

February 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 No. 26-08-EL – The Narragansett Electric Company d/b/a Rhode Island Energy
Tariff Advice Filing to Add an Advanced Metering Functionality Recovery Provision,
RIPUC No. 2282**

Dear Ms. De La Rosa:

On behalf of Rhode Island Energy,¹ and in accordance with the Rhode Island Public Utilities Commission’s (“PUC”) Rules of Practice and Procedure, 810-RICR-00-00-1.10(C) (“Rule 1.10(C)”)² please find enclosed a tariff advice filing to add a new proposed electric tariff, entitled, Advanced Metering Functionality Recovery Provision, RIPUC No. 2282 (referred to herein as, the “AMF Recovery Provision”).

Pursuant to PUC Rule 1.10(C)(3), absent an order issued by the PUC to suspend the proposed Tariff, it will go into effect on April 1, 2026 (the proposed effective date, subject to suspension by the PUC).

On September 27, 2023, the Commission authorized Rhode Island Energy, to “transition its electric distribution operations from the existing AMR-based metering system to a system that utilizes advanced metering functionality (AMF),” subject to certain conditions as set forth in the PUC’s Open Meeting and Votes in Docket 22-49-EL.³ Pursuant to ordering Paragraph No. 9 of the Commission’s written order, the Commission directed the Company to file an “ISR Addendum” that encompassed the Commission’s findings and include,

a proposal to recover the revenue requirement associated with the eligible advanced metering functionality CapEx spending to be appropriately allocated to each rate class and recovered through a fixed charge embedded in the applicable customer charge for each rate class for further review by the Commission.⁴

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

² The Public Utilities Commission’s Rules of Practice and Procedure are codified as 810-RICR-00-00-1.

³ RIPUC Open Meeting and Votes on September 27, 2023, Docket No. 22-49-EL, para. 1, 3 (written Order No. 25353 issued May 20, 2025).

⁴ RIPUC Docket No. 22-49-EL, Order No. 25353 at 25.

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The Company filed the Electric ISR Addendum with the Company’s Compliance Filing in Docket No. 22-49-EL on December 22, 2023; however, the Commission did not take any action on the ISR Addendum at that time. The Company is now filing the enclosed AMF Recovery Provision to implement the AMF CapEx Factor, which has been proposed for the first time in the fiscal year (“FY”) 2027 Electric ISR Plan in Docket No. 25-54-EL that is currently pending before the PUC.

The Company is proposing an effective date of April 1, 2026, for the AMF Recovery Provision to coincide with the proposed effective date of the AMF CapEx Factor in the FY 2027 ISR Plan.

Thank you for your attention to this matter. If you have any questions, please contact me at 401-316-7429.

Very truly yours,



Jennifer Brooks Hutchinson

Enclosures

cc: Docket No. 22-49-EL Service List
Docket No. 25-54-EL Service List
John Bell, Division
Nick Vaz, Special Assistant Attorney General

THE NARRAGANSETT ELECTRIC COMPANY
ADVANCED METERING FUNCTIONALITY RECOVERY PROVISION

In accordance with the Commission’s decision in Docket No. 22-49-EL, the prices for electric distribution service contained in all of the Company’s tariffs are subject to adjustment to reflect the operation of its Advanced Metering Functionality (“AMF”) Recovery Provision. The Company is not required to prove a need to deploy AMF for its electric distribution operations in place of the existing automated meter reading metering system.

A. Definitions

“AMF Actual Capital Investment” shall mean the sum of the AMF Capital Investments that were placed in service during the twelve-month period that aligns with the applicable ISR Plan year.

“AMF CapEx Factor” shall mean the per-customer fixed charge, embedded in the applicable customer charge, for each rate class, to recover the forecasted AMF Cumulative Revenue Requirement, net of the Special Sector Deferrals, as allocated by the Rate Base Allocator from the most recent base distribution rate case, based on Forecasted kWh usage for each rate class.

“AMF CapEx Reconciling Factor” shall mean the per-customer fixed charge, embedded in the applicable customer charge, for each rate class, designed to recover or refund the under or over billing of the actual AMF Cumulative Revenue Requirement through the AMF CapEx Factor for the prior ISR Plan recovery period, based on Forecasted Customer Count for the recovery or refund period.

“AMF Capital Investments” shall mean capital investments associated with AMF Project Implementation, including but not limited to 1) AMF meters; 2) AMF-related network capital costs; 3) AMF-related software capital costs; and 4) the respective share of capital project management costs associated with the capital investments.

“AMF Cumulative CapEx” shall mean the cumulative AMF Actual Capital Investment placed in service for years prior to the AMF Current Year plus AMF Forecasted Capital Investment for the AMF Current Year, recorded since the beginning of AMF Project Implementation.

“AMF Cumulative Revenue Requirement” shall mean the return and taxes on year-end cumulative AMF Incremental Rate Base, at a rate equal to the pre-tax weighted average cost of capital as approved by the Commission in the most recent base distribution rate case proceeding plus the annual depreciation on AMF Cumulative CapEx using the same depreciation rate as the ISR Plan investments, plus the annual municipal property taxes on AMF Cumulative CapEx. In addition, the amortization only of MDMS Capital Costs will be included in the total AMF Cumulative Revenue Requirement to be recovered through the AMF CapEx Factor and AMF CapEx Reconciling Factor.

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“AMF Current Year” shall mean the twelve-month period during which the proposed AMF CapEx Factor will be in effect that aligns with the start date of the ISR Plan recovery period.

“AMF Forecasted Capital Investment” shall mean the estimated AMF Capital Investments anticipated to be incurred and/or recorded by the Company for the twelve-month period that aligns with the applicable ISR Plan year.

“AMF Incremental Rate Base” shall mean the AMF Cumulative CapEx adjusted for accumulated depreciation and calculated accumulated deferred taxes on AMF Cumulative CapEx.

“AMF Project Implementation” is the period of time in which the Company makes the investments and performs the work necessary to begin operation of the AMF meters with all the approved and required functionalities, as outlined in the Commission’s September 27, 2023, Open Meeting motions and votes approving with conditions the Company’s AMF Business Case.

“Forecasted Customer Count” shall mean the forecasted number of the Company’s electric distribution customers by rate class for the period during which the proposed factors, as defined in this AMF Recovery Provision, will be in effect.

“ISR Plan” shall mean the Company’s annual Electric Infrastructure, Safety and Reliability Plan for the applicable 12-month period of April 1 through March 31 pursuant to the Infrastructure, Safety and Reliability Provision.

“MDMS Capital Costs” shall mean the costs to install the Meter Data Management System (“MDMS”) components allocated to AMF, which are equal to forty-four percent (44%) of the capital costs associated with the work to install the MDMS and are separate from, and not included in, AMF Actual Capital Investment or AMF Forecasted Capital Investment.

“Special Sector Deferrals” shall mean the on-going net cumulative deferral balances related to the Special Sector Programs identified in Article II.C.20 of the Amended Settlement Agreement approved by the Commission in Docket No. 4770 (Report and Order No. 23823, issued on May 5, 2020) consisting of 1) the Energy Storage Demonstration program and 2) the Electric Transportation program. In addition, the on-going net cumulative deferrals balances of the AMI Business Case Study and GIS Enhancements from Docket No. 4770 will be included in the Special Sector Deferrals total.

B. Recovery Mechanism

The AMF CapEx Factor shall recover the AMF Cumulative Revenue Requirement, net of the Special Sector Deferrals, on AMF Cumulative CapEx as approved by the Commission in the annual proceeding for approval of the Company’s proposed ISR Plan for the applicable program year. The AMF CapEx Factor shall be applicable for the twelve-month period commencing at

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the start date of the CapEx Factor for the ISR Plan Filing. AMF Capital Investments that commenced prior to the Company's ISR plan filing for the twelve-month period ending March 31, 2025, shall be eligible for recovery through this AMF Recovery Provision notwithstanding the fact that the spending was not part of the pre-approved investments within a prior ISR Plan filing.

Recovery of costs incurred for AMF Capital Investments shall be capped in the aggregate at a budget of \$153,217,548.

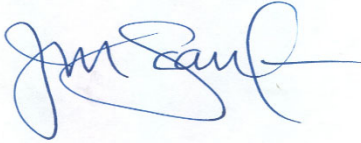
The MDMS Capital Costs shall not be eligible for rate base recovery by inclusion in AMF Incremental Rate Base. The MDMS Capital Costs shall be amortized over the depreciation period and recovered through the AMF Cumulative Revenue Requirement without a return on those costs.

The Company's AMF Recovery mechanism shall include an annual AMF CapEx Factor reconciliation, which will reconcile actual AMF Cumulative Revenue Requirement to actual billed revenue generated from the AMF CapEx Factor for the applicable AMF Current Year. The recovery or refund of the reconciliation amounts (either positive or negative) shall be reflected in the AMF CapEx Reconciling Factor. The Company shall include the AMF CapEx Factor reconciliation as part of its annual ISR Plan Reconciliation Filing, to become effective for a twelve-month period. The amount approved for recovery or refund through the AMF CapEx Reconciling Factor shall be subject to reconciliation with amounts billed through the AMF CapEx Reconciling Factor and any difference reflected in future AMF CapEx Reconciling Factors.

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

February 27, 2026
Date

The Narragansett Electric Company d/b/a Rhode Island Energy
Docket No. 22-49-EL Advanced Meter Functionality (AMF)
Service list updated 5/7/2025

Name/Address	E-mail Distribution List	Phone
The Narragansett Electric Company d/b/a Rhode Island Energy Jennifer Hutchinson, Esq. 280 Melrose Street Providence, RI 02907	JHutchinson@pplweb.com ;	401-316-7429
	JScanlon@pplweb.com ;	
	COBrien@pplweb.com ;	
	SBriggs@pplweb.com ;	
	PDCapwell@RIEnergy.com ;	
	CAGill@RIEnergy.com ;	
	NABegnal@RIEnergy.com ;	
	WJHennegan@pplweb.com ;	
	EMcCord@RIEnergy.com ;	
	JOliveira@pplweb.com ;	
	BESchuster@RIEnergy.com ;	
PJWalnock@pplweb.com ;		
Hinckley Allen Adam Ramos, Esq. 100 Westminster Street, Suite 1500 Providence, RI 02903-2319	aramos@hinckleyallen.com ;	401-457-5164
	AGiron@hinckleyallen.com ;	
	cdieter@hinckleyallen.com ;	
	ssuh@hinckleyallen.com ;	
Division of Public Utilities (Division) Leo Wold, Esq. Christy Hetherington, Esq. Division of Public Utilities and Carriers 89 Jefferson Blvd. Warwick, RI 02888	Leo.Wold@dpuc.ri.gov ;	401-780-2177
	Christy.Hetherington@dpuc.ri.gov ;	
	Margaret.L.Hogan@dpuc.ri.gov ;	
	John.bell@dpuc.ri.gov ;	
	Al.contente@dpuc.ri.gov ;	

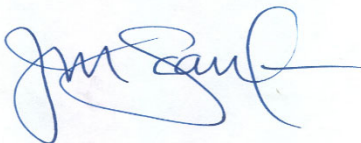
	Joel.munoz@dpuc.ri.gov ;	
	Linda.George@dpuc.ri.gov ;	
	Ellen.golde@dpuc.ri.gov ;	
	Machaela.Seaton@dpuc.ri.gov ;	
	Al.mancini@dpuc.ri.gov ;	
	mark.a.simpkins@dpuc.ri.gov ;	
	kyle.j.lynch@dpuc.ri.gov ;	
	gregory.schultz@dpuc.ri.gov ;	
	Thomas.kogut@dpuc.ri.gov ;	
	john.r.harrington@dpuc.ri.gov ;	
Mike Brennan	mikebrennan099@gmail.com ;	
Robin Blanton	robin.blanton@ieee.org ;	
William Watson	wfwatson924@gmail.com ;	
David Littell	dlittell@bernsteinshur.com ;	
Gregory L. Booth, PLLC 14460 Falls of Neuse Rd. Suite 149-110 Raleigh, NC 27614	gboothpe@gmail.com ;	
Linda Kushner L. Kushner Consulting, LLC 514 Daniels St. #254 Raleigh, NC 27605	lkushner33@gmail.com ;	
Office of Attorney General Nick Vaz, Esq. 150 South Main St. Providence, RI 02903	nvaz@riag.ri.gov ;	401-274-4400 x 2297
	mbedell@riag.ri.gov ;	
Office of Energy Resources (OER) Adam Fague, Esq. Dept. of Administration 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 ;	
	Steven.Chybowski@energy.ri.gov ;	
Chris Kearns, OER	Nathan.Cleveland@energy.ri.gov ;	
	William.Owen@energy.ri.gov ;	
Mission:data Coalition James G. Rhodes, Esq. Rhode Consulting LL 160 Woonsocket Hill Rd. North Smithfield, RI 20896	james@jrhodeslegal.com ;	401-225-3441
George Wiley Center Jennifer L. Wood, Executive Director R.I. Center for Justice	jwood@centerforjustice.org ;	
	georgewileycenterri@gmail.com ;	

1 Empire Plaza, Suite 410 Providence, RI 02903	camiloviveiros@gmail.com ;	
NRG Retail Companies Craig Waksler, Esq. Eckert Seamans Cherin & Mellott, LLC Two International Place, 16 th Floor Boston, MA 02110	CWaksler@eckertseamans.com ;	617-342-6890
	Kmoury@eckertseamans.com ;	717-237-6000
	sstoner@eckertseamans.com ;	
Conservation Law Foundation (CLF) James Crowley, Esq. Conservation Law Foundation 235 Promenade Street Suite 560, Mailbox 28 Providence, RI 02908	jcrowley@clf.org ;	401-228-1905
Original & 9 copies file w/ PUC: Stephanie De La Rosa, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Stephanie.DeLaRosa@puc.ri.gov ;	401-780-2107
	Cynthia.WilsonFrias@puc.ri.gov ;	
	Alan.nault@puc.ri.gov ;	
	Todd.bianco@puc.ri.gov ;	
	Christopher.Caramello@puc.ri.gov ;	
	kristen.l.masse@puc.ri.gov ;	
Interested Parties:		
Victoria Scott (GOV)	Victoria.Scott@governor.ri.gov ;	
Seth Handy, Esq.	seth@handylawllc.com ;	
Stephan Wollenburg	swollenburg@seadvantage.com ;	
Mary McMahan	mmcmahan@seadvantage.com ;	
Jim Kennerly	jgifford@seadvantage.com ;	
Amy Boyd, RI Director, Acadia Center	aboyd@acadiacenter.org ;	401-276-0600
Oliver Tully, Acadia Center	otully@acadiacenter.org ;	
Amanda Barker	amanda@greenenergyconsumers.org ;	
Larry Chretien	larry@greenenergyconsumers.org ;	
Nancy Lavin	nlavin@rhodeislandcurrent.com ;	

Certificate of Service

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Joanne M. Scanlon

February 27, 2026

Date

**Docket No. 25-54-EL – RI Energy’s Electric ISR Plan FY 2027
Service List as of 1/21/2026**

Name/Address	E-mail Distribution	Phone
The Narragansett Electric Company d/b/a Rhode Island Energy Jennifer Brooks Hutchinson, Esq. 280 Melrose St. Providence, RI 02907 Adam S. Ramos, Esq. Hinckley Allen 100 Westminster Street, Suite 1500 Providence, RI 02903-2319	JHutchinson@pplweb.com ;	401-316-7429
	cobrien@pplweb.com ;	
	jscanlon@pplweb.com ;	
	aramos@hinckleyallen.com ;	
	AGiron@hinckleyallen.com ;	
	sbriggs@pplweb.com ;	
	KMCampbell@RIEnergy.com ;	
	PLaFond@RIEnergy.com ;	
	NKocon@RIEnergy.com ;	
	JADenson@pplweb.com ;	
	CMBird@RIEnergy.com ;	
	smtoronto@RIEnergy.com ;	
	ATLaBarre@RIEnergy.com ;	
	rconstable@RIEnergy.com ;	
	krcastro@RIEnergy.com ;	
	CJRooney@RIEnergy.com ;	
	joliveira@pplweb.com ;	
TGShields@pplweb.com ;		
nhawk@pplweb.com ;		
PDCapwell@RIEnergy.com ;		
PJWalnock@pplweb.com ;		

	CAGill@RIEnergy.com ;	
	EMcCord@RIEnergy.com ;	
Division of Public Utilities (Division) Gregory Schultz, Esq. Margaret Hogan, Esq.	Gregory.Schultz@dpuc.ri.gov ;	
	Margaret.I.hogan@dpuc.ri.gov ;	
	Ellen.golde@dpuc.ri.gov ;	
	John.bell@dpuc.ri.gov ;	
	Al.contente@dpuc.ri.gov ;	
	Robert.Bailey@dpuc.ri.gov ;	
	Christy.Hetherington@dpuc.ri.gov ;	
	leo.wold@dpuc.ri.gov ;	
	mark.a.simpkins@dpuc.ri.gov ;	
	kyle.j.lynch@dpuc.ri.gov ;	
	jvanreen@vanreenaccounting.com ;	
	dschmelzer@vanreenaccounting.com ;	
David Effron Berkshire Consulting 12 Pond Path North Hampton, NH 03862-2243	Djeffron@aol.com ;	603-964-6526
Gregory L. Booth, PLLC 14460 Falls of Neuse Rd. Suite 149-110 Raleigh, N. C. 27614	gboothpe@gmail.com ;	919-441-6440
Linda Kushner L. Kushner Consulting, LLC 514 Daniels St. #254 Raleigh, NC 27605	Lkushner33@gmail.com ;	919-810-1616
Office of Energy Resources Adam Fague, Esq.	adam.fague@doa.ri.gov ;	
	nancy.russolino@doa.ri.gov ;	
	Christopher.Kearns@energy.ri.gov ;	
	Shauna.Beland@energy.ri.gov ;	
	William.Owen@energy.ri.gov ;	
	david.augustyn@energy.ri.gov ;	
Office of Attorney General Nick Vaz, Esq. 150 South Main St. Providence, RI 02903	nvaz@riag.ri.gov ;	401-274-4400 x 2297
	mgomes@riag.ri.gov ;	
Conservation Law Foundation (CLF) James Rhodes, Esq. Conservation Law Foundation 235 Promenade Street Suite 560, Mailbox 28 Providence, RI 02908	jrhodes@clf.org ;	401-225-3441
File an original & 9 copies w/ PUC:	stephanie.delarosa@puc.ri.gov ;	401-780-2107

Stephanie De La Rosa, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Cynthia.WilsonFrias@puc.ri.gov ;	
	ryan.coyne@puc.ri.gov ;	
	Todd.bianco@puc.ri.gov ;	
	Alan.nault@puc.ri.gov ;	
	Kristen.L.Masse@puc.ri.gov ;	
Matt Sullivan, Green Development LLC	ms@green-ri.com ;	
Emily Koo, Director, Acadia Center	EKoo@acadiacenter.org ;	