



Rhode Island Energy Billing System Evaluation – **Redacted**

Final Report for RIPUC Docket No. 25-08-GE

Prepared for:



Rhode Island Public Utilities Commission

Submitted by:

Guidehouse Inc.
125 High Street, Suite 401
Boston, MA 02110

Reference No.: 229357
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guidehouse.com

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Executive Summary

In May 2022, PPL acquired The Narragansett Electric Company, now operating as Rhode Island Energy (“Company” or “RIE”), from National Grid, initiating a complex transition of operations, including the customer billing system. The transition, which began in May 2022 and completed in August 2024, was supported by a Transition Services Agreement (TSA) with National Grid. Despite extensive planning, the billing system transition encountered significant challenges, including data migration issues, billing irregularities, and customer complaints, particularly during the winter of 2024-2025. These concerns prompted the Rhode Island Public Utilities Commission (PUC) to open Docket No. 25-08-GE in March 2025 to investigate RIE’s billing practices. The State of Rhode Island, RIE’s largest customer, experienced notable billing discrepancies, including delayed application of net metering credits, leading to substantial overpayments. The Office of Internal Audit and Program Integrity (OIAPI) conducted a parallel audit, identifying systemic issues tied to the billing system transition. In response, RIE initiated remediation efforts and collaborated with stakeholders to address emerging issues, culminating in the commissioning of this independent evaluation by Guidehouse Inc. (Guidehouse) and Van Reen Accounting LLC (Van Reen Accounting).

Project Background

The objective of this evaluation was to assist the Rhode Island Public Utilities Commission in assessing the operational status, accuracy, and effectiveness of Rhode Island Energy’s billing systems following its transition from National Grid to PPL. The scope included evaluating the billing system’s ability to produce accurate and understandable bills, the performance of related back-office and metering systems, and the reliability of billing data for financial and regulatory purposes. The Evaluation Team – Guidehouse and Van Reen Accounting – conducted a structured review across six analytical pillars: transition execution, billing requirements, system testing, operational readiness, billing operations and controls, and accounting. Through data collection, interviews, workshops, and system analysis, the team identified key issues, root causes, and areas for improvement to support the Commission’s oversight and inform future remediation efforts.

Summary of Approach

To assess Rhode Island Energy’s billing system performance, the Evaluation Team conducted extensive qualitative and quantitative analysis. This analysis began with data collected from formal data requests, interviews, and workshops with RIE personnel, as well as via access to Rhode Island Energy’s internal systems and documentation. The team reviewed known billing issues, analyzed customer accounts with and without known errors, and evaluated the completeness and accuracy of billing data. The analysis approach combined qualitative assessments of pre-cutover transition planning and system implementation with quantitative testing of post-cutover billing accuracy, system functionality, and data integrity. Key methodologies included top-down and bottom-up bill analyses, tariff reviews, and assessments of data migration, system testing, and operational readiness. This comprehensive approach enabled the team to identify systemic issues, validate root causes, and inform targeted recommendations for improvement.

Key Findings and Recommendations

The Evaluation Team completed its analysis of the Company's customer billing system, and confirmed that the Company identified many defects during the go-live period and has made progress to address these defects which caused errors and omissions in customer bills. Although the Evaluation Team has not quantified the impact of each and every error, the team has found no evidence of material or pervasive errors in current billings as of September 2025 (i.e., errors impacting many bills across many customer classes). These known defects and the applicable remediation plan are discussed throughout this Report and summarized in Appendix E.

However, in addition to the billing issues tracked and mitigated by the Company, the Evaluation Team did identify errors and omissions in customer accounts resulting in incorrect billing. The Evaluation Team recommends the Company execute the remediation plans as outlined in Table ES-1 (starting on Page 3) to assess the financial impact of certain errors and omissions, and to ensure that all affected processes and procedures are appropriately addressed.

Table ES-1 summarizes the most significant issues identified by the Evaluation Team, and describes a specific remediation plan for each issue.¹ In addition to these issues, there are other findings that the Evaluation Team determined to be less significant. For a complete list of recommendations, see Section 7 of this Report.

Rate Implications

Although not within the scope of the Evaluation Team's analysis, the team understands that the Company intends to file a rate case in the fourth quarter of 2025. The Evaluation Team has considered billing errors and defects which impact rate making. The Evaluation Team encourages RIE, the Commission, and the Division to consider the potential impact of billing system issues on these components of the revenue requirement:

- Bad debt – Cost of service will include bad debt expense. The methodology to determine bad debt expense could be based on historical net write-offs. If bad debt expense would be based on historical net write-offs, consideration should be given to the Evaluation Team's finding of incorrect bills in a sample of net write-offs, which indicates that some net write-offs in the billing system are overstated.
- Working capital requirements – This requires a comprehensive review of normalized revenue collection lag (lead/lag study).
- Normalized O&M for the Customer organization – This requires a comprehensive analysis of incremental costs.

In addition to the rate case, certain billing errors and omissions could impact rate reconciliation mechanisms, specifically customers that were not billed and will not be billed for prior service. While the Evaluation Team has seen no evidence that any impact of the aforementioned issues is material, further analysis would be needed to determine how rate reconciliation mechanisms may be impacted.

¹ The list of issues and recommended remediations included in Table ES-1 does not include issues already known by RIE.

Table ES-1. Issues and Remediation Plans

#	Issue	Remediation Step(s)	Timeline	Accountability	Reference
1	For customer accounts repaired through the Company’s ongoing “Genesis” and “Armageddon” processes ² , customers are not billed for all or a portion of their usage.	<ul style="list-style-type: none"> Continue to update the list of all accounts repaired under these processes. Quantify the financial impact of unbilled customers. 	Q1 of 2026	<ul style="list-style-type: none"> Provide a comprehensive analysis demonstrating the financial impact. 	Section 6.4.1
2	In some cases, the Company does not correct under-billings.	<ul style="list-style-type: none"> Compile a list of all accounts that were underbilled Quantify the financial impact of underbilling customers. 	Q1 of 2026	<ul style="list-style-type: none"> Provide a comprehensive analysis demonstrating the financial impact. 	Section 6.4.1
3	Net write-offs include incorrect bills, which results in the overstatement of net write-offs.	<ul style="list-style-type: none"> Analyze the population of net write-offs to identify all instances of write-offs that include incorrect billings. Quantify the financial impact. 	Q1 of 2026	<ul style="list-style-type: none"> Provide a comprehensive analysis demonstrating the financial impact. 	Section 6.4.2
4	The Choice supplier rate is incorrect on customer bills when there are rate changes in a billing period. For one of the two accounts identified, the billed rate was higher than any of the historical or rate changes that occurred in the period.	<ul style="list-style-type: none"> Establish controls within the Supplier Portal that prevent suppliers from modifying prices outside the Company’s defined procedures. Investigate bill source data and system setup to determine how a billed rate was higher than any of the historical or changed rates displayed in the system. 	Q1 of 2026	<ul style="list-style-type: none"> Demonstrate that the update to the Supplier Portal was completed. 	Section 6.1.1 and Appendix F.1
5	The Company’s data repair did not correct all Choice supplier customers. For certain customers, Choice supplier is correct in the system but is not correct on customer bills.	<ul style="list-style-type: none"> Compile supplier selections for each customer account not repaired by the original fix. Confirm if supplier is correctly listed in the system. Confirm if the supplier is correctly included on the bill at the correct rate. Investigate bill source data and system setup to identify how this issue occurred. Update system accordingly. 	Q1 of 2026	<ul style="list-style-type: none"> Provide comprehensive analysis demonstrating the comparison. Demonstrate that the update to the billing system was completed. 	Section 6.1.1, Section 5.13, and Appendix F.1

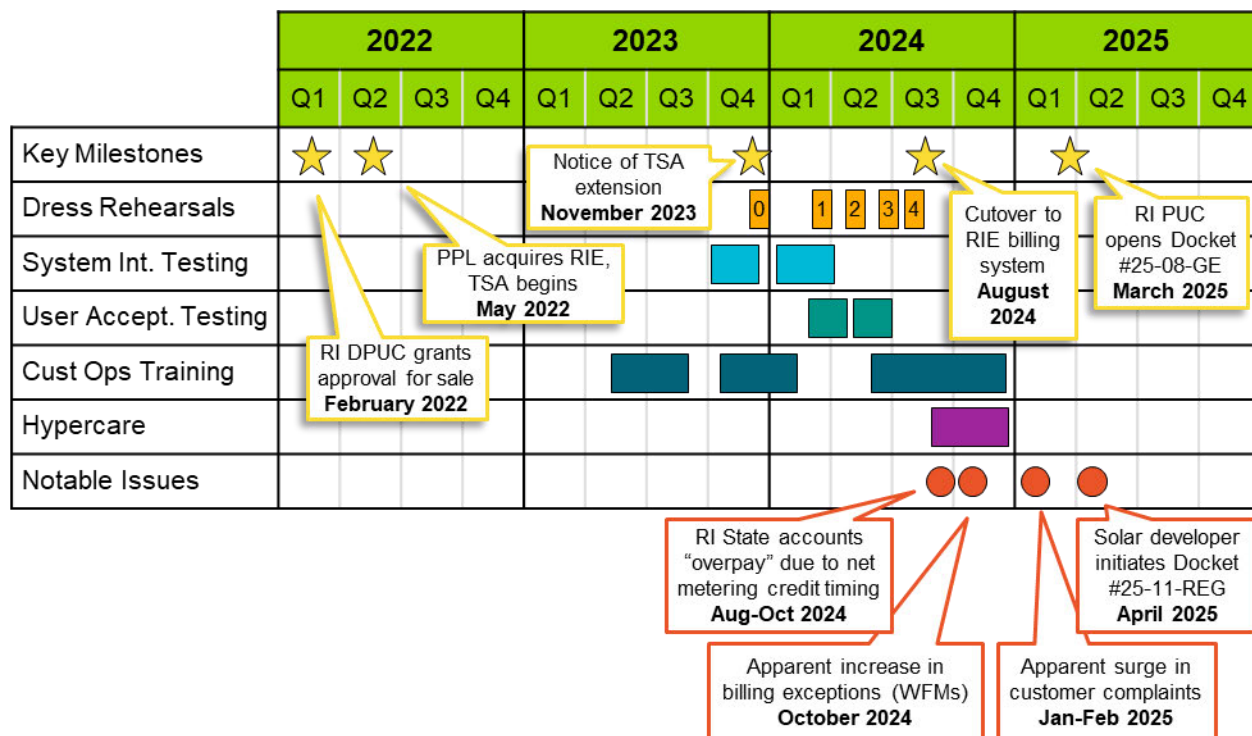
Source: Evaluation Team

² “Genesis” is a data repair process that corrects an account by inserting a new service activation date; this process does preserve all historical data while resetting the start date. “Armageddon” is a process that permanently closes an account when repair is not feasible; a new account may be created with the same setup, if needed.

1. Background

In May 2022, PPL acquired The Narragansett Electric Company d/b/a Rhode Island Energy (“Company” or “RIE”) from National Grid.³ Following the Acquisition, operations of the Company were transitioned from National Grid to PPL. That included operation of the billing system and associated metering and customer operations systems, which went live in August 2024. In March 2025, because of public comments and direct customer outreach regarding bills, the Rhode Island Public Utilities Commission (“PUC” or “Commission”) opened an inquiry into the Company’s billing systems practices and performance in Docket No. 25-08-GE. Within that proceeding, Guidehouse Inc. and Van Reen Accounting LLC (collectively, “Evaluation Team”) were selected via competitive procurement to evaluate the Company’s billing system, culminating in this Billing System Evaluation Report (“Report”). A timeline highlighting select events within the transition is shown in Figure 1-1.

Figure 1-1. Timeline of Transition to Rhode Island Energy Billing System



Source: Evaluation Team

1.1 Transition from National Grid to PPL

On February 23, 2022, the Rhode Island Division of Public Utilities and Carriers (“DPUC” or “Division”) granted approval for the transfer of ownership of The Narragansett Electric Company, the primary electric and natural gas distribution provider in Rhode Island, from

³ On May 25, 2022, PPL Rhode Island Holdings, LLC, a wholly owned indirect subsidiary of PPL Corporation, (together, “PPL”) acquired 100% of the outstanding shares of common stock (the “Acquisition”) of The Narragansett Electric Company from National Grid USA (“National Grid”). Following the Acquisition, The Narragansett Electric Company, which had been operating under the d/b/a of “National Grid”, began operating under the d/b/a “Rhode Island Energy”.

National Grid to PPL. This approval followed a stakeholder process initiated in May 2021 within Docket No. D-21-09. On May 25, 2022, PPL acquired 100% of the outstanding shares of common stock of the Company from National Grid, closing the Acquisition.

As part of the Acquisition, National Grid and PPL agreed to a Transition Services Agreement (“TSA”) wherein National Grid would support operation of the Company over a 24-month Transition Period.⁴ This TSA included 135 individual Transition Services to be provided by National Grid to the Company across a broad range of functional areas.⁵ One of these Transition Services was the interim use of the National Grid customer information and billing systems while the Company stood up its own system to eventually cutover to. Because the initial duration of the TSA was established prior to the Acquisition closing date, PPL stated in January 2023 that “it is reasonable and expected that the initial Transition Service durations may have to be adjusted over the course of the next 18 months”.⁶ As the transition progressed, PPL determined that more time would be needed to prepare for final cutover, and so provided notice to National Grid on November 25, 2023 that they were extending the original cutover date from May 25, 2024 to August 31, 2024.⁷ Note that while this extended transition led to more costs to PPL than initially forecasted, PPL committed to not seek recovery of any of those costs from its Rhode Island customers.⁸

Due to the constrained timeframe and in an attempt to manage risk within the broader portfolio of transition activities, for many of the complex IT system upgrades in Rhode Island, PPL generally sought to replace National Grid systems by leveraging existing processes and technology platforms that PPL used for its Pennsylvania and Kentucky operating companies.⁹ As it pertains to the billing systems, PPL indicated that while both it and National Grid utilized an Accenture Customer/1 Customer Information System platform, different configurations required the Company to build a new version largely from scratch.¹⁰ The IT system go-live, including the use of the new billing system, occurred on August 19, 2024, with all Transition Services related to customer billing and payment processing ending by August 31, 2024.¹¹

In parallel with the transition, the Company took steps to inform customers about the planned changes. In February 2024, the Company developed a strategic Change Communications Plan to provide customers and stakeholders with advanced notifications about the new customer and work management systems, which included a new website and bill design.¹² This plan also prepared for communications about situational adjustments or unforeseen events related to the TSA exit. In its Fifth Transition Report, the Company noted its heightened state of care and

⁴ Transition Services Agreement by and among National Grid USA Service Company, Inc., National Grid USA (solely with respect to Section 4.6 of the TSA), and The Narragansett Electric Company entered into as of May 25, 2022.

⁵ See Transition Update Report – May 25, 2022 Through November 24, 2022, filed January 18, 2023 under Docket No. D-21-09 (“First Transition Report”), at 3.

⁶ See First Transition Report, at 2.

⁷ See Transition Update Report – May 25, 2024 Through September 30, 2024, filed October 21, 2024 under Docket No. D-21-09 (“Fifth Transition Report”), at 2.

⁸ See Fifth Transition Report, at 6-7.

⁹ See Fifth Transition Report, at 4.

¹⁰ *Ibid.*

¹¹ See Fifth Transition Report, at 2 and in Attachment 1. Note that the process of “cutover”, where legacy billing systems were decommissioned and new systems activated, occurred over the weekend of August 16-19, 2024, culminating in the new system “go-live”, where all new billing systems were operational, on August 19, 2024.

¹² See Fifth Transition Report, at 6.

support after the final cutover, with a goal to quickly respond to feedback from customers, suppliers, and vendors.¹³

1.2 Issues Identified within Docket No. 25-08-GE

In January and February 2025, the Commission and its staff noted a surge in customer complaints and inquiries, mostly about high winter energy prices and increased usage due to unusually cold weather in New England.¹⁴ However, some complaints pointed to billing irregularities, such as delays in applying net metering credits and “bill increases that Commission staff could not readily attribute to higher usage or known rate adjustments”.¹⁵ Following these complaints and inquiries, on March 28, 2025 the Commission opened Docket No. 25-08-GE, an Inquiry into Rhode Island Energy’s Billing Systems Practices and Performance.

Through data requests within that docket, as well as through other ongoing cases in Rhode Island, Commission staff and the Company identified several incidents that potentially indicated issues with the Company’s billing system and/or billing processes. As described in PUC Order No. 2532 within Docket No. 25-08-GE (“Order”), those included:

- The Company’s aggregate RE-Growth net metering credits reported for Q4 of 2024 had unusual month-to-month variance.
- In February 2025, a RE-Growth Program customer, when inquiring about the status of performance-based incentives they had not yet received, was informed by a Company employee of a “company-wide billing debacle”.¹⁶
- A solar developer and owner of a large solar facility allegedly had not received net billing credits through the RE-Growth Program in a timely manner, which they raised in Docket No. 25-11-REG in April 2025.
- The electric bills of Providence Water did not show the bill calculations in a manner that was completely understandable, according to Commission staff.
- The Rhode Island Department of Administration was involved in a dispute with the Company regarding electric and natural gas bills for numerous state accounts (discussed in further detail in Section 1.3).
- In December 2024, the Company discovered a billing system error tied to a missing file related to a third-party supplier that had not correctly been transferred during the transition.
- There was a significant number of customer accounts without bills being issued (“No Bills”), which were either inherited or emerged after the transition in August 2024.
- There was a significant increase in work flow manager billing exceptions (“WFM exceptions”) in October 2024, which flag potential issues with bills for review. This was

¹³ See Fifth Transition Report, at 6.

¹⁴ See PUC Order No. 25352 issued May 16, 2025 within Docket No. 25-08-GE (“Order”), at 3.

¹⁵ See Order, at 3-4.

¹⁶ In response to PUC 4-50 within Docket No. 25-08-GE, the Company noted that the actual cause was “a misunderstanding of the PBI payment process and insufficient document organization”, distinguishing that from the “issues within the billing system that are preventing bills from being created and credits from being distributed”.

followed by an increase in the percentage of WFM exceptions that were not addressed before applicable bills were issued to customers.

- There was a significant increase in customers who dropped from the autopay option.
- Based on an anecdotal review of individual customers' bills, Commission staff noted that "bill information is often confusing, and there are sometimes numbers on the bill that do not add up in a way one would expect", also noting that there is sometimes contradictory usage information and that net metering credits are sometimes not shown.¹⁷

In its Order, the Commission determined that the incidents listed above warranted a more comprehensive review. The Commission noted that issues with the Company's billing system impacts both the confidence of individual customers in the integrity of their bills as well as that of the Commission in using billing data to help set rates.¹⁸ Importantly, the Commission emphasized in its Order that "the available information does not necessarily support the conclusion that a widespread failure to bill accurately or reliably occurred, and there is no evidence of a massive pool of incorrect bills that have gone unnoticed".¹⁹ However, the known issues and perceived performance trends raised the need for further inquiry.

Therefore, the PUC and Company moved forward with a competitive procurement for independent consulting services to evaluate the Company's billing system and processes. As a result of that process, Guidehouse Inc. and Van Reen Accounting LLC were selected to complete the evaluation. The objective and scope of the evaluation is described in Section 2.

1.3 Impact on Rhode Island State Accounts

The single largest customer of the Company is the State of Rhode Island, which is comprised of roughly 2,100 electric and 150 gas accounts.²⁰ Following concerns raised by the Rhode Island Office of Energy Resources, which oversees utility payment for these State accounts, the Office of Internal Audit and Program Integrity (OIAPI) initiated a limited-scope audit of electric and gas bills issued to the State. A preliminary analysis revealed a discrepancy that occurred during the Transition, specifically identifying that certain electric bills did not account for the net metering credits the State should have received for August, September, and October 2024.²¹

According to OIAPI, the State submitted a payment of approximately \$6.1 million to the Company in November 2024 to cover bills for August 2024 through October 2024.²² Had the net metering credits been applied concurrently with the bills, OIAPI notes that the payment would have been approximately \$2 million less.²³ While OIAPI has characterized this as being "overcharged", the Company has said that the bills "were accurate in terms of the usage being reflected", but that "they didn't necessarily have the credits in the right timing", resulting in an

¹⁷ See Order, at 8.

¹⁸ See Order, at 9.

¹⁹ *Ibid.*

²⁰ See Rhode Island Energy State Billing Audit Report, published by the Office of Internal Audit and Program Integrity on September 5, 2025 ("OIAPI Audit Report"), available at: https://omb.ri.gov/sites/g/files/xkqbur751/files/2025-09/Rhode%20Island%20Energy%20Audit%20Report_September%205%202025.pdf

²¹ See OIAPI Audit Report, at 2.

²² *Ibid.*

²³ *Ibid.*

overpayment by the State.²⁴ Overpayments were applied to future billing charges, with the State withholding subsequent payments for gas until June 2025 and for electric until August 2025.²⁵

In OIAPI's Rhode Island Energy State Billing Audit Report, published September 5, 2025, OIAPI made five findings related to the impact of apparent billing issues on the State of Rhode Island:

1. The Company had inaccurate billing reporting and calculations, highlighting mismatches between printed billing statements and online account summaries as well as billing statements wherein OIAPI found the calculation methodology to be “unclear and inaccurate”.²⁶
2. The Company did not have a process in place to regularly reconcile monthly billing statements with consolidated billing files produced for the State accounts, which left some apparent discrepancies in bills unresolved.
3. Approximately 50 active State accounts had not been billed after the cutover, with one account still having not been billed since July 2024 at the time the OIAPI Audit Report was written.
4. Some line items within bills were not sufficiently defined or explained, according to OIAPI.
5. The consolidated billing file produced for the State account by the Company did not always link each account to the correct agency address.

In its conclusion, OIAPI identifies the primary cause of the billing discrepancies as “the transition from a legacy billing system to a new billing platform”.²⁷ OIAPI notes that they worked collaboratively with the Company throughout the audit to identify and address issues, with the Company continuing to resolve some discrepancies at the time of publication.

During the completion of this Report, the Evaluation Team met with OIAPI staff to review findings and gain insights from their OIAPI Audit Report. OIAPI has provided useful information that has been incorporated into this evaluation.

1.4 Company Response to Date

The Company has worked to stabilize their billing system and processes since the cutover in August 2024. In their Fifth and Final Transition Report under Docket No. D-21-09, the Company stated that they were entering a phase of “hypercare” post-cutover to quickly identify and address any issues with their systems, processes, and services.²⁸ The Company also prepared to quickly respond to feedback from customers, suppliers, and vendors. As described above, the Company did receive feedback post-cutover that they sought to address.

Within Docket No. 25-08-GE, the Company completed six sets of data requests as of November 1, 2025, assembling over 100 individual question responses in total. Within these responses,

²⁴ Direct quote from Rhode Island Energy President Greg Cornett, made to WPRI within “Rhode Island Energy overcharged state more than \$2M for utilities, audit found” by Sarah Guernelli and Leah Crowley, last updated on 9/11/2025; full story available at: <https://www.wpri.com/target-12/rhode-island-energy-overcharged-state-more-than-2m-for-utilities-audit-found/>

²⁵ See OIAPI Audit Report, at 2.

²⁶ See OIAPI Audit Report, at 6.

²⁷ See OIAPI Audit Report, at 11.

²⁸ See Fifth Transition Report, at 6.

the Company identified many of the issues that the Commission summarized in its Order, reproduced here in Section 1.2 above.

Through the Evaluation Team’s assessment, it was identified that RIE took actions across the following areas to understand and address issues as they were identified after cutover:

- **Issue Identification and Prioritization:** Immediately following cutover and during the hypercare time period, RIE established War Rooms where cross-functional, end-to-end teams of business, IT, and field resources would investigate emerging issues that were impacting business operations and customer billing to identify and prioritize actions to take and communicate across teams.
- **Process & Controls Improvements:** The RIE team through issue investigation found instances where processes and procedures were either unclear, not being accurately followed or controls did not exist to mitigate errors or exceptions from occurring. In specific instances, detailed in Section 5, the company took actions to create reports to improve visibility, institute additional controls to limit manual transactions that were prone to misinterpretation, introduce validation checks before orders were released, update process documentation and retrain employees.
- **Manual Corrections:** The company took actions to manually correct data errors in the system related to the data conversion process and as deemed necessary to correct customer billing errors as they were identified.
- **System Enhancements:** The RIE team built new reports to provide data and operational visibility and controls that did not exist at cutover. Upon confirmation of the functionality that would be included in the initial cutover release, the company also created a “fast follow list” of high priority items to be addressed following cutover, including system changes to be implemented.
- **Customer Support:** Related to specific issue instances, RIE stood up an escalated complaints team that worked directly with customers to understand disputed billing items, customer impacts, clarify feedback, and make corrections.

2. Objective and Scope

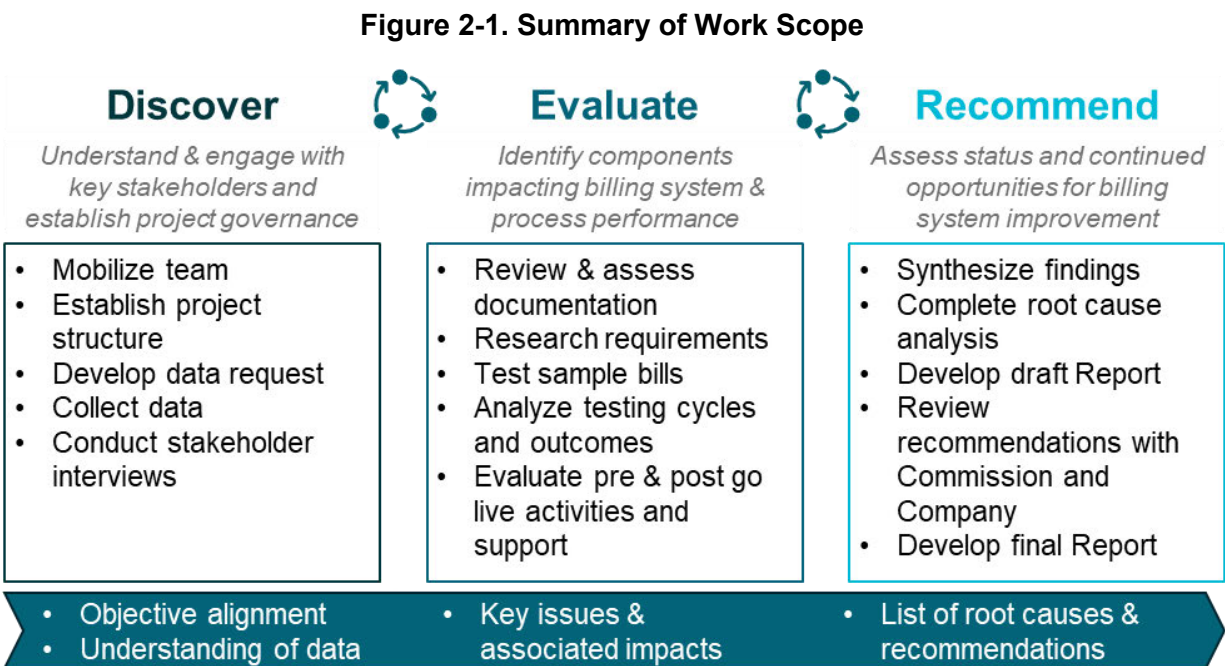
The Evaluation Team worked with Commission staff and the Company to develop a scope that was achievable within a defined (~10 week) period while also meeting the objectives of evaluation identified by the Commission in their Order in Docket No. 25-08-GE. The objectives are to assist the Commission in evaluating:

- the operational status, accuracy, and effectiveness of the Company’s electric and gas billing systems (including the format, the calculations depicted on the bills, and any other information provided on the bills that would impact the customer’s understanding of how the charges were determined);
- the operation of the back-office systems, meter data management system, and any other systems or processes that relate to producing accurate electric and gas bills to customers;
- the consistency between kilowatt-hours billed by the Company at retail and kilowatt-hours reported by the Company to ISO New England; and
- the reliability of the billing systems for purposes of determining billed revenue that is used for financial and rate accounting.²⁹

This section provides more details about the scope of work and the key questions assessed by the Evaluation Team to meet these objectives.

2.1 Description of Scope of Work

The scope of work developed by the Evaluation Team is summarized in Figure 2-1 below.



Source: Evaluation Team

²⁹ See Order, at 13-14.

This work included three distinct phases. First, collecting data to build an understanding of the system and the information available for analysis, as well as identifying key Company personnel for interviewing. Then, analyzing available information to identify, measure, and/or verify the timing, magnitude, and impact of potential issues with the billing system and processes. And finally, synthesizing findings from the analysis to confirm root causes of any issues and to provide recommendations to the Company and the Commission for moving forward.

In the initial phase of the evaluation, the Evaluation Team worked closely with Commission staff and the Company to align on objectives. The Team also worked closely with Company staff to safely and securely gain access to the Company's sensitive customer information. In addition to reviewing publicly available data, the Team then worked with the Company to request and receive data. The overall data collection process is detailed in Section 3 of this Report.

Within the core evaluation phase, the Evaluation Team used several discrete methods to identify and assess the performance of the billing system and processes. These ranged from qualitative assessments of the Transition plan and new system implementation to quantitative assessments of hundreds of tables within the Company's customer information database. The analysis approach is detailed in Section 4 of this Report.

This data collection and evaluation culminated in the identification of several findings and root causes for issues with the Company's billing system and processes. These findings and root causes are described in Section 5 for known issues and in Section 6 for other analysis. The Evaluation Team then identified several key recommendations, as summarized in Section 7, which were reviewed with Commission staff and the Company prior to the final publication of this Report. Note that throughout this Evaluation, the Evaluation Team met weekly with staff at the Commission, the Division, and the Company to provide updates on progress and review preliminary findings. The Company reviewed draft versions of this Report to provide fact verification but did not have editorial control of the content herein.

There are several instances where this scope of work was bounded to efficiently meet the Commission's objectives. Such cases include:

- While this evaluation does examine the Company's financial accounting practices related to the billing system, this evaluation does not constitute a comprehensive financial audit of the Company's general accounting practices throughout its business.
- While this evaluation does explore certain customer complaints that are relevant to or particularly symptomatic of billing system issues, it does not seek to resolve all outstanding customer complaints.
- While this evaluation does describe the status of issue resolution by RIE and/or recommend potential future solutions for RIE to consider, it does not implement those solutions directly.

2.2 Key Questions Analyzed across Key Pillars

Before initiating the evaluation, the Evaluation Team developed a list of questions to address. These questions were split across several pillars of analysis, which were informed by the Evaluation Team's experience with the implementation and/or review of other utility billing systems. These questions are listed in Table 2-1, below.

Table 2-1. Key Questions Analyzed

Pillar	Key Questions
Transition Project Execution	<ul style="list-style-type: none"> • Was the transition plan comprehensive & achievable? • Did RIE engage necessary stakeholders? • Did RIE follow best practices?
Billing System Requirements	<ul style="list-style-type: none"> • Do the requirements match the tariff? Are there any gaps? • Do the requirements include the ability to calculate & produce a bill for all customer types and scenarios? • Was the process of gathering requirements comprehensive?
Billing System Testing	<ul style="list-style-type: none"> • Did RIE test all of the requirements? • Did test results match expected outcomes? • Did RIE test the customer scenarios that have been failing?
Change Management & Operational Readiness	<ul style="list-style-type: none"> • Did necessary stakeholders receive adequate training? • Were changes and problems communicated to necessary stakeholders? • What was the sentiment amongst key stakeholders before, during, and after the transition? • What resources were available to support change management?
Billing Operations / Controls (Post go-live)	<ul style="list-style-type: none"> • Does RIE have a structure in place to confirm that requirements are being met and adhered to in production? • Are there gaps in the requirements/controls? • Is the information within the meter-to-cash flow of the billing system internally consistent? If not, where are discrepancies? • What billing issues have been resolved by RIE? What billing issues have not been resolved, and why? • Are there other issues RIE has not identified yet? • Does system-wide aggregate data align with other sources (e.g., ISO-NE)? • Are customer bills consistent with online billing information?
Accounting	<ul style="list-style-type: none"> • Are customer bills accurate? • Is financial information from the billing system recorded to the financial statements? • Have the billing system issues resulted in an increase in accounts receivable write-offs?

Source: Evaluation Team

3. Data Collection

In the initial phase of the evaluation, the Evaluation Team gathered information from the Company through formal data requests, in-person interviews, and discussions with staff at the Company. This section provides additional detail on these activities.

3.1 Summary of Data Requested & Received

The Evaluation Team issued a preliminary set of data requests to the Company that was addressed on a rolling basis over several weeks. The Company worked collaboratively with the Evaluation Team to provide responses as they became available. Throughout the process of review, the Evaluation Team had several follow-ups or subsequent data requests that it added to a running data request. At the time of writing this Report, there were still several outstanding data requests. The summary of the formal data request, along with descriptions of the Company's response to each request, is reproduced in Appendix B of this Report.

One of the key data request responses provided to the Evaluation team was a comprehensive list of billing system issues known to the Company and identified to date. In total, the Company identified approximately 20 high-level issues with the billing system and processes. These issues are summarized in Appendix E.

3.2 Overview of Interviews and Discussions with RIE Personnel

Throughout the Evaluation, a targeted interview and workshop process was conducted to gather insights from Company leadership and impacted business units directly involved in billing operations and system implementation from end-to-end. A total of 16 interviews and 8 workshops were conducted, with numerous follow-up conversations when clarification was needed. The Company was proactive and collaborative in working with the Evaluation Team, bringing the correct stakeholders and subject matter experts to the table and being forthcoming with challenges and opportunities.

Key takeaways from these interviews and workshops were extracted and organized into the following focus areas to enable a multi-dimensional evaluation of the billing system challenges. This framework provided a clear lens for identifying systemic gaps and informing targeted remediation strategies.

- 1. Requirements:** This area focused on evaluating how the Company defined what the Billing System and processes must do to meet business needs and stakeholder expectations.
- 2. Testing:** This area focused on the Company's process of evaluating the Billing System and/or components to verify it meets specified requirements and functions correctly.
- 3. Operational Readiness:** This area focused on the steps the Company took to achieve a state of being fully prepared to deploy, support, and maintain the Billing System and processes in a live environment.
- 4. Billing Operations and Controls:** This area focused on procedures and safeguards the Company took to ensure accurate, timely, and compliant billing processes within the organization.

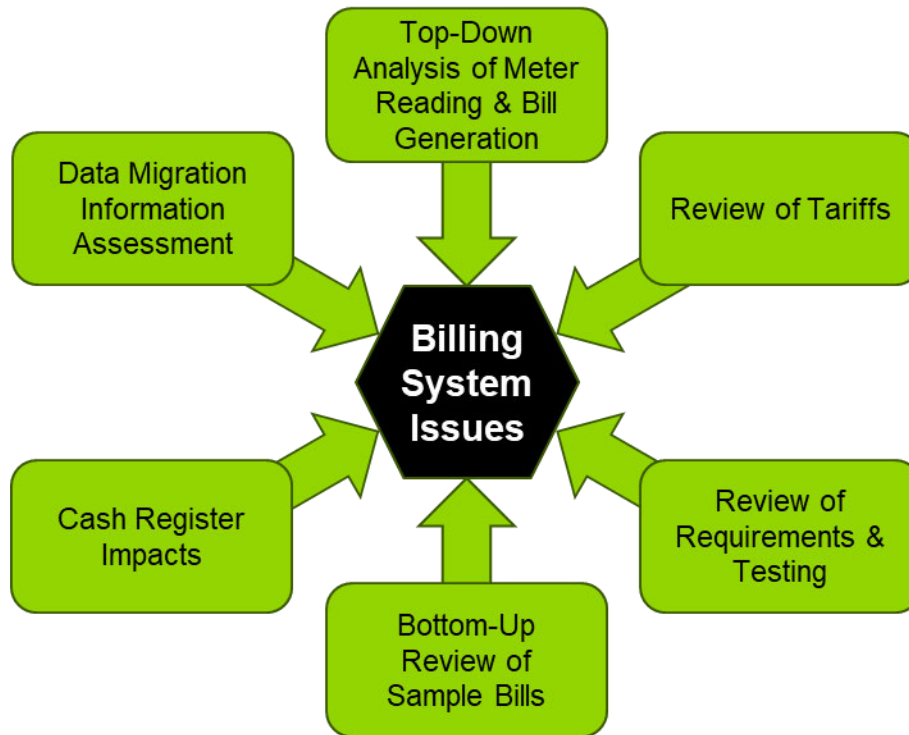
- 5. Accounting:** This area focused on the systematic recording, reporting, and analysis of customer billing activities.

To support the evaluation process, a structured root cause analysis (RCA) approach was applied using a modified version of the Five-Why technique. This method allowed for an investigation into observed issues by starting with documented symptoms from interview and workshops and iteratively going deeper with “Why?” questions to uncover the root causes.

4. Analysis Approach

In order to perform a comprehensive analysis, the Evaluation team utilized a multifaceted approach to identify and/or validate issues with the Company’s billing system and processes. The component methodologies used within this Evaluation are shown in Figure 4-1, below. The following section provides further details about each of these analyses.

Figure 4-1. Evaluation Component Analyses



Source: Evaluation Team

4.1 Overview of Data Migration Information Assessment

Through a series of targeted workshops, the Evaluation Team met with subject matter experts across the Company’s IT, metering, billing and customer operations teams. The team discussed how information was received, tested, and ingested to the Company’s billing and metering systems and the resulting performance of those systems after cutover.

The Evaluation Team met with RIE team members to understand the system architecture, data flow between systems, and approach taken to populate data. The purpose of this assessment was to determine if the Company had a data migration plan defined, vetted the plan, and executed the plan.

Through the assessment discussions, the Company shared that they had identified and requested historic data to facilitate testing and eventual cutover to the new system. The Company tested data transfer and upload across four “Dress Rehearsal” events that simulated cutover to the new system. A Dress Rehearsal is a full-scale simulation of the cutover process, where all steps required for go-live are executed in a controlled environment to validate

readiness and identify gaps before the actual transition. Each version (Dress Rehearsal 1, 2, 3, and 4) represents the iterative cycles of this simulation, progressively refining processes, timing, and issue resolution to ensure a smooth and accurate final cutover.

Members of the RIE team noted that numerous data and system issues were identified in Dress Rehearsal 1 that resulted in improvements and better results in Dress Rehearsal 2, but that the files received from the legacy provider in Dress Rehearsal 3 were of different formats and required a lot of rework to resolve before Dress Rehearsal 4. They also noted limitations in how much data could be received to use for testing and pre-cutover preparation. See Section 5.3 for a more detailed discussion.

4.2 Review of Requirements and Testing

In parallel to conducting interviews and workshops, the Evaluation Team reviewed requirements, process design, and testing documentation provided by Rhode Island Energy. Evaluation of these documents was to determine if the Company had adequate requirements defined and that those requirements carried through to the system build and that each requirement had an associated test case with a successful test outcome.

Since the Company used a clone of the PPL PA Customer/1 system, they did not compile a comprehensive requirements traceability matrix document. Instead, they did a fit-gap assessment to detail the requirements unique to Rhode Island Energy's operations and billing tariffs. In addition, since PPL PA did not have a system designed for gas customers, RIE had to detail requirements for gas operations and billing and create test scripts for these scenarios since they did not already exist within PPL PA's documentation.

Of particular interest when reviewing the design/build/test documentation and the subsequent analysis was assessing if the system was built to accurately house the rate tariff information to ensure billing at the appropriate tariff rate values. To that end, the Evaluation Team reviewed unique and complex billing criteria such as net metering rules, credit and collections procedures, customer protection clauses, summary billing, and proper application of rates and suppliers to accounts.

The Company implemented a comprehensive parallel billing strategy that clearly outlines the testing approach, success criteria, and methodology across multiple test cycles. This structured framework ensures thorough validation of system functionality and readiness. Additionally, RIE developed a detailed strategy for the Move Group 4b Cutover process, which was supported by consistent status updates and well-defined go/no-go decision checkpoints. These decisions were appropriately based on the execution status of test cases, resolution of critical defects, and tracking of outstanding issues. Overall, RIE had a disciplined and transparent approach to deployment readiness.

4.3 Overview of “Top-Down” Meter Reading and Bill Generation Analysis

The objective of “top-down” Meter Reading and Bill Generation Analysis was to fully understand the customer billing process and issues throughout the entire Meter-to-Cash lifecycle. The primary information in this analysis related to understanding the setup of the meter master data and the customer master data and the flow of usage information between meter systems. A

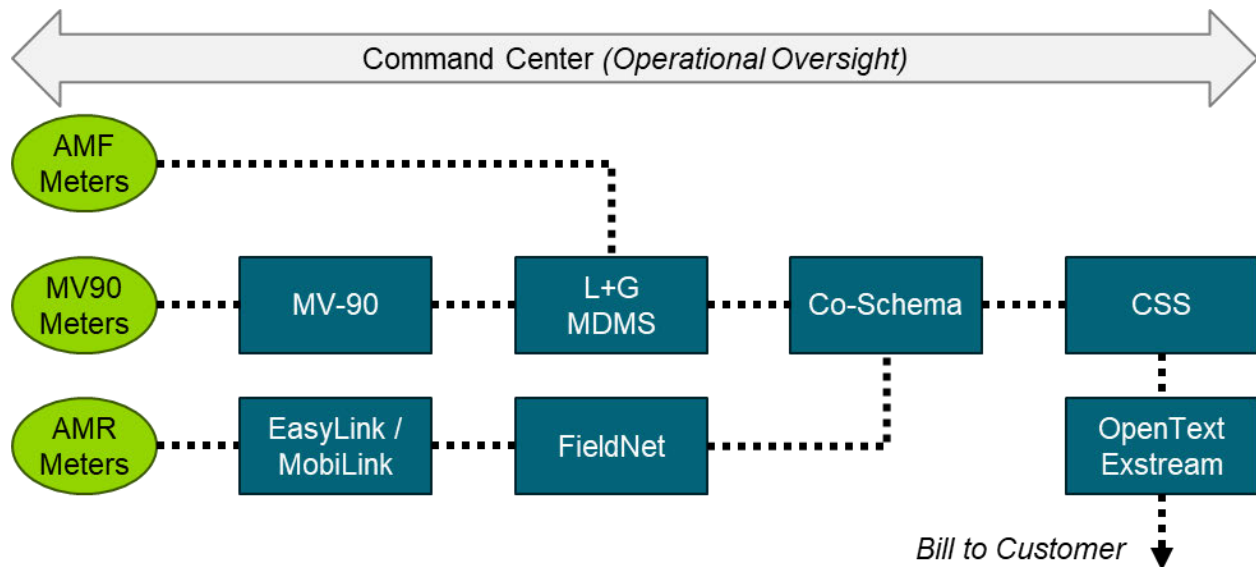
selection of key database tables that the Evaluation Team utilized in its analysis is shown in Appendix D.

The meter master data includes information about the meter that is entered into the system upon inventory processing that includes the meter ID (unique to the meter type and serial number of the meter) and the meter configuration that is programmed into the meter either from the factory or upon custom set up in the Meter department. Setup of the meter master includes the meter constant, also known as the multiplier. The meter constant is critical to bill calculation and, if incorrect, can result in under or over billing a customer.

The customer master data includes information key to an account being billed to the responsible ratepayer at the appropriate rate including a unique customer account ID, account contact information, premise address, rate class, and supplier (if enrolled in an alternate to Last Resort Service).

The Company stood up multiple metering systems in their environment to facilitate capture and export of metering data. As can be seen in the simplified diagram of system interactions within the meter-to-cash process in Figure 4-2, the meter data ecosystem is comprised of numerous distinct systems, including EasyLink, MobiLink, FieldNet, MV-90, MDMS, and Co-Schema.

Figure 4-2. Simplified Meter-to-Cash Process Architecture Diagram



Note: Dotted lines represent interactions between systems, which are shown as blue boxes. Process for electric and for gas systems both follow this general approach, although there are no AMF meters for gas. Deployment of electric AMF is ongoing. Complete architecture diagrams are shown in Appendix C.

Source: Evaluation Team summary of information provided by the Company

Meter reads for the company AMR meters are captured in the FieldNet system and meter indexes are sent to CSS via Co-Schema. The meter reads are scheduled to be captured within a 4-day billing window to facilitate calculation and production of the customer bill by CSS. If a meter read is not obtained, then an estimated read is calculated. In parallel to sending the meter usage information to CSS, FieldNet also sends information to MDMS via Co-Schema for reporting purposes. The MDMS is not the source of truth for billing usage data for AMR meters.

MV-90 and AMF meters send usage data to the MDMS, then to Co-Schema, and from there to CSS for billing. The validation rules defined do not allow for estimation of any of the MV-90 reads and therefore an MV-90 meter cannot be billed unless all read intervals are populated.

4.4 Overview of “Bottom-Up” Bill Analysis

The objective of “bottom-up” bill analysis is consistent with the “top-down” analysis, which, as stated above, is to fully understand the customer billing process and issues. Bottom-up analysis involves testing a sample of customer bills to evaluate the accuracy of rates, usage and other billing components. The Evaluation Team’s procedures were designed to achieve the following:

- Understand if billing errors/omissions identified by RIE have been fixed
- Understand if there are any billing errors/omissions for problem accounts which have not been identified by RIE, and
- Understand if there are any errors or omissions in bills without known errors (“normal” bills).

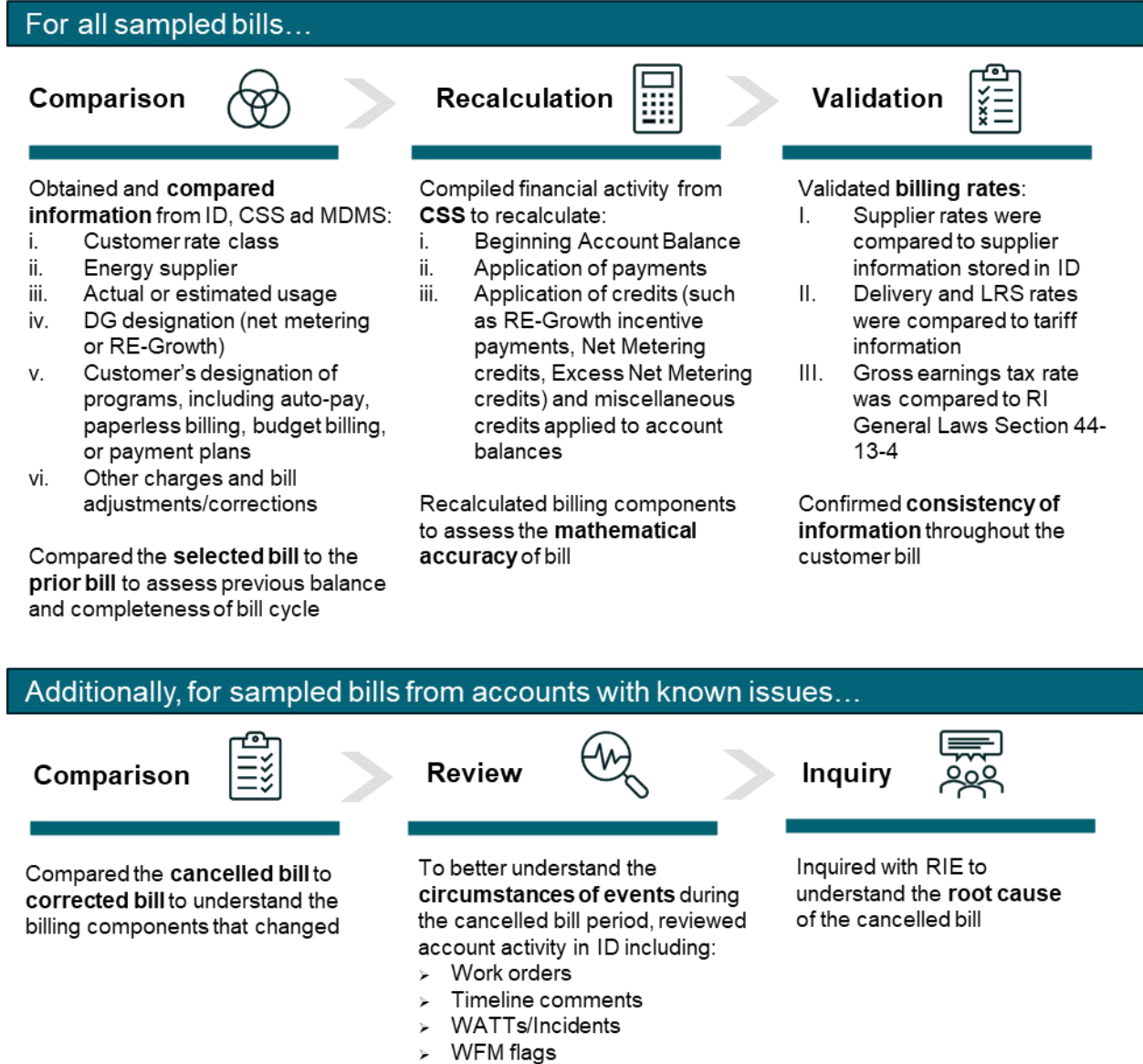
To select a sample of bills, the Evaluation Team requested a starting population of all bills from August 2024 to July 2025.

RIE provided two populations: 1) accounts with known billing errors, which consisted of a list of bills that were canceled and rebilled during the period requested, and 2) accounts with no known billing errors, meaning the accounts had no bills that were cancelled and rebilled during the period requested.

- 1) **Known billing errors:** the Evaluation Team obtained approximately 43K of unique issues by Account number and Issue explanation (“TX_Remarks_Generic”). The Evaluation Team analyzed the population obtained to get a general understanding of key issues and themes. From the population of known billing errors, the Evaluation Team selected 8 samples with issues impacting customer class, supplier, usage, rates, DG, credits and mathematical accuracy/calculation. The Evaluation Team then made 7 more selections with issue descriptions that appeared to align to problem areas identified by RIE, the PUC and/or Division.
- 2) **No known billings errors:** the Evaluation Team obtained approximately 739K accounts with no known errors as of July 2025. The Evaluation Team analyzed the population to understand the completeness of the accounts provided during this period. From this population, 8 accounts were selected for testing.

To test the bills, the Evaluation Team performed key checks to build an understanding of known issues and check for any additional issues present. A summary of the testing approach is shown in Figure 4-3. For any identified observations during testing, the Evaluation Team looked at more recent bills to see if the error was still happening to date. For observations requiring further consideration, the Evaluation Team requested additional support and explanations from the Company to understand any noted discrepancies.

Figure 4-3. Summary of Sample Bill Testing Approach



Source: Evaluation Team approach

4.5 Review of Tariffs

A review of tariffs was conducted anchored around the rate schedules included in the sample bill testing. This included the following areas of review:

1. Subject matter expertise in tariff interpretation for sample bill testing purposes, including Net Metering and the RE-Growth programs
2. Comparison of vintaged per sample bill testing and October 2025 CSS rate level data to appropriate vintage tariff/public rate sheets
3. Review of PPL_RI_Requirements and Fit Gap Functional Requirements as it relates to rates

The Net Metering and RE-Growth programs were also included in the sample bill testing process. Subject matter expertise was used to interpret the Net Metering and RE-Growth rules for sample bill testing purposes.

Electric Rate schedules reviewed in sample bill testing included the following:

- A-16: Basic Residential Rate
- A-60: Residential Low Income
- G-02: General C&I Rate
- G-32: Large Demand Rate

Gas Rate schedules reviewed in sample bill testing included the following:

- Rate 10: Residential Non-Heating
- Rate 12: Residential Heating
- Rate 21: C&I Small
- Rate 61: Non-Firm Transportation (NFT) Service

The following rate schedules were flagged to contain possible rate errors through the sample bill testing process:

Electric

- A-16: Basic Residential Rate

Gas

- Rate 12: Residential Heating
- Rate 21: C&I Small

PPL_RI_Requirements and Fit Gap Functional Requirements were reviewed for the associated rate schedules included in the sample bill testing against tariff language as check to accuracy of implementation of rate tariff rules.

4.6 Cash Register Impact

Within the Order in Docket No. 25-08-GE, the Commission highlighted that the “Company’s billing system is essentially the ‘cash register’ of the utility”, noting that inaccuracies therein could “impact the data relied upon by this Commission in setting just and reasonable rates”.³⁰ To that end, the Evaluation Team specifically analyzed revenue reconciliations and net write-offs to understand how billing system issues may or may not impact rate setting.

4.6.1 Revenue Reconciliations

Since the Company’s distribution base rates are calculated using a return on rate base and certain operating expenses (such as wages, benefits, bad debt expense, other operation and maintenance expenses, depreciation, and taxes), billed revenue does not have an impact on a

³⁰ See Order, at 9.

general rate case proceeding. However, the Company does have ‘rate reconciliation mechanisms’, which are impacted by billed revenue. Rate reconciliation mechanisms are PUC approved programs in which the Company is authorized to recover or required to pass back the difference between actual revenue and the underlying costs being recovered or differences between actual revenues and targeted amounts as approved by the PUC. For RIE, this would include mechanisms such as the Revenue Decoupling Mechanism, the Infrastructure, Safety and Reliability (ISR) program, the Energy Efficiency (EE) program, and the recovery of commodity costs, among others.

When customers are not billed in a timely manner, the Company could be requesting a larger under-recovery of costs or targeted amounts than it would have requested had it billed customers in a timely manner; this impact will eventually reverse when the customers are billed. However, if the customers are not billed appropriately or not billed at all, the billed revenues reported in those rate reconciliation mechanisms are inaccurate in the sense that the revenues do not accurately reflect the financial impact of the services provided by the Company. In other words, the Company is made whole through the rate reconciliation mechanisms (will not over-earn or under-earn), but they are not technically billing each customer based on the service provided. Not correcting underbilling of customers could create an under-recovery of the rate reconciliation mechanism, which results in a reconciliation rate that will be charged to all customers versus only the customers who were underbilled. Not correcting overbilling of customers could create an over-recovery of the rate reconciliation mechanism, which results in a reconciliation rate that passes back that over-recover to all customers versus only the customers who were overbilled.

To evaluate how billed revenue from the billing system is recorded to the general ledger, the Evaluation Team obtained Company-prepared revenue reconciliations for the periods August 19, 2024 (go-live date of the new billing system) to December 31, 2024, and for year-to-date July 31, 2025. The Evaluation Team examined and determined the reasonableness of the reconciling items.

In addition, the Evaluation Team requested the Company’s analysis for the following situations:

1. When a no-bill account is finally billed, especially those accounts that have taken several months or years to correct the no-bill issue, does the Company require the customer to pay the entire back-billing amount? Are there no-bill accounts for which the Company did not bill part or all of the no-bill periods?
 - a. If there are situations in which customers are not required to pay the rebilled amount or are not billed for part or all of the no-bill periods, has the Company prepared an analysis of the financial impact?
 - b. If analysis has been prepared, the Evaluation Team requested the Company prepared analysis.
2. If the Company identifies customer accounts that are underbilled due to billing related issues, is the Company cancelling prior bills and rebilling the customers for the corrected amount?
 - a. If there are situations in which customers are not billed the underbilled amount, has the Company prepared an analysis of the financial impact?
 - b. If analysis has been prepared, the Evaluation Team requested the Company prepared analysis.

3. Does the Company track, by account, credits that were issued to customers due to billing system related issues? If so, please provide a list of all accounts that were issued credits due to billing system related issues, the amount of the credit per account, and how the credits were recorded.

4.6.2 Net Write-Offs

The calculation of the Company's distribution base rates includes the recovery of bad debt expense. In the Company's prior rate case, bad debt expense was determined using a historical average of net write-offs. To understand the impact that the implementation of the billing system and billing errors may have had on net write-offs, the Evaluation Team obtained and examined a Company prepared trend of net write-offs from September 2023 to July 2025 and the account level detail of write-offs for the period of August 2024 to July 2025.

5. Findings Related to Known Issues

As a result of the qualitative and quantitative evaluation efforts outlined in Sections 3 and 4, the Evaluation Team identified numerous findings and contributing root causes related to the billing system issues identified by the Company. The issues identified by the Company are shown in Appendix E. Based on the review of questions identified by pillar from Table 2-1, a summary of findings are shown in Table 5-1 below.

Table 5-1. Summary of Findings by Pillar

Finding	Transition Execution	Requirements	Testing	Op Readiness	Billing Ops / Controls	Accounting
The Company Identified Billing Issues and Sought to Address Them	✓		✓		✓	✓
The Company Met Industry Standards for Project Management & Governance	✓					
Data Limitations Complicated Identifying and Addressing Challenges	✓			✓		
The Company had Comprehensive Training Materials & Plans, but had Constraints in Execution	✓			✓		
The Company had Clear Staffing Needs and Hiring Plans, but Onboarding and Training Timelines were Constrained	✓			✓		
Internal Risk and Issue Communications were Siloed	✓			✓		
Missing Customer Data Limited the Impact of External Communications	✓			✓		
There were Considerable Meter Data and Data Flow Issues	✓	✓	✓		✓	
Field and Work Order Management Lacked Controls and Operational Visibility	✓	✓	✓	✓	✓	
Exception Tracking & WATT Management Challenges Led to Delayed Bills	✓	✓	✓	✓	✓	
Account Management, Move-In/Move-Outs, and Cancel/Rebill Processing Led to Incorrect Bills	✓	✓	✓		✓	
Complex Billing Capability & C&I Customer Experience Did Not Meet Legacy System Levels	✓	✓	✓		✓	
Supplier EDI Billing & Enrollment Management is Inconsistent	✓	✓	✓		✓	
The Company was Underprepared for Distributed Generation Billing at Cutover	✓	✓	✓		✓	
System Age-Based Limitations Create Vulnerabilities and Exacerbate Challenges in Fixing Known Issues					✓	

Source: Evaluation Team

5.1 The Company Identified Billing Issues and Sought to Address Them

As stated in the Section 4.4, the Evaluation Team tested bills from 17 accounts with known billing issues because they had previous cancellations and 8 accounts without known billing issues (“normal bills”).

For the 17 selections of accounts with known errors, the Evaluation Team analyzed the information and documentation for each selection to understand the underlying cause of the incorrect bill, which had been identified and canceled by RIE. The Evaluation Team then determined whether the error was resolved in the reissued bill. The results of this analysis are shown in Table 5-2.

Table 5-2. Issues Identified by the Evaluation Team in Cancelled Bills

Cancellation Reason	Issue Resolved for Account?		
	Yes	No	Unknown
<i>Identified in RIE’s Top Issues Table</i>			
Genesis Account – Account had not billed since January 2021 & meter read error	X		
MDMS not feeding into CSS for MV-90 Complex Bills		A	
MV-90 meter dial mismatch between actual read and CSS		A	
Host/Satellite not billing together	X		
<i>Other Known Cancellation Reasons</i>			
Missing net metering rider	X		
Wrong rate class	X		
Wrong supplier		B	
Change Meter Out (CMO) – Read for new meter was added as end read for old meter	X		
CMO not put on tape, incorrect meter multiplier	X		
Meter read error	X		
Adjusted meter read in error	X		
Final read adjustment	X		
Unknown			C

Note:

- X** The billing issue causing the original bill(s) to be cancelled was fixed for our sampled account(s).
- A** The billing issue was not fixed for our sampled account(s). RIE represented that the fix had been made, but it was not corrected within the last bill sampled (October 2025). See Section 6.1.1 & Appendix F.1 and Section 6.1.2 & Appendix F.2.
- B** The billing issue was not fixed for our sampled account(s), and for one account, the most recent bills continue to have the wrong supplier. See Section 6.1.1 & Appendix F.1.
- C** Original bill could not be located, so the Evaluation Team could not independently test the cancellation reason. The Evaluation Team identified a supplier rate billing issue in our sampled account(s), as reported in Section 6.1.1 & Appendix F.1. However, the Evaluation Team is unable to determine if this supplier rate billing issue was related or unrelated to the original cancellation reason without reviewing the original bill.

Source: Evaluation Team analysis

Issues addressed in RIE’s top issues table:

- Genesis Account - Account had not been billed since January 2021: One account that was selected for testing had not received a bill since early 2021 and was part of the genesis process to re-establish billing (described in Section 6.4, “Observations Related to the Cash Register”). This situation was more complicated because the satellite and the host were not billing in sync. Service orders were created in early January because the meter was not reading or billing. It took several months after the initial meter check to eventually change out the meter. Once they did, the meter change reading was mistyped which led to the customer receiving two very large bills totaling \$26K in August and September of 2025. The bills were canceled and rebilled in late September 2025, and they set the meter with a start reading of 24510 based on prorated usage since the genesis activation date. It looks like the customer is now receiving regular bills.
- MDMS not feeding into CSS for MV-90 Complex bills: MDMS was not feeding automatically into CSS for a MV-90 complex account. This was causing the account not to bill. In order to get this account to bill, they manually uploaded MDMS readings into CSS (which they called “Plan B”) and validated the bill to ensure it lined up with prior bills. In CSS, it shows 0 readings until July 29, 2024. After that date, it appears meter reads were manually entered into CSS until August 2025. The Evaluation Team suggests that RIE continue monitoring to see if the problem has been fixed.³¹
- MV-90 Meter dial mismatch between actual read and CSS: RIE stated the reason for this canceled bill was due to a MV-90 meter dial mismatch between the actual reads and CSS. MDMS does not tie to CSS. They canceled the bill in September 2024 and reissued the bill in April 2025 with adjusted reads. To date, meter reads appear misaligned, and RIE has continued to issue adjusted meter reads.
- Host/Satellite not billing together: This shared solar account had an issue where the host and satellites were not billing together. This issue was discovered in November 2024. Six bills from November 5, 2024 to April 23, 2025 were cancelled and reissued in August 2025. At the end of August, a system enhancement went into effect that does not allow the satellite to bill if the host fails to bill.

Other cancellation reasons observed in the sample of bills included:

- Missing net metering rider
- Wrong rate class
- Wrong supplier
- Change meter out (CMO) data issues, such as swapping the new meter read with the old meter read, CMO not put on tape, incorrect meter multiplier
- For one of these accounts, the error created a bill with +6,407% increase in usage. There were notifications of “High bill alert” prior to issuance of the bill, but the bill was still issued. The \$21K balance carried forward until the bills were canceled and rebilled. The Evaluation Team asked if the system prevents high bills from being issued and RIE responded that the system does prevent high bills from being issued. The Evaluation Team confirmed, by review of billing exception types within the system, that there are WATT types defined in the system to flag Hi/Low errors for demand and kWh. The “High bill alert” would require a user to review within a few business days and release. Based on that response, it appears the bill

³¹ This account is also referenced in Section 6.1.1 & Appendix F.1 under “meter read discrepancy”.

was reviewed and released. The \$21K balance would not issue subsequent alerts because the initial bill was already reviewed and released.

- Meter read errors, meter read adjustments or adjustments made in error
- Unknown: For this account, the canceled bill(s) were not available in Intelligent Desktop (ID). The Evaluation Team requested the canceled bill(s) to get a better understanding of the cancellation reason, but RIE was unable to provide the bill(s) by the time of publication of this Report.

5.2 The Company Met Industry Standards for Project Management & Governance

Due to the complexity of the system transition, RIE stood up a project management office (PMO) and operational change management (OCM) office to oversee the governance and execution of the billing systems transition from the legacy provider to RIE. While there were unforeseen challenges and issues due to data migration and system configuration, the Company met industry standards for project management, governance and oversight.

RIE and its implementation vendor developed project management tools, templates, and processes to monitor, track, and document tasks, activities, milestones, and deliverables pertaining to each business unit (e.g., Customer Operations, Billing Operations, Field Operations, Financial Operations, Metering Operations, etc.). Supervisors and project managers within each business unit were accountable for ensuring that project and change management documentation was updated on a consistent basis and risks, issues, and decisions were escalated to executive leadership, when necessary.

RIE staff also maintained a centralized Defect Log to record bugs, defects, and issues that arise from both internal sources (e.g., system-related problems) and external interactions (e.g., customer-reported concerns). This hub-based log enabled staff to review all active and inactive issues, creating visibility across the organization.

5.2.1 Identified Root Cause(s) and System(s) Involved

Robust Project Management and Governance Materials

Based on best practice standards for software development lifecycle and project management, the Evaluation Team found that throughout all stages of this transition, RIE had robust project management and governance processes in place to ensure ample coverage of tasks, activities, deliverables, and milestones. RIE's project management and governance materials indicate comprehensive levels of project details that enabled effective and decentralized decision making. These materials included Defect Logs, Cutover Plans, Data Migration Plans (also referred to as IT Charters), Hypercare Plans, and Testing Plans. RIE instituted a stage gate process whereby leadership teams met to align on next steps, review escalated risks and issues, and provide "go-no-go" approvals before proceeding to the next stage. RIE held daily meetings within individual business units and weekly project management meetings with supervisors to check progress and ensure accountability.

Organizational Commitment

During the hypercare period, when the Call Center experienced a surge in customer calls and reported issues from customers, RIE established a - or sometimes multiple - "War Room(s)" to bring together supervisors and leadership from key business units – such as Operations,

Customer Service, IT, and Communications – to rapidly identify root causes to customer issues, coordinate responses, and implement resolutions. The Company created a scoring system to prioritize issues that were brought forward by the business. The establishment of the War Room reflects RIE’s recognition of the urgency and scale of the problems that customers were experiencing. It demonstrates that leadership committed to resolving customer issues and pain points by decentralizing decision-making and enabling real-time collaboration across business units. Beyond immediate crisis response, RIE’s War Room evolved into a platform for continuous improvement and helped RIE adapt quickly to operational disruptions.

5.3 Data Limitations Complicated Identifying and Addressing Challenges

Project management, change management, and governance infrastructure lacked full visibility into the necessary data and involved systems, making it difficult to identify and address challenges. As noted in Section 1.1, RIE stood up its own billing and collections system using PPL PA systems as a baseline. This system was different from the legacy provider’s system. The full breadth of the differences was not known until go-live on August 19, 2024, resulting in documentation, data, and technical support issues. Knowledge gaps resulted in increased risks and costs. Findings indicated that RIE operated the PMO and CMO to the best of their ability within the given constraints and at the level they deemed appropriate.

5.3.1 Identified Root Cause(s) and System(s) Involved

Data, Staffing, and System Limitations

Limitations of historical data and the limited applicability of the legacy provider’s system to the new system created knowledge gaps, making it difficult for RIE to create the infrastructure necessary to govern the new system. Although RIE’s cutover plans, testing frameworks, and criteria were highly detailed, there were exception scenarios that RIE was not able to reproduce prior to go-live. Additionally, the data RIE received from the legacy provider for cutover and the four dress rehearsals between March and August 2024 was, at times, inconsistent and incomplete. RIE learned of these data issues during the dress rehearsal events, which was their intent, but new issues seemed to emerge as the dress rehearsals progressed. For example, during the third dress rehearsal between June 24-30, 2024, the legacy provider sent the data in a different format from the previous dress rehearsals.

The Company’s Data Migration Plans reviewed by the Evaluation Team show some areas that could benefit from greater consistency. For example, while the IT Charters and Cutover Plans outlined requirements for migrating data from the legacy provider to RIE, the level of completeness varied across the documents. According to the Company, Cutover Plans became the source of truth for tracking, monitoring, and documenting approvals as well as deliverable completions. Prior to cutover, RIE supervisors approved the Cutover Plans, even though some items were marked as “incomplete” or had missing completion dates. The Evaluation Team found that there were multiple documents with extensive details capturing tasks, activities, and milestones throughout the transition. This abundance of information, while thorough, may have introduced challenges in maintaining consistency across reporting efforts or in effectively utilizing the documentation due to the volume of material requiring upkeep. Using multiple different tracking documents limits the ability to understand accurate project status.

Between May 2023 and October 2024, RIE hired staff with varying levels of expertise to support the transition. This mix included new hires, internal transfers, and current employees. This

medley of employees coupled with data discrepancies from the legacy provider resulted in logistical and operational readiness challenges for RIE supervisors and project managers.

Siloed Management

Each business unit involved in the implementation relied on its own IT Charters and Cutover Plans to guide and manage its workloads through the transition. The Cutover Plans for the different business units reviewed by the Evaluation Team varied in completeness and uniformity. Some business units maintained very detailed Cutover Plans while others lacked essential information, such as details that would indicate the closure of key tasks and activities. Although it is important to document this information for each business unit, the use of separate logs results in a more siloed project management approach.

Furthermore, RIE relied upon a small team of supervisors to multitask their project management responsibilities while also supporting testing, training, and hiring activities throughout the transition. This reliance on supervisors for significant workloads makes prioritization between activities more difficult, which is apparent in the varying levels of completeness of various PM documentation, for example, the IT Charters and Cutover Plans.

5.4 The Company had Comprehensive Training Materials & Plans, but had Constraints in Execution

Between May 2023 and June 2024, which was prior to cutover, RIE developed a comprehensive training plan. The plan included diverse delivery methods and detailed schedules. To confirm that RIE maintained a comprehensive plan, the Evaluation Team required the following documentation for review, for which RIE successfully provided supporting evidence:

- Change Impact Assessment
- Communication Plans (Internal and External)
- Training Plan with diverse training methods
- Training Curriculum by role or business unit
- Training Rosters
- Training Materials across impacted processes (could include instructor-led presentation materials to hands on activities and e-learning modules)
- Training Schedule with adequate time to cover required training materials
- Training Completion Rates by role or business unit

The implementation vendor was responsible for developing the Change Impact Assessment and the training materials, while RIE was responsible for delivering the trainings. RIE and the implementation vendor developed a training plan using the materials and knowledge available to them, including from the legacy provider and from PPL. The training plan included a variety of training methods, including instructor-led sessions, web-based e-learning, simulations, micro-learnings, demonstration videos, and knowledge checks by business unit. RIE developed and implemented training schedules for all staff involved in the transition. The cutover extension from May 2024 to August 2024 allowed for additional training time for the first rounds of new hires.

However, data gaps, system differences, and staffing limitations produced training gaps and inaccuracies. Additionally, RIE developed trainings post-cutover in reaction to real-time issues that emerged.

5.4.1 Identified Root Cause(s) and System(s) Involved

Dedicated Resources

RIE prioritized training as part of the transition infrastructure by dedicating staff, including vendor support, and collaborating with customer operations field resources to develop, vet, and implement the training plan. The training leadership was able to navigate the various TSA and contractual restrictions to develop a training schedule that allowed new staff to be trained in time for the go-live date of August 19, 2024.

Data and System Limitations

RIE lacked full understanding of how the historical data from the legacy provider would translate to the new system. This meant that the training materials developed were not as precise as planned given the lack of full visibility into the new system. Following cutover, RIE identified, reviewed, and analyzed shortcomings of the new system and implemented mechanisms to address these gaps through subsequent trainings, updated internal communications, and agile project management functions like the War Room, which took place from August through October 2024. For example, Call Center staff lacked specific training on when to create meter change orders. Given the increase in customer calls concerning meters, Call Center staff submitted an unnecessary number of meter change requests, causing backlog for the Field Operations team and operational and billing challenges related to meter change orders not being completed prior to subsequent changes on the same account. RIE provided on-the-spot training to Call Center staff and developed internal controls to monitor meter change requests.

RIE did not receive all requested data from the legacy provider, notably call recordings to use for upskilling Call Center staff. RIE requested access to historical call recordings prior to cutover but was denied the request. After escalation, RIE paid for the legacy provider to dedicate an analyst to create and send call file exports to use for training. This limited the effectiveness of trainings as Call Center staff were unable to train using real calls with the customer base, as is typical in Call Center training. The first time Call Center staff heard or spoke with a RIE customer was on the first day of cutover in advance of go-live on August 19, 2024, which does not align with best practices for Call Center training.

5.5 The Company had Clear Staffing Needs and Hiring Plans, but Onboarding and Training Timelines were Constrained

RIE developed staffing targets based on anticipated needs, including increased Call Center staff. RIE hired supervisors for each business unit in 2023, but they varied in expertise and experience. RIE met or exceeded hiring targets from 2023 to December 2024, however, new staff training was limited given data and system limitations.

Prior to cutover, RIE faced key limitations due to TSA and other contractual requirements for staffing. The TSA stipulated that RIE could not solicit hiring of legacy provider employees who had historically worked in RI territory. Additionally, certain contractual protections prevented some employees from taking calls from service territories outside of Rhode Island, which limited training opportunities until the go-live date. Lastly, certain employees from the legacy provider could not be hired by RIE.

5.5.1 Identified Root Cause(s) and System(s) Involved

Dedicated Staffing Resources

While the Evaluation Team did not do a dedicated analysis of normalized staffing levels, it appears RIE dedicated specific resources to plan, manage, and execute staffing responsibilities. These resources coordinated across the Company to understand anticipated challenges that would require staff support during the lifecycle of the transition. RIE developed a staggered hiring approach from early 2023 through June 2024 to accommodate TSA and other contractual restrictions. During the hypercare period, RIE implemented surge support hiring, particularly in the Front Office, to manage anticipated increases in customer call volume through December 2024. This staggered approach allowed staff to train prior to cutover and avoided onboarding staff too early.

TSA Restrictions and Other Contractual Requirements Limited New Staff Training

RIE indicated that new hires had varying degrees of experience and skillsets needed to navigate the complex billing issues faced immediately following cutover. RIE escalated a request for Back Office billing training from the legacy provider prior to cutover, but this request was denied, creating a gap in training accuracy.

Contractual protections prevented employees from working on non-Rhode Island and/or Rhode Island accounts, depending on the company that the employee transferred from. Knowing this, RIE staggered Call Center hirings because new hires were unable to take live calls before cutover as the legacy provider's Call Center included territories outside of Rhode Island. The first time the RIE Call Center staff took live calls was the first day of cutover in advance of go-live on August 19, 2024.

Limited Training Content and Context from Legacy Provider

RIE and the implementation vendor developed trainings using limited resources and context to piece together historical information that varied in applicability to RIE's system. As a result, much of the necessary learning and adaptation occurred on the job. Delays in data provisioning and the lack of exception-based scenarios for testing and training further constrained training accuracy.

Many of the challenges that RIE staff encountered, including double the call volumes from August to September 2024, could not have been anticipated. While RIE expected to see a 5-10 percent increase in call volumes from August to September 2024, they were unprepared for a doubling of call volumes. The complex billing issues that arose for customers on the new system were difficult for the RIE team to fix due to the limited applicability of training materials and system knowledge from the legacy provider's system to RIE's new system.

Unanticipated Customer Support Issues

RIE did not anticipate the volume of complex billing issues that arose post-cutover. In response, RIE established a Complex Billing Business Unit in March 2025. The implementation of this business unit prior to cutover would have enabled a more streamlined handling of complex bills during hypercare and allowed the Back Office to focus on issues within their jurisdiction.

5.6 Internal Risk and Issue Communications were Siloed

The Evaluation Team reviewed RIE's internal communications infrastructure. For the assessment to indicate adequate internal communications infrastructure, the Evaluation Team would expect to see:

- Documentation of issues, risks, and mitigation strategies available to affected business units
- Timely dissemination of issue, risks, and mitigation strategies to affected business units

The Evaluation Team considered these criteria to be met if the following research questions could be answered for each internal communication that was reviewed:

- Was the internal communication clear and concise?
- Were impacted systems, dependencies, or other associated risks or issues defined in the internal communication?
- Were the internal communications distributed to the proper stakeholder(s)?
- Were the action items and/or resolutions clearly defined?

RIE's internal communication documentation indicates that RIE handled internal communications adequately and met the necessary criteria for proper dissemination of the issue and mitigation strategies to affected business units.

RIE had an internal communications lead who attended regular status update meetings across business units throughout the entire transition process, including the War Room, to determine communications needs. The internal communications lead reviewed and updated a Hypercare Submission Issue Tracker to inform communication needs. Leadership signed off on all internal communications prior to dissemination. The internal communications lead worked closely with the external communications team to develop internal communications related to all external communications to customers. For example, the internal communications lead would notify Call Center staff about letters sent to RIE customers so that Call Center staff were prepared for potential questions from customers.

During the hypercare period between August and December 2024, supervisors conducted one-on-one training with Call Center staff to communicate issues in real time as they emerged. RIE documented procedural changes discussed during these sessions in ProcedureFlow™ (a cloud-based knowledge management application to manage standard operating procedures, centralize organizational process information, and transform procedures into visual flows) and added them to a Hypercare Issue Tracker. Findings indicate that RIE disseminated internal communications to broad audiences to confirm everyone in the Company was updated.

Different business units maintained separate Cutover Plans and IT Charters throughout the transition period, which served as internal communication mechanisms. There was a focus on the escalation and resolution of IT and data-related issues throughout the transition, and each business unit had its own escalation process.

5.6.1 Identified Root Cause(s) and System(s) Involved

Siloed Risk and Issue Communication

The sentiment from employee discussions indicated that although internal communications were properly documented, there were often gaps in communication between the Tech and Business teams during testing and cutover periods. Prior to cutover, certain team members that were less directly involved in cutover and transition activities were not always included in all planning and communication efforts.

The siloed risk and issue management can be helpful for the individual business units to maintain their own systems, but it can create difficulties when understanding overall project status and it can limit internal communications. Although not every team or supervisor needs full visibility into all operational details, maintaining a centralized tracking system aids general awareness of key activities, milestones, and potential risks or issues can reinforce cross-functional alignment and readiness.

Findings indicate that internal communications were sent to broad audiences to keep RIE staff updated on status. However, communication gaps can arise when teams receive excessive or insufficient information or information that lacks clarity regarding its relevance to their team.

5.7 Missing Customer Data Limited the Impact of External Communications

The Evaluation Team reviewed RIE’s external communications prior, during, and after cutover. For the assessment to indicate adequate external communications infrastructure, the Evaluation Team would expect to see:

- Documentation of external communication plans with diverse communication channels, a segmented audience approach, key messages, roles and timelines
- Metrics of success for tracking
- Risk and contingency planning

RIE collaborated with a third-party vendor to develop a Communications Plan focused on addressing the expected changes for customers during the transition, specifically June through August 2024. Completed in April 2024, the Communications Plan clearly defined the relevant messages for the key audiences, including RIE staff, and the appropriate communications channels to use. The Communications Plan incorporated a diverse range of communication channels including “tear and go” sheets for field teams to provide customers, social media ads, radio segments, and presentations for in-person meetings. RIE disseminated materials in English, Spanish, and Portuguese. The Communications Plan included metrics for tracking success and contingency plans for unanticipated messaging needs.

RIE provided escalated support where RIE account managers provided hands-on and in-person support to large customers who had previously used the legacy provider’s business account portal, anticipating customers’ frustration with losing this functionality. Through contingency planning and comprehensive customer engagement, RIE addressed customer concerns by providing up-front solutions to anticipated and potential issues that could have arisen after cutover.

RIE continuously tracked customer feedback with quarterly surveys (J.D. Power Electric Residential Customer Satisfaction Study) and social media sentiment monitoring from 2024 through 2025. However, it was found that the public sentiment reports generated by the vendor failed to provide a comprehensive understanding of social media sentiment about RIE, thus requiring additional manual monitoring of social channels.

RIE worked with a vendor to develop and implement a communications campaign for 2025 focused on rebuilding trust with customers in response to persistent negative public sentiment. This plan included key messages, segmented audiences, prioritized communication channels, and a timeline for implementation.

The Evaluation Team reviewed RIE's External Communications Plan and materials to understand if they met the criteria necessary to address customer concerns and issues. The Evaluation Team considered the criteria met if the following research questions could be answered:

- Were external communications clear and concise?
- Did the materials disseminated align with the strategy in the External Communications Plan?
- Were external communications distributed to relevant customer group(s) at appropriate times?
- Were the impacts and action items clearly defined in the external communication?

RIE's external communications were generally timely, commencing in July 2024 and continuing through December 2024. While data migration issues from the legacy provider caused delays in reaching certain customer groups prior to cutover, the external communications were aligned with the External Communications Plan and overall messaging remained clear and concise with any required actions from the customer clearly identified

5.7.1 Identified Root Cause(s) and System(s) Involved

Data Migration Issues and Gaps in Customer Information

Data migration issues from the legacy provider related to customer contact information arose during the third dress rehearsal in late June 2024. RIE received only 60 percent of RIE customer contact information from the legacy provider, which delayed outreach on key changes regarding payment processes, portal connect, supplier portal, and business account portal customers. For example, the list of business account portal customers from the legacy provider was not segmented and did not include specific company or customer names, limiting its usability for targeted outreach.

5.8 There were Considerable Meter Data and Data Flow Issues

At cutover, Rhode Island Energy identified a significant volume of unreadable meters that were not reflected in legacy system records. In addition to missing inventory, a subset of meters were miscoded in the legacy asset management system, including meters that were inaccurately accepted into meter inventory in the legacy system, and a small population of borderline meters that were incorrectly assigned to the Rhode Island service territory. There were also meters that were previously retired from service that continued to report as active, creating mismatches in meter status across systems. These errors led to underbilling, delayed corrections, and a backlog of service requests that required manual intervention and field dispatch.

The data flow between metering systems and billing platforms has been a source of operational errors, particularly in the post-cutover environment. In specific scenarios, the meter-to-cash data did not reliably flow from the field and head-end systems into the billing and exceptions management system after cutover. In some cases, this resulted in billing delays, estimated bills, and even no bills being generated. For example, the co-schema system, responsible for calculating billing determinants, initially took over 4 to 5 hours to process complex billing determinants, which delayed downstream bill processing steps. There was also a delay in processing reads within the required billing window in EasyLink, resulting in delayed and/or estimated bills. Additionally, MV-90 data has intermittently failed to flow into CSS from MDMS, and connectivity issues between WattNet+ and CSS have caused discrepancies in meter status, further compounding billing challenges.

Following cutover, RIE identified several challenges related to meter multipliers. The issue manifested itself in multiple ways: incorrect fixed factors applied to bills, misconfigured meter groups, and inconsistent data across systems. These discrepancies led to billing errors, customer complaints, and a backlog of unresolved meter setups. In some cases, multipliers intended to scale consumption were out of sync, requiring manual overrides and field validations to be corrected. While these issues were prevalent during cutover and directly impacted billing accuracy and timeliness, they have since been resolved through corrective actions and validation steps. As a result, the issue is now considered a low priority, requiring only routine monitoring rather than immediate intervention.

5.8.1 Identified Root Cause(s) and System(s) Involved

Legacy System Data Gaps

The meter inventory issues were primarily driven by incomplete and inaccurate data available during the system transition. The legacy asset management system used to support inventory migration contained incomplete records, including a substantial number of active meters that were missing entirely from the dataset due to incomplete processing of meter change cards prior to system cutover. In addition, there was a population of meters that were accepted into inventory in the legacy system as the incorrect meter type and approximately 4,000 meters that were on the mandated replacement list that the legacy provider did not replace prior to transition, which resulted in no reads. These gaps affected the efficacy of pre-cutover testing, which involved comparing the received inventory file with the master file. The missing and incorrect records did not allow for complete reconciliation. As a result, unreadable meters were not identified until billing operations began, or were found during field investigations, contributing directly to the volume of corrections and service requests required post-cutover.

Cutover Gaps and System Limitations

Incomplete data conversion extracts due to legacy system limitations led to gaps in meter status and read history during cutover. Miscoded legacy meter inventory, including correct multipliers and asset statuses, created inconsistencies between CSS and WattNet+. Meter attributes, such as CT/PT ratios, were incorrectly configured across MV-90, MDMS, and WattNet+, from the legacy systems, resulting in erroneous usage calculations and billing.

Insufficient Controls

Pre-bill controls within MDMS were not in place at cutover, allowing meter data to pass into billing without appropriate quality control. For example, the absence of duplicate record checks during cutover allowed the MDMS to double meter usage on accounts that were duplicated, which disrupted downstream processes.

Testing Gaps

EasyLink experienced volume and bandwidth limitations and lacked comprehensive load testing prior to cutover, which led to connectivity failures between WattNet and CSS.

The Co-Schema system was not optimized for high-volume processing and lacked performance testing under real-world conditions.

Meter Multiplier Discrepancies

The underlying causes for the meter multiplier issues were multifaceted. First, key platforms, such as MV-90, MDMS, and CSS were not properly synchronized, causing mismatches in meter status and multiplier values, with CSS failing to populate WattNet+ consistently. Many problems also stemmed from data issues inherited from the legacy provider, and meter cards that were often incomplete or missing. Fixed factor checks were also only performed annually, which allowed errors to persist until the review was completed. Manual processes for correcting multipliers were inconsistent, and some inactive accounts still had active multipliers due to setup oversights.

5.8.2 RIE Remediation

Short-Term Fix

Following cutover, Rhode Island Energy initiated targeted remediation efforts to address immediate metering issues impacting billing and service accuracy. Meters that were non-responsive or flagged through customer complaints were prioritized for replacement. Field teams were deployed to investigate and resolve discrepancies, and service orders were generated to correct unreadable or misclassified meters. For inventory mismatches, each affected record was manually reviewed, documented, and closed to ensure short-term resolution and billing continuity.

To stabilize operations, several measures were implemented to quickly mitigate errors. New reporting tools were introduced to identify anomalies in usage and duplicate records. A pre-bill status report started being distributed to the IT Metering team to facilitate troubleshooting prior to bill generation. Many manual data repair protocols were established to correct meter status mismatches between WattNet+ and CSS. Manual exports were also triggered by the IT Metering team to review data from the MV-90 to MDMS flow.

EasyLink performance was addressed through direct engagement with the vendor, and post-cutover testing was conducted to improve data processing performance and reduce processing time.

RIE also implemented enhancements to the Co-Schema system, allowing it to connect to a replicated cloud database, which reduced batch processing time to approximately 30 minutes.

RIE responded to incorrect meter multipliers with a comprehensive set of remediation actions. In the short term, teams manually corrected multiplier values and conducted field visits to validate meter setups during the fixed factor check period. The call center and connections teams collaborated to validate meter configurations. To ensure this issue won't arise again, RIE is implementing automated validation protocols to ensure multipliers are rechecked when equipment changes occur. Training programs are also being updated to include multiplier logic and correction procedures.

Long-Term Fix

To strengthen meter data integrity and reduce future disruptions, Rhode Island Energy implemented a structured, age-based meter replacement program. This initiative proactively identifies meters nearing end-of-life and schedules replacements to maintain readability and operational reliability. The program is supported by a dashboard that tracks meter responsiveness and flags potential failures based on system alerts and customer feedback. Full implementation of the age-based replacement strategy is expected within the next 18 months.

In parallel, enhancements to meter validation capabilities have been introduced. Rhode Island Energy now utilizes specialized equipment to test and verify meter configurations internally, reducing reliance on customer-reported discrepancies. This capability enables more efficient identification and correction of mismatched inventory records, improving overall data accuracy and reducing the need for manual rebilling.

While many short-term solutions were manual fixes, RIE has worked to incorporate automated controls and validations across MV-90, MDMS, and CSS to prevent recurrence of data flow errors. Dashboards and reports have been developed to monitor meter data flow to proactively identify gaps. Many cross-system sync processes have been implemented, including field-by-field comparisons to detect and resolve mismatches in meter attributes such as multipliers. RIE has also made an effort to have complimentary training to reinforce proper procedure steps.

5.9 Field and Work Order Management Lacked Controls and Operational Visibility

After cutover, RIE experienced repeated dispatches of field crews for meter changes that had already been completed. In many cases, duplicate orders were generated due to training gaps and procedure misunderstandings in the Call Center resulting in multiple meter changes at a single location on the same day. Because the system processes meter records during nightly batch, and there were same day changes at one location, the initial work orders could not be properly closed out and record the old meter index and new meter information before a subsequent new meter was installed, leading to confusion in the field, inefficient use of labor, and billing complications. The lack of system synchronization between FieldNet and CSS further complicated the issue, making it difficult to confirm whether work had already been performed.

During the transition period, RIE also saw an increase in the number of open work orders, with the backlog peaking at over 2,500, far above the normal volume of approximately 400. This backlog created delays in service, billing, and customer resolution. The surge in customer calls during cutover, combined with limited visibility into meter status and resource tracking, made it difficult to manage and prioritize work effectively.

5.9.1 Identified Root Cause(s) and System(s) Involved

Redundant field work and a backlog of work orders was caused by training and procedure gaps and a lack of controls and reporting visibility. Without automated validation and a centralized reporting system to track work order status, meter status, and resource allocation, duplicate orders were generated and dispatched. Field and front office staff were newly hired and lacked sufficient training, which made it difficult to identify and prevent duplicate work.

5.9.2 RIE Remediation

To mitigate the errors, RIE conducted stand-downs with the field and front office teams to clarify order types and correct misunderstandings. These sessions helped reduce confusion and prevent further duplication by temporarily taking agents off the phones and walking through scenarios in which incorrect actions were taken and detailing the correct procedure to follow. RIE involved field crews in the standdowns to ensure end-to-end understanding of procedures and reinforce training. A War Room was also assembled to triage the backlog and implement real-time controls. As a result, RIE created new controls to direct field orders to the back office team for review prior to being released to the field. Post-cutover, new reporting tools were introduced to crosscheck meter changes before dispatch and work order aging. Finally, staff training enhancements were implemented to address gaps in field knowledge and reinforce correct procedures.

5.10 Exception Tracking & WATT Management Challenges Led to Delayed Bills

Exception tracking limitations within the WATT system have introduced operational inefficiencies that may contribute to delayed bill issuance. Management lacks visibility into emerging trends in billing exceptions, which impairs the ability to identify and proactively address growing issues and requires manual intervention to identify and address arising issues. This constraint limits strategic workforce planning, including the ability to appropriately train staff and prepare teams to manage exception volumes effectively.

Additionally, the system does not provide sufficient insight into agent productivity or resolution timelines. The system lacks sufficient visibility into agent productivity and resolution timelines. Without clarity on how exceptions are managed, leadership cannot accurately assess performance trends or determine whether staffing levels – both in number and skill – are adequate for efficient resolution. Supporting this function is further constrained by the need for extensive manual data review and analysis. Current reporting tools are limited in scope and lack the automation and depth required for effective execution.

Compounding these challenges, manual creation of WATT exceptions by front office staff during the transition period led to a significant backlog and categorization inconsistencies. The absence of a clear process for consistent creation of WATT types resulted in confusion, duplicate entries, and difficulty identifying the primary drivers of billing issues. These factors collectively slowed exception resolution and increased the risk of billing delays for affected accounts.

5.10.1 Identified Root Cause(s) and System(s) Involved

The inefficiencies contributing to delayed billing are driven by four interrelated factors: system limitations, unclear training protocols, staffing constraints, and documentation gaps during transition.

System Limitations

The WATT platform does not support robust reporting or productivity tracking. While management can view exceptions they created or completed, the system lacks functionality to monitor exception aging, resolution timelines, performance metrics, or exception trend analysis.

This limits management's ability to assess workload distribution, identify bottlenecks, and respond to emerging billing issues.

Training

Complex billing training prior to cutover was limited. The RIE team requested training on the legacy system from the legacy provider, but this training was not provided, even after escalation by project leadership to the executive Integration Management Office. This resulted in training gaps and reliance on on-the-job learning after cutover.

Training protocols at cutover did not clearly define procedures for creating and categorizing WATT exceptions. With hundreds of WATT types in use and no standardized guidance, manual creation, particularly by front office staff, led to inconsistent assignment, duplication, and confusion. This made it difficult for agents to understand when, how, and what type of exception to create, resulting in a backlog and misclassification of issues.

Staffing Constraints and Reporting Gaps

Based on interviews, Rhode Island Energy has lacked dedicated staff for exception reporting and analysis. Without centralized oversight, leadership lacks visibility into exception trends. This hinders strategic decision-making and delays the identification of systemic billing issues.

Documentation Gaps

Documentation inherited from legacy systems lacked sufficient detail on exception handling. The limited scope of exception types and absence of procedural guidance required Rhode Island Energy to rely on assumptions and iterative learning to develop training materials and operational processes. Although exception counts were eventually reduced and WATT categories standardized, the initial lack of clarity contributed to early inefficiencies and resolution delays.

5.10.2 RIE Remediation

Short-Term Fix

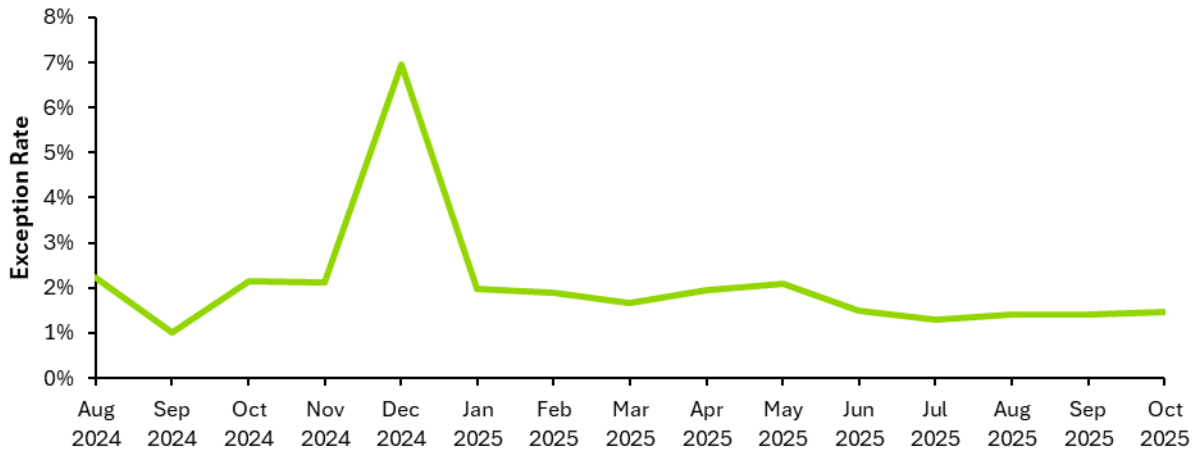
To reduce the backlog of billing exceptions and mitigate delays, Rhode Island Energy prioritized active resolution efforts. Prior to cutover, the billing team worked on the existing backlog of legacy exceptions to attempt to correct billing problems ahead of cutover. Exception counts were immediately brought down through manual review and processing, with agents working through existing entries to restore continuity to billing. A scratchpad method was introduced to help categorize exceptions by status (e.g., created vs. completed), providing basic visibility into aging and resolution progress.

In terms of resources, the Company identified the gap in an exceptions manager and created a position that is currently being filled. The Company additionally brought on full-time subject matter expertise from Pennsylvania that were brought in pre-Hypercare and supported through the end of Hypercare, ensuring that gaps were filled.

From the review of billing exceptions, the Evaluation Team analyzed the billing exception rate by month. This is a calculation to compare the number of exceptions occurring compared to the total bills each month. From the analysis, as seen in Figure 5.1, the Company experienced an increase in exceptions starting in October that ultimately spiked in December then reduced back down. This time period coincides with when customers would have started receiving their first few bills from Rhode Island Energy and occurred during the Hypercare time period. The occurrence of an increase in billing exceptions following go live is not unexpected. The

exception rate has maintained at just under 1.5% indicating that the system is stabilizing and that the actions taken to date by the Company have reduced the billing exception rates over time.

Figure 5-1. Total Monthly Exceptions as an Approximate Percent of Bills Sent



Source: Evaluation Team analysis of Company CSS data

Long-Term Fix

To support exception management, Rhode Island Energy has defined a structured process for manual WATT entries. Front office teams now follow standardized buckets for exception creation, supported by on-the-job learning and coaching.

Additionally, a dashboard is under development to improve visibility into exception trends and agent productivity. This tool will enable leadership to monitor resolution timelines, identify recurring issues, and make informed staffing decisions.

Through the addition of the new exceptions manager role, the team can build this capability over time. Concurrently, efforts are also underway to build out a dedicated analytics and reporting function to support long-term operational oversight.

5.11 Account Management, Move-In/Move-Outs, and Cancel/Rebill Processing Led to Incorrect Bills

RIE’s CSS stores protections (e.g., discount rate, medical, elderly, blind, disabled, unemployment) at the account level. Because gas and electric services at the same address are processed as separate and independent service contracts and not presented to agents as a single premise with cross-service prompts, agents can apply or update a protection on only one service when it should have been applied to all services associated with the premise. With separate forms and no automated cross-checks, some customers can experience incorrect protections resulting in incorrect discounts or holds across services.

Through sample bill testing, the Evaluation Team identified a specific instance where certain bills were flagged as incorrect and then RIE cancelled and rebilled “corrected” bills that, upon testing, was found to also be incorrect. Testing results are detailed in Section 6.1.1 and Appendix F.1.

The Move In/Move Out (MI/MO) process faced challenges post-cutover, particularly around held connects and soft-off decisions. For example, for accounts with a “user without contract”, wherein a prospective customer needs to provide additional identity verification, if a new customer failed to provide the necessary information within five days, service was resumed to the previous customer. This created billing errors. As a result, these accounts remained in a held state, requiring manual field orders to complete the process.

5.11.1 Identified Root Cause(s) and System(s) Involved

Manual Cancel/Rebill Processing

Due to the differentiation between the RIE billing system and the legacy billing system, when a bill needed to be cancelled and rebilled across a timeframe that spanned prior to the August 2024 cutover, the rebill cancellation had to be manually calculated outside of the CSS because those past billing records did not exist in the production system. Manual calculation is prone to human error and lacks automated validation checks that are present in CSS.

Exception Governance

Exception handling was managed through WATT, and at cutover included many exception types with inconsistent selection rules, and no visibility into exception aging or productivity. Protection mismatches were frequently misrouted or recategorized, and the lack of automated cross-checks or triggers to prompt the agents resulted in an error-prone process.

Training

Because of certain contractual protections, many staff personnel had delayed onboarding and were trained on a condensed timeline starting in June 2024 on both legacy and Rhode Island specific systems, which are not like-for-like. Without access to historical examples or detailed documentation, agents often had difficulty correctly mapping exceptions, which led to inconsistent resolution of protections.

Electric Service MI/MO

The electric service MI/MO issues were rooted in the meter technology limitations at cutover that do not allow for remote disconnect/reconnect functionality. Without automation, the process relied heavily on manual interventions and field orders. Agents lacked visibility into the status of held connects and had no reporting tools to track unresolved cases. The soft-off process, which leaves meters energized until a formal disconnect is confirmed, further complicated the situation. Additionally, agents struggled to obtain accurate customer information from new move in customers when power remained on in the previous owner’s name awaiting disconnect, and there were no clear procedures for finalizing previous customer accounts during the held state.

5.11.2 RIE Remediation

RIE’s training methodology was responsive to billing issues as they arose, including on-the-floor training and daily check-ins with Call Center staff during the hypercare period after cutover from August to December 2024. Also during this period, RIE established War Rooms for two and a half months (August through October 2024) where supervisors and leadership from IT, Operations, and Customer were co-located and met daily to share updates. RIE continuously revised ProcedureFlow™ with resolutions, providing RIE staff with real-time updates to procedural changes.

RIE stabilized the backlog of held connects through manual field orders and prioritized resolution of no-bill scenarios. An enhancement of the disconnect/reconnect process was introduced as part of a recent meeting, aimed at improving the handling of electric meters. Training was reinforced to help agents better manage soft-off scenarios and held connects. RIE is also working on enabling the automated processing system and developing reporting tools to provide visibility into MI/MO statuses and aging, which will reduce reliance on manual interventions and improve process consistency.

5.12 Complex Billing Capability & C&I Customer Experience Did Not Meet Legacy System Levels

In some cases, landlord data migration was incomplete, resulting in incorrect rate assignments and missing inactive landlord records, which were only discovered during field maintenance or safety checks.

Commercial customers experienced website and payment processing issues and were unable to view all associated accounts in the manner they previously had available on the business account portal provided by the legacy provider. RIE did not offer a business account portal online experience at cutover which resulted in decreased self service capability for customers like cities, towns, and universities, which disrupted consolidated billing and required manual workarounds. In addition, autopay was disrupted due to migration errors, leading to double withdrawals or missed payments.

5.12.1 Identified Root Cause(s) and System(s) Involved

Account data and requirements

These landlord data issues stemmed from incomplete testing scope and limitations in data conversion processes. The mapping logic used during migration lacked automated checks. Landlord data was not fully cleansed or validated prior to cutover, and there was no system flag to identify inactive landlords.

Online Account Information

The PPL system did not have an existing business account portal platform that enabled bulk self-service functionality to stand up at cutover.

Related to the online self-service experience that was offered, payment systems lacked end-to-end testing across testing environments for commercial account scenarios, and the lack of scenario-based testing contributed to missed edge cases. There was insufficient validation of system readiness prior to cutover.

In addition, delivery of website requirements was deprioritized as they were determined to not be able to be completed prior to cutover, but it was included in the fast follow list for delivery post go-live. This resulted in customers being delivered an online experience that was inconsistent with their experience with their legacy provider and limited functionality related to account management and payment processing.

5.12.2 RIE Remediation

Pre-cutover

From June 2024 to cutover in August 2024, RIE informed online customers of changes coming to their online account management and what features and functions to expect at cutover. This included informing customers of password reset requirements.

Short-Term Fix

RIE addressed these issues through targeted manual fixes and ongoing system enhancements. Landlord data issues were resolved through field discovery and manual corrections, with plans to improve system identifiers. These efforts were supported by War Room prioritization, IT collaboration, and continuous monitoring of complex account performance, which took place from August to October 2024.

Regarding the customers that were used to the legacy provider's business account portal online capabilities, RIE engaged directly with impacted customers, collected feedback, and instituted manual fixes in the immediate interim. Until the website is improved, for commercial account visibility and payment processing, RIE stood up an escalation team to work directly with these customers to understand and resolve account and billing related issues.

Long-Term Fix

Post-cutover, RIE has continued to build out and test the website functionality and plans to launch an enhancement in Q1 of 2026, inclusive of building a new summary billing solution tailored to municipal and institutional needs.

5.13 Supplier EDI Billing & Enrollment Management is Inconsistent

Following cutover, RIE experienced challenges with supplier-related Electronic Data Interchange (EDI) transactions, particularly around enrollments and drops. Customers who had submitted enrollment or drop requests prior to cutover were caught in a transitional state, requiring manual intervention to complete the transactions. Agents were unclear on the correct steps to process supplier changes, leading to delays and incorrect billing. RIE rejected many supplier transactions due to formatting or regulatory mismatches, as the legacy system had previously used Massachusetts regulations that did not align with Rhode Island's requirements. These issues disrupted the supplier switching process and created confusion for both customers and agents.

Separately, approximately 1,379 customers were dropped from budget billing due to supplier charges not being incorporated correctly in the legacy system.

Upon sample testing, the Evaluation Team confirmed that issues existed with data mismatches between the Supplier Portal enrollment status and the supplier listed on the bill not just during the cutover and hypercare periods through 2024, but extending into recent customer bills in 2025. Detailed sample bill test results are included in Appendix F.

The persistence of the issue on current bills prompted the Evaluation Team to do further analysis to validate supplier enrollment information in CSS. According to information within CSS, approximately 143,500 active customer accounts had a third-party supplier as of August 1, 2025. The Evaluation Team reviewed the most recent available PDF bills for a random sample of 1,585 of these accounts, and identified two additional accounts where the supplier

printed on the PDF bill was not the correct third-party supplier, but rather RIE.³² While this issue should be addressed by the Company, the observed rate of error indicates to the Evaluation Team that the issue is likely not material and pervasive.

5.13.1 Identified Root Cause(s) and System(s) Involved

RIE inherited a list of in-flight transactions, accounts pending enrollment or supplier switches, that were not clean data sets before migration.

Within the parallel billing testing documentation, RIE made a decision to exclude supplier accounts from the automated bill comparison tool due to known discrepancies between the legacy CSS and RIE CSS. The Evaluation Team has not been able to find manual bill test execution for this specific scenario. Furthermore, from a follow-up conversation with RIE. The RIE team did not test supplier file ingestion with any Suppliers. This lack of testing scenario drove the inability to detect and resolve the issues with file ingestion prior to cutover and necessitated incremental and escalated effort to correct after cutover.

The use of Massachusetts regulatory formats for processing EDI transactions in the legacy system conflicted with Rhode Island's standards in their CSS, causing RIE to reject improperly formatted supplier data. Upon enforcing the new rules, Suppliers were slow to adapt to RIE's ingestion requirements, and some EDI vendors failed to send files due to missing customer information, such as names or meter types. There were also mismatches between CSS and Intelligent Desktop (ID), particularly around effective dates and supplier codes. Internally, agents lacked clear guidance on how to process supplier enrollments and drops through the portal, and training did not adequately prepare them for these tasks.

Budget billing logic failed to account for supplier charges due to inherited coding limitations from the legacy system that did not align with the RIE system, which impacted migration accuracy.

5.13.2 RIE Remediation

RIE addressed these issues through a combination of manual processing, system enhancements, and supplier engagement. A daily War Room was established from August to October 2024 to prioritize and resolve application defects, and the supplier team worked closely with IT to manage data repairs. Most of the repairs needed to be resolved individually rather than in bulk.

A controls report was also developed post-cutover to track missing files and is now being enhanced based on lessons learned. RIE had biweekly meetings with suppliers, as well as one-on-one meetings for extra support. This helped build trust with suppliers and improve coordination. Along with detailed reporting, agents were coached on supplier portal procedures, and documentation was updated to clarify enrollment and drop workflows.

RIE became aware of the configuration mismatch between the legacy system and the new system prior to cutover. This issue was escalated by the team to project leadership of RIE and the legacy provider, requesting a change to the legacy system configuration for data migration that was not agreed to. The RIE team acknowledged that this mismatch would need to be corrected after cutover and developed a remediation plan. The budget billing logic was

³² One account with this issue was selected as part of the 25 sampled bills discussed in Section 6.1 and in Appendix F. That means three accounts total are currently known for certain to have this issue.

corrected to incorporate supplier charges, and affected customers were re-enrolled post cutover.

The team continues to monitor and prioritize issue resolution with the technical team to address processing issues.

5.14 The Company was Underprepared for Distributed Generation Billing at Cutover

Through workshop discussions and interviews the Evaluation Team learned that RIE encountered challenges managing distributed generation programs post-cutover, particularly with RE-Growth payments, net metering credits, and host-satellite allocations where there is a generation host site that has customer accounts enrolled (satellites) to receive credits from the host.

Incorrect performance-based incentive (PBI) releases and allocation limits disrupt payments to community Distributed Generation (DG) participants, and once checks were issued, they could not be recovered. As a result of cutover data migration, net metering credits were not consistently carried over to all accounts, and delays in billing were caused by missing meter reads and non-simultaneous billing cycles. To correct bills, calculations were performed outside the system and manually updated, which increased the risk of error. Additionally, limitations in data availability and sharing between CSS and the DG Portal created barriers for vendors supporting solar customers.

5.14.1 Identified Root Cause(s) and System(s) Involved

The RE-Growth Program lacked automated validation and reconciliation processes, forcing teams to manually calculate payments. The legacy systems did not support crediting for banked generation, and the transition to CSS introduced gaps in host-satellite logic impacting billing timing.

Missing or delayed meter reads further disrupted allocation accuracy. Access roles in the DG portal were not fully defined at cutover, leaving vendors without the necessary permission to manage solar contracts. Contract data was also stored in fragmented formats that were difficult to retrieve and validate.

5.14.2 RIE Remediation

RIE addressed these issues through manual corrections. Teams recalculated PBI payments and updated CSS records to reflect accurate allocations. Net metering logic was reviewed and adjusted to ensure credits were applied correctly, and field teams prioritized meter reads to reduce billing delays. Vendor access issues were resolved by refining CSS role definitions and improving contract visibility. Further information on net metered customer bill testing is included in Section 6.1.

5.15 System Age-Based Limitations Create Vulnerabilities and Exacerbate Challenges in Fixing Known Issues

RIE uses a relational data environment to manage data tables for the components of its billing system, such as MDMS, CSS, MV-90, FieldNet, and Co-Schema, which was designed to be run

on a mainframe over 30 years ago. As described in Section 1.1, this system was utilized for operational consistency and data conversion efficiencies because analogous systems were in place for both PPL PA and the legacy provider.³³ However, this system doesn't adhere to all modern best practices because of its vintage. While functionally comprehensive, the environment lacks unified data definition, schema control, and rule-based validation. This necessitates more proactive controls and supplemental manual process intervention by the Company, which is less efficient to implement.

For important information such as account status, billing metrics, or key intermediate results, there are no standardized or approved database views available for users to directly access and reuse. As a result, teams often build their own ad hoc queries to retrieve similar data.

Currently, RIE does not have a centralized catalog describing columns, relationships, or code dictionaries across tables. Knowledge about data definitions, flows and dependencies is currently fragmented across teams and maintained through local scripts, individually managed data versions, dispersed documentation, and third-party vendors' institutional knowledge.

5.15.1 Identified Root Cause(s) and System(s) Involved

System Vintage

While the system as it stands facilitates core billing operational functionality, its age caused certain limitations in comparison to modern day best-practice standards. Such limitations include:

- **Lack of Referential Integrity Constraints** – In modern systems, the Evaluation Team would expect to see robust constraints around data types and interactions across various tables. This helps to prevent duplicate, inconsistent, or missing data from impacting downstream calculations. However, the Company's system lacks some of these best practices due to its age. For example, the coding language underpinning the system doesn't have a data type for "dates", so the Company uses a specific word to indicate missing data, which needs to be accounted for in all calculations.
- **Missing Managed Analytical Views and Query Logic** – Standardized and managed analytical views for key data (e.g., accounts, billing status, intermediate results) can help ensure consistency, reliability, and auditability of analyses. However, under the current system, users at the Company often need to develop bespoke data lookup queries, leading to duplication and inconsistent business outcomes. To compensate, the Company has a dedicated data team that owns reporting consistency.
- **Outdated Cross-Table Data Catalog and Entity Mapping** – A detailed catalog of data tables and transparent diagrams mapping connections between tables can help to identify the source of issues that may arise. The entity-relationship (ER) diagram provided by the Company in response to an Evaluation Team request was drafted in 2008 and very likely missing updates. In addition, business rules, naming conventions, and code definitions are often documented sporadically, making it difficult to align data across tables or for RIE staff to quickly locate and understand datasets managed by other teams. This presents a

³³ Note that PPL largely based RIE's customer billing system on that of their Pennsylvania-based operating company. The Company evaluated using the Kentucky platform versus the Pennsylvania platform. Although Kentucky has gas customers, the Company found there was more alignment with customer choice, customer programs, and system integration choice with the Pennsylvania system.

possible risk of inconsistent mapping and interpretation during future integrations or system upgrades.

- **Lack of Cross-System Mapping** – Whereas modern systems have defined APIs that facilitate standardized data exchange mechanisms, the Company is currently is reliant on data transformations across systems that are often embedded in SQL scripts or ETL (Extract-Transform-Load) jobs without clear boundaries or error isolation. This limits visibility into the full lifecycle of billing data – from raw meter reads to final invoices – making root-cause analysis of discrepancies time-consuming and error-prone.

Given the system limitations and integration complexities, the Company requires highly trained and deeply knowledgeable staff to maintain and operate the system. In addition, to manage risk of misinterpretation of data or comprised data integrity, the Company has to institute access limitations. As a result, the Company relies heavily on individual expertise, which can lead to bottlenecks and make it difficult to maintain operational continuity with staff changes.

6. Data Analysis and Testing Findings

As described in Section 4, the Evaluation Team conducted its own analysis to independently verify issues that had been identified by the Company and/or identify additional issues. In this section, the Evaluation Team addresses additional findings discovered through the following testing and analyses performed. These findings are summarized in Table 6-1, below.

Table 6-1. Data Analysis and Testing Findings

Analysis	Finding(s)
Customer Bill Testing	<ul style="list-style-type: none"> Although RIE has made progress correcting errors/omissions within customer accounts, in limited instances uncorrected errors/omissions remain in certain accounts. There are errors/omissions which have not been identified or quantified by RIE for problem accounts.
Billing System Analysis	<ul style="list-style-type: none"> Total billed usage aligns with independent data sources. Cancelled bills and no bills were elevated immediately after cutover, but have been trending downward through 2025.
Tariff Review	<ul style="list-style-type: none"> Current rates used in CSS to calculate customer bills generally align with public tariff sheets, but some rate components are grouped together in CSS.
Cash Register Analysis	<ul style="list-style-type: none"> The Evaluation Team analyzed the reconciliation of billed operating revenue to the general ledger and did not identify any material discrepancies. Certain billing errors/omissions would impact rate reconciliation mechanisms, specifically, customers that were not billed and will not be billed for prior service. The Evaluation Team does not have evidence at this time that the impact is material. The Evaluation Team identified approximately \$128K of incorrect bills in a sample of net write-offs, which indicates that some net write-offs in the billing system are overstated. The Company will need to perform analysis to identify all instances of write-offs that include incorrect bills and quantify the financial impact. The Evaluation Team has identified four areas the billing system issues will impact rates, which are not included in the scope of this report: <ul style="list-style-type: none"> Bad debt – Cost of service will include bad debt expense. The methodology to determine bad debt expense could be based on historical net write-offs. If bad debt expense would be based on historical net write-offs, consideration should be given to the Evaluation Team’s finding of incorrect bills in a sample of net write-offs, which indicates that some net write-offs in the billing system are overstated. Working capital requirements – This requires a comprehensive review of normalized revenue collection lag (lead/lag study). Normalized O&M for the Customer organization – This requires a comprehensive analysis of incremental costs. Rate reconciliation mechanisms – This requires a review of each rate reconciliation mechanism to determine how the mechanism was impacted by improperly billed revenue.

Source: Evaluation Team

6.1 Observations Identified in Customer Bill Testing

The Evaluation Team tested bills from accounts with known billing issues, which are accounts with one or more bills that had been cancelled and rebilled by the Company prior to the Evaluation. The Evaluation Team also tested bills from accounts without known billing issues (“normal bills”). As described in Section 4.4, this sample of 25 total accounts was judgmentally selected to capture a range of potential issues; the sample of customer bills tested is not statistically representative of the entire population of accounts.

In addition to the cancellation reasons described in Section 5.1 above, the Evaluation Team made several observations across the sample of 25 accounts.³⁴ For accounts with cancel/rebills, observations were identified on reissued bills or recent bills.

Table 6-2. Observations Identified through Bill Testing

Observation Type	Observations	Associated Section & Appendix
Errors	6	Section 6.1.1 & Appendix F.1
Opportunities for Improvement	35	Section 6.1.2 & Appendix F.2

Note: An account may have multiple issues

Source: Evaluation Team analysis

6.1.1 Errors

From the sample of 25 accounts reviewed during bill testing, the Evaluation Team identified 6 errors across 5 of the accounts tested. The following table identifies error categories by bill date and bill type.

Table 6-3. Issues Identified on Bills, by Bill Date and Bill Type

Category	Total Tested Accounts with Each Error	Bill Date		Bill Type	
		Nov 2024 - Dec 2024	Jan 2025 - Current	Reissued Bill	Recent Bill
Wrong supplier rate/prorated rate	2	✓	✓	✓	✓
Wrong supplier	2	✓	✓	✓	✓
Meter read differences	1		✓	✓	✓
Usage smoothing	1		✓	✓	
Total	6				

Note: Total number of accounts with errors is 5. Some accounts have multiple issues, such that the Total Tested Accounts with Each Error sums to more than 5 accounts. The checkmarks represent the bill period (based on bill date) or bill type of the bill(s) that the Evaluation Team identified the error in.

Source: Evaluation Team

³⁴ As described in Section 4.4, the sample of 25 accounts was judgmentally selected. Because it was not a statistical sample, the error rate cannot be extrapolated to the entire population.

Supplier information

- **Wrong supplier rate/Prorated supplier rate:** Identified one account where the choice supplier's rate was not updated in the corrected bill. Identified another account where the choice supplier's rate changed three times during the period, but the billed rate was higher than any of the three rates listed in CSS and ID. The Evaluation Team recalculated a recent bill and the prorated rate is still different from the rate billed.
- **Wrong supplier:** Identified two accounts where the reissued bill continues to have the wrong supplier listed. One account eventually updated the supplier in a later bill.³⁵ For this account, the problem was caused by an issue in the supplier history table within CSS. The account received several change requests from multiple suppliers, which caused it to get stuck in a pending status. A code change was implemented in July 2025 to resolve this issue. The other account has not been updated to date, despite 6 months of customer complaints. The correct supplier is listed in CSS and ID for this account, but the bills continue to show RIE as the supplier. This issue was identified as the cancellation reason; however, since the reissued bills did not appear to fix the issue, this observation has been listed again in this section.³⁶

Usage calculations

- **Meter read differences:** Identified an account with billed usage that did not align to CSS on a reissued bill. In addition, we noticed that CSS did not align to MDMS nor the billed reads on the last three recent bills on this account. This account was part of the issue described above where MDMS was not feeding automatically into CSS, and RIE had to manually upload MDMS readings into CSS for it to bill. Although the read differences were small, this account has a meter multiplier which causes the difference to multiply by 6,000. This issue has continued to the present.
- **Usage smoothing:** A residential account originally had the wrong rate class for 6 months (5 bills). RIE rebilled for the entire 6-month period through two bills. The system captured actual reads for each month; however, once the 5 bills were canceled, the system canceled the regular reads. The bill prorated usage evenly across the months based on number of days per month instead of using actual reads for each billing period. The Evaluation Team recalculated using actual reads to determine the amount the customer would have paid if the rate class was not wrong to begin with. The Evaluation Team's total was different from RIE's due to rate changes that occurred over those periods.

For screenshots of detailed findings, refer to Appendix F.1.

³⁵ The reissued bill on 12/26/24, for usage period of September to October 2024, included the correct supplier but billed at the wrong supplier rate. However, the ending account balance only included the budget plan amount. The 12/26/24 bill was never canceled. On 7/11/25, RIE issued another bill for the same usage period and listed the incorrect supplier; however, the account balance was the same \$352 amount inclusive of the budget billing plan. The additional amount due totaled the payment installment plan amount of \$29.33. Based on how RIE is calculating the ending balance for budget bills, the Evaluation Team cannot see actual cost detail tracked in the account activity, so the team cannot determine if the supplier was fixed for that usage period. However, the correct supplier is added to bills after this period. This account is also referenced in Section 6.1.2 and in Appendix F.2.

³⁶ The Evaluation Team inquired to determine why the bills are still showing RIE as the supplier and have not received an answer.

6.1.2 Opportunities for Improvement

The Evaluation Team has identified 30 additional observations that did not rise to the level of an error related to bill presentation and bill calculation during testing, as shown in the table below Table 6-4.

Table 6-4. Additional Bill Presentation and Calculation Observations in Tested Bills

Category	Total Tested Accounts with Each Observation	Bill Date		Bill Type	
		Nov 2024 - Dec 2024	Jan 2025 - Current	Reissued Bill	Recent Bill
Calculation Rounding	13	✓	✓	✓	✓
RE-Growth Energy Credit Rounding	1	✓	✓	✓	✓
Bill Format & Account Balance for Budget Billing Plans	1	✓	✓	✓	✓
Beginning Balance Data and Format	15	✓	✓	✓	
Miscellaneous credit	1		✓		✓
Adjusted meter reads	3		✓	✓	✓
Refund and credit applied on bill	1		✓		✓
Total	35				

Note: Some accounts have multiple observations, such that the Total Tested Accounts with Each Observation sums to more than the number of accounts tested. The checkmarks represent the bill period (based on bill date) or bill type of the bill(s) that the Evaluation Team identified the observation in.

Source: Evaluation Team

- Calculation Rounding:** The Evaluation Team observed that the Company’s calculation of individual tariff components is rounded to a 2-digit cent and only the tariff components that result in a charge are included on the face of the bill. Please see Appendix F.2 for a specific example.
- RE-Growth energy credits for satellite accounts are rounded:** For satellite accounts, the Evaluation Team observed that RE-Growth credits that are allocated from the host to the satellite account are rounded. For example, if a host generates 888 kWh and the agreement states the satellite can get 5%, -44 kWh gets allocated to the satellite, not -44.4 kWh (assuming usage is higher). Evaluation Team cannot conclude at this time if that is the correct approach. Please see Appendix F.2 for a specific example.
- Bill Format & Account Balance for Budget Billing Plans:** The current bill format for customers using a budget billing plan is confusing for readers. Please see Appendix F.2 for a specific example.

- **Beginning Account Balances for rebills:** The Evaluation Team has seen inconsistency in the data pulled into the “Previous Balance” and “Payment” section for rebills, which is creating “Beginning Account Balances” that do not foot. Please see Appendix F.2 for specific examples.
- **Miscellaneous credit:** The Evaluation Team identified one account that was given a miscellaneous credit of \$108.40 with the description of “special agreement”. The “special agreement” credit was applied in January 2025 during the settlement month for a budget billing customer. The credit appears to have reduced the settlement amount of \$280.40 back to the deferred amount of \$172. The budget billing export from ID uses the correct settlement amount of \$280.40 to reduce the deferred amount to \$0. However, the bill only charges the \$172. The Evaluation Team has not received an explanation for why this customer received a \$108.40 credit.
- **Adjusted meter reads:** For three accounts, the end read was canceled and adjusted. One of these accounts had an original cancelation reason due to “MV90 Meter dial mismatch between actual read and CSS” and the mismatch does not appear to be resolved to date (refer to Table 5-2). The Evaluation Team inquired about the methodology and calculation of these adjusted reads but has not received a response at this time.
- **Refund and credit applied on bill:** While analyzing the account balance for one of the samples, the Evaluation Team noticed a refund for \$10.41 and a RE-Growth credit of -\$10.41 on the customer’s bill. For the RE-Growth program, a customer has the option to credit their balance or receive a refund. The Evaluation Team followed up to understand if this customer was actually refunded. If the customer was refunded, it looks like the customer received the benefit in two different ways: 1) reduction of bill, and 2) a refund.

For a more detailed discussion of these observations, refer to Appendix F.2.

6.2 Observations Related to Billing Systems Analysis

As described in Section 4.3, the Evaluation Team assessed aggregate data from across the Company’s billing system. The results of this review are presented in the subsections below.

6.2.1 Reconciliation of Total Billed Usage to Independent Sources

A key consideration identified by the Commission in their Order was whether total energy usage billed by the Company at an aggregate level aligns with independent sources. If the Company is billing for more usage than identified by other sources, that may indicate systemic issues with metering or usage estimation. If the Company is billing for less usage than identified by other sources, that may indicate systemic issues with underbilling or perhaps that some customer accounts were “lost” in the transition from the legacy provider. Based on analysis by the Evaluation Team, there does not appear to be any systemic issues causing discrepancies in total billed usage; total electricity and natural gas billed usage aligns with independent sources.

For this comparison, the Evaluation Team apportioned monthly bill readings for electricity and natural gas from the Company’s CSS system into calendar months for comparison to independent sources. This apportionment assumes straight-line usage over the course of the reading, which is a limiting simplification. To illustrate this point, imagine an electric customer whose meter was read first on May 15th and then next on June 15th. For this apportionment, the total monthly usage read on June 15th is allocated 50% to May and 50% to June. However, if it was particularly mild in May and then particularly hot in June, it’s likely that electricity usage was

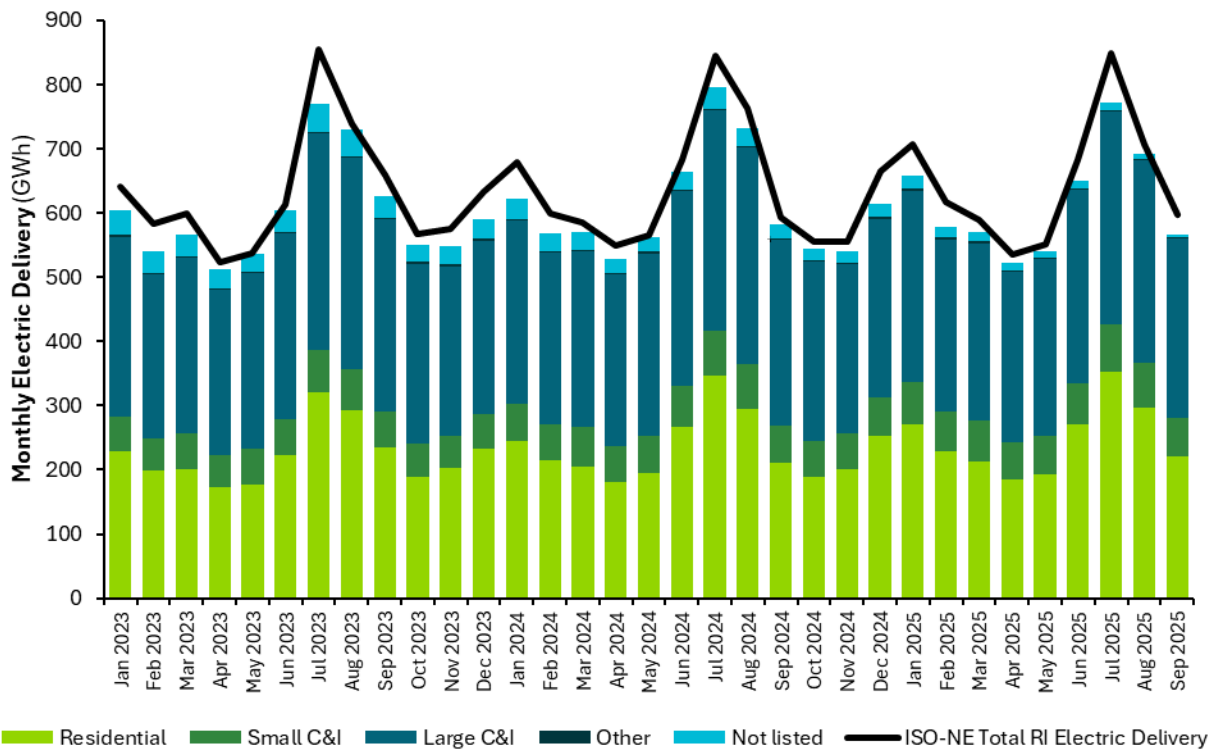
actually higher in June due to higher space cooling loads. Note that while this will lead to high month-to-month variation, these impacts should cancel out over extended periods of time.

The reconciliation of billed usage for electric and gas deliveries is explored as follows:

Electric

ISO New England (ISO-NE) manages the generation of electricity throughout New England and tracks its delivery to the electric distribution companies within each state in near real-time. This data is published by ISO-NE on its website. This presents a prime opportunity to compare total billed electricity deliveries by the Company to this independent source of data on total electricity delivered to the Company. Figure 6-1 below presents the apportioned monthly billed usage by customer type according to RIE’s CSS system to the monthly electricity delivered to the state of Rhode Island by month according to ISO-NE.

Figure 6-1. Comparison of RIE Billed Electricity to ISO-NE Publications



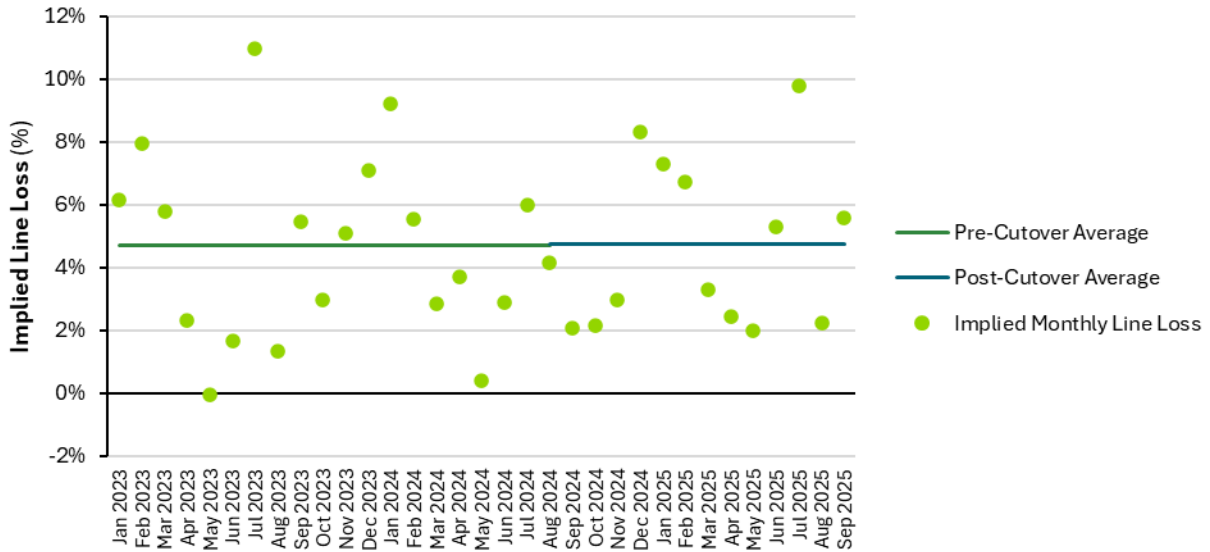
Note: Monthly billed readings from the Company’s CSS are apportioned linearly to calendar months based on number of days that the reading overlapped with the month. All of Rhode Island’s electricity deliveries per ISO-NE are assumed to be delivered to RIE.

Source: Evaluation Team analysis of billed usage data from the Company’s CSS, as well as ISO-NE’s monthly data by load zone, available at: <https://www.iso-ne.com/isoexpress/web/reports/load-and-demand/-/tree/zone-info>

While the two datasets are well correlated, it appears the amount of electricity flowing “in” to RIE’s electric distribution network according to ISO-NE is consistently higher than the amount of electricity flowing “out” of RIE’s electric distribution network according to the Company’s billed usage. This is actually expected, because some electric energy is lost as it flows through the power lines of the distribution system. Graphing this implied line loss by month in Figure 6-2 , there is month-to-month variation as would be expected due to the apportionment methodology

noted above, but on average the line loss has remained consistently around 5% when averaging selected months pre- and post-cutover. This is well within the expected value range for line losses; ISO-NE assumes within its forecasting that the electric distribution network in New England averages 6% line loss.³⁷

Figure 6-2. Implied Electric Line Loss



Source: Result of dividing monthly ISO-NE usage by the apportioned monthly billed usage from the Company’s CSS, as shown in Figure 6-1.

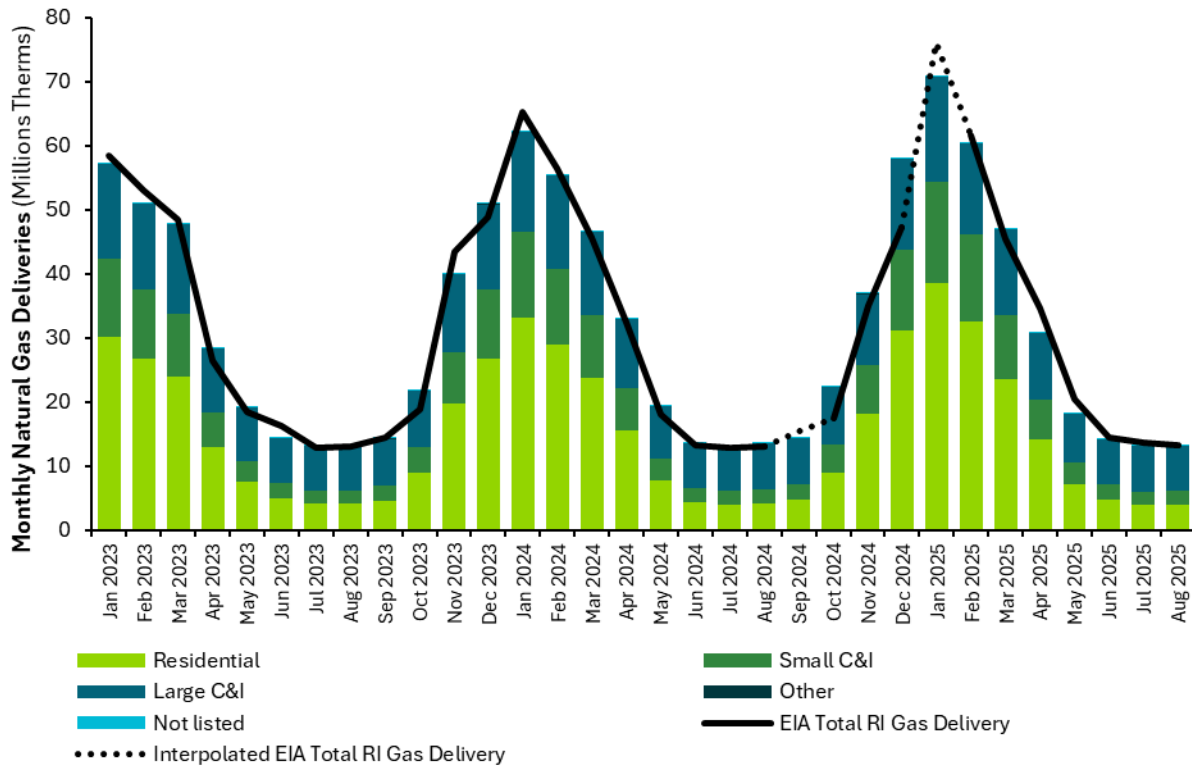
Gas

For the Company’s natural gas system, there is not a purely independent source of data on total deliveries to Rhode Island analogous to ISO-NE for electricity. While the Company does receive a majority of its natural gas from interstate pipelines, the Company also utilizes liquefied natural gas supplies that may be trucked into the state. The ability to store natural gas both on- and off-system also complicates the comparison over time of pipeline natural gas deliveries to billed usage; whereas the majority of electricity demand is met by electricity that is generated approximately simultaneously within ISO-NE, much of the natural gas delivered to customers in Rhode Island during periods of peak demand is delivered from storage that had been filled by interstate pipeline during periods of low demand.

Therefore, for this comparison, the Evaluation Team utilized EIA data on monthly deliveries to customers within Rhode Island. This data source is at least partially circular, because one of the sources used by EIA to report this information is gas distribution companies like RIE itself. However, this data is supplemented by third-party suppliers and pipeline companies as well. The comparison is shown in Figure 6-3.

³⁷ See Slide 25 of ISO-NE’s Update on the 2020 Transportation Electrification Forecast, available at: https://www.iso-ne.com/static-assets/documents/2019/11/p2_transp_elect_fx_update.pdf

Figure 6-3. Comparison of RIE Billed Natural Gas to EIA Publications

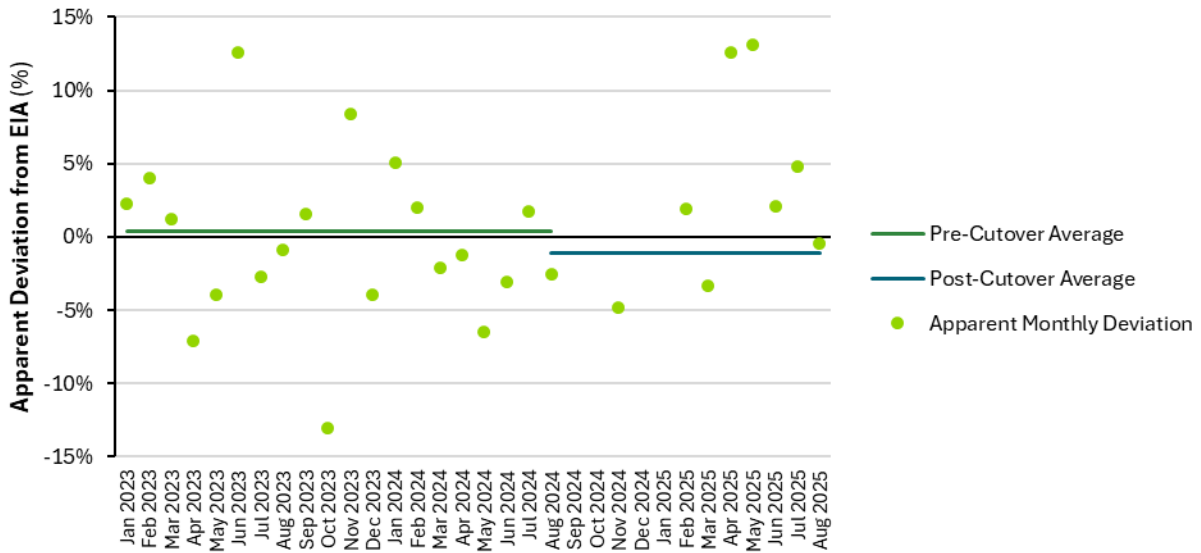


Note: Monthly billed readings from the Company’s CSS are apportioned linearly to calendar months based on number of days that the reading overlapped with the month. All of Rhode Island’s natural gas deliveries per EIA are assumed to be delivered by RIE. Note that EIA did not publish several months of data on natural gas deliveries to industrial customers; the graph shows interpolated data assuming industrial gas deliveries equal that from the same calendar month in the previous year.

Source: Evaluation Team analysis of billed usage data from the Company’s CSS, as well as EIA’s monthly natural gas data by state, available at: <https://www.eia.gov/dnav/ng/hist/n3060ri2m.htm>

Because the EIA data and natural gas billing data from the Company are both measured at the point of sale to the end user, there is not an expected factor for natural gas analogous to electric line loss. The apparent monthly percent difference in the two data sources is shown in Figure 6-4, below. As can be seen, while there are significant monthly variations, the long-term average difference hovers around 0%.

Figure 6-4. Apparent Deviation in RIE Billed Natural Gas Deliveries to EIA Data



Note: EIA did not publish several months of data on natural gas deliveries to industrial customers; the graph shows interpolated data for “Post-Cutover Average” assuming industrial gas deliveries equal that from the same calendar month in the previous year.

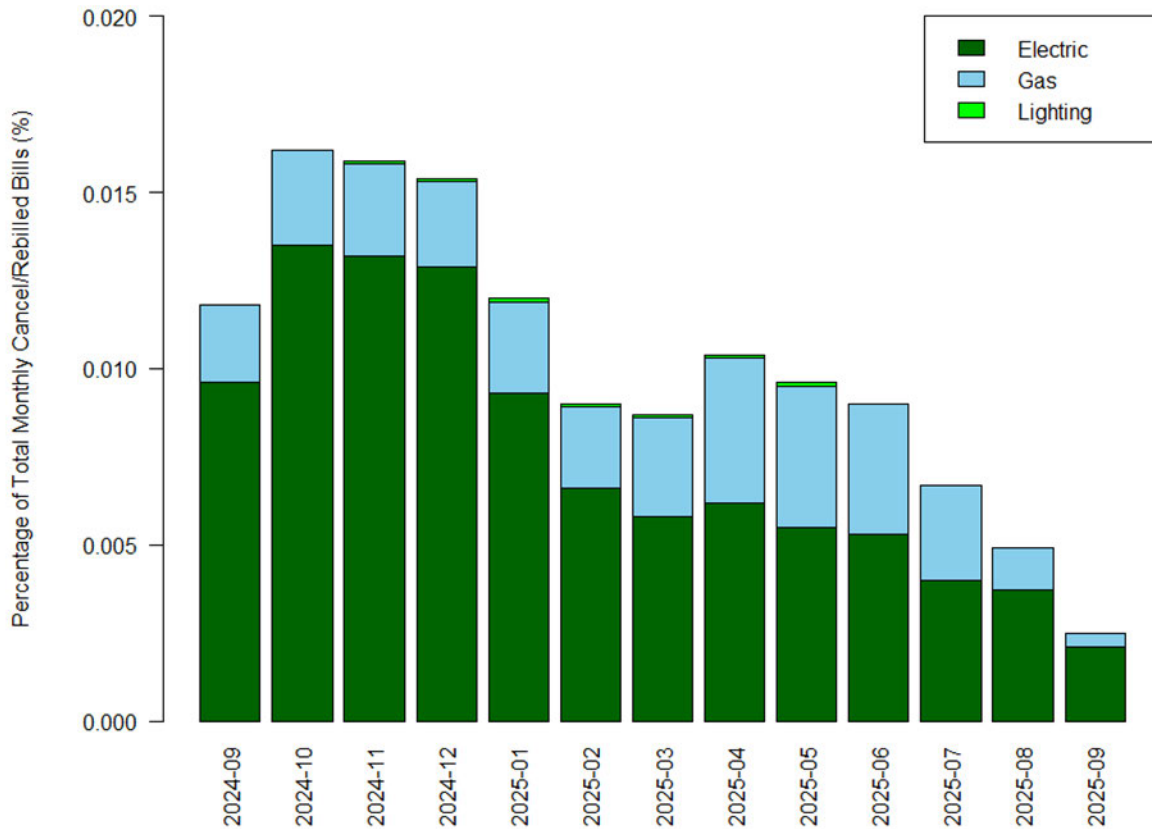
Source: Result of dividing monthly ISO-NE usage by the apportioned monthly billed usage from the Company’s CSS, as shown in Figure 6-3.

6.2.2 Trends in Cancel/Rebills

The Company’s billing system (like most utilities’ billing systems) has a process for identifying and preventing incorrect bills from being sent to customers. However, gaps in this process can allow incorrect bills to be sent. When the Company subsequently identifies these errors, the incorrect bills are cancelled and the Company reissues corrected bills for the relevant time period. While no utility billing system could be expected to perfectly capture all incorrect bills before they are sent, a low, stable number of bill cancellations over time implies that the utility’s exception management system is working appropriately.

The Evaluation Team conducted an analysis of cancel/rebill trends based on data from the Company’s CSS system. The number of bills cancelled and rebilled spiked in October of 2024 with a record of approximately 9,000 bills, which were primarily electric customers. The number of rebills has slowly dropped, with September of 2025 reporting roughly 1,500 bills as cancelled and/or rebilled. Figure 6-5, below shows the downward trend in bills flagged for cancellation and rebilling. The magnitude of bills flagged has dropped from 1.7% to less than 0.5% of total monthly bills.

Figure 6-5. Percentage of Bills Cancelled/Rebilled, by Service Type

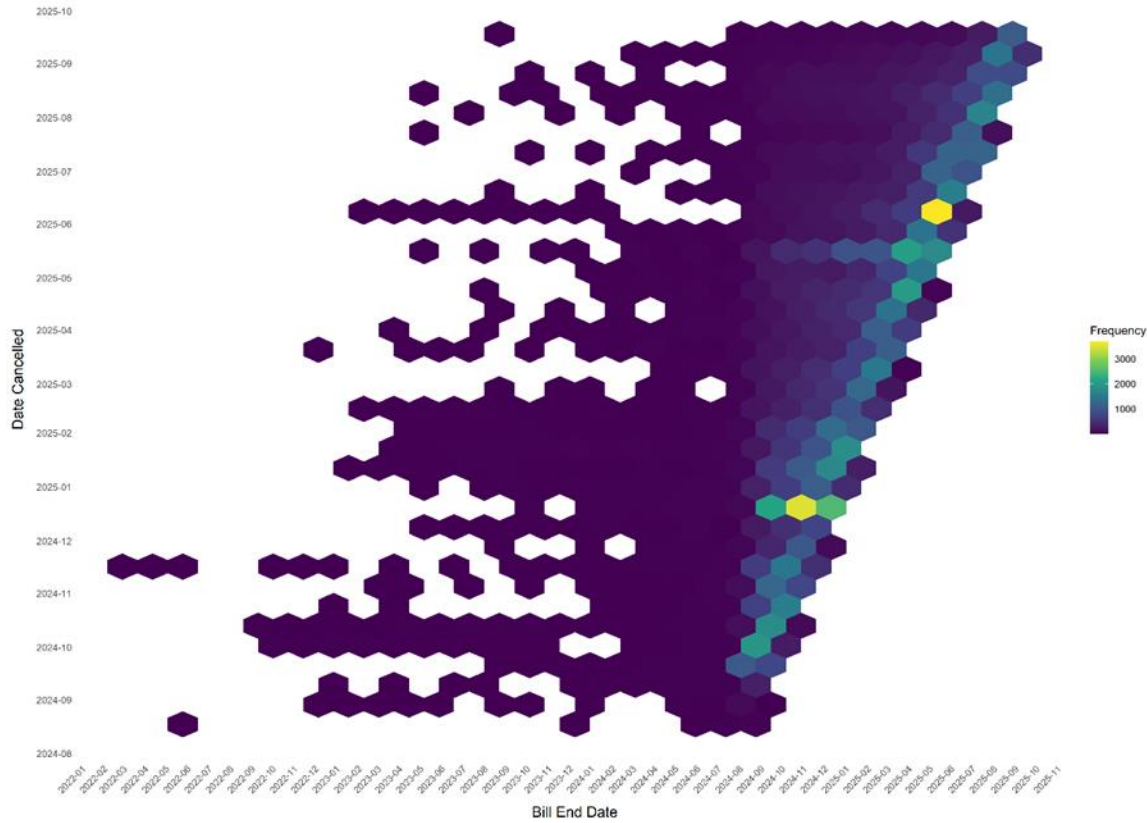


Note: Values are presented as a percentage of total RIE customers reported in the 2024 EIA Form 861.

Source: Evaluation Team analysis of cancel/rebill information from RIE's CSS

The Evaluation Team considered the possibility that the downward trend in the preceding graph is because incorrect bills continue to be sent out, but that the Company has not yet identified and cancelled those bills. To test this, the Evaluation Team additionally mapped Bill End Dates with Date Cancelled to see if any distinct correlations existed. As shown in Figure 6-6, the spread of dates is fairly even across the time horizon, with incorrect bills typically cancelled about a month after delivery. This implies that, while more historic bills may still be cancelled, especially in September 2025, the primary reason for the reduction in cancelled bills through 2025 to date is the Company's improvement in preventing incorrect bills from being sent to customers.

Figure 6-6. Heatmap of Cancel/Rebill Date Combinations



Source: Evaluation Team analysis of cancel/rebill information from RIE’s CSS

Interestingly, the data does present two bill end dates with an unusually high frequency of cancelled bills: 2024-10-30 and 2025-05-13. The first high frequency bill was largely cancelled 26 days after being sent, while the second was cancelled 51 days after being sent. The number of bills cancelled on these particular days is shown in Table 6-5, below.

Table 6-5. Dates with High Frequency Corrections

Bill End Date	Date Cancelled	Count of Cancelled Bills
October 30, 2024	December 12, 2024	3,486
May 13, 2025	June 8, 2025	3,680

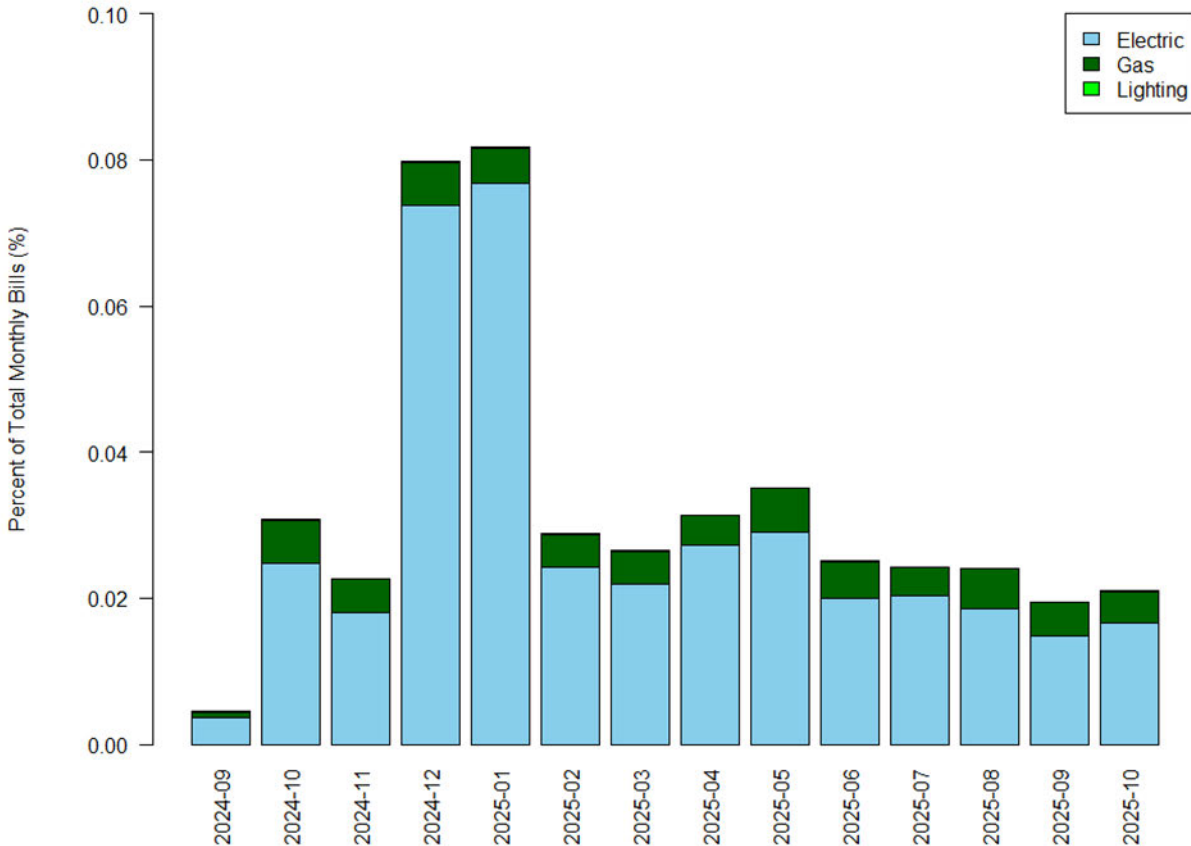
Source: Evaluation Team analysis of cancel/rebill information from RIE’s CSS

6.2.3 Trends in No Bills

As described above, a utility’s billing system is designed to prevent bills that may be incorrect from being sent to customers. In addition to incorrect bills being sent to customers and needing to be cancelled/rebilled, another possibility from this system design is that bills are not sent to customers. In some cases, customers can go extended periods without receiving bills, which creates uncertainty for the customer. As described in Section 5.10, the Company reported both inheriting a set of customers who had not received bills for some time from the legacy provider pre-cutover, as well as an elevated level of No Bills after go-live for several different reasons.

The Evaluation Team examined the trends in No Bills based on data from the Company’s CSS system. The figure below indicates a spike in the number of no bills in December of 2024 and January of 2025, with nearly 8.2% of total monthly bills not billed. Since then, the number of No Bills has dropped down and steadily smoothed out to roughly 2.1% of total monthly bills as of October of 2025.

Figure 6-7. Percentage of No Bills by Service Type



Note: Values are presented as a percentage of total RIE customers reported in the 2024 EIA Form 861.

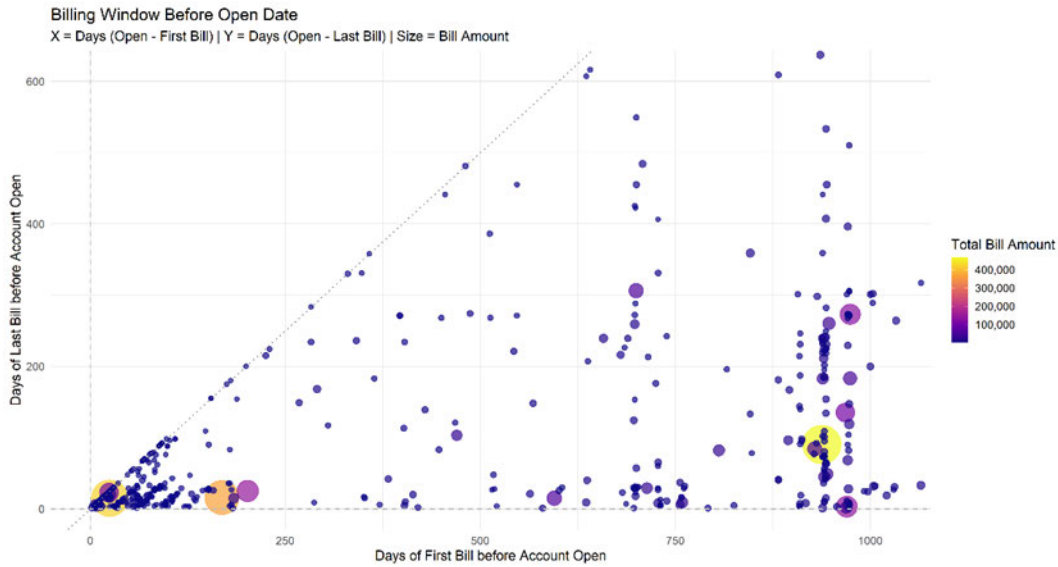
Source: Evaluation Team analysis of No Bill information from RIE’s CSS

6.2.4 Review of Account-Level Metadata & Usage

Anomalies were identified in the billing system where a subset of accounts had bills generated prior to the account opening date listed in CSS. Figure 6-8, below, visualizes the distribution of accounts that bill prior to listed account opening, showing the timing of first and last pre-opening bills relative to the account open date, with bubble sizes representing the total billed amounts. Note that these findings are consistent with how the Company characterized data repairs completed as part of the Genesis and Armageddon processes.³⁸

³⁸ “Genesis” refers to a data repair process that corrects an account by inserting a new service activation date; this process does preserve all historical data while resetting the start date. “Armageddon” refers to a process that permanently closes an account when repair is not feasible; a new account may be created with the same setup, if needed.

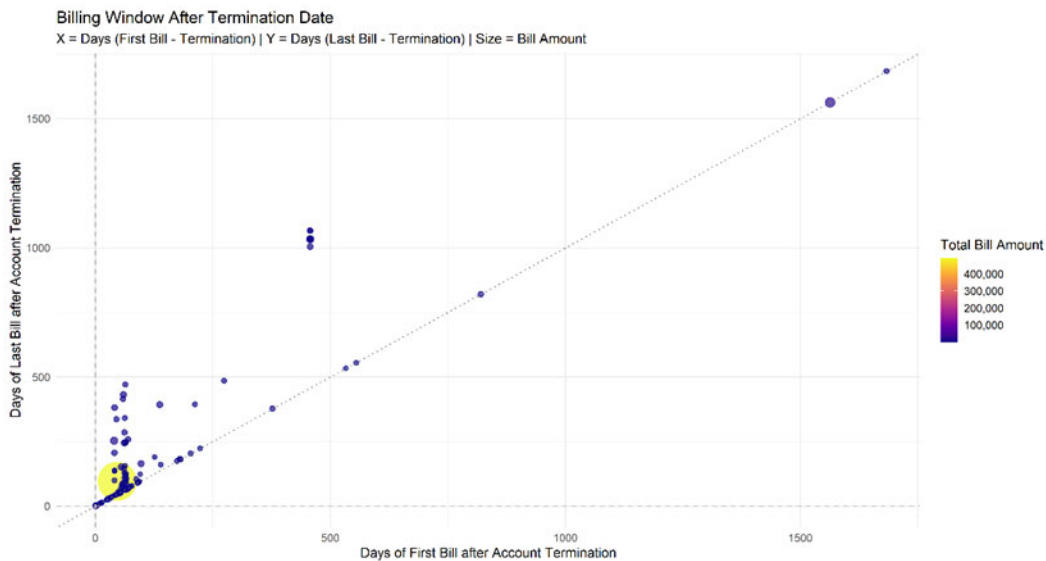
Figure 6-8. Bill Amount for Periods Before Account Open



Source: Evaluation Team analysis of bill account information from RIE's CSS

A review of billing data also revealed a group of accounts that received bills after the CSS-listed termination date of service (billing period started reading after termination date). Figure 6-9, below, illustrates the distribution of these accounts, mapping the timing of first and last post-termination bills relative to the termination date, with bubble sizes indicating the magnitude of total billed amounts. Note that these findings are consistent with how the Company characterized data repairs completed as part of the Armageddon processes, although there could be other contributing factors.

Figure 6-9. Bill Amount for Periods After Account Termination



Source: Evaluation Team analysis of bill account information from RIE's CSS

6.3 Observations from Tariff Review

Upon comparing the CSS October 2025 rate table with October 2025 tariff/public rate information, the Evaluation Team found no significant discrepancies for either electric or gas rates. The outcome of the analysis suggests that the correct rates are currently being used today to calculate customer bills. Individual rate components as shown in the CSS rate table were verified against the tariff/public rate information. Most of the components in the CSS rate table were able to be directly compared against the tariff/public rate information, but not all.

The following 3 electric rate components contain uncollectible or reconciliation factors on the tariff/public rate information, but not the CSS rate table:

- Transmission Uncollectible Factor
- O&M Expense Reconciliation Factor
- CapEx Factor Reconciliation Factor

The Evaluation Team verified the accuracy of the rate components in CSS by summing the values from the public tariff with their respective base values. An example of this is shown Table 6-6 below for electric rate schedule A-16: Basic Residential Rate. The Evaluation Team found the approach shown in this example to be consistent across electric rate schedules. This requirement to combine components before applying them in CSS was inconsistent with the process followed for other rate elements, creating some amount of risk. Also, because bill components are rounded to the nearest cent after being multiplied by usage, the total sum of usage may differ by a cent depending on when rounding occurs; see Section 6.1.2 for more on this calculation rounding.

Table 6-6. Comparison of Tariff Line Items to Rates used in CSS for Schedule A-16

Component [Source]	Rate (\$/kWh)	Component [Source]	Rate (\$/kWh)	Component [Source]	Rate (\$/kWh)
Base Transmission Charge [Tariff]	\$0.04411	O&M Expense Charge [Tariff]	\$0.00223	CapEx Factor Charge [Tariff]	\$0.00832
Transmission Uncollectible Factor [Tariff]	\$0.00062	O&M Reconciliation Factor [Tariff]	\$0.00004	CapEx Reconciliation Factor [Tariff]	\$0.00094
Transmission Charge [CSS]	\$0.04473	O&M Expense Charge [CSS]	\$0.00227	CapEx Factor Charge [CSS]	\$0.00926

Note: Component values from the public tariff sum to equal the rate values used in CSS.

Source: Values pulled from CSS (“[CSS]”) and compared to Summary of Retail Delivery Rates sheet for RIPUC Tariff No. 2095, published by RIE (“[Tariff]”)

Through additional discussions with a subject matter expert at RIE on the CSS, an additional finding was made that the setup and management of the CSS Rate Table is managed by a third-party, as opposed to Company personnel. The Company is responsible for verifying that rates are correct as a control, including verifying testing results and validating post-production. Insights into the bill calculation process that uses the CSS Rate Table were not conclusive.

Separately, the results of the review of the PPL_RI_Requirements and Fit Gap Functional Requirements are in alignment with tariff language. This suggests that implementation of the tariff should be working correctly.

The Evaluation Team also reviewed information in the PPL_RI_Requirements and Fit Gap for the Net Energy Metering and RE-Growth programs. Although no immediate contradictions were found between the PPL_RI_Requirements and Fit Gap Functional Requirements and tariff language for the programs, findings such as rounded credits and a RE-Growth customer receiving two forms of payment were found during sample bill testing. These are described in further detail in Section 6.1.

6.4 Observations Related to the Cash Register

As described in Section 4.6, the Evaluation Team analyzed revenue reconciliations and net write-offs to understand how billing system issues may or may not impact rate setting. The results of these analyses are presented in the following subsections.

6.4.1 Revenue Reconciliation

Figure 6-10 below summarizes the revenue reconciliations for the periods August 19, 2024 (go-live) to December 31, 2024, and for year-to-date July 31, 2025.

Figure 6-10. Revenue Reconciliations

<i>(in 000s)</i>	2024*	2025
Billed Operating Revenue per the Billing System	\$ 611,991	\$ 1,256,723
<i>Reconciling items:</i>		
Last Resort Service (LRS) Credits	(5,025)	(3,134)
Gas Revenue Correction	-	320
Recorded to Other Revenue	(383)	(103)
Timing Differences	(154)	154
Other/not identified	(23)	9
Billed Operating Revenue per the General Ledger	\$ 606,406	\$ 1,253,969
<small>*Amounts are from August 19, 2024 (date of the billing system conversion) to December 31, 2025</small>		

Source: Data from RIE Accounting Department

The table above illustrates that billed operating revenue from the billing system does reconcile to the general ledger with the following reconciling items:

- **LRS Credits:** This relates to the LRS credits issued to electric customers in accordance with Docket No. 24-31-EL.³⁹ The LRS credits failed to bill when the credit amount provided was larger than the current charges for the bill, resulting in a "negative bill." To correct the error and apply the LRS credits to the impacted customers' accounts, the Company recorded the

³⁹ Docket No. 24-31-EL, Last Resort Service Winter Rates for Effect October 1, 2024 compliance filing, required the Company to provide bill credits to certain residential, commercial and industrial customers.

credits as a one-sided entry in the billing system during the months of October 2024,⁴⁰ December 2024, and January through March 2025. One-sided entries are utilized in the billing system when the generation of accurate credits and/or adjustments would require significant lead time for programming changes. The process allows the Company to issue applicable credits in a timely manner. The LRS credits were applied to the impacted customers' accounts receivable balances within the billing system, and those credits were recorded to the general ledger. Because the credits were not a 'billed' component, they were not in the billed revenue database reports used in the reconciliation above; therefore, creating a reconciling item.

- **Gas Revenue Correction:** The May 1, 2025 off-peak Distribution Charge rate was not updated for five rate codes by the effective date. When the error was identified, the Company utilized the one-sided entry process, described above, to apply a charge to each impacted account for the specific amount owed. The corrections were applied to the impacted customers' accounts receivable balances within the billing system, and those charges were recorded to the general ledger. Because the charges were not a 'billed' component, they were not in the billed revenue database reports used in the reconciliation above; therefore, creating a reconciling item.
- **Recorded to Other Revenue:** During the period of August 2024 (implementation of the billing system) to February 2025, there were mapping differences between the billing system and the general ledger that required manual entries to be recorded by revenue accounting. To ensure the general ledger classifications were consistent with billing reports that would be used throughout the Company and because the amounts were not material, these manual entries were recorded to other revenue (account 456).
- **Timing Differences:** This relates to general ledger entries recorded to properly capture activity on a calendar month versus a billing cycle.

In addition to the revenue reconciliations, the Evaluation Team requested the Company's analysis for the questions defined in Section 4.6.1. These situational questions and the review of the Company's responses are listed in Table 6-7 below.

⁴⁰ The LRS credits for low-income accounts occurred over six months, starting in November 2024. In order for the credits to be reflected in the November bill cycle, the credits were applied in the billing system on the last day of October.

Table 6-7. Review of Company’s Responses to Billed Revenue Situations

Question for the Company	Review of Company’s Response
<p>When a no-bill account is finally billed, especially those accounts that have taken several months or years to correct the no-bill issue, does the Company require the customer to pay the entire back-billing amount? Are there no-bill accounts for which the Company did not bill part or all of the no-bill periods?</p>	<p>The Company indicated that they require customers to pay the entire back-billing amount unless the account was ultimately billed utilizing the “Genesis” and “Armageddon” processes.⁴¹ These processes were utilized to bill accounts that had not been billed for a long period of time and resulted in all or a portion of the customer account usage to not be billed. The Company indicated that it has utilized these processes since the implementation of the billing system in August 2024. The Company is currently identifying all the customer accounts that were repaired through these processes and will quantify the financial impact of unbilled customers.</p>
<p>If the Company identifies customer accounts that are underbilled due to billing related issues, is the Company cancelling prior bills and rebilling the customers for the corrected amount?</p>	<p>The Company indicated that in most, but not all, cases they would bill for the underbilling. The Company should compile a list of all customer accounts that were underbilled and quantify the financial impact of underbilling customers.</p>
<p>Does the Company track, by account, credits that were issued to customers due to billing system related issues? If so, please provide a list of all accounts that were issued credits due to billing system related issues, the amount of the credit per account, and how the credits were recorded.</p>	<p>The Company indicated that it does not specifically track credits issued to customers due to billing system related issues, but they did provide credit allowances issued to customers between August 2024 to September 2025, totaling approximately \$153K. There are no transaction codes that would allow for a precise categorization of the credits. However, based on remarks on the customer’s account, the credits related to items such as credits for billing errors, credits for late payment charges, and general ‘goodwill’ credits. The Company records these credits as a reduction to revenue.⁴²</p>

Source: Evaluation Team

6.4.2 Net Write-Offs

To understand the impact that the implementation of the billing system and billing errors may have had on net write-offs, the Evaluation Team obtained the following trend of net write-offs.⁴³

⁴¹ “Genesis” refers to a data repair process that corrects an account by inserting a new service activation date; this process does preserve all historical data while resetting the start date. “Armageddon” refers to a process that permanently closes an account when repair is not feasible; a new account may be created with the same setup, if needed.

⁴² For \$41K of credits issued in August 2024 (the month of cutover), the credits were reclassified to below the line (Account 42659, miscellaneous income/deductions).

⁴³ Net write-off amounts will differ from the amounts reported in Docket No. 4770, the Company’s Low-Income Monthly Report. The net write-offs in Docket No. 4770 only include the net write-off of utility charges for gas (code 0100), electric (code 0200) and lighting (code 0700). It excludes other write-offs, such as the write-off of non-utility charges (reconnect fees and returned payment fees) and manual write-offs for situations like bankruptcy.

Figure 6-11. Monthly Trend of Net Write-Offs

Electric			Gas		
Month	Year	Net Write-offs* (in 000s)	Month	Year	Net Write-offs* (in 000s)
August	2024	\$ 1,390	August	2024	\$ 673
September	2024	\$ (106)	September	2024	\$ (59)
October	2024	\$ (97)	October	2024	\$ (76)
November	2024	\$ (110)	November	2024	\$ (33)
December	2024	\$ (143)	December	2024	\$ (112)
January	2025	\$ 2,424	January	2025	\$ 483
February	2025	\$ (58)	February	2025	\$ (36)
March	2025	\$ (60)	March	2025	\$ (30)
April	2025	\$ 2,960	April	2025	\$ 810
May	2025	\$ 455	May	2025	\$ 627
June	2025	\$ 463	June	2025	\$ 72
July	2025	\$ 16,408	July	2025	\$ 8,153

**Net write-off amounts were compiled from the monthly general ledger journal entries. Amounts will differ from current amounts in the billing system, as the billing system will reflect recoveries based on write-off period.*

Source: Data from RIE Accounting Department

At the time of the billing system implementation in August 2024, the Company had not fully developed and deployed the collection functionality. The functionality for commercial collections was operational on January 10, 2025, and the functionality for residential collections was operational April 11, 2025. Therefore, there were no collections efforts for commercial customers from July 31, 2024 to January 10, 2025, and no collection efforts for residential customers from July 31, 2024 to April 11, 2025.⁴⁴

Our analysis of the trend of net write-offs identified the following:

- Net write-offs for August 2024 were primarily recorded before August 19, 2024, the date of the billing system conversion.
- Net write-offs were minimal during the period of August 19, 2024 to December 2024 (activity is a net recovery). This is the period that collection efforts ceased while the collection functionality was developed and implemented.
- Net write-offs increased during January 2025. This is primarily due to an increase in commercial account write-offs at the implementation of the collection functionality for commercial accounts. The Company indicated that these were commercial accounts that had gone through active and final collections and were paused at the write-off step prior to cutover. The accounts written off in January have account closed dates between 2022 and October 2024.
- Net write-offs increased during April 2025. This is primarily due to an increase in commercial and residential account write-offs. The Company indicated that they changed their process

⁴⁴ For certain customer classes, there is a shut-off moratorium from November 1 to May 1.

to allow all accounts under \$50 to write-off and skip the collection agency step. The accounts written off in April have account closed dates between 2005 and April 2025.

- Net write-offs increased during July 2025. This is primarily due to an increase in residential account write-offs. The Company indicated that this aligns with the residential customers restarting the final collection process in April.⁴⁵ The accounts written off in July have account closed dates primarily between May 2024 and March 2025.
- Total net write-offs for the period August 2024 to July 2025 were approximately \$33.9M (total electric and gas). Approximately \$16.4M, or 48%, are net write-offs for accounts that were closed prior to August 2024.

In addition to the analysis of the net write-off trends, the Evaluation Team made a judgmental selection of 25 write-offs on accounts that were closed after the billing system conversion. The Evaluation Team reviewed account history for high bills and account notes that may indicate that incorrect bills were included in the write-off amounts. Based on that review and inquiry of the Company, six of the sampled write-offs include amounts related to incorrect bills, which means some net write-offs in the billing system are overstated. The Evaluation Team estimates that the total incorrect bills included in net write-offs for these six samples is approximately \$128K. Table 6-8 The table below presents a summary of the six samples by type of error.

Table 6-8. Summary of Sampled Write-Offs with Incorrect Bills

Category of Error	Number of Accounts	Evaluation Team's Estimate of Incorrect Billed Amounts (in 000s)	Time Period of Error
Final meter read lower than prior meter read, causing meter read to appear to be a meter roll over	3	\$66	2 in September 2024; 1 in December 2024
Incorrect meter read when meter was removed	2	\$47	October 2024
Temporary meter not removed in CSS	1	\$15	October 2024 - February 2025
Total	6	\$128	

Source: Evaluation Team

The Company should analyze the population of net write-offs to identify all instances of write-offs that include incorrect billings and quantify the financial impact.

⁴⁵ Accounts restarted at the beginning of final collections and wrote off 70 business days later.

7. Summary of Recommendations

The subsections below provide a summary of the recommendations that the Evaluation Team has for RIE based on each category of findings presented in Sections 5 and 6. The tables are structured according to relative priority to help guide RIE in the implementation of these recommendations. Additionally, each recommendation is aligned to at least one specific finding and/or observation from Section 5 or 6.

7.1 Project Management, Governance, and Change Management

Although the RIE team has demonstrated industry standard project management, governance, and change management practices throughout cutover, the Evaluation Team identified potential improvement opportunities based on the associated findings. These recommendations should be considered for implementation in 2026 and beyond. A summary of these recommendations can be found in Table 7-1.

Table 7-1. Summary of PM, Governance, and Change Management Recommendations

Priority	Reference	Recommendation	Description & Actions
Low	Section 5.2	Establish a centralized project management and governance system	<ul style="list-style-type: none"> Develop a Project Health Dashboard that is used by all business units to dynamically monitor, track, and record key actions, risks, deliverables, and timelines in real-time and is accessible across business units. These views can serve as a central “source of truth” for the project to avoid multiple tracking systems and support internal communications by allowing all business units to view the same data in real-time.
Low	Section 5.6	Internal communications liaisons for each business unit	<ul style="list-style-type: none"> Incorporate internal communication liaisons for each business unit that report to the internal communications lead. The communications liaisons would be responsible for escalating key issues or changes from their business unit to the communications lead. These backup resources would help ensure internal communication continuity and limit communication delays when the lead is unavailable.

Note: The Priority column is relative to all recommendations throughout Section 7, and are listed to help guide RIE in implementation of these recommendations.

Source: Evaluation Team

7.2 Meter Data and Customer Billing

The Evaluation Team’s recommendations related to Meter Data and Customer Billing are shown in Table 7-2

Table 7-2. Summary of Meter Data and Customer Billing Recommendations

Priority	Reference	Recommendation	Description & Actions
Medium	Section 5.10	Implement a comprehensive reporting and analytics strategy for exception tracking and WATT management.	<ul style="list-style-type: none"> Onboard a full-time SME to build out exception analysis and reporting capabilities Develop operational dashboards that provide near real-time visibility into exception trends on a daily basis and rolled up to weekly and monthly. Include metrics such as total exception volume, exception rate (as compared to total bill volume), counts by exception type, average resolution time per exception code, and the ratio of pending versus resolved exceptions. Implement agent productivity tracking to gain insight into how long it takes to resolve exceptions by type and monitor agent performance. Enables proactive workforce planning, targeted training, and timely intervention to prevent future delays Develop formal escalation processes in collaboration with other internal teams to address exception issues before they cause widespread operational impact Continue to train front-office staff on WATT entry procedures as RIE’s remediation strategy successfully reduced erroneous entries that generated a backlog
Medium	Section 5.13	Strengthen supplier EDI infrastructure by enforcing certification standards and automating validation to ensure accurate, compliant, and efficient data exchange.	<ul style="list-style-type: none"> The supplier certification should be in a specific EDI file format and have RIE-specific requirements RIE could consider providing data conversion tools to assist suppliers in meeting compliance standards Deploy automated EDI validation tools to help identify discrepancies early, reduce manual intervention, and ensure accurate and timely data exchange between systems
Medium	Section 5.8	Accelerate the transition to AMF meters and enhance system-wide automation and reporting across MV-90, MDMS, and CSS to improve billing accuracy and regulatory compliance.	<ul style="list-style-type: none"> Continue to replace MV-90 meters with AMF meters to strengthen data integrity across the billing system and support streamlined insight into potential pre-bill issues throughout the meter-to-cash process Upgrade operational reports by revising existing reports to include AMF meter data, ensuring consistency as AMF rollout progresses Include AMF meters in reporting to enable proactive identification of anomalies that may occur in the future and enhance compliance with regulatory requirements

Priority	Reference	Recommendation	Description & Actions
Medium	Section 5.11	Strengthen billing and customer service operations by formalizing quality assurance, accelerating automation, and preparing for remote capabilities post-AMF deployment.	<ul style="list-style-type: none"> Continue its practice of regular training stand-ups and call center check-ins, as these measures have proved effective in reinforcing process consistency and reducing errors Formalize a structured Quality Assurance framework that includes sampling and auditing corrected bills, coupled with refresher training based on identified gaps Accelerate automation of manual cancel/rebill processes and implement robust reporting tools to monitor electric service MI/MO statuses Once AMF deployment is complete, RIE should evaluate the feasibility of instituting a remote disconnect/reconnect policy for electric service and associated procedures to minimize manual interventions, reduce field orders and improve billing accuracy
Medium	Section 5.12	Prioritize enhancements to complex billing processes by addressing gaps in data integrity, system functionality, and customer experience. These measures will enhance self-service capabilities, reduce manual interventions, reduce self-service related complaints, and ensure a more seamless customer billing experience for both residential and commercial customers.	<ul style="list-style-type: none"> Create flags for inactive landlord accounts to enable improved identification and potential manual billing errors Continue to expand website functionality with an emphasis on ensuring requirements are representative of the desired customer experience and reflect customer feedback to address pain points Enhance testing scenarios to adequately tests across systems to represent the whole customer journey. Test all billing and payment functionalities, like autopay, with strengthened protocols pre-go-live to ensure that customer experience is not disrupted. Identify a formal feedback mechanism to continuously capture customer feedback on payment experiences and general website functionality to ensure that improvements align with customer expectations. Incorporate feedback into an established and ongoing enhancement process that includes updating the website with bug fixes and new features. Similar efforts should be made with the creation of a business portal for commercial customers that would enable improved account management, especially for summary billing customers. Continue to inform customers of changes to the website and online portal.

Priority	Reference	Recommendation	Description & Actions
Medium	Section 5.14	Automate and refine Distributed Generation (DG) billing processes to ensure data integrity and scalability as AMI deployment progresses.	<ul style="list-style-type: none"> • Implement automated validation and reconciliation for RE-Growth payments, net metering credits, and host-satellite allocations • Continue enhancing CSS functionality to support accurate and efficient RE-Growth billing • Enable automated credit applications and validations in CSS, with proactive anomaly monitoring • Refine CSS logic and begin meter read validation with automated alerts prior to billing cycles • Create audit and reporting tools to increase transparency and oversight of host-satellite allocations • Use automated tools to identify and track solar customers for improved billing precision and compliance

Note: The Priority column is relative to all recommendations throughout Section 7, and are listed to help guide RIE in implementation of these recommendations.

Source: Evaluation Team

7.3 Data Governance and Management

While RIE’s system architecture itself is well established and technically robust, it has significant limitations in comparison to modern-day billing systems. Upgrades to the system could help ensure data integrity, accuracy, and traceability across billing and metering functions, but the feasibility and cost-effectiveness should be evaluated by the Company. RIE should therefore perform an assessment of the costs versus benefits of implementing each of the items detailed in Table 7-3 below.

Table 7-3. Summary of Data Governance and Management Recommendations

Priority	Reference	Recommendation	Description & Actions
Medium	Section 5.15	Strengthen metadata control and data validation	<ul style="list-style-type: none"> • Improve metadata enforcement and data validation to enhance data integrity and traceability across all systems • Define primary and foreign keys to enhance relational integrity and enforce missing data and uniqueness constraints • Implement rule-based data validation to automatically flag anomalies (e.g., out-of-range values, mismatches, etc.) before data are joined across tables and systems

Priority	Reference	Recommendation	Description & Actions
Medium	Section 5.15	Centralize views and query management	<ul style="list-style-type: none"> Standardize and centralize the generation and management of version-controlled data queries for recurring analyses (e.g., net-metering active accounts, usage aggregation, and reconciliation) If calculations or equations (e.g., multipliers for converting meter readings to actual consumption) are embedded within queries, they should be formally documented and versioned
Medium	Section 5.15	Develop data catalog and entity mapping	<ul style="list-style-type: none"> Establish an enterprise data catalog to provide a unified understanding of data structures, relationships, and code definitions across RIE's systems Align with industry standards and best practices such as International Electrotechnical Commission (IEC) and Oracle Utilities Application Framework (OUAF) standards Develop Entity-Relationship (ER) diagrams showing key relationships (e.g., Account-Meter-Premise-Usage-Bill) across tables
Medium	Section 5.15	Implement data lineage and cross-system mapping	<ul style="list-style-type: none"> Document end-to-end data flow beyond tables to improve transparency, accountability, and issue resolution efficiency across all operational systems Maintain lineage documentation, review cross-system mappings, and implement validation whenever data moves across system boundaries Implement automated lineage tracking with graph-based models to capture data flow, transformations, and dependencies across systems, enabling visualization and querying of complex relationships Define and document ownership of each data hand-off point between systems
Medium	Section 5.15	Integrate knowledge into a shared governance framework	<ul style="list-style-type: none"> Consolidate institutional knowledge into a structured platform to reduce reliance on individuals, improve long-term continuity and collaboration, as well as improve capabilities of know-how capabilities to new issues Build an ontology-based knowledge system to connect data domains, properties, relationships, workflows, and scripts Create interactive dashboards that trace data flows and errors across all processing stages, and embed visual data maps into governance reviews, training, and documentation

Note: The Priority column is relative to all recommendations throughout Section 7, and are listed to help guide RIE in implementation of these recommendations.

Source: Evaluation Team

7.4 Customer Bill Testing

The Evaluation Team identified potential improvement opportunities based on the associated findings within the sample of bills tested in Section 6.1. The higher priority recommendations will have a designated timeline for implementation and accountability metrics that should be followed. See the executive summary for more information. The medium and low priority observations should be considered for implementation in 2026 and beyond. A summary of these recommendations can be found in Table 7-4 below.

Table 7-4. Summary of Customer Bill Testing Recommendations

Priority	Reference	Recommendation	Description & Actions
High	Section 6.1.1 Wrong supplier rate/prorated rate	Establish choice supplier rate change controls.	<ul style="list-style-type: none"> Establish controls within the Supplier Portal that prevent suppliers from modifying prices outside the Company's defined procedures. Investigate bill source data and system setup to determine how a billed rate was higher than any of the historical or changed rates displayed in the system.
High	Section 6.1.1 Wrong supplier	Identify the population of customers with the incorrect supplier on bills but correct supplier in the system. Update the billing system.	<ul style="list-style-type: none"> Compile supplier selections for each customer account not using default supply. Confirm if supplier is correctly listed in the system. Confirm if the supplier is correctly included on the bill at the correct rate. Investigate bill source data and system setup to identify how this issue occurred. Update billing system accordingly.
Medium	Section 6.1.1 Meter read differences Section 5.1 MDMS is not feeding into CSS for MV-90 Complex bills	Establish controls to compare data sources between usage pulled into bills and CSS, as well as CSS and MDMS (for MV-90 accounts).	<ul style="list-style-type: none"> Identify the population of instances where billed usage differs from CSS to ensure billing system is billing the correct usage. For instances where CSS usage does not align to billed, investigate bill source data and system setup to identify how this issue occurred. Identify the population of instances where CSS differs from MDMS (for MV-90 accounts) to ensure billing system is billing the correct usage. This recommendation will also help monitoring instances where MDMS is not feeding into CSS for MV-90 Complex bills referenced in Section 5.1. Establish controls to monitor and compare data sources.
Medium	Section 6.1.1 Usage smoothing	Reassess multi-month rebilling methodology and system criteria.	<ul style="list-style-type: none"> Reassess RIE's methodology for canceling regular reads and prorating usage evenly when rebilling multiple months. Implement billing system modification if deemed necessary (Note: this may be complex and take time.)

Priority	Reference	Recommendation	Description & Actions
Medium	Section 6.1.2 RE-Growth energy credits are rounded	Reassess host/satellite credit allocation calculations.	<ul style="list-style-type: none"> Reassess RIE's methodology. Implement billing system modification if deemed necessary (Note: this may be complex and take time.)
Medium	Section 6.1.2 Refund and credit applied on bill	Reassess RE-Growth credit tariff requirements and procedures for implementing credits and refunds.	<ul style="list-style-type: none"> Identify the rationale behind the refund. Reassess tariff requirements for RE-Growth customers. Reassess procedures and system controls for RE-Growth credit refunds and applying excess credits on bills.
Low	Section 5.1 WFM High Bill Flags	Reassess WFM procedures and trainings	<ul style="list-style-type: none"> Identify the root cause of the \$21K bill that was issued. Reassess WFM procedures and training documents to ensure guidance is clear and protocols are in place to prevent similar issues in the future.
Low	Section 6.1.2 Bill Format & Account Balance for Budget Billing Plans	Reassess bill format and account balance calculations for budget billing plans.	<ul style="list-style-type: none"> Reassess RIE's Bill format for budget billing plans. Implement billing system modification if deemed necessary (Note: this may be complex and take time.)
Low	Section 6.1.2 Beginning Balance Data and Format	Reassess RIE's Bill format for "Previous Balance," "Payment Received" and "Balances as of [date]" for reissued bills.	<ul style="list-style-type: none"> Reassess RIE's Bill format for "Previous Balance," "Payment Received" and "Balances as of [date]" for reissued bills. Implement billing system modification if deemed necessary (Note: this may be complex and take time.)
Low	Section 6.2 Miscellaneous credit	Update Company's existing procedures for miscellaneous credits.	<ul style="list-style-type: none"> Identify the rationale for this miscellaneous credit. Establish an audit trail in the billing system that will include more detail on why the credit was issued.
Low	Section 6.2 Adjusted meter reads Section 5.1 MV-90 meter dial mismatch between actual reads and CSS	Assess adjustment methodology.	<ul style="list-style-type: none"> Assess the calculation methodology for these adjustments, especially for those MV-90 accounts with meter dial mismatches between actual reads and CSS (referenced in Section 5.1).

Note: The Priority column is relative to all recommendations throughout Section 7, and are listed to help guide RIE in implementation of these recommendations.

Source: Evaluation Team

7.5 Tariff Review

Given the findings identified through the tariff review, the Evaluation Team has identified a set of recommendations for further investigation into tariffs, as listed in Table 7-5.

Table 7-5. Summary of Tariff Recommendations

Priority	Reference	Recommendation	Description & Actions
Medium	Section 6.3	Update the CSS Rate Table to individually list rate components from the tariff in CSS (opposed to combining some components, which may or may not relate)	<ul style="list-style-type: none"> Consider consistency by having all rate components that are shown on the tariff/public facing rate sheets in the CSS Rate Table Investigate how the Transmission Uncollectible Factor, O&M Expense Reconciliation Factor, and CapEx Reconciliation Factor rate components are currently being derived and implemented in the CSS Rate Table for bill calculation use Consider continuing to mature internal RIE competency levels by increasing the number of personnel that are knowledgeable of the CSS Rate Table including how the CSS Rate table is used for the bill calculations

Note: The Priority column is relative to all recommendations throughout Section 7, and are listed to help guide RIE in implementation of these recommendations.

Source: Evaluation Team

7.6 Cash Register

As noted above, the Commission has highlighted that the “Company’s billing system is essentially the ‘cash register’ of the utility”, noting that inaccuracies therein could “impact the data relied upon by this Commission in setting just and reasonable rates”.⁴⁶ The Evaluation Team identified two situations that could impact the Commission’s rate setting process:

- There are instances where the Company has underbilled or not billed customers. These errors and omissions could impact rate reconciliation mechanisms.
- There are instances where net write-offs include amounts related to incorrect bills, which means some net write-offs are overstated. These errors would impact base rates and rate reconciliation mechanisms that utilize historical net write-offs to determine bad debt expense or an uncollectible factor.

Table 7-6 below summarizes the Evaluation Team’s recommendations for these errors. These are high priority recommendations that will have a designated timeline for implementation and accountability metrics that should be followed. See the Executive Summary for more information.

⁴⁶ See Order, at 9.

Table 7-6. Summary of Cash Register Recommendations

Priority	Reference	Recommendation	Description & Actions
High	Section 6.4.1	Quantify the financial impact of unbilled customers	<ul style="list-style-type: none"> Continue to update the list of all accounts that were not billed for all or a portion of prior usage. Quantify the financial impact of not billing customers.
High	Section 6.4.1	Quantify the financial impact of underbilling customers	<ul style="list-style-type: none"> Compile a list of all accounts that were underbilled. Quantify the financial impact of underbilling customers.
High	Section 6.4.2	Quantify the financial impact of incorrect bills in net write-offs	<ul style="list-style-type: none"> Analyze the population of net write-offs to identify all instances of write-offs that include incorrect billings. Quantify the financial impact.

Note: The Priority column is relative to all recommendations throughout Section 7, and are listed to help guide RIE in implementation of these recommendations.

Source: Evaluation Team

Appendix A. Definitions and Acronyms

Term	Definition
AMF or AMI	Advanced Metering Functionality or Advanced Metering Infrastructure
AMR	Automated Meter Reading
Armageddon	A process that permanently closes an account when a repair is not feasible
Bad Debt	Amounts billed to customers that are unlikely to be collected and are eventually written off as a loss
Billing Period	Billing period refers to the service dates between meter reads. In other words, the day when your meter was read marks the end of a billing period and the beginning of a new billing period. A billing period typically ranges from 26 to 35 calendar days
C&I rate	Commercial and Industrial rate
Commission or PUC	Rhode Island Public Utilities Commission
CSS	Customer Service System - a billing and account management platform
CT/PT ratios	Current Transformer Ratio: the ratio between the primary current (actual load) and the secondary current (fed to the meter) Potential Transformer Ratio: the ratio between the primary voltage (line voltage) and the secondary voltage (fed to the meter)
Customer/1	Customer Information System platform used by the Implementation vendor
Cutover	August 16-19, 2024 – IT and production transition phase where legacy systems were decommissioned and new systems activated (see also, “Go-live”)
Cutover Plan	Detailed roadmap for transitioning from legacy system
DG	Distributed Generation
Division or DPUC	Rhode Island Division of Public Utilities and Carriers
EasyLink	Used to collect and transmit meter data into FieldNet
EDI	Electronic Data Interchange - used to exchange enrollment, billing, and transaction data between utility and third-party energy suppliers
EE	Energy Efficiency Program
ER Diagram	Entity Relationship Diagram
Estimated Read	The meter was not read and was calculated based on typical monthly usage
ETL	Extract Transform Load
Exception	A failure of a validation rule within a system that creates an item to be reviewed or manually resolved before a process can be completed
FieldNet	A MDMS system used to collect and manage meter readings before they flow into CSS
Fixed Factor	A constant multiplier applied to the readings of a utility meter to accurately calculate the actual consumption or usage for billing purposes
Genesis	A data repair process that revives an account by inserting a new service activation date
Go-live	August 19, 2024 – Moment new system became operational for business use (see also, “Cutover”)
Held Connects	Customer service requests for new connections that are placed on hold until identity verification or required documentation
Hypercare	Support phase after go-live
ID	Intelligent Desktop - Front-end interface used by customer service representatives
IEC	International Electrotechnical Commission
ISR	Infrastructure, Safety and Reliability Program

Term	Definition
IT Charters	Formal document that defines the purpose, scope, objectives, and governance structure for an IT project
Legacy system	The historic system(s) of record for maintaining and processing meter and/or customer data prior to TSA exit
LRS	Last Resort Service - default electric supply service provided to customers who do not select a competitive energy supplier in deregulated markets
MDMS	Meter Data Management System - Centralized platform that collects, validates, stores, and processes data from metering devices
Meter Multiplier or Constant	Factor used to convert the reading on meter into amount of energy consumed
MI	Move-In- when a customer starts a service at a premise
MO	Move-Out - when an existing customer terminates service at a premise
MV-90	Specialized meter data collection and management system to handle interval data for complex meters
Net Metering	Electric billing mechanism that allows customers who generate their own electricity to send excess energy back to the grid and receive credits
Net Write-offs	Total uncollectible revenue written off after accounting for any recoveries
NFT service	Non-Firm Transportation Service
No Bills	Accounts that should have been billed but were not
O&M	Operations and maintenance
OCM	Operational change management
OIAPI	Office of Internal Audit and Program Integrity
OUAF	Oracle Utilities Application Framework
PBI	Performance-Based Incentives
PMO	Project Management Office
ProcedureFlow	Agent-facing tool used to display step-by-step process flows for common customer inquiries
RAID logs	Document risks, actions, issues, and decisions
Rate reconciliation mechanism	Regulatory tools used by utilities to ensure they recover the correct amount of revenue when actual billing differs from what was expected under approved rates
RE-Growth	Renewable Energy Growth Program - Provides Performance-based Incentives (PBI) for community solar or DG participants
RTMs	Requirements Traceability Matrices
Schema	Defines how data is organized within a relational database
Soft-off	Partial service disconnection where the account is marked as inactive in the billing system, but the physical service remains on
TSA	Transition Services Agreement
UAT	User Acceptance Testing - final phase of software testing
User Without Contract	Term used to differentiate a new move in customer that fails to verify their identity as part of a move in/start service request, and is pending submission of follow up information.
VEE	Validation, Estimation, and Editing - Ensures meter data accuracy
War Room	Daily Stand Ups during hypercare used to rapidly identify root causes across Operations, Customer Service, IT, and Communications
WATT	A system used for exception handling and reporting in back-office operations

Term	Definition
WattNet Plus	Meter data and rate management platform that handles complex billing logic, rate calculations, and data validation
WFM Exceptions	Work flow manager billing exceptions - Flags billing and meter data anomalies

Appendix B. Table of Data Received

Question	Information Provided
CSS – Description of Capabilities and Uses	RIE granted access to system and provided instruction on its use
Intelligent Desktop - Description of Capabilities and Uses	RIE granted access to system and provided instruction on its use
ViewBill - Description of Capabilities and Uses	RIE granted access to system and provided instruction on its use
Opentext/Exstream - Description of Capabilities and Uses	RIE provided written description of the system and its role in creating PDF versions of bills
Broadridge - Description of Capabilities and Uses	RIE clarified that this a printing company that creates and sends paper copies of PDF bills
RIEnergy.com - Description of Capabilities and Uses	RIE provided written description of the system
Salesforce.com - Description of Capabilities and Uses	RIE provided written description of the system
WATT- Description of Capabilities and Uses	RIE granted access to system and provided instruction on its use
Meter Data - Description of Capabilities and Uses	RIE detailed that system is related to Watt Net Plus
Management System (MDMS) - Description of Capabilities and Uses	RIE granted access to system and provided instruction on its use
Watt Net Plus Description of Capabilities and Uses	RIE provided written description of system
ESG EDI - Description of Capabilities and Uses	RIE clarified that this was EDI used by vendor
Training Materials - Description of Capabilities and Uses	RIE provided PPT documenting Change & Training Plan
Billing Systems - Policies and Procedures	RIE provided written documentation (including links to trackers, reports, and Power BI dashboards)
Usage Calculations - Policies and Procedures	RIE provided written documentation detailing usage calculations
Bill Calculations - Policies and Procedures	RIE indicated that procedures are the same as MDMS
Quality Control - Policies and Procedures	RIE provided written documentation detailing the SOX audit, a quality control check on the CSS system
MDMS - Policies and Procedures	RIE provided written documentation detailing Functional Specifications for AMR and Complex Billing
Supplier Data Transfer - Policies and Procedures	RIE provided written documentation including procedures, process flow diagrams, and controls
Customer Payments - Policies and Procedures	RIE provided written documentation including process flow diagrams, system descriptions, and controls
Customer Credits - Policies and Procedures	RIE provided links to RIPUC documentation on Net Metering, Non-Residential Renewable, Renewable Cost Recovery, Renewable Reconciliation, Renewable Recovery, and Residential Renewable
Specific Customer Bills for detail testing	RIE provided lists of accounts with and without known errors for bill selection

Question	Information Provided
Population of customer bills from August 2024 - July 2025: without known billing errors and with known billing errors	RIE provided links to excel sheets of Accounts without bill issues, No Bills, and Cancel/rebills
Training details – course content, instructor guidelines, course completion rates by work level	RIE provided links to demo videos, written scenarios, kahoots, and activity sheets
Training feedback and data on knowledge change because of training	RIE provided links to demo videos, written scenarios, kahoots, and activity sheets
Organizational charts, job title descriptions, role and process mapping	RIE provided PPTs documenting both Hypercare & UAT roles and responsibilities and Pre-cutover, hypercare, and current organizational chart diagrams
Communications (internal and external) regarding billing problems	RIE provided internal and external email communications detailing the issues being experienced during transition
Employee Sentiment on billing problems	RIE does not have any formally documented employee feedback
Stakeholder Sentiment on billing problems	RIE does not have any formally documented stakeholder feedback
Mapping of billing process and system	RIE coordinated screensharing of process software
Documentation of Future State vision of billing processes and resolution of billing problems	RIE linked Change Impact Analysis Documentation detailing current/future state, impacts, mitigations, etc.
Estimate of resources to support change plan implementation	RIE provided written update detailing resource changes within Customer Group
Strategic documentation of RIE’s goals including strategic plan, employee handbook, etc.	RIE provided other documentation that detailed RIE’s goals, but did not provide an employee handbook
Rates and Tariffs - Map of Rate Provisions to Customer Classes	RIE uploaded documentation on Summary of Rates and Rate Ride Combos
Rates and Tariffs - Third-Part Generation Services	RIE linked documentation
Rates and Tariffs - Net Metering Customers	RIE linked excel documentation on satellite accounts and RIE website documentation on Net Metering in RI
Any internal audit reports on the billing system, revenue recognition or accounts receivable write-offs	RIE indicated that no audits meeting these criteria have been conducted since August 2024
Any external audit reports on the billing system, revenue recognition or accounts receivable write-offs	RIE indicated that no audits meeting these criteria have been conducted since August 2024
Billing Components - Policies and Procedures	RIE indicated that there are not any internally documented procedures from revenue accounting standpoints aside from reconciliation performed monthly. Linked documentation on control performed by IT to ensure RICSS billing database aligned with CSS
Billing Adjustments / Rebilling - Policies and Procedures	RIE indicated that accounting does not have any documented procedures or controls for billing adjustments. Transactions occur in CSS and push through to the GL.

Question	Information Provided
Bad Debt Expense and Accounts Receivable - Policies and Procedures	RIE provided links to excel sheets detailing Bad Debt Write-off summary and Customer Uncollectible Reserve
Electric Billing - Financial Data (billing and general ledger reports)	RIE provided link to excel sheet containing RI Operating Revenue documentation
Gas Billing - Financial Data (billing and general ledger reports)	
Electric Total Revenue - Financial Data (monthly trend of total revenue, net write-offs, and bad debt expense)	
Gas Total Revenue - Financial Data (monthly trend of total revenue, net write-offs, and bad debt expense)	RIE provided link to excel sheet containing monthly revenue, write-offs, and bad debt expense (Sep 2023 – July 2025)
User Acceptance Testing Documentation (process, approval gates, and testing categories)	RIE provided links to excel sheets, PPTs, and written documentation all detailing MG4B Testing status/strategy, UAT/SIT exit meetings, MG4B capabilities sign-off, and Parallel Billing testing strategy
Process for submission of tickets, sprint cycles, and defect intake/prioritization, severity levels and SLAs for response time	RIE provided links to written documentation, CSS Hypercare defect dashboard, and CSS features backlog
IT Integration Plans – Meter-to-billing systems and functions, Integrations with PPL systems and third-party vendors	RIE provided links to documentation containing process flow diagrams
Data Migration Plans – Procedures, Requirements, and Controls	RIE provided links to written documentation detailing conversion requirements and procedures, excel sheets detailing data controls around cutover, PPTs detailing Data Reconciliation plans, and a comprehensive folder with all Data Migration related material
Validation, Estimation, and Editing (VEE) Processes and Data	RIE provided link to PPT detailing VEE exception resolution training
Mitigation Plans and actions following UAT	RIE provided links to PPT material
Detail of Pre and Post Deployment steps and proof of completion	RIE provided links to excel sheets detailing integrated project plan for MG4b
Business Validations – Results of checks done after deployment before system was officially considered live	RIE provided link to PPT detailing MG4b Cutover Strategy
Meter Multiplier Investigation – All large electric customers requiring use of meter multiplier (ensure meter data accurately reflects load)	RIE provided link to excel sheet detailing accounts with meter multipliers
Organizational Charts (Job title descriptions, role, and responsibility mapping)	RIE provided a link to diagram

Question	Information Provided
Statements of Work for Implementation Governance	RIE provided links to written contract documentation (for CSS Implementation, Customer Portfolio Business Analyst, and CATCH/Hypercare services)
Project Lifecycle Documentation	RIE provided links to excel sheets detailing IT Charters and MG4b Cutover Plans and PPTs detailing decision frameworks, checkpoints, Hypercare strategy, and Go-No-Go parameters
Roles & Responsibility Matrix (RACI)	RIE provided written documentation detailing responsibilities by Service provider (vendor) and customer (RIE)
Defect Logs	RIE provided link to defect log Azure DevOps query with status, dates, and owners
Risk and Issue Plan and Log (along with mitigation and escalation strategies)	RIE provided a link PPT detailing Parallel Billing Exit Decision and excel sheet detailing Risk, Issues, Mitigations and Next Steps
IT Assets and Instructions – Contractor PAN forms	RIE provided link to contractor PAN form to be filled out by team
Command Center Daily standup dashboard	RIE provided PPTs detailing daily standups from August 2024 to current
"Top 20" issue list	RIE provided excel sheet link detailing top 24 issue accounts, owners, root causes, and actions taken
Can you provide more detail on bugs, WATTs referenced in "Population of Known Billing Errors"?	RIE provided additional remarks
Can you provide more detail on black items in "Population of Known Billing Error"?	RIE provided additional remarks and clarity on why certain items were left blank
"Executive Summary" of issues	RIE provided table detailing the billing issues, steps taken to resolve said issues, and RIE contacts for follow-up questions
Low Income Monthly Report (4770 compliance reports) (January 2023 to July 2025)	RIE provided reports from August 2024 (when they began filing)
OIAPI (Office of Internal Audit and Program Integrity) report – What were the findings, actions taken, status of those actions?	RIE provided links to report as well as comments from RIE to PUC
Courtesy Credits – How does the company track them? What is the magnitude? How have the Billing Issues impacted credits to customers?	RIE provided diagram detailing when it is appropriate to process a Goodwill Credit
Customer email to the Division – The Evaluation Team would like to meet with RIE to discuss the email	RIE provided an email with its response
Financial Data – Follow-up on Request #42/43 - Does the company have explanations for the remaining difference by type? What is the threshold for an immaterial net difference?	RIE provided a written response

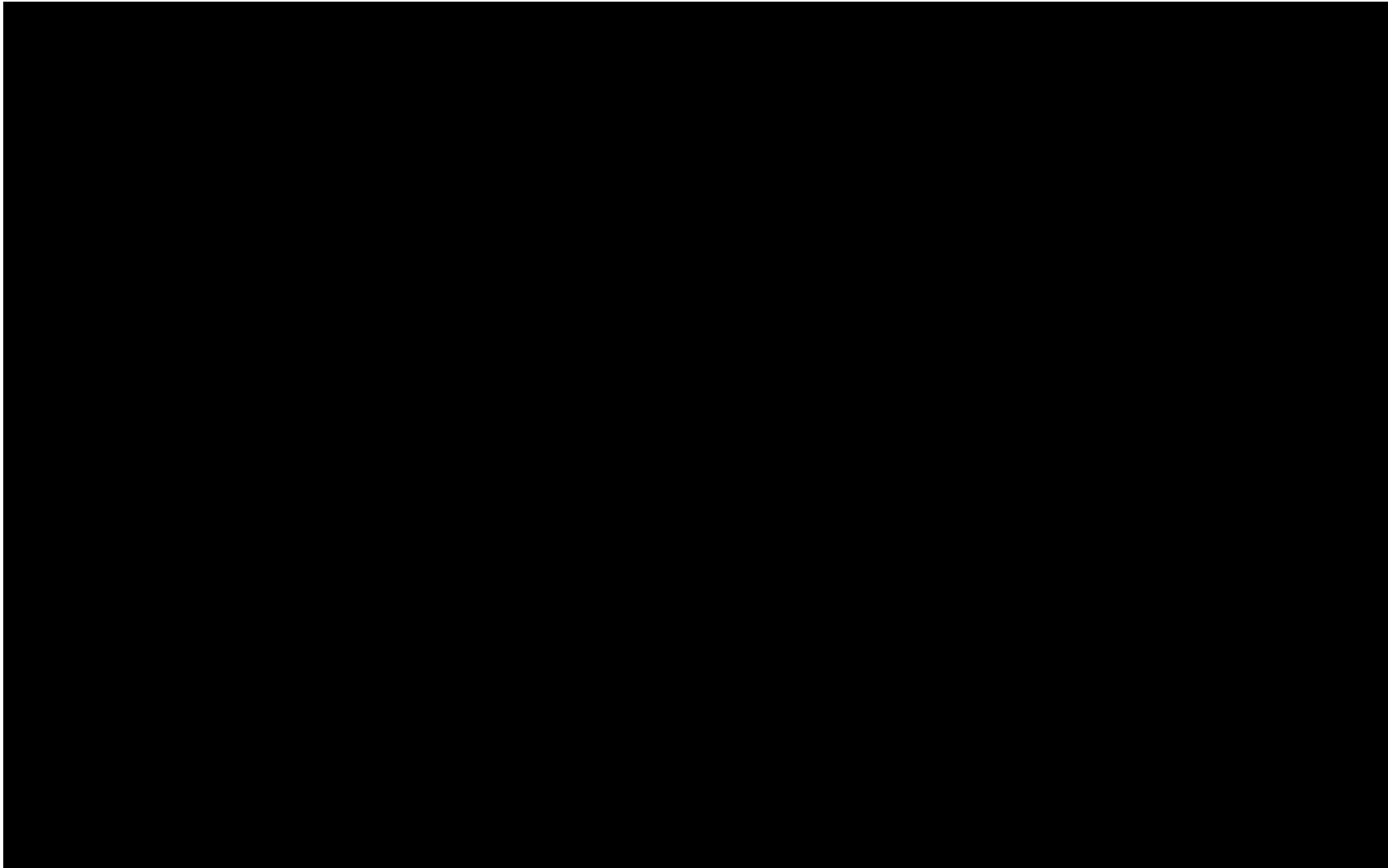
Question	Information Provided
Financial Data – Follow-up on Request #42/43 - Specific Questions on One-sided LRS Credits tab of “RI Operating Revenues”	RIE provided a written response
Financial Data – Follow-up on Request #42/43 - Specific Questions on Pivot 2024-12 tab of “RI Operating Revenues”	RIE provided a written response
Financial Data – Follow-up on Request #42/43 - Specific Question on GL 2024-10 tab of “RI Operating Revenues”	RIE provided a written response
Financial Data – Follow-up on Request #42/43 - Specific Question on GL 2024-12 tab of “RI Operating Revenues”	RIE provided a written response
Financial Data – Follow-up on Request #42/43 - Specific Questions on GL 2025-01 tab of “RI Operating Revenues”	RIE provided a written response referenced discussions from #75-77 and provided link to revised file with formula to external workpaper
Financial Data – Follow-up on Request #42/43 - Specific Questions on GL 2025-02 tab of “RI Operating Revenues”	RIE provided a written response referenced discussions from #75-77
Financial Data – Follow-up on Request #42/43 - Specific Questions on GL 2025-03 tab of “RI Operating Revenues”	RIE provided a written response
Financial Data – Follow-up on Request #42/43 - Specific Questions= on GL 2025-05 tab of “RI Operating Revenues”	RIE provided a written response
Financial Data – Follow-up on Request #42/43 - Specific Question on GL 2025-05 tab of “RI Operating Revenues”	RIE provided a written response
Financial Data – Follow-up on Request #42/43 - Question on ESSR Power BI RSAP tab – Are energy growth credits, generation credits, and Cogen debits recorded to energy purchases?	RIE provided a written response
Financial Data - Docket No 25-08-GE, PUC 4-37: Does the Company still not estimate billed revenue for accounts that fall into the “no bill” category for rate accounting or financial accounting purposes?	RIE provided a written response, confirming yes.
Financial Data – For Rate Adjustment Mechanisms does the Company include estimated unbilled revenue as part of the ‘actual revenue’ reported in those filings/reconciliations?	RIE provided a written response, confirming no.
Billing Systems – Policies and Procedures: Follow-up question to the SOX control provided in #14. Have the controls been tested and determined to be designed and operating effectively?	RIE provided a written response

Question	Information Provided
Electric and Gas Tariff sheets for the entire testing period (August 2024-current). Historical data and gas data on the Company and PUC website?	RIE provided additional documents and website links
Customer Bill Testing (August 2024 - July 2025) Customer Bills – Can you please provide the canceled and corrected bills for each of the accounts?	RIE detailed that outstanding bill images identified on 10/6 are unavailable, as their bills were rejected and not sent to the customer. RIE provided link displaying all cancelled/rebilled accounts.
Customer billing – If the company identifies customer accounts that are underbilled due to billing related issues, is the Company cancelling prior bills and rebilling the customers?	RIE provided a written response, confirming yes, in most cases.
Customer billing – When a no bill is finally billed does the Company require that customer to pay the entire back billing amount?	RIE provided a written response, confirming yes unless account was put through Genesis or Armageddon
Customer billing- Does the company track by account credits that were issued to customers due to billing system related issues?	RIE provided a written response, confirming no.
Customer billing- When a bill is cancelled, the billing system reverses the originally billed items and that reversal is automatically recorded to the GL when the billing cycle is recorded to the GL. Manual entries are not required to be recorded. No amounts from the cancelled bills are recorded as write offs.	RIE provided a written response, confirming.
Customer billing- Provide detail on all Net write-offs (August 2024 – September 2025)	RIE provided a link to excel sheet detailing account numbers, customer names, customer class, amount, and dates
Follow-Up question to response #39 – Have the controls been tested and determined to be designed and operating effectively?	RIE provided a written response, confirming yes and that there have been no deficiencies. Testing of controls will continue through 12/31.
Customer billing – Questions on no-bill accounts: <ol style="list-style-type: none"> 1. Is there limit on how far back a customer can be billed? 2. Are there no bill accounts for which the Company did not bill part or all of the no-bill periods? 	RIE provided a written response clarifying that there is no max number of months a rebill can be done and confirming yes on Question #2.
CSAT Reports <ol style="list-style-type: none"> 1. CSAT Reports for 2024 split out by quarter 2. Raw data for CSAT Reports for 2024 and 2025 	RIE provided PPT material and Excel sheets containing raw data

Question	Information Provided
JD Power Scores - Any documentation regarding JD Power scores that can be shared with our team at this time?	RIE provided written responses detailing how JD Power Scores were used and PPT material showing results
Public Sentiment Reports – Are there any results/reports from third party(s) regarding public sentiment on social media?	RIE provided reports detailing public sentiment results
Training Completion Rates - Number of attendees, number of training sessions completed, etc.	RIE provided Excel documentation for Phase 2, Class 1 trainees, completion status, and type of learning material as well as Excel documentation detailing Phase 1 training participants
<p>War Room Artifacts</p> <ol style="list-style-type: none"> 1. Artifacts/documentation supporting War Room efforts 2. Write-Up on the objectives, purposes, attendees, number of issues resolved 	RIE provided written response and Word documentation outlining War Room structure
Hiring Details - Tiered hiring structure/plan for contract employees during cutover	RIE provided written response
How were communications tracked internally and monitored?	RIE provided links to Internal and External Change Communications tracker, Readiness scorecards and provided detail on daily meeting cadence/status updates with vendors and leadership. RIE also provided an issue tracker used to communicate issues internally to the rest of the division.
How were communications eliminated or consolidated?	RIE provided written response
How were business account portal changes communicated to the customer?	RIE provided written response as well as PPT and word docs outlining plans for both general external communication material and white glove services for customers.

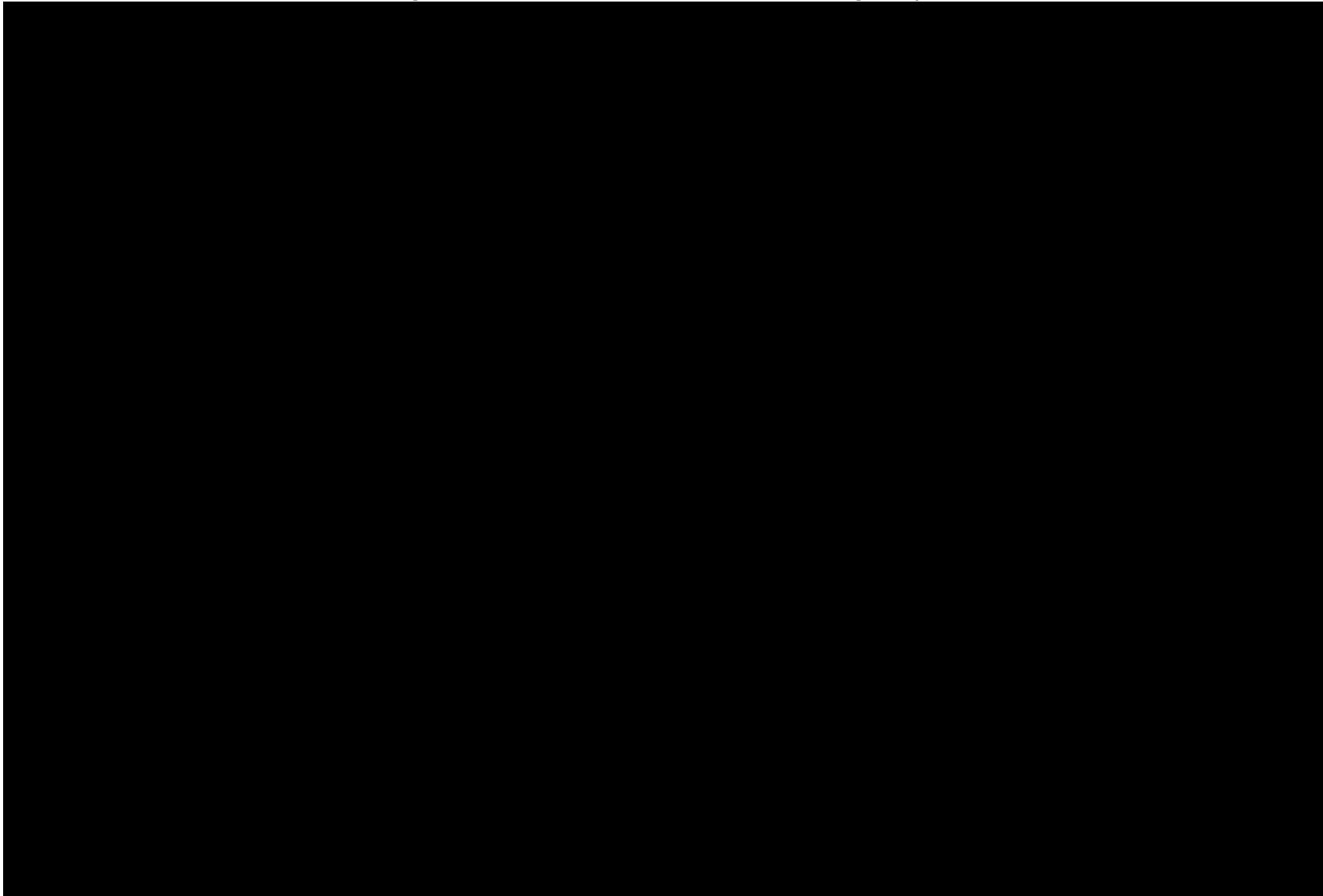
Appendix C. Complete Meter-to-Cash Process System Diagrams

Figure C-1. Meter-to-Cash Architecture Diagram | Gas



Source: Provided by Rhode Island Energy

Figure C-2. Meter-to-Cash Architecture Diagram | Electric



Source: Provided by Rhode Island Energy

Appendix D. List of Key Database Tables Utilized for Analysis

As part of data collection, the Company provided the Evaluation Team with read-only access to the over 600 tables that comprise the Company’s CSS. The Evaluation Team utilized a subset of these tables for analysis, which are listed and described in Table D-1, below.

Table D-1. Key CSS Database Tables Utilized for Analysis

Table ID	Description
CU02TB01	Represents a relationship between a customer and a single premise where the customer has agreed to assume responsibility for the services at that premise. All charges are recorded under the bill account. Non-premise accts hold non-premise charges.
CU02TB09	Tracks which Bill Account is financially responsible for a meter point(MP) at a particular time. For example, when an account is closed and a new account opened for the same location, this table is updated to show that the new account is responsible for the MP.
CU02TB82	This relational table tracks requests made by a supplier for the type of usage data to be sent to that supplier.
CU04TB03	Grouping of meters/services that are billed together under a given tariff schedule for a specific Bill Account. A way to group meter points together. There are three types of Service Points: electric, private area lighting, and gas.
CU04TB04	Contains historical data regarding the association of a Service Point within a particular tariff schedule. The current tariff is NOT on this table - it is on the Service Point Table.
CU04TB05	Contains detailed information for a given tariff schedule code. Note that 'inactive' rows reflect historical data that was 'cancelled' (rather than a true logical delete).
CU04TB08	This is the Reading Consumption Header table. It contains information for up to 4 different types of readings. Any additional readings will reside on the Reading Consumption Detail table. A row exists on the table each time a reading is taken.
CU04TB09	This is the Reading Consumption Detail table. The first four different types of readings will be contained on the Consumption Header table. Any more than 4 will exist on the detail table. If ky-1st-use-no is greater than 0 on the header table, there are detail rows on this table.
CU04TB20	Refects [sic] total usage by usage type. Usage types are determined by the tariff schedule. Total usage quantities relate to a particular service point's usage. One row exists for each billing of the service point.
CU04TB21	This is the Total Usage Detail table.
CU04TB81	This table contains the Tariff Rate Schedule and description by Service Provider.
CU06TB02	This table contains the "from" and "to" work order id. Used for those work orders requiring several people to complete.
CU06TB03	This table contains one row for each type of work order. Example- Disconnect, Reconnect, etc. It also contains the priority for the work orders. This is a static table.
CU06TB05	A user group is a class of users that perform a set of functions within the CSS system. Example - District Accounting Clerks, GOC Billing Division.
CU06TB06	This table contains comments for Hold and Refer objects.

Table ID	Description
CU06TB07	This table contains information on the number of work items issued and completed each day.
CU06TB11	This table will provide the link to the PWQ directory table, that maintains a record for every occurrence of a Bill Account error during cash processing.
CU06TB14	This is the WFM Data table which contains details about an adjustment made by A/R.
CU06TB16	The table will be used to provide information useful to solving the work order based on the Key PWQ and a Reason code.
CU06TB17	This table is used for monthly reporting. It has the number of work items that were issued and completed during the month. It's broken down by location, group and work item type.
CU06TB47	This table is required to pass necessary information for PWQ's issued for a PAL Transaction, from the PAL Maintenance Issuance screen.
CU06TB48	Used to pass information for Work Flow Manager items issued for a PAL (private area lighting) transaction from the PAL maintenance issuance window.
CU06TB51	The Work Flow Manager Allocation table identifies the location that is responsible for performing a group of work items for a reporting level.
CU06TB53	The Work Flow Manager User Location table identifies the locations that may be worked by a specific user. A user may work more than one location and a location may have more than one authorized worker.
CU06TB54	Detail WFM table for the cancel/rebill of readings. KW - speedometer (max speed); KWH - odometer (usage); KVA - meters that generate a large load (higher value per month) transformer level.
CU06TB55	This is the detail WFM table for the cancel/rebill of PAL consumption.
CU06TB56	This is a generic WFM data table for WFM items.
CU06TB57	Used for issuance and completion of excess credit investigations.
CU06TB58	This table contains all valid WFM locations.
CU06TB59	This table is used to store information related to a rate or tax class change for a bill account. This type of change creates a WFM queue item that must be reviewed/approved before the changes are posted. A row is created for each service point affected.
CU06TB60	Generic locking table for work flow manager items. Eight 'filler' columns at end for row locking; can be removed in DB2 version 4.
CU07TB01	Consists for a control unit #, financial transaction id, and a partition #. The partition # is used to prevent locking problems. Each posting batch job will execute against a specific partition number. Summarize across all partitions into summary.
CU12TB11	The Usage Type table (CU12TB11) will contain a valid list of all usage types. The table will have 2 additional data elements (Tx-Usage-Description and Cd-Usage-Formula) that will elaborate on the specific characteristics of the usage type.
CU12TB20	For a given tariff schedule there are multiple rates by effective date. (Prices)
CU12TB22	This table stores attributes of a charge type (debit or credit under a tariff or tariffs).

Source: Reproduction of CSS database table name and description information provided by the Company for a subset of tables utilized by the Evaluation Team for analysis.

Appendix E. List of Issues with the Company Billing System

In response to a data request from the Evaluation Team, the Company provided a list of issues that had been identified to date by the Company. These issues are summarized in Table E-1 below.

Table E-1. Summary of Billing System Issues According to the Company

Category	Billing Issue	Description	Max Accounts Impacted	Status
Suppliers	Missing Inflight transactions not processed prior to cutover	Missing Inflight transactions: Supplier History was not fully converted prior to cutover	7,442 (~200 accounts still being addressed by data repair, includes AMP accts where rate changes were rejected and A13 enrollment rejections)	Resolved
	Data Conversion issues	Data Conversion Issues Examples: >Supplier accounts where ██████████ tables have discrepancies >Tax Exemption Issues >Missing Supplier Pricing/Rates		
	Business rule changes created redundancies in Supplier data	Business rule changes causing redundancy > Rate switching not following NFI rules > Multiple pending enrollments & drops > Backdating transactions (enrollments, drops, changes) that were previously rejected		
DG (Distributed Generation)	Shared Solar Host and Satellite Billing Dependencies	Shared Solar Host and Satellite accounts must bill in-sync to correctly allocate credits. Satellites need to wait until the host generation is available to receive credits; hosts need to wait until satellite credits are allocated to determine what remains.	Total population of Shared Solar accounts is ~130 host accounts and ~270 satellite accounts. At the peak of the issue, ~74 host accounts were No Bills and required multi-step manual processing to bill forward, including cancel/rebills of satellites. There are currently ~10 accounts that require further investigation.	In-Progress
DG (Distributed Generation)	RE-Growth Meters Read on Different Days	Most RE-Growth accounts have a 2-meter setup - 1 meter to track consumption and 1 meter to track generation. When reads for the 2 meters are collected on different days, this causes a No Bill until it is worked by the back office.	There are ~7,000 2-meter RE-Growth accounts. On average, ~35 accounts are impacted each day.	In-Progress

Category	Billing Issue	Description	Max Accounts Impacted	Status
DG (Distributed Generation)	Distributed Generation Accounts Not Receiving Actual Reads	If a DG account does not receive an actual meter read, it will not bill as DG accounts do not estimate reads.	At conversion, 697 DG customers were no bills for the legacy provider. As RIE works these accounts, we are down to an average of 300 - 400 DG no bills. Of ~26,700 DG customer, <150 are not billing due to not receiving actual reads.	In-Progress
Public Assistance Group (PAG)	PAG Billing Issue where PAG terms did not add down correctly (A)	During parallel billing, it was identified that down payment amounts were reviewed differently. Therefore, RIE PAG terms were represented differently on the bill due to how RIE reviews for its down payment.	2,812	Resolved
Public Assistance Group (PAG)	PAG Billing Issue where PAG terms did not add down correctly (B)	During parallel billing, it was found that down payment plus installment amounts were reviewed differently. Therefore, RIE PAG terms were not represented correctly on the bill when the second installment was being billed.	1,122	Resolved
Public Assistance Group (PAG)	PAG Billing Issue where PAG terms did not add down correctly on the bill (C)	Due to residential accounts needing to be excluded from collections once commercial collections was turned on for RIE, it was found that the suspended charges placed on residential accounts with PAGs and these PAG accounts would then go through billing, the PAG terms were recalculated incorrectly due to past payments being considered for "current review" and were not due to the suspended charges on the accounts	1,257	Resolved
AMP	AMP Terms were not correct and did not show correctly on the bill. They were overstated.	Due to residential accounts need to be excluded from collections once commercial collections was turned on for RIE back in January, suspended charges were applied. If an account with an AMP PAG had one of these suspended charges, the AMP PAG terms where presented inaccurately on the bill	90	Resolved
AMP	AMP Missed Terms were incorrectly placed in CSS, causing the AMP missed term data on the bill to not show correctly.	The issue occurred during conversion prior to go live where the first missed payment was accidentally placed within the second missed payment data on the [REDACTED] table. Vice versa for the second missed payment data.	121	Resolved

Category	Billing Issue	Description	Max Accounts Impacted	Status
LRS Credits	LRS Credits Provided to Customers in December 2024. This was a one-time event related to LRS.	Approximately 370,000 electric customers were provided with an LRS credit in December 2024. Approximately 10% of these accounts then failed to bill. The root cause was determined to be that billing failed when the credit amount provided was larger than the current charges for the bill, resulting in a "negative bill."	~37,000	Resolved
FT1 Accounts	Not all intervals were captured in billed usage	When calculating MV90 Gas bills 1 day of usage was not getting billed	500	Resolved
Meter Data	Incorrect RIE meter data	Incorrect RIE meter data impacting billing accuracy for 480 accounts, leading to potential revenue discrepancies	480	Resolved
Inherited No Bills (Pre-Cutover)	Certain accounts had not been billed for a long period prior to cutover	Accounts were identified as inherited no bills if they had not been billed since July 2024 or prior. Number of unbilled months vary by customer account.	1,631	In-Progress
Meter Data Mismatch (Pre-Cutover)	Model type mismatch for a specific meter type	Accounts had an incorrect meter type in WattNet Plus which in turn caused incorrect billing	429	In-Progress
Mass Debit	No gas seasonal rates for some gas seasonal rate codes from May 1 to May 8	The change to the off-peak seasonal Distribution Charge price that was effective on May 1st didn't occur, so was billed at \$0/therm for any usage from 5/1-5/8; this is a prorated charge, so the usage in April was still charged at the correct price	76,861	Resolved
		[REDACTED]		
Demand Contract	Demand charges for gas billing contract were not renewed for November 2024	Key challenges include: 1. [REDACTED] 2. Lack of a standardized process for adding/renewing contract for gas accounts with demand component 2.1. Outdated contract values for accounts that transitioned between rate classes (e.g., small to medium). 2.2. Missing contract entries in accounts.	5,714	In-Progress

Category	Billing Issue	Description	Max Accounts Impacted	Status
Bill Print	Bill due date as showing as one year ago for bills on 04/17/2025	For the 2024 due dates, the root cause was related to updates the team were making for the RIE billing calendar because of differences in holidays. One of the holidays that has changed was Good Friday - holiday pre-cutover but not at RIE. As RIE made those adjustments, a year of 2024 was used on 2 date rows instead of 2025	57,058	Resolved
MV90	Incorrect billing determinants were sent to CSS - Billing determinants are null	During complex billing, the billing determinants sent to CSS were incorrect. All of the values were zero.	>100	Resolved
Mass Debit	Electric Rate billing determinants issue	[REDACTED]	2	In-Progress

Source: Summary by the Evaluation Team of information provided by the Company

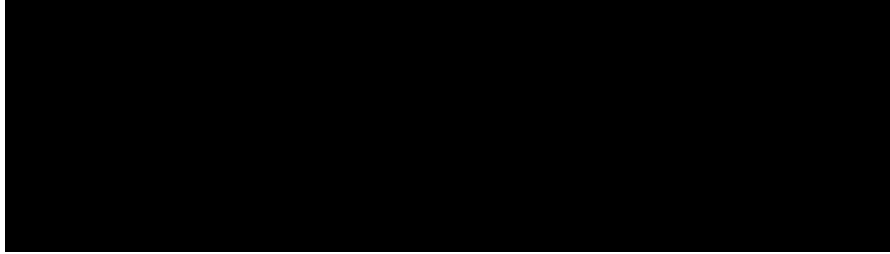
Appendix F. Detailed Analysis Results

This Appendix provides detailed results of analysis.

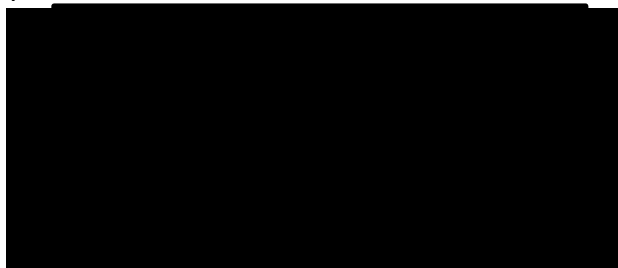
F.1 Error Examples from Bill Testing

1) Prorated Supplier:

- Reissued Bill (3/26/25): Usage January to February 2025



- Supplier information in ID:



- Calculation:

Recalculation					RIE Rate	Difference
Start	End	Days	%			
1/23/2025	1/31/2025	8	24%			
2/1/2025	2/19/2025	19	58%			
2/20/2025	2/25/2025	6	18%			
		33				
Supplier	Rate	Prorated				
Period 1	0.16199	0.03927				
Period 2	0.1619	0.09322				
Period 3	0.15943	0.02899				
		0.16147		0.20072	(0.03925)	

2) Wrong Supplier:

Example 1 – Wrong supplier billed on account to date:

- Original/Cancelled Bill (1/21/25) > Reissued Bill (5/14/25) > Recent Bill (9/11/25):

Supply Details	Supply Details	Supply Details
Supply Charges for Nov. 6, 2024 - Dec. 5, 2024 Energy Charge: 140 kWh at 0.16387 22.95 Total Supply Charges \$22.95	Supply Charges for Nov. 6, 2024 - Dec. 5, 2024 Energy Charge: 140 kWh at 0.16387 22.95 Total Supply Charges \$22.95	Supply Charges for Aug. 7, 2025 - Sep. 9, 2025 Energy Charge: 144 kWh at 0.10068 14.50 Total Supply Charges \$14.50

- Timeline in ID:



- ID Supplier information:

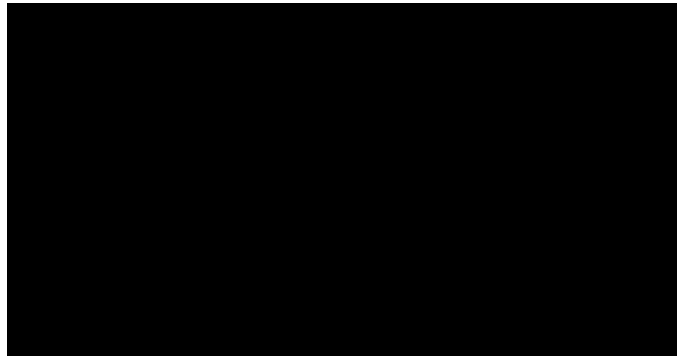
Supplier	Effective Date	Terminate Date	Status	Bill Option	Rate Code
TOWN OF PORTSMOUTH NEXTERA	5/8/2025		Active	Rate Ready	8609771_PRM \$
TOWN OF PORTSMOUTH NEXTERA	12/5/2024	5/8/2025	Inactive	Rate Ready	8616044_PRM \$

- CSS Supplier information:

Supplier Name:	TOWN OF PORTSMOUTH NEXTERA	Supplier Eff Date:	12/05/24
Supplier Status:	Active	Bill Option:	Rate Ready

3) Meter read rounding

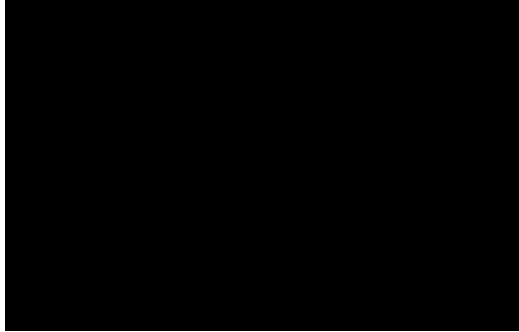
- Example 1 - Recent Bill (9/25/25): CSS did not tie to billed usage and CSS did not align to MDMS.



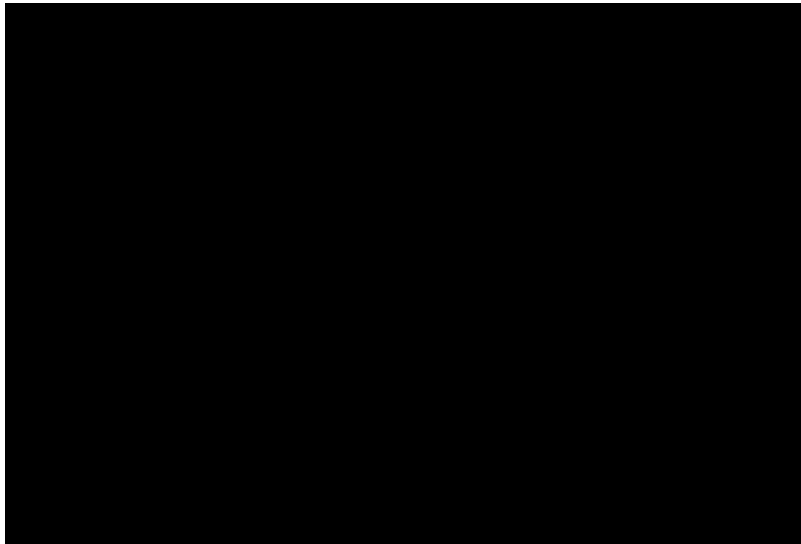
- Calculation:

9/25/25 Bill									
	A	B	A-B	C	B	C-B	A-C		
	Recalculated - CSS	Billed	Difference	Recalculated - MDMS	Billed	Difference	CSS v MDMS Difference		
8/28/2025	6384			6480.93			-96.93		
9/24/2025	7363			7363.9			-0.9		
Total	979	978.9435	0.0565	882.97	978.9435	-95.9735	96.03		
Meter Multiplier	6000			6000					
Total kWh	5874000	5873661	339	5297820	5873661	-575841	576180		

- Example 2 - Reissued Bill 8/14/25: CSS did not tie to billed usage; however, CSS did align to MDMS.



- Meter read source data:
MDMS



- CSS

From	To	Source	Tot KWh	Tot KWH Usage	Pk KW	Pk KW Usage	Tot.kWh	Tot.kWh (-)	Pf	Pk.kW G	Pk Kva	Pk Kva Usage
08/25/2025	09/24/2025	Regular	7363	5873661	1.876	11256	0	0	0	0	2.042	12252
07/25/2025	08/25/2025	Regular	6384	6254232	2.046	12276	0	0	0	0	2.226	13356
06/25/2025	07/25/2025	Regular	5342.61	6340305	0	12408	0	0	0	0	0	13512
05/24/2025	06/25/2025	Regular	4286	5666487	0	12264	0	0	0	0	0	13344

- Calculation

	Recalculated	Billed	Difference
End	5342.61	5343	-0.39
Start	4286	4286	0
Difference	1056.61	1057	-0.39
Multiplier	6000	6000	0
Total kWh	6339660	6342000	-2340

4) Usage Smoothing: Residential customer was originally billed 5 bills (over 6 months) at the wrong rate class. Reissued two bills. The reissued bills prorated usage evenly across the months based on number of days per month instead of using actual reads for each billing period.

- Calculation

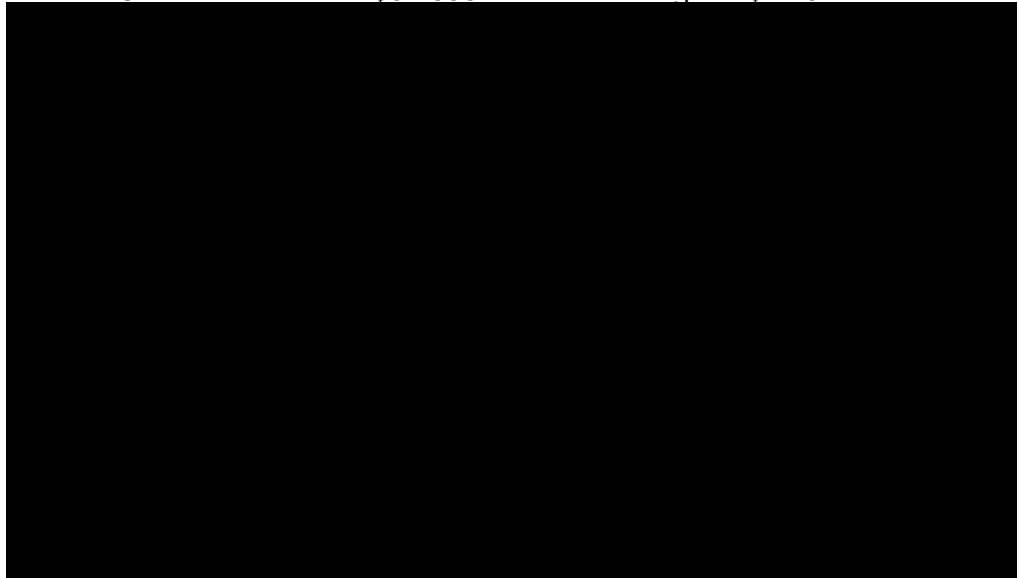
Bill Period	Start	End	Days	%	RIE Billed	Actual Usage	Difference
Period 1	12/31/2024	1/15/2025	15	9%	252	350	-98
Period 2	1/15/2025	2/13/2025	29	18%	487	677	-190
Period 3	2/13/2025	3/14/2025	29	18%	487	1224	-737
Period 4	3/14/2025	4/15/2025	32	20%	537	325	212
Period 5	4/15/2025	5/14/2025	29	18%	487	71	416
Period 6	5/14/2025	6/11/2025	28	17%	470	73	397
Total			162		2720	2720	0

F.2 Opportunities for Improvement identified in Bill Testing

1. **Calculation Rounding:** The Evaluation Team observed that the Company’s calculation of individual tariff components is rounded to a 2-digit cent and only the tariff components that result in a charge are included on the face of the bill. This result is:
 - i. the total tariff on the face of the bill being different than the total approved tariff, and
 - ii. the total charge on the bill being slightly different if rounding occurred at the total tariff level.

- **Example:**

- The DAC rate on this bill is \$0.4835 for a total charge of \$2.49



- The DAC tariff rate for this time period is \$0.4822

Small (< 5,000/yr)	Rate 21 Peak Off-Peak	\$25.00 \$25.00	N/A N/A	\$0.5232 \$0.4619	\$0.4822 \$0.4822
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- Calculating the charge using the total DAC tariff rate results in a charge of \$2.48:

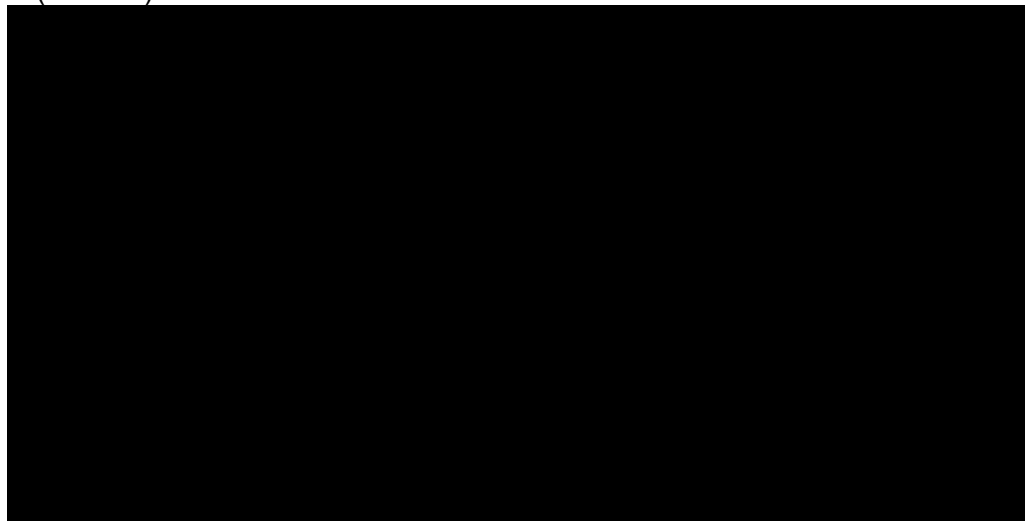
A	B	C=A*B
Usage	Tariff Rate	Total
5.14	0.48220	2.48

- The billing system calculates and rounds the charge at the tariff subcomponent level to a 2-digit cent. Only the subcomponent rates that result in a 2-digit cent charge are included on the face of the bill:

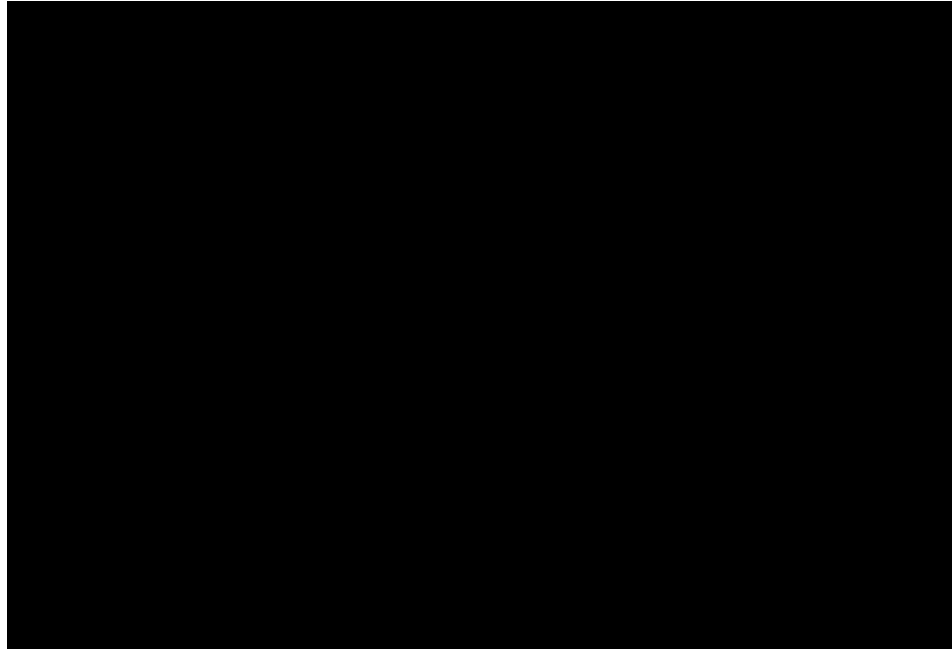
DAC components	A	B	C=A*B, rounded to 2-digit cent	
	Therms	Tariff Rate	Charge on bill	Rates with Charges (displayed on bill)
THM D Infra Safety/Rel (XG)	5.14	0.32990	1.70000	0.32990
THM D Recon ISR Factor (XH)	5.14	0.03250	0.17000	0.03250
THM D Low Inc Disc Recovery (XI)	5.14	0.02530	0.13000	0.02530
THM D Serv Qual Perf (XK)	5.14	(0.00020)	0.00000	
THM D Earn Sharing Mech (XL)	5.14	-	0.00000	
THM D Storm Net Revenue Factor (XM)	5.14	-	0.00000	
THM D System Pressure (XN)	5.14	0.04050	0.21000	0.04050
THM D Arrearage Mgmt Adj Factor (XP)	5.14	0.00030	0.00000	
THM D Environ Response Cost (XQ)	5.14	(0.00090)	0.00000	
THM D Pension/Post Retire (XR)	5.14	(0.02110)	-0.11000	(0.02110)
THM D Rev Decoupling Mech (XF)	5.14	0.06860	0.35000	0.06860
THM D Lost Rev Adj (XE)	5.14	0.00780	0.04000	0.00780
THM D Recon Def Acct Bal (XD)	5.14	(0.00050)	0.00000	
Total		0.48220	2.49000	0.48350

2. **RE-Growth energy credits for satellite accounts are rounded:** For satellite accounts, the Evaluation Team noticed that RE-Growth credits that are allocated from the host to the satellite account are rounded. For example, if a host generates 888 kWh and the agreement states the satellite can get 5%, -44 kWh gets allocated to the satellite, not -44.4 kWh (assuming usage is higher). Evaluation Team cannot conclude at this time if that is the correct approach.

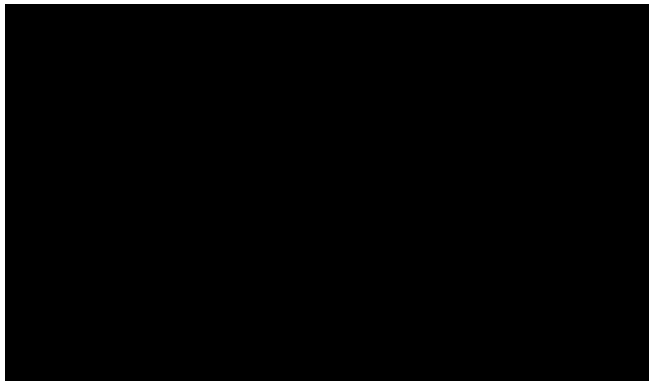
- Host Bill (8/18/25):



- Satellite Bill (8/15/25):



- CSS Agreement terms:



- Calculation differences:

Usage Information		Credit allocation				
		Host Credits		888		
Satellite 1 kWh		Allocation %	Recalculated Credits	Billed	Difference	Note
Start	8699					
End	9058					
Total	359	0.95	359	359	0	Can't exceed usage
Satellite 2						
Start	2689					
End	2895					
Total	206	0.05	44.4	44	0.4	Rounded
Satellite 3 **Selection						
Start	53328					
End	53451					
Total	123	0.05	44.4	44	0.4	Rounded

Renewable Growth Credits Calculation - Satellite 3 (Selection)				
	Rate	Recalculation	Billed	Difference
Distrib Energy Chrg	0.063	-2.7972	-2.772	0.0252
Transmission Chrg	0.04161	-1.847484	-1.83084	0.016644
Commodity Chrg	0.15187	-6.743028	-6.68228	0.060748
Total		-11.39	-11.29	0.10

3. **Bill Format & Account Balance for Budget Billing Plans:** The current bill format for customers using a budget billing plan is confusing for readers. The indentations make it appear as though the bill does not foot properly. In addition, RIE calculates the ending account balance by adding the previous balance, budget plan amount (and payment installment amount or bad check and other fees, if applicable). This calculation of ending balance is not how other utilities display their bills for similar programs. Other utilities calculate account balances using actual charges incurred during the period and separate out the “Amount Due” portion to only include the budget plan amount. Displaying it separately allows the reader to understand the dollar amount of current usage compared to the budget plan amount in a given month.

- o RIE Bill Example:

Billing Summary	
Previous Balance	\$344.00
Payment Received - Thank You!	-\$641.78
Balance as of Dec 26, 2024	-\$8.00
Budget Plan Amount	\$172.00
Total Supply Charges	\$51.94
Total Delivery Charges	\$57.52
Other Charges/Adjustments	
Paperless Billing Credit	-\$0.37
Gross Earnings Tax	\$2.38
\$57.15 at 0.041667	
Returned Check Amount	\$180.00
Returned Check Fee	\$8.00
Total Other Charges/Adjustments	\$190.01
Amount Due By 1/21/25	\$352.00
Account Balance	\$352.00

Does not foot (see next observation below)

Indentation makes it seem like ending balance should be \$354.01

Ending Balance = -8 + 172 + 180 - 8 = \$352

- o Other utility example:

Budget Payment Plan	
Previous Amount Due on 06/12/2025	\$120.00
Payments Received by 06/10/2025 Thank you	-\$120.00
Balance on 06/26/2025	\$0.00
Budget Amount This Period	+\$120.00
Current Charges Due by 07/14/2025	\$120.00
<ul style="list-style-type: none"> • If paid after 07/14/25, a late payment charge of 1.5% may be applied to your utility balance. • There is 1 month remaining in the Budget Year, which ends in July, 2025. 	

Actual Account Summary	
Beginning Balance	\$253.34
Payments Received	-\$120.00
Current Utility Charges	+\$63.15
Actual Account Balance	\$196.49
<ul style="list-style-type: none"> • Your Actual Account Balance reflects the actual amount you owe based on your billed usage and payments as of the date of this bill. • For more information regarding these charges, see the Detail Charges section. 	

4. **Beginning Account Balances for rebills:** The Evaluation Team has seen inconsistency in the data pulled into the “Previous Balance” and “Payment” section for rebills, which is creating “Beginning Account Balances” that do not foot. The Evaluation Team has identified rebills that use the Previous Balance from the canceled bill and some that have pulled it from the bill before the original canceled bill was issued. The

Evaluation Team has seen instances of payments pulling from the period prior to the “Previous Balance”, but those payments would already be captured in the “Previous Balance” amount which should be the ending account balance of the prior bill. In those situations, it appears the “Beginning Account Balance” amount was manually corrected.

- **Example 1:**
 - Reissued bill:

Billing Summary		
Previous Balance	\$36.93	Previous Balance from last canceled bill
Payment Received - Thank You!	-\$881.84	Total payments
Balance as of Jul 1, 2025	\$0.00	Does not foot
Total Supply Charges	\$369.15	
Total Delivery Charges	\$453.25	
Other Charges/Adjustments		
Paperless Billing Credit	-\$0.37	
Paperless Billing Credit	-\$0.37	
Paperless Billing Credit	-\$0.37	
Paperless Billing Credit	-\$0.37	
Paperless Billing Credit	-\$0.37	
Paperless Billing Credit	-\$0.37	
Gross Earnings Tax	\$3.40	
\$81.48 at 0.041667		
Gross Earnings Tax	\$6.60	
\$158.44 at 0.041667		
Gross Earnings Tax	\$6.60	
\$158.44 at 0.041667		
Gross Earnings Tax	\$6.71	
\$161.04 at 0.041667		
Gross Earnings Tax	\$5.50	
\$131.87 at 0.041667		
Gross Earnings Tax	\$5.37	
\$128.91 at 0.041667		
Excess Credit	-\$880.56	Adjustment cancels last 5 bills
Total Other Charges/Adjustments	-\$848.60	
Amount Due	NONE	
Account Balance	-\$26.20	

- Account activity:

Date	Amount	Status	Adjust	Payments	Balance
2/26/2025	325.65	Canceled			325.65
3/18/2025	374.17	Canceled			699.82
4/3/2025				-699.82	0
4/11/2025	107.34	Canceled			107.34
5/8/2025	1.28	Late payment fee			108.62
5/12/2025	36.47	Canceled			145.09
5/14/2025				-145.09	0
6/11/2025	36.93	Canceled			36.93
6/13/2025				-36.93	0
7/1/2025	854.36	*Corrected Bill*	-880.56		-26.2
7/9/2025	23.52	Active			-2.68

- **Example 2:**
 - Reissued bill:

Billing Summary	
Previous Balance	\$28.75
Payment Received - Thank You!	-\$57.98
Balance as of Jul 1, 2025	\$0.00
Total Supply Charges	\$0.00
Total Delivery Charges	\$14.79
Other Charges/Adjustments	
Paperless Billing Credit	-\$0.37
Gross Earnings Tax	\$0.45
\$14.42 at 0.030928	
Excess Credit	-\$28.75
Total Other Charges/Adjustments	-\$28.67
Amount Due	NONE
Account Balance	-\$13.88

Previous Balance from last canceled bill
Last two payments
Does not foot

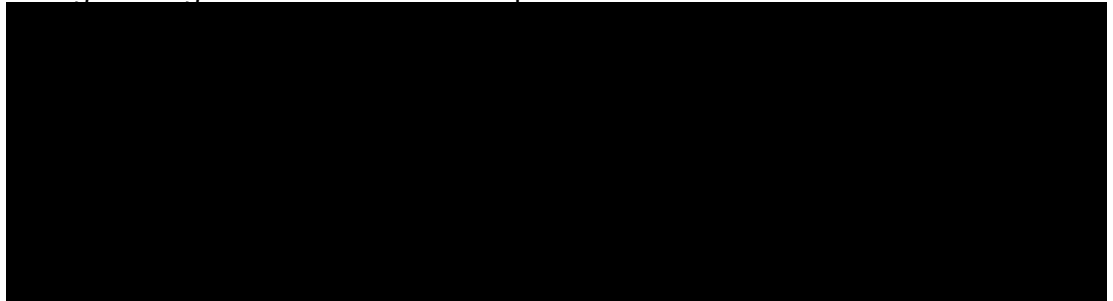
Account activity:

Date	Amount	Status	Adjustment	Payments	Balance
3/31/2025	30.73	Active			30.73
4/11/2025				-30.73	0
4/30/2025	29.23	Active			29.23
5/21/2025				-29.23	0
5/30/2025	28.75	Canceled			28.75
6/24/2025				-28.75	0
7/1/2025	14.87	Corrected Bill	-28.75		14.87
Total	698.12	0	-28.75	-683.25	-13.88

Previous Balance = End balance of canceled bill

5. **Miscellaneous credits:** The Evaluation Team identified 1 account that was given a miscellaneous credit of \$108.40 with the description of “special agreement”. The “special agreement” credit was applied in January during the settlement month for a budget billing customer. The credit appears to have reduced the settlement amount of \$280.40 back to the deferred amount of \$172. The budget billing export from ID uses the correct settlement amount of \$280.40 to reduce the deferred amount to \$0. However, the bill only charges the \$172. The Evaluation Team has not received an explanation for why this customer received a \$108.40 credit at the time of this report.

Budget Billing settlement amount compared to bill:



Misc. Credit in CSS:

Date	Source	Amount [0]	Application	Method	Tender Type	Receipt Number	Business Office	Agency ID	Batch	Sequence
09/1/2025	Payment	101.00	General	EDI	Credit Card	9999			404120	155
07/2/2025	Special Agreement	108.40	Contable			0				
12/05/24	Payment	100.00	General	EFT	Direct Deposit	9999			400393	156

Account Balance:

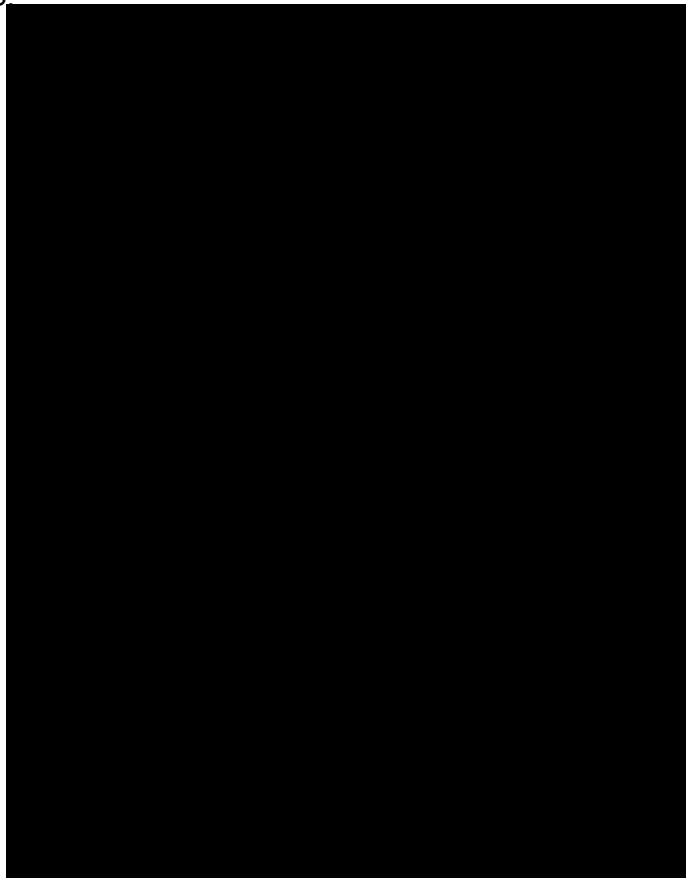
Date	Desc	Amount	Adjustment	Payment	Balance
12/4/2024	Beginning Balance				344
12/5/2024	Check payment			-180	164
12/10/2024	Returned Check & fee	8		180	352
7/21/2025	January Bill	280.4	-108.4		524 Special Agreement Misc. Credit

6. **Adjusted meter reads:** For three bills, the end meter reading was canceled and adjusted. In two instances, the regular reads aligned between CSS and MDMS except for the final meter read and adjusted meter read. In one instance, the reads in CSS and MDMS are misaligned and continue to differ to the present.⁴⁷

- For example:
 - CSS:

From	To	Source	CCF	CCF Usage	CorrectionFactor	BtuFactor	Status	Reading Sequence
08/01/2024	09/01/2024	Adjusted	2000730	665270	1	1	Billed	2820
08/01/2024	09/01/2024	Regular	200073	1331320	1	1	Cancelled	2750
06/30/2024	08/01/2024	Regular	1335460	698420	1	1	Billed	2730

- MDMS:



- The Evaluation Team understands that the source of meter data for billing depends on the type of meter and CSS is the source for most meters. The Evaluation Team would still like to understand the methodology and calculation of these adjusted reads.

7. **Refund and credit applied on bill:** While analyzing the account balance for one of the samples, the Evaluation Team noticed a refund for \$10.41 and an excess credit of -

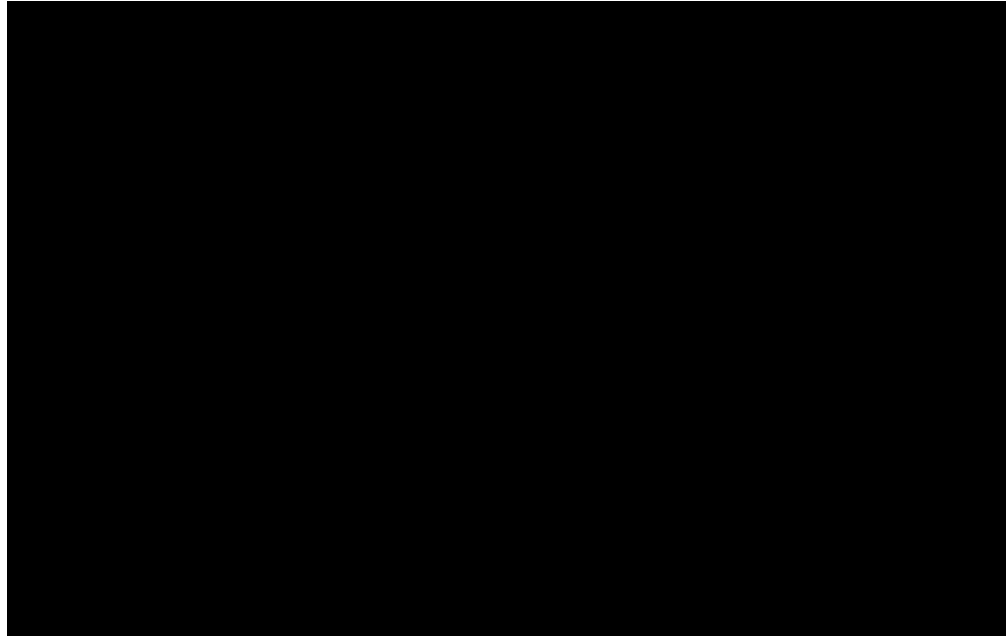
⁴⁷ This account was referenced in Table 5-2 under "MV90 meter dial mismatch between actual read and CSS".

\$10.41. For the RE-Growth program, a customer has the option to credit their balance or receive a refund. In the account details below, the Delivery Charge was listed at the net amount on September 4, 2024 (\$33.18-\$10.41). In addition, the Evaluation Team sees an excess credit in the account details and a refund. The Evaluation Team followed up to understand if this customer was actually refunded. If the customer was refunded, it looks like they received the benefit in two different ways: 1) reduction of bill, and 2) a refund. If the customer did not receive a refund, the “refund” line debits against the excess credit canceling them out. No response has been provided to date.

- Account Balance recalculation:

Date	Amount	Status	(Adjustments & Credits)	(Payments) / Refunds	Balance
9/4/2024	16.83	Supply Charge			459.95
9/4/2024	24.15	Delivery Charge			484.1 Already net 10.41 credit
9/6/2024			-10.41		473.69 Excess Credit (Renewable energy credit)
9/9/2024				10.41	484.1 Refund

- Bill:



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