

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

IN RE: THE NARRAGANSETT ELECTRIC COMPANY :
d/b/a RHODE ISLAND ENERGY APPLICATION FOR : **DOCKET NO. 25-45-GE**
APPROVAL OF A CHANGE IN ELECTRIC AND GAS :
BASE DISTRIBUTION RATE :

AMTRAK’S FIRST SET OF INTERROGATORIES
TO RHODE ISLAND ENERGY – SET I
(Issued: February 5, 2026)

Where the interrogatories seek electronic spreadsheet models, please supply those models with all formulae and links intact, all sections visible and unhidden, and with no special permissions required to access any of the spreadsheet architecture. If the electronic spreadsheet models are fed with data from other linked models, please supply those feeder models as well.

For purposes of these interrogatories, refer to the testimonies and exhibits of Rhode Island Energy (“RIE” or “the Company”) witnesses Peter R. Blazunas, Lance C. Schafer, and Stephanie A. Briggs.

Witness Blazunas

AMK 1-1: Please provide the electronic spreadsheet models referred to in Witness Blazunas’ Pre-Filed Direct Testimony, specifically Schedules PRB-1-ELEC, PRB-2-ELEC, PRB-3-ELEC, PRB-4-ELEC and PRB-6-ELEC.

Response can be found at Book 1, Bates pages 1-3.
See Excel versions of Attachment AMTRAK 1-1-1 Confidential and Attachment AMTRAK 1-1-2 Confidential.

AMK 1-2: If not contained in one of the foregoing electronic spreadsheet models referred to in testimony, please provide the electronic spreadsheet model which contains Table 3 (p. 15) in Witness Blazunas’ Pre-Filed Direct Testimony, and any similar tables for all RIE Rate Years and Data Years.

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

AMK 1-3: If not contained in one of the foregoing electronic spreadsheet models referred to in testimony, please provide a model which contains, similar to Table 5 (p. 17) in Witness Blazunas’ Pre-Filed Direct Testimony, the same analysis for all customer charges for all customer classes, including Rate X-01, where a customer charge is levied. If this table is contained in one of the requested electronic spreadsheets models above, please identify the tab and cell references where it resides.

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

AMK 1-4: Refer to pages 18-21 in Witness Blazunas' Pre-Filed Direct Testimony regarding Electric Rate Design.

- a. Are the opinions offered relative to whether and the extent to which the Company's rate design proposal satisfies each of the criteria in Section 3.1 of the Docket No. 4600A Guidance Document the opinions of Mr. Blazunas? Why or why not? Please explain.
- b. Are the opinions offered relative to whether and the extent to which the Company's rate design proposal satisfies each of the criteria in Section 3.1 of the Docket No. 4600A Guidance Document the opinions of the Company? Why or why not? Please explain.

Response can be found at Book 1, Bates pages 6-7.

AMK 1-5: To the extent not already provided, provide all workpapers and documents relied on by Witness Blazunas in developing Witness Blazunas' testimony in this case.

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

Witness Schafer

AMK 1-6: Please provide the electronic spreadsheet models referred to in the Pre-Filed Direct Testimony of Witness Schafer, specifically Schedules LCS-1-ELEC, LCS-2-ELEC, LCS-3-ELEC, LCS-4-ELEC, LCS-5-ELEC, and LCS-9-ELEC.

**Response can be found at Book 1, Bates pages 9-11.
See Excel version of Attachment AMTRAK 1-6-1 Confidential.**

AMK 1-7: Refer to p. 6, lines 1-4 in the Pre-Filed Direct Testimony of Witness Schafer. Has an ACOSS been prepared by the Company for any other revenue requirement for any of rate years subsequent to Rate Year 1? If yes, is that ACOSS tied out to any other revenue requirement for any of rate years subsequent to Rate Year 1? If other such ACOSS' have been developed, please provide the electronic spreadsheet model for each.

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

AMK 1-8: Refer to p. 10 in the Pre-Filed Direct Testimony of Witness Schafer. What year (test year or rate year) do the Table 1 results correspond to? Please explain.

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

AMK 1-9: If not contained in one of the foregoing electronic spreadsheet models referred to in testimony, please provide the electronic spreadsheet model which contains Table 1 (p. 10) the Pre-Filed Direct Testimony of Witness Schafer, and any similar tables prepared by the Company for all RIE Test Year, Rate Years and Data Years.

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

AMK 1-10: If not contained in one of the foregoing electronic spreadsheet models referred to in testimony, please provide the electronic spreadsheet model which contains, similar to Table 2 (p. 11) in the Pre-Filed Direct Testimony of Witness Schafer, the table of customer unit costs. Please provide the related analysis of and a detailed narrative explanation for the steep decline in Rate X-01 unit costs since the ACOSS in RIE PUC Case No. 4770. Please provide the electronic spreadsheet model(s) containing the ACOSS in Case No. 4770.

Response can be found at Book 1, Bates pages 15-16.

AMK 1-11: Please provide and identify using a one-line diagram, color coded to highlight the specific transmission and distribution plant, together with a list of all transmission and distribution plant and equipment (by FERC Account number) *used and useful*, from the Test Year through the Rate Years and Data Year, in service to Amtrak in Rate X-01.

Response can be found at Book 1, Bates pages 17-18.

AMK 1-12: Please provide for each of the specific plant and equipment items identified in the above response: the year of installation, useful life, depreciation method, original cost, accumulated depreciation, net plant value and any projections of salvage value made by the Company.

Response can be found at Book 1, Bates page 19.

AMK 1-13: To the extent not already provided, provide all workpapers and documents relied on by Witness Schafer in developing Witness Schafer's testimony in this case.

Response can be found at Book 1, Bates pages 20-21.

Witness Briggs

AMK 1-14: Please provide the electronic spreadsheet models referred to in testimony, specifically Schedules SAB-1-ELEC, SAB-2-ELEC, and SAB-11-ELEC the Pre-Filed Direct Testimony of Witness Briggs.

Response can be found at Book 1, Bates pages 22-37.

AMK 1-15: Refer to p. 83 in the Pre-Filed Direct Testimony of Witness Briggs (Book 16) regarding the discussion of tariff revisions. Please provide an editable Word document version of the tariff revisions contained in Book 16.

Response can be found at Book 1, Bates pages 38-43.

AMK 1-16: To the extent not already provided, provide all workpapers and documents relied on by Witness Briggs in developing Witness Briggs' testimony in this case.

Response can be found at Book 1, Bates page 44.