

STEVEN J. BOYAJIAN

One Financial Plaza, 14th Floor
Providence, RI 02903-2485
Main (401) 709-3300
Fax (401) 709-3399
sboyajian@rc.com
Direct (401) 709-3359

Also admitted in Massachusetts

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

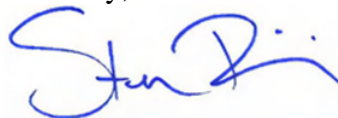
**Re: Docket No. 25-52-REG – The Narragansett Electric Company d/b/a Rhode Island Energy
Renewable Energy Growth Program Year 2026-2027
Responses to Division Data Requests – Set 1**

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 responses to the Division of Public Utilities and Carriers’ First Set of Data Requests for filing with the Public Utilities Commission in the above-referenced docket.

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 No. 25-52-REG Service List

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.

Heidi J. Seddon

January 6, 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**

Parties' Name/Address	E-Mail	Phone
The Narragansett Electric Company d/b/a Rhode Island Energy Andrew S. Marcaccio, Esq. Celia B. O'Brien, Esq. 280 Melrose Street Providence, RI 02907	AMarcaccio@pplweb.com ;	401-784-4263
	COBrien@pplweb.com ;	
	JScanlon@pplweb.com ;	
	CAGill@RIEnergy.com ;	
	KRCastro@rienergy.com ;	
	ERussellSalk@RIEnergy.com ;	
	RConstable@rienergy.com ;	
	KMCampbell@pplweb.com ;	
	HDGonsalves@pplweb.com ;	
	LKurdgelashvili@pplweb.com ;	
KWGauntner@pplweb.com ;		
Steven J. Boyajian, Esq. Leticia C. Pimentel, Esq. Robinson & Cole LLP One Financial Plaza, 14th Floor Providence, RI 02903	sboyajian@rc.com ;	401-709-3359
	lpimentel@rc.com ;	
	hseddon@rc.com ;	
DG Board / Office of Energy Resources Adam Fague, Esq. Division of Legal Services One Capitol Hill, 4 th Floor Providence, RI 02908	adam.fague@doa.ri.gov ;	401-222-8880
	Nancy.Russolino@doa.ri.gov ;	
	Christopher.Kearns@energy.ri.gov ;	
	Shauna.Beland@energy.ri.gov ;	
	Abigail.Hasenfus@energy.ri.gov ;	
	William.Owen@energy.ri.gov ;	
	David.Augustyn@energy.ri.gov ;	
	Karen.Stewart@commerceri.com ;	
	angela.tuoni@TNC.ORG ;	
h.oakley@osjl.com ;		

	hkenyon@rihousing.com ;	
	john@jhmccannlaw.com ;	
	lchbartsch@gmail.com ;	
	mark.kravatz@gmail.com ;	
	meagans@naturalpower.com ;	
	sbradner@peregrinegrp.com ;	
	beschuster@rienergy.com ;	
	alexandriad@naturalpower.com ;	
Jim Kennerly	jkennerly@seadvantage.com ;	
	jgifford@seadvantage.com ;	
	Tarmstrong@seadvantage.com ;	
Division of Public Utilities and Carriers Margaret L. Hogan, Esq.	Margaret.L.Hogan@dpuc.ri.gov ;	401-780-2120
	christy.hetherington@dpuc.ri.gov ;	
	John.bell@dpuc.ri.gov ;	
	nicole.m.corbin@dpuc.ri.gov ;	
	mark.a.simpkins@dpuc.ri.gov ;	
	leo.wold@dpuc.ri.gov ;	
	kyle.j.lynch@dpuc.ri.gov ;	
	Gregory.Schultz@dpuc.ri.gov ;	
	john.r.harrington@dpuc.ri.gov ;	
	Joel.munoz@dpuc.ri.gov ;	
	Ellen.Golde@dpuc.ri.gov ;	
Mike Brennan 500 North Boundary St. Raleigh, NC 27604	mikebrennan099@gmail.com ;	919-219-2957
Gridwealth Development Seth H. Handy, Esq. Handy Law, LLC 42 Weybosset Street Providence, RI 02903	seth@handylawllc.com ;	401-626-4839
	ispringsteel@gridwealth.com ;	
A. Quincy Vale, Esq. MassAmerican Energy LLC dba Gridwealth 33 Union Avenue Sudbury, MA 01776	qvale@gridwealth.com ;	617-694-5181
File an original & 9 copies w/ Stephanie De La Rosa, Commission Clerk Cynthia Wilson-Frias, Commission Counsel Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Stephanie.DeLaRosa@puc.ri.gov ;	401-780-2107
	Alan.nault@puc.ri.gov ;	
	Todd.bianco@puc.ri.gov ;	
	jordan.sasa@puc.ri.gov ;	
	Cynthia.WilsonFrias@puc.ri.gov ;	
	theodore.smith.ctr@puc.ri.gov ;	
	Christopher.Caramello@puc.ri.gov ;	

	kristen.l.masse@puc.ri.gov ;	
Interested Parties:		
Paul Rhodes	PRhodes@gridwealth.com ;	
Matt Sullivan, Green Development	ms@green-ri.com ;	
Hannah Morini, Green Development	hm@green-ri.com ;	
Fred Unger	unger@hrtwd.com ;	
Charlie Grant, Essex Capital Partners	cgrant@essexcapitalpartners.com ;	
Stuart Flanagan, NP TRE-Newport Renewables	sflanagan@nptre.com ;	
Ameresco	mgibbs@ameresco.com ;	
Maya Gibbs	praducha@ameresco.com ;	
Paul Raducha	npollis@ameresco.com ;	
Nikkie Pollis		
Brian Smith, Orsted	brsmi@orsted.com ;	
Jamie Rhode, Conservation Law Foundation (CLF)	jrhodes@clf.org ;	

Division 1-1

Request:

It is the Division's understanding that the "PBI-2" described on pages 12 and 13 applies only during the period when both terms are active. It is the Division's further understanding that the "PBI-2b" rate will only apply to the second solar system. Will RIE calculate the kWh to be compensated at the PBI-2b rate by multiplying the total metered generation by the portion assigned to the second system (i.e., 41% in the example given in the testimony)?

Response:

No. The Company will determine the kWh compensated at the PBI-2b rate based on 100 percent of the generation exported via the Renewable Energy Growth meter. The Company believes a reduction of 41 percent in this hypothetical would result in an unattractive and unreasonable proposal where the original project is generating, the Company is receiving the benefits of that generation, but the customer is not being compensated for that generation. Instead, the PBI-2b rate is derived from a weighted combination of PBI-1 and PBI-2a. This rate only applies to the second solar project. The PBI-2b rate does, however, account for the generation of the first system since they are electrically integrated. The Company proposes a reduced compensation (i.e., not at the original tariff price) to compensate customers at a rate similar to what they would receive if they were net metered..

Division 1-2

Request:

RIE indicates that “the original project cannot independently qualify for net metering due to the shared meter” (Gauntner testimony page 14 lines 3 and 4).

- a. Why is this the case?
- b. If this is the case, what option will the customer have to be compensated for the generation from the original project after the original tariff term ends (assuming the generation from the second project is compensated using the PBI-2b rate)?
- c. Can the entire expanded system qualify for net metering at the end of the original tariff term?

Response:

- a. Two solar projects located behind the same Renewable Energy Growth meter will be electrically connected in some manner. They will likely share some wiring and conduits or even inverters depending on system configuration. It would be inefficient and potentially cost prohibitive for a small-scale Renewable Energy Growth customer to modify their original solar system to become completely electrically separated from the second solar system to be net metered following the end of its tariff term.
- b. Please reference the Company's response to Division 1-1. The Company believes the compensation for the second solar project must take into account the fact that the first project is generating, and the Company is receiving the benefits of that generation due to the projects being electrically integrated.
- c. The Company carefully evaluated whether the combined solar system (solar project 1 plus solar project 2) should move to net metering at the end of the tariff term of the first project, in response to valuable comments from the Division during the development of this proposal. The Company ultimately decided not to propose this approach because to reasonably compensate a customer for the development, construction and operation of the second renewable energy project in the potentially short remaining tariff term of the first project could result in high performance-based incentives which could present issues with the reconciliation of program costs and rate predictability.

Following the end of the tariff term of the second solar project, the entire system (solar project 1 and solar project 2) will qualify for net metering.