

DIV 5-4. When RIE witness Blazunas calculated burdens, did he subtract the estimated or projected LIHEAP benefit from the electricity cost prior to calculating the burden?

Response can be found at Book 1, Bates page 4.

DIV 5-5. If the answer to the immediately preceding question was “yes,” please provide a detailed explanation of how witness Blazunas:

- a. Allocated LIHEAP benefits between electric non-heating customers and electric heating customers;
- b. Allocated LIHEAP benefits between electric non-heating customers and customers who heat with a fuel other than electricity;
- c. Allocated LIHEAP benefits between customers who assigned their LIHEAP to RIE and those who assigned their LIHEAP to a vendor (utility or otherwise) other than RIE?

Response can be found at Book 1, Bates page 5.

DIV 5-6. If the answer to Question No. 4 was “yes,” please explain how he addressed the section of the federal LIHEAP statute which reads in relevant part: “Notwithstanding any other provision of law unless enacted in express limitation of this paragraph, the amount of any home energy assistance payments or allowances provided directly to, or indirectly for the benefit of, an eligible house-hold under this title shall not be considered income or resources of such household (or any member thereof) for any purpose under any Federal or State law, including any law relating to taxation, food stamps, public assistance, or welfare programs.” (42 USC §8624(f)(1)).

Response can be found at Book 1, Bates page 6.

DIV 5-7. In calculating the burdens of RIE electricity customers, and thus the discounts to be provided to LIDR participants, did RIE witness Blazunas distinguish between electricity customers who received LIHEAP (and assigned it to RIE) and those who did not?

Response can be found at Book 1, Bates page 7.

DIV 5-8. If the response to the immediately preceding question was “yes,” please explain how he addressed the section of the federal LIHEAP statute which reads in relevant part: “which states in relevant part: “b)As part of the annual application required by subsection (a), the chief executive officer of each State shall certify that the State agrees to—. . .(7) if the State chooses to pay home energy suppliers directly,

establish procedures to—. . .(C) assure that the home energy supplier will provide assurances that any agreement entered into with a home energy supplier under this paragraph will contain provisions to assure that no household receiving assistance under this subchapter will be treated adversely because of such assistance under applicable provisions of State law or public regulatory requirements.” (42 USC §8624(b)(7(c))).

Response can be found at Book 1, Bates page 8.

DIV 5-9. Please provide a detailed explanation of what happens with the recovery of LIDR costs if actual LIDR costs exceed budgeted or projected LIDR costs on an annual basis? Provide a similar explanation of what happens if actual LIDR costs are less than budgeted or projected LIDR costs on an annual basis.

Response can be found at Book 1, Bates page 9.

DIV 5-10. Please explain, in projecting, or budgeting for, LIDR costs, how RIE has taken into account increasing capacity costs set in ISO-NE capacity auctions?

Response can be found at Book 1, Bates page 11.

DIV 5-11. Please provide a detailed explanation of whether since 2024, capacity costs set in ISO-NE capacity auctions have been increasing, decreasing, or remaining stable, and, if increasing or decreasing, by what extent?

Response can be found at Book 1, Bates page 12.

DIV 5-12. Please explain how recent increases, if any, in capacity costs set by ISO-NE capacity auctions were used by RIE witness Blazunas in:

- a. Setting the discount levels proposed for LIDR in this proceeding; and
- b. Estimating the LIDR costs for purposes of rate recovery in this proceeding.

Response can be found at Book 1, Bates page 13.

DIV 5-13. Please provide a detailed explanation of how LIDR discounts are periodically updated to reflect increases or decreases in bills to LIDR participants.

Response can be found at Book 1, Bates page 14.

DIV 5-14. Confirm or deny: Under the existing LIDR, SNAP participants are, by virtue of their participation in SNAP, eligible to participate in LIDR. If denied, provide a detailed explanation of the basis for the denial.

Response can be found at Book 1, Bates page 15.

DIV 5-15. If the response to Question No. 14 was “confirmed” (see, DeSousa Direct Testimony, at pages 27:22 – 28:3: “Customers enrolled in programs such as LIHEAP, Supplemental Nutrition Assistance Program 1 (“SNAP”), or Supplemental Security Income (“SSI”) receive a 25 percent discount on both the supply and delivery portions of their bill.”), please reconcile the RIE report that 22% of income-eligible customers are currently enrolled in LIDR (Workpaper PRB-7) with USDA reports (see e.g., <https://fns-prod.azureedge.us/sites/default/files/resource-files/ear-snap-Reaching-Those-in-Need-2022.pdf>) that more than 98% of the population eligible for SNAP in Rhode Island participate in SNAP.

Response can be found at Book 1, Bates page 16.

DIV 5-16. If the response to Question No. 14 was “confirmed” ” (see, DeSousa Direct Testimony, at pages 27:22 – 28:3: “Customers enrolled in programs such as LIHEAP, Supplemental Nutrition Assistance Program 1 (“SNAP”), or Supplemental Security Income (“SSI”) receive a 25 percent discount on both the supply and delivery portions of their bill.”), please reconcile the Company’s reported LIDR participation rate of 31,935 (RIE Workpaper PRB-7) with the Census estimate (American Community Survey, Table S2201) that Rhode Island has 62,265 households receiving SNAP (MOE of +/- 4,839).

Response can be found at Book 1, Bates page 17.