

The Narragansett Electric Company  
d/b/a Rhode Island Energy

APPLICATION FOR APPROVAL  
OF A CHANGE IN ELECTRIC AND  
GAS BASE DISTRIBUTION RATES

Rhode Island Energy's Responses to  
the Twenty-Ninth Set of Data Requests from  
the Division of Public Utilities & Carriers

Book 1 of 1

April 15, 2026

Submitted to:  
Rhode Island Public Utilities Commission  
Docket No. 25-45-GE

Submitted by:



**Rhode Island Energy™**  
a PPL company

Division 29-1

Request:

DIV. 22-9 stated in pertinent part:

Referring to the table in the Company's response to DIV. 11-13 (b) which is a tabulation of the number of services in the Soft-Off status since cutover, where the usage exceeded a total of 100 kilowatt hours in a month that did not have a notice sent to the premise indicating that service shall be terminated unless an account is established. In 2025 alone, there were 3,871 service premises that did not receive a notice indicating that service shall be terminated unless an account is established.

a) Please explain why the Company is not complying with its Tariff to send notices.

The Company's response to this question stated:

a) The Company manually reviews instances of where usage exceeded a total of 100 kWh in a month prior to notification and disconnection to attempt to identify the user of the service so an account can be established. In many instances a call is made to the possible user, indicating that the service needs to be put in their name or it may be terminated.

The Company's answer is non-responsive. The Division did **not** ask what the Company is doing in lieu of following its own Tariff. The Division very specifically asked why the Company is not complying with its own Tariff by not sending the required notices when consumption reaches 100 kilowatt hours.

Please answer the question that was asked and do so immediately. The answer is now overdue.

Response:

The Company is using good faith efforts to comply with its Tariff.

The Company does not have a formal process currently to send a notification to each premises at the point at which metered consumption exceeds 100 kWh in a month; however, the Tariff does not specify a timeframe between exceeding 100 kWh in a month and sending the notification. It is the Company's position that commencing the termination process once metered consumption exceeds 250 kWh, which includes a written notification to the premises, among other efforts, is consistent with the requirement under the Tariff to send a notice indicating service will be terminated unless an account is established. As discussed in Division 22-9, the Company is manually reviewing these instances to attempt to identify the user of the service so an account can be established. This manual review is a time-intensive process; therefore, the Company's use

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on inactive (“UOI”) process to identify premises when metered consumption exceeds 250 kWh enables it to focus its resources on addressing soft-off services with higher consumption.

The Company has a defined process to provide notices and proceed to terminate service when metered consumption at the location exceeds an aggregate of 250 kWh, subject to the statutory and/or termination rights of other electric customers at the premises in accordance with its Tariff; however, due to the manual and time-intensive nature of this effort, a backlog exists, which the Company is continuously working to reduce.<sup>1</sup> The Company utilizes a systematic process that identifies premises when metered consumption exceeds 250 kWh. As noted in the original response to Division 22-9, the Company does further research on these premises first to ensure that there is no new customer in the process of moving in or missed (i.e., moved into one service i.e., gas or electric service, but not the other at the same premises). If no party is identified, a letter is manually sent to the premises notifying the occupant of the need to establish an account or risk termination of service. This written notification is in addition to field visits to the premises and placement of door hangers to attempt to establish an account. This process is consistent with the Company's process for UOIs as described in the Company's response to Data Request Division 11-25 in this proceeding.

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<sup>1</sup> The Company's General Terms and Conditions, RIPUC No. 2275, Section 32 states, [w]hen metered consumption at a premises where a Soft Off termination has been implemented exceeds 100 kilowatt-hours in a month, the Company will send notification to the premises indicating that service shall be terminated pursuant to the Commission and Division's rules and regulations governing the termination of service if an account is not established. When metered consumption at the location exceeds an aggregate of 250 kilowatt-hours, service to the location will be terminated; provided however that where such a termination would affect the statutory and/or termination rights of other electric customers at that location, service will be terminated at the Soft Off premises as soon as the Company is able to accomplish the termination so as not to conflict with the rights provided under the Commission and Division's rules and regulations governing the termination of service for the other customers.