

**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' Sixth Set of Joint Data Requests
Directed to Rhode Island Energy (Company)**

**(Issued July 24, 2025
Responses due August 14, 2025)**

Billing Conversion and Stabilization Incremental Cost-Tracking Report

- 6-1. On June 27, 2025, the Company submitted its first Billing Conversion and Stabilization Incremental Cost-Tracking Report (incremental cost report). The Company defined incremental costs on page 2 of the report. Please file a new schedule (see Excel attachment Sheet 1 to this data request) that further categorizes the costs on Schedule NECO-1 into the categories listed in the Company's definition. "Other related costs" should be notated to include the types of costs included in this line item.
- 6-2. Please fill out Excel attachment Sheet 2 to this data request. Column C should include the total customer operations expense that does not relate to billing stabilization. Column D is filled out with the dollar values in the June 30, 2025 report and should be updated to add a row 14 for the June 2025 values. Column F should add column C and Column D. (Please note that this table should be updated and included with each subsequent monthly incremental cost-tracking report).
- 6-3. On page 2 of 5, the Company includes a definition of "incremental costs." What is included in "any other costs related to addressing, remediating, and resolving inaccurate bills and the underlying problems causing those inaccurate bills." Please list the types of costs, including, but not limited to, software, customer service, etc. Where are those costs included in NECO-1?
- 6-4. Please provide a definition of Customer Operations Expense as it is used in the Incremental Cost tracking report.
- 6-5. Please provide a list and definition of each general ledger account included in Customer Operations Expense (including accounts that have no charges related to Billing Conversion and Stabilization).
- 6-6. Please provide a table that itemizes the amounts for calendar year 2024 in Customer Operations Expense. Please include the following columns:
 - a. General Ledger Account Number
 - b. General Ledger Account Name

- c. Billing Conversion and Stabilization Costs
- d. Non-Billing Conversion and Stabilization Costs
- e. Total Customer Operations Expense (column e. should equal columns c. plus d.)

- 6-7. Are hypercare and fast-follow activities retail customer facing or Company facing? Please explain if the answer is both. To what extent are there costs in that category that would be considered "Customer Operations Expense."
- 6-8. Please explain whether the costs included in Schedule NECO-1 include incremental customer service costs to address customer complaints related to resolving billing system issues, including outside contractors, overtime, etc. If not, please explain why not.
- 6-9. Please indicate whether the costs included in Schedule NECO-1 include the cost of outside legal counsel or consultants in responding to formal complaints made by customers to the Commission and/or Division that arose from billing system issues. If not, please provide those excluded costs and, in the future, ensure such costs are included in the incremental cost report.
- 6-10. How are costs associated with re-billing, including any manual processes, and the cost of re-running the bills accounted for? Where are these listed in Schedule NECO-1?
- 6-11. Generally, how do PPL employees allocate their time to their subsidiaries? Please provide a copy of guidelines PPL employees follow.
- 6-12. Have PPL employees been allocating their time using carveout accounting as defined in the incremental cost-tracking report? If not, why not? If so, where are those costs included in Schedule NECO-1?
- 6-13. Please fill out attachment Excel Sheet 3 to this data request.