

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

March 5, 2026

**VIA ELECTRONIC MAIL AND HAND DELIVERY**

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

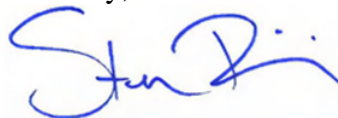
**Re: Docket Nos. 25-52-REG & 25-53-REG – The Narragansett Electric Company d/b/a Rhode Island Energy Renewable Energy Growth Program Year 2026-2027 and 2026-2027 Renewable Energy Growth Program Factor Filing  
Response to PUC Post-Hearing Data Request – Set 1**

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 response to the Public Utilities Commission’s Post-Hearing 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

March 5, 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 1/28/2026**

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

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

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

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

March 5, 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 1/28/2026**

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

	<a href="mailto:Karen.Stewart@commerceri.com">Karen.Stewart@commerceri.com</a> ;	
Jim Kennerly	<a href="mailto:jkennerly@seadvantage.com">jkennerly@seadvantage.com</a> ;	
	<a href="mailto:jgifford@seadvantage.com">jgifford@seadvantage.com</a> ;	
	<a href="mailto:Tarmstrong@seadvantage.com">Tarmstrong@seadvantage.com</a> ;	
<b>Division of Public Utilities and Carriers</b> Margaret L. Hogan, Esq. Kyle Lynch, Esq	<a href="mailto:Margaret.L.Hogan@dpuc.ri.gov">Margaret.L.Hogan@dpuc.ri.gov</a> ;	401-780-2120
	<a href="mailto:kyle.j.lynch@dpuc.ri.gov">kyle.j.lynch@dpuc.ri.gov</a> ;	
	<a href="mailto:Gregory.Schultz@dpuc.ri.gov">Gregory.Schultz@dpuc.ri.gov</a> ;	
	<a href="mailto:John.bell@dpuc.ri.gov">John.bell@dpuc.ri.gov</a> ;	
	<a href="mailto:mark.a.simpkins@dpuc.ri.gov">mark.a.simpkins@dpuc.ri.gov</a> ;	
	<a href="mailto:leo.wold@dpuc.ri.gov">leo.wold@dpuc.ri.gov</a> ;	
	<a href="mailto:christy.hetherington@dpuc.ri.gov">christy.hetherington@dpuc.ri.gov</a> ;	
	<a href="mailto:Joel.munoz@dpuc.ri.gov">Joel.munoz@dpuc.ri.gov</a> ;	
	<a href="mailto:Ellen.Golde@dpuc.ri.gov">Ellen.Golde@dpuc.ri.gov</a> ;	
Mike Brennan 500 North Boundary St. Raleigh, NC 27604	<a href="mailto:mikebrennan099@gmail.com">mikebrennan099@gmail.com</a> ;	919-219-2957
<b>Gridwealth Development</b> Seth H. Handy, Esq. Handy Law, LLC 42 Weybosset Street Providence, RI 02903	<a href="mailto:seth@handylawllc.com">seth@handylawllc.com</a> ;	401-626-4839
	<a href="mailto:ispringsteel@gridwealth.com">ispringsteel@gridwealth.com</a> ;	
A. Quincy Vale, Esq. MassAmerican Energy LLC dba Gridwealth 33 Union Avenue Sudbury, MA 01776	<a href="mailto:qvale@gridwealth.com">qvale@gridwealth.com</a> ;	617-694-5181
File an original & 9 copies w/ Stephanie De La Rosa, Commission Clerk Cynthia Wilson-Frias, Commission Counsel <b>Public Utilities Commission</b> 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Stephanie.DeLaRosa@puc.ri.gov">Stephanie.DeLaRosa@puc.ri.gov</a> ;	401-780-2107
	<a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov</a> ;	
	<a href="mailto:Todd.bianco@puc.ri.gov">Todd.bianco@puc.ri.gov</a> ;	
	<a href="mailto:rhianon.small@puc.ri.gov">rhianon.small@puc.ri.gov</a> ;	
	<a href="mailto:Cynthia.WilsonFrias@puc.ri.gov">Cynthia.WilsonFrias@puc.ri.gov</a> ;	
	<a href="mailto:jordan.sasa@puc.ri.gov">jordan.sasa@puc.ri.gov</a> ;	
	<a href="mailto:Christopher.Caramello@puc.ri.gov">Christopher.Caramello@puc.ri.gov</a> ;	
	<a href="mailto:theodore.smith.ctr@puc.ri.gov">theodore.smith.ctr@puc.ri.gov</a> ;	
	<a href="mailto:kristen.l.masse@puc.ri.gov">kristen.l.masse@puc.ri.gov</a> ;	
<b>Interested Parties:</b>		
Paul Rhodes	<a href="mailto:PRhodes@gridwealth.com">PRhodes@gridwealth.com</a> ;	

Matt Sullivan, Green Development	<a href="mailto:ms@green-ri.com">ms@green-ri.com</a> ;	
Hannah Morini, Green Development	<a href="mailto:hm@green-ri.com">hm@green-ri.com</a> ;	
Fred Unger	<a href="mailto:unger@hrtwd.com">unger@hrtwd.com</a> ;	
Charlie Grant, Essex Capital Partners	<a href="mailto:cgrant@essexcapitalpartners.com">cgrant@essexcapitalpartners.com</a> ;	
Stuart Flanagan, NPTRE-Newport Renewables	<a href="mailto:sflanagan@nptre.com">sflanagan@nptre.com</a> ;	
Seth Handy, Esq.	<a href="mailto:seth@handylawllc.com">seth@handylawllc.com</a> ;	
Maya Gibbs	<a href="mailto:mgibbs@ameresco.com">mgibbs@ameresco.com</a> ;	
Paul Raducha	<a href="mailto:praducha@ameresco.com">praducha@ameresco.com</a> ;	
Brian Smith, Orsted	<a href="mailto:brsmi@orsted.com">brsmi@orsted.com</a> ;	

PUC PH 1-1

Request:

In this docket, the Company has filed a proposal to permit Renewable Energy Growth (REG) customers in the Small Solar I and Small Solar II classes to expand their existing systems by installing an additional solar project behind an existing REG meter. The Company has also proposed a methodology to calculate capacity-weighted performance-based incentives (PBIs) applicable to a customer's generation over time.

Assuming the following treatment:

- 1. The Company's method to determine each project's share of aggregate capacity would remain unchanged. The second solar project's PBI would not be adjusted to account for assumed cost efficiencies. The Company's method to calculate a capacity-weighted PBI while both tariff terms are effective would otherwise remain unchanged.*
- 2. During the period that the first solar project's tariff term has expired, but the second solar project's tariff term is still active, the first project's PBI would be replaced by the four-component Renewable Net Metering Credit (RNMC) value as prescribed in R.I. Gen. Laws § 39-26.4-2(22). The Company's method to calculate a post-original tariff term (POTT) PBI would otherwise remain unchanged.*
- 3. After the expiration of the second solar project's tariff term, the projects would be transitioned to a net metering facility using two meters. The facility would receive the four-component RNMC value as prescribed in R.I. Gen. Laws § 39-26.4-2(22) for generation. Customers may rewire at their sole expense to net meter behind a single meter, and if so, the facility would receive a full volumetric rate for generation.*

What, if any, administrative challenges or open questions to be addressed in program rules does this treatment present?

Response:

The Company's response is based on the following understanding of the assumptions proposed above:

PUC PH 1-1, Page 2

The Company's methodology for allocating proportional shares for each project will remain consistent with the approach previously proposed; however no modifications will be made to the Performance-Based Incentive (PBI) for the second solar project to reflect any assumed cost efficiencies. Furthermore, the process utilized by the Company to determine a capacity-weighted PBI during the period when both tariff terms are active will remain unchanged.

Upon expiration of the tariff term for the first solar project, while the tariff term for the second solar project is still in effect, the PBI applicable to the first solar project will be replaced with the four-component Renewable Net Metering Credit (RNMC) value as prescribed by R.I. Gen. Laws § 39-26.4-2(22). The Company's methodology for calculating the post-original tariff term (POTT) PBI in all other respects will remain unchanged.

With respect to the portion attributable to the first solar project and compensated via the four-component RNMC, at the end of each billing cycle, the customer will be paid the RNMC for generation associated with the proportional share of the solar project and billed based on the full amount of their usage.

Following the expiration of the tariff term for the second solar project, both solar projects will be transitioned to a net metering arrangement utilizing two separate meters. At that point, the facility will receive compensation for all generation, at the four-component Renewable Net Metering Credit (RNMC) value, as set forth in R.I. Gen. Laws § 39-26.4-2(22), and will be billed for all usage. Customers may, at their sole expense, choose to reconfigure their wiring to net meter behind a single meter. In such cases, the facility will be compensated at the full volumetric retail rate for electricity generated up to the customer's on-site usage that is offset through netting behind-the-meter. The "full volumetric retail rate" includes all applicable per-kWh billing charges, such as those for Renewable Energy and Energy Efficiency Programs, which are not included in the RNMC but are considered part of the avoided cost in a single-meter net metering scenario. Any excess electricity exported to the grid beyond the customer's usage under this configuration will continue to be compensated at the RNMC value.

This treatment would present the following open questions:

1. First, it is not clear whether, under the proposed transition process, customers will be eligible to receive Excess Renewable Net Metering Credits for generation that exceeds

PUC PH 1-1, Page 3

their annual on-site usage. Specifically, it is not clear whether the intention would be for these systems to be formally enrolled in net metering, thereby allocating excess net metering bill credits calculated at the excess rate or whether the intent would be to apply the RNMC rate structure for compensation purposes only.

The Company proposes that the first solar project be formally enrolled in the Net Metering program, while the second solar project continues to participate under the Renewable Energy Growth (REG) Program during the time in which the two tariff terms do not coincide. Under this approach, any excess generation from the first solar project would be credited at the applicable excess net metering rate, whereas the portion of generation netted against on-site usage would be compensated at the RNMC rate, in accordance with R.I. Gen. Laws § 39-26.4-3. This structure also provides clarity regarding the Company's recovery mechanisms applicable to each portion of the compensation.

2. As explained during the Commission's February 3, 2026 hearing in this docket, there remains an open question regarding the process and feasibility for the allocation and division of Renewable Energy Certificates (RECs) in scenarios where the generation from the first solar project is compensated through net metering—resulting in customer ownership of the associated REC—while the second solar project is compensated under the Renewable Energy Growth program, with the REC retained by Rhode Island Energy. Presently, RECs generated by Small Scale Solar customers enrolled in the Renewable Energy Growth Program are calculated and deposited into a single, aggregated REC account within the NEPOOL GIS, designated as "RE Growth Small Scale Solar Aggregation." Under this arrangement, individual customer RECs are not separately identified or tracked. Consequently, any program rules should provide clarity regarding the appropriate procedures for splitting and allocating RECs to ensure proper accounting and compliance with program requirements.

The treatment set forth in this data request is expected to present the following administrative issues that would require consideration:

1. Rhode Island Energy anticipates deploying a new billing system in approximately 2028. Based on preliminary consultations with relevant internal stakeholders responsible for the

PUC PH 1-1, Page 4

development and integration of this system, at this time the Company expects that the new platform will be capable of accommodating a two-meter net metering configuration. This includes support for the RNMC structure, incorporating its bi-annual rate adjustments, timing of meter reads and billing cycles, as well as the capability to process split allocations of the generation meter to net-metering RNMC and Renewable Energy Growth PBI as required.

2. To effectively support implementation of the two-meter configuration and the corresponding compensation mechanisms as determined by the Commission's final order, the Company would need to make necessary modifications to its net metering tariff and processes.