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January 27, 2026

**VIA ELECTRONIC MAIL AND HAND DELIVERY**

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

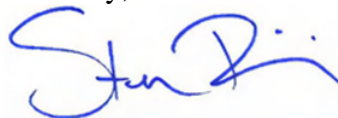
**Re: Docket Nos. 25-52-REG & 25-53-REG – The Narragansett Electric Company d/b/a Rhode Island Energy Renewable Energy Growth Program Year 2026-2027 and 2026-2027 Renewable Energy (RE) Growth Program Factor Filing Response to PUC Data Request – Set 5**

Dear Ms. De La Rosa:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”), I have enclosed the Company’s response to the Public Utilities Commission’s Fifth Set of Data Request in the above-referenced dockets.

Thank you for your attention to this matter. If you have any questions, please contact me at (401) 709-3359.

Sincerely,



Steven J. Boyajian

Enclosure

cc: Docket Nos. 25-52-REG & 25-53-REG Service Lists

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate were 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.

Elaina M. Weir

January 27, 2026

Date

**Docket No. 25-52-REG – Renewable Energy Growth Program for Year 2026-2027  
The Narragansett Electric Company & RI Distributed Generation Board  
Service List updated 12/16/2025**

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Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate were 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.

Elaina M. Weir

January 27, 2026

Date

**Docket No. 25-53-REG – 2026-2027 Renewable Energy Growth Program Factor Filing  
The Narragansett Electric Company d/b/a Rhode Island Energy  
Service List updated 12/16/2025**

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PUC 5-1

Request:

In response to PUC 1-8, the Company expresses concern that an original solar project that is electrically joined to a second solar project could not independently qualify for net metering at the end of its tariff term without significant electrical wiring changes and financial investment. The Company explains that these modifications are required for the original solar project to be independently metered and to be appropriately compensated under net metering.

The Company continues by stating, “[i]f a customer intends for the original Renewable Energy Growth (“REG”) system to independently qualify for net metering upon the expiration of its tariff term while also seeking to install a second solar project under REG, the most direct approach would be to meter each REG system separately using two distinct REG meters.”

Please review the Company's response to PUC 2-1 in Docket No. 4268, which reads, in relevant part:

“Under R.I.G.L. § 39-26.2-6(g), a developer can submit an application for a DG Standard Contract, which would apply to a facility that is intended by the customer to be employed for net metering purposes and to sell the excess output from its distributed generation project pursuant to the standard contract provisions. Under that provision, the total excess output of the on-site generator would be the subject of a DG Standard Contract, assuming that the applicant is awarded a DG Standard Contract in one of the enrollments. The customer could employ the proposed facility's output to offset on-site usage. In this case, the Company believes that the most administratively reasonable method to accomplish this approach would be to determine, during the applicable billing period, the excess generation beyond the on-site consumption to which DG Standard Contract prices will apply.”

Does the Company's response in Docket No. 4268 indicate that a customer could have two, electrically joined solar projects, one of which can be in net metering and another in REG? If not, please explain why not. Please also indicate whether the Company's proposal in this docket represents a departure from its prior position and explain why or why not.

PUC 5-1, Page 2

Response:

No, the Company's response in Docket No. 4268 pertains to a single renewable energy system and describes how such a system may be eligible to receive two types of compensation: the retail rate under Net Metering for the portion of generation used to offset on-site consumption, and compensation under a DG Standard Contract for excess generation, in place of receiving Excess Renewable Net Metering Credits. In contrast, if there are two electrically interconnected solar projects, they operate as a single integrated system from an electrical perspective. As a result, it is not possible to electrically separate or independently meter the output of the original solar project from that of the second solar project. Once electricity is generated by these electrically joined systems, there is no practical method to determine or meter the specific amount of electricity produced by each individual project, since all output is combined and cannot be measured separately as long as the systems remain electrically joined. The use of two meters—one net meter and one Renewable Energy Growth meter—connected to a single electrically integrated system would not result in accurate metering of the two solar projects.

The Company does not consider the proposal in this docket to represent a deviation from any prior position. Docket 4268 concerns a scenario where a customer receives two forms of compensation from a single renewable energy project located behind one net meter. However, rather than receiving Excess Renewable Net Metering Credits, a customer could choose to receive a fixed-price payment under a Distributed Generation (DG) Standard Contract—the predecessor to the Renewable Energy Growth program—for any excess generation. It should be noted that enrollment in the DG Standard Contract program concluded in 2014, and current statutes do not permit new arrangements of this kind.

Furthermore, given the significant number of renewable energy projects participating in both Net Metering and Renewable Energy Growth, the Company believes that instituting such a process, if permitted under statute, could be administratively burdensome, with respect to monthly billing and annual reconciliation.