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June 12, 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
Electric and Gas Service Quality Plans
Responses to PUC Joint Data Requests – Set 5**

Dear Ms. De La Rosa:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”), I have attached one original and nine copies of the Company’s responses to the Public Utilities Commission’s Fifth Set of Joint Data Requests in the above-referenced docket.

Thank you for your attention to this matter. If you have any questions, please contact me at 401-578-7800.

Very truly yours,

A handwritten signature in blue ink that reads "Celia B. O'Brien".

Celia B. O'Brien

Attachment

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

PUC 5-1
Meter Data Management System and Settlement

Request:

Please report any months from January 2024 through the most current data for which RIE has submitted Requested Billing Adjustments (RBA) to ISO-NE. Please note the type of RBA filing (e.g., meter data error (MDE)).

Response:

The Company has submitted Requested Billing Adjustments ("RBAs") to ISO-NE for the months of July 2024 through December 2024. The RBA types are all meter data errors.

The Narragansett Electric Company

d/b/a Rhode Island Energy

RIPUC Docket No. 25-08-GE

In Re: Commission's Inquiry into Billing Systems Practices and Performance
Responses to the Commission's Fifth Set of Joint Data Requests

Issued May 23, 2025

PUC 5-2

Meter Data Management System and Settlement

Request:

Please report any months from January 2024 through the most current data for which RIE anticipates submitting Requested Billing Adjustments to ISO-NE. Please note the type of RBA filing (e.g., MDE).

Response:

In addition to the July 2024 through December 2024 Requested Billing Adjustments ("RBAs") that the Company has already submitted to ISO-NE, the Company currently anticipates it will submit an RBA for the month of January 2025. The January 2025 RBA is also anticipated to be a meter data error.

PUC 5-3
Meter Data Management System and Settlement

Request:

Have suppliers been notified of pending and anticipated RBAs that may affect them? If so, when were they notified. Please describe how they were notified and provide an example if one exists.

Response:

The Company has not sent out any formal notifications to suppliers that may be impacted by the Requested Billing Adjustments ("RBAs") that have been submitted or those that the Company anticipates will be submitted. Therefore, there are no examples of formal notification. The primary reason the Company has not reached out to suppliers is that the Company is in the process of researching and taking actions to resolve any identified issues that were causing the need for RBAs, so it was premature for the Company to reach out to suppliers with only partial information.

There have been instances where suppliers have reached out to the Company, and the Company has transparently responded either verbally or via email communication that RBAs have been submitted or are anticipated to be submitted. The Company does not have knowledge on whether or not ISO-NE has communicated information regarding the RBAs to any of the impacted suppliers.

Please note that the number of RBAs that have been filed for a given territory (i.e., The Narragansett Electric Company), by month, are publicly available on the ISO-NE website: <https://www.iso-ne.com/static-assets/documents/100022/2024-mde-rba-submission-reports.pdf>.

Also note that the Company submitted its December 2024 RBA on June 10, 2025, so the December 2024 RBA may not be reflected on the report link listed above.

PUC 5-4
Meter Data Management System and Settlement

Request:

Per ISO-NE's billing policy and/or Tariff, is there a deadline by which RBAs must be submitted? If so, please report the earliest RBA deadline applicable to the RBAs provided in response to 5-1.

Response:

Yes, there are deadlines established in Section 3.6 (Data Reconciliation) of ISO-NE Market Rule 1. Market Rule 1 is Section III of the ISO New England Inc Transmission, Markets and Services Tariff. There are several deadlines in terms of when various documents or data sets, etc. need to be submitted. The ISO-NE Metering and Resettlements Deadline Calendar can be found at the following link (https://www.iso-ne.com/static-assets/documents/100005/mtr_restle_deadlines_2024.pdf).

In Attachment PUC 5-4, the Company has included a copy of the 2024 calendar, with dates highlighted in orange to illustrate various examples:

- For operating month August 2024: Any Meter Data Error Requested Billing Adjustments (“RBAs”), whether they are Wholesale (Directly Metered) or Retail (Profiled Load) must be identified to ISO-NE through a formal filing by February 12, 2025 (see I4), or in the case of a Retail RBA, may forgo the formal filing if the Retail RBA is pursuant to a change in the zonal load as a result of a Wholesale RBA for that same month.
 - After such a filing is accepted by ISO-NE, the data for a Wholesale RBA must be submitted between March 24, 2025 (see I15) and March 29, 2025 (see I16). A Retail RBA, if accepted by ISO-NE, must have its data submitted between April 13, 2025 (see I17) and May 9, 2025 (see I18).
 - After updated data has been received by ISO-NE, the changes will appear on the July 14, 2025 (see I5) ISO-NE bill for all impacted parties.

**ISO-NE
2024 Metering and Resettlements Deadline Calendar**

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
	Market Month												
	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	
1	Initial Monthly Bill Date	2/12/2024	3/11/2024	4/16/2024	5/13/2024	6/10/2024	7/15/2024	8/12/2024	9/16/2024	10/15/2024	11/12/2024	12/16/2024	1/13/2025
2	Day One of Data Reconciliation Process	2/1/2024	3/1/2024	4/1/2024	5/1/2024	6/1/2024	7/1/2024	8/1/2024	9/1/2024	10/1/2024	11/1/2024	12/1/2024	1/1/2025
3	Data Reconciliation Process Bill Date	6/10/2024	7/15/2024	8/12/2024	9/16/2024	10/15/2024	11/12/2024	12/16/2024	1/13/2025	2/10/2025	3/10/2025	4/14/2025	5/12/2025
4	Meter Data Error RBA Submission Limit	7/10/2024	8/14/2024	9/11/2024	10/16/2024	11/14/2024	12/12/2024	1/15/2025	2/12/2025	3/12/2025	4/9/2025	5/14/2025	6/11/2025
5	Meter Data Error RBA Resettlement Bill Date	12/16/2024	1/13/2025	2/10/2025	3/10/2025	4/14/2025	5/12/2025	6/16/2025	7/14/2025	8/11/2025	9/15/2025	10/14/2025	11/10/2025
6	DATA SUBMISSION DEADLINES - DATA RECONCILIATION PROCESS												
7	Meter Reading UI Opens -- Day Following Initial Monthly Bill Date	2/13/2024	3/12/2024	4/17/2024	5/14/2024	6/11/2024	7/16/2024	8/13/2024	9/17/2024	10/16/2024	11/13/2024	12/17/2024	1/14/2025
8	Directly Metered Assets -- UI Closes Day 45 @ 17:00	3/16/2024	4/14/2024	5/15/2024	6/14/2024	7/15/2024	8/14/2024	9/14/2024	10/15/2024	11/14/2024	12/15/2024	1/14/2025	2/14/2025
9	Final Directly Metered Assets -- Email to ISO CS Day 65 @ 17:00	4/5/2024	5/4/2024	6/4/2024	7/4/2024	8/4/2024	9/3/2024	10/4/2024	11/4/2024	12/4/2024	1/4/2025	2/3/2025	3/6/2025
10	Preliminary Profiled Load Assets & Peak Contribution -- UI Closes Day 65 @ 17:00	4/5/2024	5/4/2024	6/4/2024	7/4/2024	8/4/2024	9/3/2024	10/4/2024	11/4/2024	12/4/2024	1/4/2025	2/3/2025	3/6/2025
11	Profiled Load Assets & Peak Contribution -- UI Closes Day 85 @ 17:00	4/25/2024	5/24/2024	6/24/2024	7/24/2024	8/24/2024	9/23/2024	10/24/2024	11/24/2024	12/24/2024	1/24/2025	2/23/2025	3/26/2025
12	Final Profiled Load Assets & Peak Contribution -- Email to ISO CS Day 99 @ 17:00	5/9/2024	6/7/2024	7/8/2024	8/7/2024	9/7/2024	10/7/2024	11/7/2024	12/8/2024	1/7/2025	2/7/2025	3/9/2025	4/9/2025
13	Internal Bilateral Transactions (IBT's) -- UI Closes Day 101 @ 17:00	5/11/2024	6/9/2024	7/10/2024	8/9/2024	9/9/2024	10/9/2024	11/9/2024	12/10/2024	1/9/2025	2/9/2025	3/11/2025	4/11/2025
14	DATA SUBMISSION DEADLINES - METER DATA ERROR RBA PROCESS												
	*** Exception Case - Only Applicable if Meter Data Error RBA Submitted for Month ***												
15	Preliminary Directly Metered Assets -- Email to ISO CS Day 40 @ 24:00	8/19/2024	9/23/2024	10/21/2024	11/25/2024	12/24/2024	1/21/2025	2/24/2025	3/24/2025	4/21/2025	5/19/2025	6/23/2025	7/21/2025
16	Final Directly Metered Assets -- Email to ISO CS Day 45 @ 17:00	8/24/2024	9/28/2024	10/26/2024	11/30/2024	12/29/2024	1/26/2025	3/1/2025	3/29/2025	4/26/2025	5/24/2025	6/28/2025	7/26/2025
17	Preliminary Profiled Load Assets & Peak Contribution -- Email to ISO CS Day 60 @ 17:00	9/8/2024	10/13/2024	11/10/2024	12/15/2024	1/13/2025	2/10/2025	3/16/2025	4/13/2025	5/11/2025	6/8/2025	7/13/2025	8/10/2025
18	Final Profiled Load Assets & Peak Contribution -- Email to ISO CS Day 86 @ 17:00	10/4/2024	11/8/2024	12/6/2024	1/10/2025	2/8/2025	3/8/2025	4/11/2025	5/9/2025	6/6/2025	7/4/2025	8/8/2025	9/5/2025
19	Internal Bilateral Transactions (IBT's) -- Email to ISO CS Day 90 @ 17:00	10/8/2024	11/12/2024	12/10/2024	1/14/2025	2/12/2025	3/12/2025	4/15/2025	5/13/2025	6/10/2025	7/8/2025	8/12/2025	9/9/2025
20	REPORTS - DATA RECONCILIATION PROCESS												
21	Day 46: SP_METERDIRECT SP_METERDOMAIN	3/17/2024	4/15/2024	5/16/2024	6/15/2024	7/16/2024	8/15/2024	9/15/2024	10/16/2024	11/15/2024	12/16/2024	1/15/2025	2/15/2025
22	Day 66: SP_METERDIRECT SP_METERDOMAIN	4/6/2024	5/5/2024	6/5/2024	7/5/2024	8/5/2024	9/4/2024	10/5/2024	11/5/2024	12/5/2024	1/5/2025	2/4/2025	3/7/2025
23	Day 86: SP_METERDOMAIN SP_METERPROFILED SP_PEAKCONTRIBUTION	4/26/2024	5/25/2024	6/25/2024	7/25/2024	8/25/2024	9/24/2024	10/25/2024	11/25/2024	12/25/2024	1/25/2025	2/24/2025	3/27/2025
24	Day 100: SP_METERDOMAIN SP_METERPROFILED SP_PEAKCONTRIBUTION	5/10/2024	6/8/2024	7/9/2024	8/8/2024	9/8/2024	10/8/2024	11/8/2024	12/9/2024	1/8/2025	2/8/2025	3/10/2025	4/10/2025
25	REPORTS - METER DATA ERROR RBA PROCESS												
	*** Exception Case - Only Applicable if Meter Data Error RBA Submitted for Month ***												
	*** Reports issued on demand, on or before the listed due dates ***												
26	Day 41: SP_METERDIRECT SP_METERDOMAIN	8/20/2024	9/24/2024	10/22/2024	11/26/2024	12/25/2024	1/22/2025	2/25/2025	3/25/2025	4/22/2025	5/20/2025	6/24/2025	7/22/2025
27	Day 46: SP_METERDIRECT SP_METERDOMAIN	8/25/2024	9/29/2024	10/27/2024	12/1/2024	12/30/2024	1/27/2025	3/2/2025	3/30/2025	4/27/2025	5/25/2025	6/29/2025	7/27/2025
28	Day 61: SP_METERDOMAIN SP_METERPROFILED	9/9/2024	10/14/2024	11/11/2024	12/16/2024	1/14/2025	2/11/2025	3/17/2025	4/14/2025	5/12/2025	6/9/2025	7/14/2025	8/11/2025
29	Day 87: SP_METERDOMAIN SP_METERPROFILED	10/5/2024	11/9/2024	12/7/2024	1/11/2025	2/9/2025	3/9/2025	4/12/2025	5/10/2025	6/7/2025	7/5/2025	8/9/2025	9/6/2025
30	DATA SUBMISSION DEADLINES - FCM DEMAND RESOURCES - DATA RECONCILIATION PROCESS												
31	Active DR Assets to the ISO (Demand Response Market UI) -- UI Closes Day 70 @ 17:00	4/10/2024	5/9/2024	6/9/2024	7/9/2024	8/9/2024	9/8/2024	10/9/2024	11/9/2024	12/9/2024	1/9/2025	2/8/2025	3/11/2025
32	Passive DR Assets to the ISO (CAMS) -- UI Closes Day 70 @ 17:00	4/10/2024	5/9/2024	6/9/2024	7/9/2024	8/9/2024	9/8/2024	10/9/2024	11/9/2024	12/9/2024	1/9/2025	2/8/2025	3/11/2025
33	Passive DG Based DR Assets to the ISO (Meter Reading UI) -- UI Closes Day 70 @ 17:00	4/10/2024	5/9/2024	6/9/2024	7/9/2024	8/9/2024	9/8/2024	10/9/2024	11/9/2024	12/9/2024	1/9/2025	2/8/2025	3/11/2025
34	DATA SUBMISSION DEADLINES - REGIONAL NETWORK LOAD												
35	Initial Monthly Submission -- UI Closes @ 24:00	2/20/2024	3/20/2024	4/22/2024	5/20/2024	6/20/2024	7/22/2024	8/20/2024	9/20/2024	10/21/2024	11/20/2024	12/20/2024	1/21/2025
36	Resubmittal - Data Reconciliation Process -- UI Opens Day Following Initial Monthly Bill Date	3/12/2024	4/17/2024	5/14/2024	6/11/2024	7/16/2024	8/13/2024	9/17/2024	10/16/2024	11/13/2024	12/17/2024	1/14/2025	2/11/2025
37	Resubmittal - Data Reconciliation Process -- UI Closes @ 24:00	5/20/2024	6/20/2024	7/22/2024	8/20/2024	9/20/2024	10/21/2024	11/20/2024	12/20/2024	1/21/2025	2/20/2025	3/20/2025	4/22/2025

PUC 5-5
Meter Data Management System and Settlement

Request:

For any RBAs identified in response to 5-1 or 5-2, what underlying cause created the need for RBAs? Please be specific as possible regarding the root cause and please explain the effect on supplier loads. If the issue is related to an issue previously identified to the PUC as part of this inquiry (for example in response to PUC 1-21) please indicate that.

Response:

On the wholesale market side, the ability to create a reasonable hourly zonal value (zonal value = the sum of generation + tie line energy inflow – tie line energy outflow) for the Rhode Island (“RI”) territory became a challenge without the ability to receive timely or complete meter reads to submit to ISO-NE prior to the initial settlement deadline. When the ISO-NE resettlement window approached without the Company having more complete data for additional wholesale assets, the Company needed to submit Requested Billing Adjustments (“RBAs”) to ISO-NE for the individual wholesale assets that met the ISO-NE threshold of 1,000 MW per month.

On the retail market side, the Company's Settlement Team had a plan in place for a manual workaround, in preparation for the August 2024 migration from National Grid's settlement system to PPL's settlement system (“cutover”), to scale ISO-NE market data (which was data submitted prior to cutover) to hourly wholesale (zonal load) values for current operating days instead of using the new system generated retail settlement results. At cutover, the Company proceeded with the plan to implement the manual workaround. With the calculated hourly zonal values being inaccurate, because of incomplete meter data, and the sum of the retail load needing to equal the hourly zonal values, all retail suppliers received additional (+ or -) Unaccounted for Energy load as part of the hourly submission values. As the retail resettlement timelines approached and the new RI system generated values were determined to not yet be an accurate reflection of load served by either individual suppliers or last resort suppliers, RBAs were submitted to ISO-NE. Please note, the Retail RBAs are needed any time a wholesale asset contributing to the RI zonal load calculation needs an RBA correction.

PUC 5-6
Meter Data Management System and Settlement

Request:

For the underlying causes provided in response to 5-5, when was the earliest RIE was aware of the issue, and when did RIE identify a need to submit RBAs?

Response:

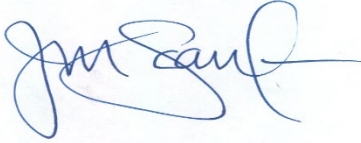
In preparing for the August 2024 migration from National Grid's settlement system to PPL's settlement system (referred to as "Cutover"), the Company assessed potential upcoming ISO-NE settlement issues. At Cutover, the Company became aware of challenges in being able to receive accurate and timely meter data for wholesale settlement, as explained in the Company's response to PUC 5-5, and the Company began taking necessary steps. As the issues remained and the ability to recover data for prior months for ISO-NE resettlement remained a challenge, Requested Billing Adjustments ("RBAs") were discussed and entered with ISO-NE.

The Company had concerns related to retail settlement prior to and at Cutover. Those concerns were related to being able to accurately calculate customer usage factors and with account/supplier relationship assignments for individual retail customers. These concerns led to the development of the manual workaround plan for resettlement. Please see the Company's response to PUC 5-5. The intent was to use the retail settlement manual workaround plan for initial settlement and then true up the retail usage in time for ISO-NE resettlement. The issues impacting the retail settlement results were not resolved prior to the ISO-NE resettlement windows, and RBAs were entered to resettle those retail load values using updated Rhode Island zonal values, which were also updated using the RBA process.

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

June 12, 2025
Date

Docket No. 25-08-GE – PUC’s Inquiry Into Rhode Island Energy’s Billing Systems Practices and Performance
Service list updated on 6/4/2025

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