

**STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

**IN RE: PASCOAG UTILITY DISTRICT :  
2021 COST OF SERVICE STUDY : DOCKET NO. 5134**

**PUBLIC UTILITIES COMMISSION'S FIFTH SET OF DATA REQUESTS  
DIRECTED TO PASCOAG UTILITY DISTRICT**

**Issued October 13, 2021**

**Please provide a response by October 29, 2021, if possible.**

COMM 5-1 Regarding PUD's net metering policy, when a net metering customer generates more energy on site than is used, thereby causing negative usage for that meter-reading period, what credit does PUD currently apply to that portion of the generation (i.e., the negative usage)?

**Response:**

The excess generation (generation that exceeds load each month) is tallied through the year, and the adjustment for all excess generation is credited at the Power Supply Service (formerly Standard Offer Service) rate. Prior to 2021, we did not realize that the meters were bidirectional and we were giving them a credit based on their generation for the year times the Power Supply Service, formally known as Standard Offer.

Witness responsible: Michael Kirkwood and Harle Young

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COMM 5-2 Regarding PUD's net metering policy, please explain how PUD currently execute the following emphasized language in its tariff: "Generation credits will be based on energy on the customer generator's side of the electric revenue meter, **up to the total amount of electricity used by that customer during an annualized period.**"

**Response:**

It was intended that the customer only be paid the Power Supply Service (formerly Standard Offer Service) rate for the generation produced, but instead we believe the customer generation was first netted against the customer load, thereby providing the customer with a credit for the full retail rate including supply service for such load reduction.

Witness Responsible: Michael Kirkwood

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COMM 5-3 Does Mr. Kirkwood's testimony, beginning on line 16 of Page 8, indicate that, because of the use of bidirectional net meters, seven net metering facilities have been over-credited for some portion of their generation during their operation?

**Response:**

Yes, we believe customers have been over-credited for the difference between the full retail rate minus the cost of the power supply service rate, except for the portion of excess energy produced by the customer generator greater than the household load for some months, which was credited only with the supply service rate.

Witness responsible: Michael Kirkwood

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- COMM 5-4 To the extent possible, please provide in a table the following for each of the existing seven net metering facilities:
- a. Commercial Operation Date;
  - b. Technology;
  - c. AC nameplate (if known);
  - d. DC nameplate (if known);
  - e. Estimated annual generation in kWh;
  - f. Sum of negative meter reads in 2019 (or N/A if not operational in 2019);
  - g. Sum of negative meter reads in 2020 (or N/A if not operational in 2020);

**Response:**

Account No.	a	b	c	d	e	f	g
1109002	10/24/19	AMR	Itron C1SDR3	Not known	6588	0	2187
14058001	12/30/15	AMR	Itron C1SDR3	Not known	3102	0	0
14673001	11/15/15	AMR	Itron C1SDR3	Not known	2298	0	0
13569001	12/21/15	AMR	Itron C1SDR3	Not known	1226	0	0
15525001	12/27/16	AMR	Itron C1SDR3	Not known	3590	0	1096
11598002	11/20/17	AMR	Itron C1SDR3	Not known	2462	1057	1190

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11598003	10/15/18	AMR	Itron CISDR3	Not known	2018	2610	625
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Witness responsible: Harle Young and David G. Bebyn, CPA

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COMM 5-5 Has PUD prepared an estimated value of the “over crediting” to these facilities’ owners since they began operating, for example using the data provided in 5-4? If not, why not?

**Response:**

Yes, the District has calculated the over crediting from 2016 through 2020 and the total over credit is \$4,116.17. Please see the Attachment to COMM 5-5.

Witness responsible: Harle Young and David G. Bebyn, CPA

## 2016

Account ID	KWh Generated	LRS RATE	Credit Given	Negative Usage	What credit should have been	Over credit
13569001	1292	0.05401	\$ 69.78	0	\$ -	\$ 69.78
14058001	6606	0.05401	\$ 356.79	25	\$ 1.35	\$ 355.44
14673001	2509	0.05401	\$ 135.51	185	\$ 9.99	\$ 125.52
	<u>10407</u>		<u>\$ 562.08</u>	<u>210</u>	<u>\$ 11.34</u>	<u>\$ 550.74</u>

## 2017

Account ID	KWh Generated	LRS RATE	Credit Given	Negative Usage	What credit should have been	Over credit
13569001	1278	0.0585	\$ 74.76	\$ -		\$ 74.76
14058001	5151	0.0585	\$ 301.33	\$ -	\$ -	\$ 301.33
14673001	2358	0.0585	\$ 137.94	\$ -	\$ -	\$ 137.94
15525001	1842	0.0585	\$ 107.76		\$ -	\$ 107.76
	<u>10629</u>		<u>\$ 621.80</u>			<u>\$ 621.80</u>

## 2018

Account ID	KWh Generated	LRS RATE	Credit Given	Negative Usage	What credit should have been	Over credit
13569001	1595	0.07166	\$ 114.30	290	\$ 20.78	\$ 93.52
14058001	4417	0.07166	\$ 316.52	0	\$ -	\$ 316.52
14673001	2299	0.07166	\$ 164.75	0	\$ -	\$ 164.75
15525001	2151	0.07166	\$ 154.14	0	\$ -	\$ 154.14
11598002	2357	0.07166	\$ 168.90	868	\$ 62.20	\$ 106.70
11598003	332	0.07166	\$ 23.79		\$ -	\$ 23.79
	<u>13151</u>		<u>\$ 942.40</u>	<u>1158</u>	<u>\$ 82.98</u>	<u>\$ 859.42</u>

## 2019

Account ID	KWh Generated	LRS RATE	Credit Given	Negative Usage	What credit should have been	Over credit
1109002	287	0.07790	\$ 22.36	0	\$ -	\$ 22.36
14058001	4583	0.07790	\$ 357.02	0	\$ -	\$ 357.02
14673001	2270	0.07790	\$ 176.83	0	\$ -	\$ 176.83
13569001	1590	0.07790	\$ 123.86	0	\$ -	\$ 123.86
15525001	2489	0.07790	\$ 193.89	0	\$ -	\$ 193.89
11598002	2398	0.07790	\$ 186.80	1057	\$ 82.34	\$ 104.46
11598003	2942	0.07790	\$ 229.18	2610	\$ 203.32	\$ 25.86
	<u>16559</u>		<u>\$ 1,289.95</u>	<u>3667</u>	<u>\$ 285.66</u>	<u>\$ 1,004.29</u>

## 2020

Account ID	KWh Generated	LRS RATE	Credit Given	Negative Usage	What credit should have been	Over credit
1109002	6588	0.06672	\$ 439.55	2187	\$ 145.92	\$ 293.63
14058001	3102	0.06672	\$ 206.97	0	\$ -	\$ 206.97
14673001	2298	0.06672	\$ 153.32	0	\$ -	\$ 153.32
13569001	1226	0.06672	\$ 81.80	0	\$ -	\$ 81.80
15525001	3590	0.06672	\$ 239.52	1096	\$ 73.13	\$ 166.40
11598002	2462	0.06672	\$ 164.26	1190	\$ 79.40	\$ 84.87
11598003	2018	0.06672	\$ 134.64	625	\$ 41.70	\$ 92.94
	<u>21284</u>		<u>\$ 1,420.07</u>	<u>5098</u>	<u>\$ 340.14</u>	<u>\$ 1,079.93</u>

Total over credit 2016-2020 \$ 4,116.17

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COMM 5-6 Has PUD prepared an estimated value of crediting these facilities at the full retail rate for unmetered generation over the remainder of their useful lives (as proposed by PUD), for example using the data provided in 5-3? If not, why not?

**Response:**

We have no way to measure the unmetered generation. The meters are bidirectional and can spin backwards when the solar panels are producing energy. This is why we are proposing a two meter set up in the new net meter tariff.

Witness responsible: Harle Young and David G. Bebyn, CPA



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COMM 5-7 PUD has proposed allowing seven existing net metering customers to continue to be credited for unmetered generation at the full retail rate. Is PUD's argument for creating two net metering rates that these customers are used to being unintentionally over credited? If not, please expand PUD's case here.

**Response:**

Yes considering the minor impact on dollars to the system and the fact it was PUD's error and not the customers, PUD would proposes to continue to credit the existing seven customers using only the negative consumption. As an alternative to put a limit on this grandfathering approach, PUD would propose that this practice would continue until (i) the customer substantially modifies its generation system, (ii) until PUD moves to implement AMI meters to replace its existing AMR meters, or (iii) five years, whichever occurs first.

Witness responsible: Michael Kirkwood

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COMM 5-8 What class would the two accounts in the Municipal Low Capacity Factor (MLCF) Rate fall in if the class were eliminated?

**Response:**

These two accounts would end up in the **General Service <200 KW** class if the Municipal Low Capacity Factor (MLCF) Rate was eliminated.

Witness responsible: David G. Bebyn, CPA

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COMM 5-9 Beginning on line 11 on page 22 of Mr. Bebyn's testimony, the witness describes a hypothetical rate increase for the Municipal Field if the MLCF Rate was eliminated. What is the expected annual rate change for this account under PUD's proposed rate structure?

**Response:**

If the Municipal Low Capacity Factor (MLCF) Rate was eliminated the account would end up in the **General Service <200 KW** class. The expected annual rate change for this account under PUD's proposed rate structure for General Service <200 KW class would be \$17,708.82.

Witness responsible: David G. Bebyn, CPA

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COMM 5-10 Beginning on line 10 of page 18 of Mr. Bebyn's testimony, the witness describes the existing demand ratchet rate having caused much hardship for smaller demand customers. Is it Mr. Bebyn's opinion based on customer comments? If so, do the customer comments reflect whether it is the demand aspect of the charge or the tightness of the ratchet that is causing the hardship?

**Response:**

Most of the customer complaints were due to overall complaints of the high bills for the smaller demand customers. Customers' comments don't discuss the individual components of their bills but just that their overall bills being so high. The hardship due to the demand ratchet were more of an observation on Mr. Bebyn's when reviewing usage patterns for these demand customers. Some of these smaller demand customers had relatively flat demand for most of the year except for a couple of months. In general Mr. Bebyn noticed that customers under a 200 KW peak had more variation in their demand patterns vs. the customers over 200 kW peak.

Witness responsible: David G. Bebyn, CPA

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COMM 5-11 Given the issues raised in Mr. Bebyn's testimony related to the demand ratchet, the MLCF Rate, and the season class, did PUD consider seasonal demand charges or seasonal ratcheting to resolve the issues raised?

**Response:**

Yes. The idea of a seasonal demand charge was rejected since the seasonal demand rate could be eliminated by the proposed changes regarding splitting demand customers between large and small customers. This already simplified the need for a seasonal demand rates except for these two unique municipal accounts. The change however still is a problem for the MLCF customers and would cause rate shock as shown in the response to COMM 5-9. Furthermore, the idea of a seasonal demand ratchet would needlessly complicate the rates for other demand customers to fit the needs of these two unique municipal accounts.

Witness responsible: David G. Bebyn, CPA

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COMM 5-12 Referencing page 13 of Mr. Bebyn's testimony starting at line 21, is PUD incurring an expense related to hosting an event for the Good Neighbor Energy Fund?

**Response:**

Yes.

Witness responsible: Harle Young and David G. Bebyn, CPA

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COMM 5-13 Please create a table that has a column showing all costs in the test year that are allocated between the electric and water divisions, a column showing the allocation to the electric division, and a column showing the allocation to the water division.

**Response:**

Please see the Attachment to COMM 5-13

Witness responsible: David G. Bebyn, CPA

**ADJUSTED TEST YEAR  
PASCOAG UTILITY DISTRICT**

ACCT. #	BUDGET ACCOUNT DESCRIPTION	TEST YEAR 06/30/20	TEST YEAR ADJUSTMENTS	ADJUSTED TEST YEAR	Electric Portion	Water Portion
<b>Accounts where test year balance is already net of water portion</b>						
<i>Operating Expense---Administrative</i>						
923.001	Outside Service-auditing	29,043		29,043	29,043	7,261
924.000	Property insurance	50,762		50,762	50,762	12,691

**Accounts where test year balance is presented with total cost (Water Portion covered by Rental Income from Water)**

<i>Other Revenue</i>						
455.000	Other revenue/rent	23,478		23,478		(23,478)
<b>EXPENSES</b>						
<i>Operating Expense---Administrative</i>						
921.000	Office supplies and expense	73,002		73,002	58,402	14,600
921.010	Custodial expense	9,615		9,615	7,692	1,923
<i>Maintenance Expense---General</i>						
935.000	Maint of plant	33,863		33,863	30,013	3,850
<i>Misc. General</i>						
930.210	Misc. general expense	75,153		75,153	72,048	3,105
<b>TOTAL EXPENSES</b>				<b>191,633</b>	<b>168,155</b>	<b>23,478</b>

**Accounts where test year balance is presented with total cost (Water Portion covered by Admin Transfer from Water)**

<i>Operating Expense---Administrative</i>						
922.000	Admin expense transfer	(124,410)		(124,410)		(124,410.00)
<b>EXPENSES</b>						
<i>Operating Expense---Customer Service</i>						
903.000	Customer record/collection	214,267		214,267	195,157	19,109.66
<i>Operating Expense---Administrative</i>						
920.000	Admin general salaries	452,327		452,327	378,342	73,984.79
926.020	Employee Benefits-health	190,341		190,341	174,349	15,992.11
926.005	DBP contributions	127,306		127,306	118,278	9,027.56
<i>Taxes</i>						
408.010	Taxes - employer FICA	99,860		99,860	93,564	6,295.88
<b>TOTAL EXPENSES</b>				<b>1,084,101</b>	<b>959,691</b>	<b>124,410</b>