSS? Of these, which WFM exceptions rely on these transferred VEE exceptions? Which VEE exceptions are not passed to the CSS?
- 4-16. For VEE exceptions that result in edited or estimated data, which of the VEE exceptions (a) *certainly* result in a message to customers that their bill is the result of an estimated read, (b) which exceptions *might not* result in a message, and (c) which exceptions *certainly will not* result in a message?
- 4-17. For each meter type (grouped if the response applies to multiple meter types), please describe how the MDMS:
 - a. Maps packet contents (e.g., register values, timestamps, read types) to its internal data model, and
 - b. Structures the resulting usage data for transfer to the CSS for billing
- 4-18. Please provide a summary change log covering any updates made to the MDMS or related validation, estimation, or usage processing logic since the launch of the new MDMS and in July.

Billing System (CSS, Electric only)

- 4-19. With reference to 4-17, part b, for each rate class, please confirm what data fields the CSS receives from the MDMS. Please explain for what purpose and how each is used by the CSS.
- 4-20. What calculations are applied by the CSS to the data received from the MDMS?
- 4-21. Please update the table of WFM exception counts provided in response to PUC 2-2 for the most recent data. Please also extend the data back one year, if that data is available. Please also add a row with totals.
- 4-22. Please provide the response to 4-21, but create separate tables for gas and electric.
- 4-23. Please provide RIE's explanation why:
 - a. High/Low Error – Energy increased in October,
 - b. Multiple Edit Failures increased in October, and
 - c. the total number of exceptions increased in October.
- 4-24. Does RIE categorize the cause for rebill? If so, please provide the categories with an explanation of each are and how the cause is confirmed.
- 4-25. If RIE does categorize rebill causes as inquired in 4-24, please provide a table with the cause for rebill number of rebills related to that cause that were in the group of customers with initial exceptions and eventual rebills provided in response to 2-4. Please provide separate tables for electric and gas.
- 4-26. Please provide a summary change log covering any updates made to the CSS or related validation, estimation, or usage processing logic since the launch of the new CSS in July.
- 4-27. Please provide a summary change log covering any updates made to the bill rendering (e.g., print application and electronic posting) bill design in July.
- 4-28. With reference to the number of estimated bills provided in response to PUC 1-12, why were the number of estimated bills for residential electric and gas customers higher in July?
- 4-29. Please update PUC 1-12 with the latest data and extend the data back one year, if available.

Known Billing Issues

- 4-30. RIE's response to PUC 1-4 includes a footnote describing an error related to a supplier in flight file that was not received.
 - a. How many accounts were affected?
 - b. Were only residential accounts affected

- c. Do the numbers reported for December include the August 2024 through November 2024 bills?
- 4-31. Regarding the accounts affected by the missing supplier in flight information, RIE's response to PUC 1-6 says, "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." [emphasis added.] Please explain if the POR price is the suppliers' contract rate to the customer, or the discounted rate RIE pays to the supplier.
- 4-32. In response to PUC 1-11, January 2025 showed 100.6% of bills successfully issued as a percent of the total bills that should have been issued for non-residential electric accounts. Please explain how the Company could issue more than 100% of expected bills.
- 4-33. Please provide the period covered by RIE's response to PUC 1-16 (i.e., on what date the information was pulled from the system).
- 4-34. Please explain why accounts identified in response to PUC 1-19 were dropped from autopay.
- 4-35. Please update RIE's response to PUC 1-21.
- 4-36. Please explain the causes, if known, of the "Non-Aged 'No Bills' " category.
- 4-37. Please explain how the Company has been accounting for revenue for rate accounting purposes as it pertains to customer accounts that fall into the "no bill" category.
- a. Specifically, does the Company (i) estimate the billed revenue for those accounts and include the estimated revenue for rate accounting purposes in rate reconciliations, or (ii) is the revenue recognition deferred until the bills are actually sent, or (iii) is it treated in another manner? If the revenue is estimated, how does the Company perform the estimate?
 - b. How does the Company account for such revenue for financial accounting purposes, if different than rate accounting treatment?

Account-Specific

- 4-38. Please update RIE's response to PUC 2-5, part d, subpart i.
- 4-39. For each month covered in response to 4-38, please provide the decoded transmission packet received by the MDMS, with an explanation of each field. Please attach a live workbook of the data, with each month in a row, and each data type in a column.
- 4-40. For each month covered in response to 4-38, please provide the VEE data prepared by the MDMS with an explanation of each field. Please attach a live workbook of the data, with each month in a row, and each data type in a column.

- 4-41. For each month covered in response to 4-38, please provide the CSS data used to generate the customer's bill, with an explanation of each field. Please attach a live workbook of the data, with each month in a row, and each data type in a column.
- 4-42. If the account referenced in 4-38 had received a High/Low Error Energy, what process would RIE have performed to ensure the bill was accurate. Please execute this process for the November 2024 through February 2025 bills and report any findings.
- 4-43. Please review Providence Water's bills for its Central Operations Facility from July 2024, through January 2025 provided in response to PUC 2-7 in Docket No. 24-51-WW.
- [https://ripuc.ri.gov/sites/g/files/xkgbur841/files/2025-02/FY 25 COF Electric Bills with redacted account number.pdf](https://ripuc.ri.gov/sites/g/files/xkgbur841/files/2025-02/FY_25_COE_Electric_Bills_with_redacted_account_number.pdf)

Beginning with the bill issued for the July to August period and for each month thereafter, for every line in the billing summary on page 2, please explain:

- a. what each line is recording,
 - b. the source of each line (specifically if it is a summation of other data on in the summary, a new measurement, drawn from other data in the CSS, and any other possible source)
 - c. how the information on each line is used to generate the amount due
 - d. whether other information not shown is used (such as previous balance and payment received), and
 - e. how each line is used in the following month's bill, if at all.
- 4-44. For the same Providence Water bills referenced in 4-43,
- a. Why do none of the bill summaries include lines for previous balances and payments? Specifically, each month appears to have an account balance recorded, but there is not line on the next month's bill for previous balance, even when the previous balance appears as an "excess credit" lower on the bill. Also, some months have an amount due, but the next month does not show a payment received, yet the balance does not include the amount that should have been paid.
 - b. How is the number in the bottom left of page 2 calculated? Please provide specific detail of how the -\$8,200.95 was calculated for the November to December bill.
 - c. With reference to the note in the usage box on Page 2 of the July to August bill, is this bill an estimated bill? Please explain how the kWh difference was calculated and how it differs from the actual kWh difference used to generate the 52,756 kWh usage.
 - d. With reference to the usage box on Page 2 of the August to September bill, please explain how the meter reading was used to calculate the kWh difference and the bill. Please explain why the kWh difference does not show more digits (that appear to be necessary to result in the 26,989 kWh usage).
 - e. With reference to the usage box on Page 2 of the September to October bill,
 - i. why does the data shown no longer include the reading dates and meter readings,
 - ii. for which customers was this data eliminated, and when, and

iii. why does the bill include instead continue to include the meter constant

- 4-45. Please review the billing history for electric account [REDACTED] for the months of May 2024 through March 2025.
- a. Why does the April to May bill show two recorded measurements for usage, 1000 kWh and -5,488 kWh?
 - b. Why are no net metering credits calculated for the three bills issued between May and July?
 - c. How does the Metered Usage for Demand-kW on the June to July bill (48.0 kW) relate to the billed usage (79.5)? Why is this relationship different for the previous two bills (i.e., 48 kW metered was related to 106 kW billed and 36 kW metered was related to 79.5 kW billed)?
 - d. Please explain how the metered “kilowatt-hours” box on page 2 of the July to August bill was derived (-6548 kWh).
 - e. Please explain for the next three bills (September, October, and November) how the metered kilowatt-hours data was derived, why it differs from the “Total Received” data, and why the metered kilowatt-hours box is used to calculate the net metering credit.
- 4-46. RIE’s response to PUC 2-8.b indicates 16 residential electric bills were adjusted upon further review. For each bill (or customer), please provide:
- a. If there was the original billing exception.
 - b. If there was an original billing exception, was there any record or summary of the WFM review before the bill was initially issued?
 - c. the reason the bill was further reviewed,
 - d. any record of further analysis of the original bill,
 - e. the determined reason for the adjustment,
 - f. the adjustment made,
 - g. any other corrective actions implemented as a result of the analyses (either applicable specifically to these customers or system-wide), and
 - h. the original and amended bills.
- 4-47. Please provide the same as 4-46, but for the gas bills described in response to PUC 2-9.b.

Other Issues

- 4-48. Has RIE discontinued consolidated billing? If so, when was it billing discontinued, and how many customers (e.g., lead accounts, account managers) were affected?
- 4-49. Paragraph 20 of Revity’s Petition in Docket No. 25-11-REG alleges:

On April 9, Central Pike and the Company had a conference call about the status of the System during which the Company stated that many developers are experiencing the same billing issues and the Company is working to

ensure that all the appropriate departments are properly communicating with each other and setting up the billing. The Company stated, during the conference call, that the Company does not have a timeframe for when the situation would be resolved.

Paragraph 20 of RIE's response states:

The Company lacks sufficient information to admit or deny the allegations contained in paragraph 20 of the Petition and, therefore, denies the allegations and leaves the Petitioner to its proof thereof.

Subsequently, in Paragraph 29 of the response, RIE states:

The Company admits that payment to the Petitioner has been delayed due to a variety of issues including: 1) the Petitioner's system was initially coded as a net metering facility as opposed to a Renewable Energy Growth facility; 2) the Company was working to address a legal uncertainty, since resolved, regarding the timing of minting of Renewable Energy Certificates; and 3) billing system issues that have prevented the Petitioner's Performance Based Incentive from being correctly reflected. The Company denies that its explanations to Petitioner have "metamorphosized." Rather, the Company identified the issues that it has been working to overcome to the Petitioner as those issues were encountered or recognized.

- a. What error caused the Project described in the Petition to be coded as at net metering facility? Please explain if this was a data system process error or human error?
- b. Did this process error affect any other facilities since May 2022?
- c. Please describe the billing system issues references as item 3) in paragraph 29 of RIE's response. In the response, please address:
 - i. the nature of issue,
 - ii. the known or estimated number of customers affected,
 - iii. the work done to resolve the issue for customers
 - iv. the work done to remedy the root cause of the issue
 - v. the status of the issue and customers impacted.

4-50. The PUC staff received an email complaint that included one email dated February 6, 2025, 10:43 AM, from an RIE Customer Energy Integration project manager to a customer regarding the status of a Renewable Energy Growth Program facility located at [REDACTED]. In the text of the email an employee of RIE refers to a “company wild [*sic*]¹ billing debacle that right now that leadership is working through.”

Please provide what issue this comment refers to, what employees are part of the “leadership” working through the issue, a summary of the work done to resolve the issue, and the current status of the issue.

¹ We assume the excerpt includes a typographical error, and the employee meant “company-wide,” but RIE’s response should clarify this.