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October 10, 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. 25-33-GE – The Narragansett Electric Company d/b/a Rhode Island Energy Proposal to Change Rate Accounting and Issue Bill Credits Relating to a Commitment to Hold Customers Harmless from and Acquisition-Related Increase in Rates Supplemental Responses to PUC Data Requests – Set 2

Dear Ms. De La Rosa:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”), enclosed are the Company’s supplemental responses to PUC 2-3, PUC 2-4, PUC 2-5, PUC 2-6, PUC 2-10, PUC 2-11, and PUC 2-12 in the Public Utilities Commission’s Second Set of Data Requests, issued on September 24, 2025, in the above-referenced docket.

Thank you for your attention to this matter. Please do not hesitate to contact me should you have any questions.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Adam M. Ramos', is written over a white background.

Adam M. Ramos

AMR:sms
Enclosures

cc: Docket No. 25-33-GE Service List

In Re: Proposal to Change Rate Accounting and Issue
Bill Credits Relating to a Commitment to Hold Customers Harmless
From an Acquisition-Related Increase in Rates
Issued September 24, 2025

PUC 2-3-Supplemental
Electric

Request:

Please calculate credits based on a per kWh factor assuming a total credit of \$36,009,858 as follows:

- a. Please calculate a uniform per kWh factor assuming credits were provided during the months of January to March 2026. (the relevant portion of the response to PUC 1-25 may be inserted here)
- b. Please identify the amount that would be credited to a 500 kWh residential customer each month and over the 3 months.
- c. Please identify the portion of the \$36 million that would be credited to residential classes using the above per kWh factor.
- d. Please identify the portion of the \$36 million that would be credited to non- residential classes using the above per kWh factor.

Response:

Of the total \$36,009,858 electric credits in January to March 2026, \$68,088 would be allocated to transmission only customers with the remaining \$35,941,770 to distribution customers. The responses to parts a through d are calculated using the \$35,941,770 to distribution customers, as was done in the Company's response to PUC 1-25.

- a. Please see Attachment PUC 2-3, Page 1, Line 3. This is the same calculation as Attachment PUC 1-25, Lines 1 through 3.
- b. Please see Attachment PUC 2-3, Page 1, Line 5 for the monthly credit that a residential customer using 500 kWh would receive each month using the factor calculated in part a. Line 6 reflects the total that would be received from January to March 2026 for that same customer.
- c. Please see Attachment PUC 2-3, Page 1, Line 8 for the portion of the \$35.9 million that would be credited to residential customers during January to March 2026 using the factor calculated in part a.

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- d. Please see Attachment PUC 2-3, Page 1, Line 9 for the portion of the \$35.9 million that would be credited to non-residential customers during January to March 2026 using the factor calculated in part a.

Supplemental Response:

If a per kWh factor was to be implemented to provide the hold harmless credits to customers, the Company would need approximately three to four months' lead time to implement the factor in its billing system. This lead time would be required to allow the time needed to design, build, and test the new factor as well as presentation on the bill. This would be the same timeline if all rate classes had the same per kWh factor or if there was a separate per kWh factor for each rate class. If there were other scenarios, such as specific customers in a rate class not being eligible for the factor, then that might require additional time beyond the three to four months.

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PUC 2-4-Supplemental
Electric

Request:

Please calculate fixed credits based on Rate Base Allocators as follows:

- a. Please identify the rate base allocation percentages to each rate class as approved in Docket No. 4770.
- b. Please calculate the amount each rate class would receive if the total credit was \$36,009,858 (provide the monthly amount and the 3-month amount).
- c. Please calculate a fixed credit for each rate class based on the above rate base allocators and the customer count per class.
- d. Please calculate the fixed credit a customer in each rate class would receive each month and over the 3 months January to March 2026.

Response:

Of the total \$36,009,858 electric credits in January to March 2026, \$68,088 would be allocated to transmission only customers with the remaining \$35,941,770 to distribution customers. The responses to parts a through d are calculated using the \$35,941,770 to distribution customers, as was done in the Company's response to PUC 1-25.

- a. Please see Attachment PUC 2-4, Line 2 for the rate base allocators as approved in RIPUC Docket No. 4770.
- b. Please see Attachment PUC 2-4, Line 3 for the amount of credit each rate class would receive for the three-month period January to March 2026 and Line 4 for the amount per month, assuming equal payments for each of the three months.
- c. Please see Attachment PUC 2-4, Line 6 for the fixed credit amount that would be applied during January to March 2026 by rate class based on the above rate base allocators and the total forecasted customer count for each rate class over the three-month period.
- d. Please see Attachment PUC 2-4, Lines 10 through 12 for the fixed credit amount that would be applied each month of January to March 2026 by rate class based on the above

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rate base allocators and the forecasted customer count by month for each rate class as well as the total for the three-month period on Line 13.

Supplemental Response:

The Company's proposal to apply fixed credits to each customer account, either uniform or allocated to each rate class, would not require additional time to implement in the Company's billing system.

If the Company had to implement bill credits on the customer's bill in a manner similar to the customer charge or RE Growth Factor each applicable month, it would require approximately six months' lead time to implement the factor in the Company's billing system. This lead time would be necessary to design, build, and test the new credit, as well as the presentation on the bill. In addition, there is added complexity to account for and implement logic to handle credits that create a "negative bill" (i.e., the credit amount is greater than the current charges). This timeline would be the same whether all rate classes had the same bill credit or whether there was a separate bill credit for each rate class. If there were other scenarios, such as specific customers in a rate class not eligible for the bill credit, additional time beyond the six months may be required.

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PUC 2-5-Supplemental
Electric

Request:

Please calculate per kWh credits based on Rate Base Allocators as follows:

- a. Please identify the rate base allocation percentages to each rate class as approved in Docket No. 4770.
- b. Please calculate the amount each rate class would receive if the total credit was \$36,009,858 (provide the monthly amount and the 3-month amount).
- c. Please calculate a per kWh credit based on the credit per rate class calculated in b. and the expected deliveries by class for each customer class for the months January to March 2026.
- d. Please calculate the monthly credit for a 500 kWh customer in rate class A-16 and the total credit for a 500 kWh per month customer in rate class A-60 would receive over 3 months.

Response:

Of the total \$36,009,858 electric credits in January to March 2026, \$68,088 would be allocated to transmission only customers with the remaining \$35,941,770 to distribution customers. The responses to parts a through d are calculated using the \$35,941,770 to distribution customers, as was done in the Company's response to PUC 1-25.

- a. Please see Attachment PUC 2-5, Line 2 for the rate base allocators as approved in RIPUC Docket No. 4770.
- b. Please see Attachment PUC 2-5, Line 3 for the amount of credit each rate class would receive for the three-month period January to March 2026 and Line 4 for the amount per month, assuming equal payments for each of the three months.
- c. Please see Attachment PUC 2-5, Line 6 for the per-kWh credit amount that would be applied during January to March 2026 by rate class based on the above rate base allocators and the total forecasted kWh usage count for each rate class over the three-month period.

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PUC 2-5-Supplemental, page 2

- d. Please see Attachment PUC 2-5, Line 8 for the monthly credit amount that an A-16 customer using 500 kWh a month would receive and Line 9 for the total credit that an A-16 customer using 500 kWh per month would receive over three months.

Supplemental Response:

If a per kWh factor was to be implemented to provide the hold harmless credits to customers, the Company would need approximately three to four months' lead time to implement the factor in its billing system. This lead time would be required to allow the time needed to design, build, and test the new factor as well as presentation on the bill. This would be the same timeline if all rate classes had the same per kWh factor or if there was a separate per kWh factor for each rate class. If there were other scenarios, such as specific customers in a rate class not being eligible for the factor, additional time beyond the three to four months may be required.

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PUC 2-6-Supplemental
Electric

Request:

Please assume a monthly credit of \$23.54 for 500 kWh per month customers in the residential rate classes as follows:

- a. Please calculate a per kWh factor that would provide a credit of \$23.54 (\$70.62 three month credit) for a customer using 500 kWh per month.
- b. Please provide the total amount credited to residential customers if the factor calculated in a. were applied to all residential kWh deliveries in the months of January to March 2026.

Response:

- a. Please see Attachment PUC 2-6, Line 4 for a per-kWh factor that would provide a monthly credit of \$23.54 for a residential customer using 500 kWh per month.
- b. Please see Attachment PUC 2-6, Line 6 for the total credits that would be provided to all residential customers in the months of January to March 2026 if the factor calculated in part a. was applied to all residential forecasted kWh deliveries for January to March 2026.

Supplemental Response:

If a per kWh factor was to be implemented to provide the hold harmless credits to customers, the Company would need approximately three to four months' lead time to implement the factor in its billing system. This lead time would be required to allow the time needed to design, build, and test the new factor as well as presentation on the bill. This would be the same timeline if all rate classes had the same per kWh factor or if there was a separate per kWh factor for each rate class. If there were other scenarios, such as specific customers in a rate class not being eligible for the factor, additional time beyond the three to four months may be required.

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PUC 2-10-Supplemental
Gas

Request:

Please calculate credits based on a per therm factor assuming a total credit of \$38,383,875 as follows:

- a. Please calculate a uniform per therm factor assuming credits were provided during the months of January to March 2026. (the relevant portion of the response to PUC 1-26 may be inserted here).
- b. Please identify the amount that would be credited each month and over the 3 months January to March 2026 to a residential customer who uses 845 therms annually using the therm delivery amounts identified in 2-9.
- c. Please identify the portion of the \$38 million that would be credited to residential classes using the above per therm factor.
- d. Please identify the portion of the \$38 million that would be credited to non- residential classes using the above per therm factor.

Response:

Please note the total proposed gas credits for winter 2026 are \$38,343,875 as used in the Company's response to PUC 1-26. The Company has used this amount in the response to parts a through d.

- a. Please see Attachment PUC 2-10, Page 1, Line 4. This is the same calculation as Attachment PUC 1-26, Lines 1 through 3.
- b. Please see Attachment PUC 2-10, Page 1, Line 6, Columns (a) through (c) for the monthly credit that a residential customer using 845 therms annually would receive each month using the factor calculated in part a. Line 6, Column (d) reflects the total that would be received from January to March 2026 for that same customer.
- c. Please see Attachment PUC 2-10, Page 1, Line 8 for the portion of the \$38 million that would be credited to residential customers during January to March 2026 using the factor calculated in part a.

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- d. Please see Attachment PUC 2-10, Page 1, Line 9 for the portion of the \$38 million that would be credited to non-residential customers during January to March 2026 using the factor calculated in part a.

Supplemental Response:

If a per therm factor was to be implemented to provide the hold harmless credits to customers, the Company would need approximately three to four months' lead time to implement the factor in its billing system. This lead time would be required to allow the time needed to design, build, and test the new factor as well as presentation on the bill. This would be the same timeline if all rate classes had the same per therm factor or if there was a separate per therm factor for each rate class. If there were other scenarios, such as specific customers in a rate class not being eligible for the factor, additional time beyond the three to four months may be required.

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PUC 2-11-Supplemental
Gas

Request:

Please calculate fixed credits based on Rate Base Allocators as follows:

- a. Please identify the rate base allocation percentages to each rate class as approved in Docket No. 4770.
- b. Please calculate the amount each rate class would receive if the total credit was \$38,343,875 (provide the monthly amount and the 3-month amount).
- c. Please calculate a fixed credit for each rate class based on the above rate base allocators and the customer count per class.
- d. Please calculate the fixed credit a customer in each rate class would receive each month and over the 3 months January to March 2026.

Response:

- a. Please see Attachment PUC 2-11, Line 2 for the rate base allocators as approved in RIPUC Docket No. 4770.
- b. Please see Attachment PUC 2-11, Line 3 for the amount of credit each rate class would receive for the three-month period January to March 2026 and Line 4 for the amount per month, assuming equal payments for each of the three months.
- c. Please see Attachment PUC 2-11, Line 6 for the fixed credit amount that would be applied during January to March 2026 by rate class based on the above rate base allocators and the total forecasted customer count for each rate class over the three-month period.
- d. Please see Attachment PUC 2-11, Lines 10 through 12 for the fixed credit amount that would be applied each month of January to March 2026 by rate class based on the above rate base allocators and the forecasted customer count by month for each rate class as well as the total for the three-month period on Line 13.

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Supplemental Response:

The Company's proposal to apply fixed credits to each customer account, either uniform or allocated to each rate class, would not require additional time to implement in the Company's billing system.

If the Company had to implement bill credits on the customer's bill in a manner similar to the customer charge or LIHEAP Charge each applicable month, it would require approximately six months' lead time to implement the factor in the Company's billing system. This lead time would be necessary to design, build, and test the new credit, as well as the presentation on the bill. In addition, there is added complexity to account for and implement logic to handle credits that create a "negative bill" (i.e., the credit amount is greater than the current charges). This timeline would be the same whether all rate classes had the same bill credit or whether there was a separate bill credit for each rate class. If there were other scenarios, such as specific customers in a rate class not eligible for the bill credit, additional time beyond the six months may be required.

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Issued September 24, 2025

PUC 2-12-Supplemental
Gas

Request:

Please calculate per therm credits based on Rate Base Allocators as follows:

- a. Please identify the rate base allocation percentages approved in Docket No. 4770.
- b. Please calculate the amount each rate class would receive if the total credit was \$38,343,875 (provide the monthly amount and the 3-month amount).
- c. Please calculate a per therm credit based on the credit per rate class calculated in b. and the expected deliveries by class for each customer class for the months January to March 2026.
- d. Please calculate the monthly and three-month January to March 2026 credit for an 845 annual use residential customer.

Response:

- a. Please see Attachment PUC 2-12, Line 2 for the rate base allocators as approved in RIPUC Docket No. 4770.
- b. Please see Attachment PUC 2-12, Line 3 for the amount of credit each rate class would receive for the three-month period January to March 2026 and Line 4 for the amount per month, assuming equal payments for each of the three months.
- c. Please see Attachment PUC 2-12, Line 7 for the per therm credit amount that would be applied during January to March 2026 by rate class based on the above rate base allocators and the total forecasted Dth usage for each rate class over the three-month period.
- d. Please see Attachment PUC 2-12, Line 9, Columns (a) through (c) for the monthly credit amount that a Residential customer using 845 therms annually would receive and Line 9 Column (d) for the total credit that customer would receive over three months.

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PUC 2-12-Supplemental, page 2

Supplemental Response:

Please note that the line number in the Company's response to part d., above, should have said Line 9 instead of Line 8, and has been corrected above.

If a per therm factor was to be implemented to provide the hold harmless credits to customers, the Company would need approximately three to four months' lead time to implement the factor in its billing system. This lead time would be required to allow the time needed to design, build, and test the new factor as well as presentation on the bill. This would be the same timeline if all rate classes had the same per therm factor or if there was a separate per therm factor for each rate class. If there were other scenarios, such as specific customers in a rate class not eligible for the factor, additional time beyond the three to four months may be required.

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.



Adam M. Ramos

October 10, 2025
Date

**Docket No. 25-33-GE – PUC In Re: Proposal to Change Rate Accounting and Issue Bill Credits Relating to a Commitment to Hold Customers Harmless from an Acquisition-Related Increase in Rates
Service List Updated 9/24/2025**

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