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January 6, 2026

VIA ELECTRONIC MAIL AND HAND DELIVERY

Stephanie De La Rosa, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

**RE: Docket No. 25-08-GE – The Narragansett Electric Company d/b/a Rhode Island Energy PUC’s Inquiry Into Rhode Island Energy’s Billing Systems Practices and Performance Request For Proposals (“RFP”) For Consulting Services for the Evaluation of Billing Systems
Rhode Island Energy’s Comments on Final Report**

Dear Ms. De La Rosa:

On behalf of Rhode Island Energy,¹ enclosed please find the Company’s comments on the Rhode Island Energy Billing System Evaluation, Final Report, submitted to the Rhode Island Public Utilities Commission on November 14, 2025, by Guidehouse Inc., and Van Reen Accounting, LLC, in the above-referenced docket.

Thank you for your attention to this filing. Please contact me at 401-316-7429 if you have any questions.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Jennifer Brooks Hutchinson", with a long horizontal flourish extending to the right.

Jennifer Brooks Hutchinson

Enclosure

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

¹ The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”).

**COMMENTS OF THE NARRAGANSETT ELECTRIC COMPANY
d/b/a RHODE ISLAND ENERGY**

The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company” or “Rhode Island Energy”) appreciates the opportunity to comment on the Rhode Island Energy Billing System Evaluation, Final Report for RIPUC Docket No. 25-08-GE (the “Report”), submitted to the Rhode Island Public Utilities Commission (“Commission”) on November 14, 2025, by Guidehouse Inc. (“Guidehouse”) and Van Reen Accounting, LLC (“Van Reen” and together with Guidehouse are sometimes referred to as the “Evaluation Team”).

I. Background

The Company issued a request for proposal on June 11, 2025, for the services of a qualified independent consulting firm to assist the Commission in its review and evaluation of the Company’s billing system and processes pursuant to RIPUC Order No. 25352 issued on May 16, 2025, in response to concerns arising from the Company’s transition from the National Grid USA (“National Grid”) billing system to a new platform in August 2024, which culminated in the Report. The Commission’s goal in directing the evaluation was to ensure billing accuracy, reliability, and customer protection during and after this transition.

Following a competitive solicitation, Rhode Island Energy recommended Guidehouse and Van Reen to the Commission on August 28, 2025, to perform an independent, comprehensive assessment of the Company’s billing operations. The Commission approved the selection of the Evaluation Team and tasked them with reviewing system performance, identifying any material errors or systemic issues, and providing conclusions and

recommendations based on their findings. The Evaluation Team delivered their Report to the Commission on November 14, 2025.

Throughout the evaluation, Company leadership and staff prioritized transparency and cooperation. Rhode Island Energy provided the Evaluation Team with full access to personnel, secure systems, and all requested information, enabling a thorough and timely review. The Company's commitment to openness and accountability was reflected in its support for discovery, interviews, and data validation efforts.

The Company acknowledges the findings in the Report and expresses its sincere appreciation to Guidehouse and Van Reen for their diligence and professionalism. Rhode Island Energy remains committed to promptly acting on the priority recommendations and continuing to improve its billing systems and customer experience.

II. Significant Company Efforts During Transition and Cutover

A. Extensive Planning and Governance

As detailed in Section 1.4 of the Report, Rhode Island Energy undertook substantial efforts to ensure a successful transition from the National Grid billing system to its new platform in August 2024. The Company established a dedicated project management office ("PMO") and operational change management ("OCM") teams to oversee the transition. This included rigorous dress rehearsals, readiness assessments, and structured go/no-go checkpoints to ensure all systems and processes were prepared for cutover.

B. Stabilization and Hypercare

Following the system cutover, Rhode Island Energy launched a robust stabilization and hypercare phase. This involved surge staffing, real-time monitoring, and rapid response teams to address any issues as they arose. The Company maintained open lines of communication with both internal teams and external stakeholders, ensuring transparency and accountability throughout the process.

III. Proactive Issue Identification and Resolution

As noted in Section 5 of the Report, the Company identified and cataloged a range of billing system issues, many of which were rooted in the complexities of data migration, system integration, and legacy account structures. Rhode Island Energy responded promptly to these challenges, implementing targeted remediation plans, and tracking progress through exception dashboards and regular status updates.

A. Continuous Improvement and Customer Focus

The Company's efforts extended beyond immediate issue resolution. Rhode Island Energy invested in enhanced employee training, strengthened data validation protocols, and improved cross-functional communication to prevent recurrence of similar issues. These actions reflect the Company's ongoing commitment to delivering accurate bills and reliable service and maintaining customer trust.

While the transition presented significant challenges, the Report acknowledged that the Company's project management, governance, and operational response were strong and

effective. Rhode Island Energy's ability to adapt, learn, and improve throughout the process was instrumental in achieving the current level of billing system stability and reliability.

IV. Response to Executive Summary and Other Recommendations

A. Acknowledgment of Progress and Evaluation Findings

The Company appreciates the thorough and independent assessment conducted by Guidehouse and Van Reen on behalf of the Commission. The Executive Summary affirms that Rhode Island Energy has made substantial progress in identifying and addressing billing issues since the transition from National Grid to PPL. Importantly, the Evaluation Team 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)”.¹ This finding is a testament to the Company’s proactive approach to identifying and responding to the identified billing issues, and it validates the Company’s commitment to operational integrity and customer service throughout a complex system transition.

The Evaluation Team also recognized repeatedly Rhode Island Energy’s proactive approach in collaborating with stakeholders, establishing cross-functional “War Rooms,” and implementing both immediate and long-term remediation measures to stabilize billing operations and address customer concerns.²

¹ Report at 2.

² Report at 8-9, 35-36, 40.

B. Commitment to Remediation of Five Key Issues

The Company acknowledges the five priority issues outlined in Table ES-1 on page 3 of the Report and discussed more fully in Section V, below. The Company is fully committed to remediating these issues within the identified timeframe (Q1-2026). For each issue, the Company has adopted the proposed plans in the Report to establish clear remediation steps and accountability measures. Additionally, to ensure all corrective actions are effective, the Company will utilize the Evaluation Team for independent validation testing and will provide the results to the Commission.

V. Status and Outlook on Priority Issues

- **Issue 1: Genesis/Armageddon (Unbilled Usage)**
 - The Company continues to update the list of all accounts repaired through Genesis and Armageddon processes, quantifying the financial impact of unbilled customers. Any discrepancies in total dollar amounts will be reconciled through the Revenue Decoupling Mechanism (RDM), ensuring no material impact on ratepayers. Comprehensive analysis will be completed and validated in Q1-2026.
- **Issue 2: Under-billings Not Corrected**
 - Rhode Island Energy is compiling a complete list of underbilled accounts and quantifying the financial impact. The Company will perform a comprehensive analysis and ensure all affected customers are addressed, with remediation steps on track for completion in Q1-2026.

- **Issue 3: Net Write-Offs Include Incorrect Bills**
 - The Company is analyzing all net write-offs to identify and quantify instances where incorrect bills may have overstated write-offs. This analysis will be finalized in Q1-2026, with measures to ensure accurate financial reporting.
- **Issue 4: Choice Supplier Rate Incorrect**
 - Controls are being established within the Supplier Portal to prevent unauthorized rate modifications. The Company is investigating system setup and bill source data to address any discrepancies, with updates and validation to occur in Q1-2026.
- **Issue 5: Choice Supplier Incorrect on Customer Bills**
 - Rhode Island Energy is compiling supplier selections for all affected accounts, confirming system and bill accuracy, and updating the billing system as needed. Validation updates will be completed in Q1-2026.

VI. Response to Other Recommendations (Section 7)

While the immediate focus remains on resolving the five priority issues, the Company values the additional recommendations provided by the Evaluation Team for implementation in 2026 and beyond. Rhode Island Energy recognizes that some recommendations, such as enhancements to complex billing processes, data governance, and customer experience, are robust and may require significant investment. The Company will continue to review and assess these recommendations, balancing the need for improvement with customer affordability and operational feasibility.

- **Examples of Other Recommendations Already Underway**
 - **“Business Portal” Creation (Recommendation on page 68, Reference Section 5.12):** The Company is prioritizing enhancements to complex billing processes, including the return of self-service multi-account capabilities through a Multi-Account Experience (“MAE”). MAE will be accessible in the Company’s existing My Account portal for all customers in Q1 of 2026, providing a streamlined way for customers to manage multiple accounts and complete bulk transactions across both gas and electric. This enhancement significantly improves efficiency and convenience for customers with multiple accounts, restoring and modernizing capabilities they valued in My Business Account, a former external portal offered by the legacy provider.
 - **AMF Capabilities (Recommendation on pg. 68, Reference Section 5.11)**

Rhode Island Energy is strengthening billing and customer service operations by preparing for remote capabilities post-AMF deployment. Remote switching for move-ins/outs and disconnects/reconnects is already in use for AMF-equipped customers.

VII. Rate Reconciliation and Financial Controls

The Evaluation Team’s “cash register” analysis found no material discrepancies between billed operating revenue and the general ledger, reaffirming the integrity of Rhode Island Energy’s financial controls. The Company agrees that any differences identified are primarily

related to timing and it will continue to monitor and reconcile these as part of ongoing operations.

VIII. Transparency and Continuous Improvement

The Company appreciates the Evaluation Team's recognition of Rhode Island Energy's transparency, collaboration, and commitment to continuous improvement. The Company is already addressing several recommendations and will continue to assess the recommended enhancements to project management, governance, data validation, and customer communications as outlined in Section 7 of the Report.

IX. Rate Case Filing and Forward-Looking Statements

The Company notes the Evaluation Team's observation regarding the recent rate case filing, submitted to the Commission on November 26, 2025, in Docket No. 25-45-GE. While outside the scope of the Report, Rhode Island Energy has accounted for potential billing system impacts on the revenue requirement through its broader rate review strategy and normalizing adjustments as appropriate.

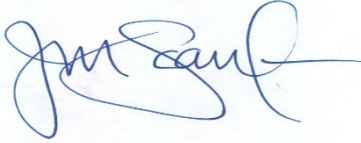
X. Conclusion

In summary, Rhode Island Energy is proud of the progress made in stabilizing and improving its billing systems during a complex transition. The Company is committed to resolving the remaining priority issues, implementing additional recommendations where feasible, and maintaining transparency with regulators, stakeholders, and customers. Rhode Island Energy values the Evaluation Team's findings and will continue to work collaboratively to ensure accurate, reliable, and customer-focused billing operations.

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



Joanne M. Scanlon

January 6, 2026
Date

Docket No. 25-08-GE – PUC’s Inquiry Into Rhode Island Energy’s Billing Systems Practices and Performance
Service list updated on 11/17/2025

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