



December 6, 2021

Rhode Island Public Utilities Commission
Ms. Luly Massaro
Commission Clerk
89 Jefferson Blvd.
Warwick, RI 02888

Re: RIPUC Docket No. 5194
Division's First Data Request

Dear Ms. Massaro:

On behalf of Pascoag Utility District Electric Department (Pascoag or the District), we herewith file an original and nine copies of Pascoag's responses to Division's First Set of Data Requests.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

Harle J Young
Manager of Finance and Customer Service

Service list

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION

IN RE: PASCOAG UTILITY DISTRICT :
2021 ANNUAL RECONCILIATION : DOCKET NO. 5194

First Set of Data Requests of the
Division of Public Utilities and Carriers
Directed to the Pascoag Utility District

Issued December 1, 2021

Please Provide Responses by December 8, 2021 if possible

Div. 1-1 Please provide a breakdown of legal fees charged to Last Resort Service and/or Transmission Service for calendar year 2021. Include actuals to-date and estimates through year end. Include a brief description of the purpose of the fees.

Response Div 1-1: HJY

A spreadsheet was prepared with the legal cost through October of 2021 along with a brief description of the fees. The District does not estimate the legal fees. It has been our practice to record them as they come in and true them up when we do the followings years' annual reconciliation.

Legal Expenses Month	Power Supply Invoice	Power Supply Legal	Transmission Legal	Total Per Month	Description
Jan-21	24926	\$ 1,375.00			First light Cabot/Turner Falls upfront service fees
	25005	\$ 496.42		\$ 1,871.42	Consulting & Advisory Services: Legal Cost for Filing of comments and protest of ISO New England's Proposed Interim Energy Program Tariff
Feb-21	25413	\$ 1,262.02			Consulting & Advisory Services: Legal Cost for Filing of comments and protest of ISO New England's Proposed Interim Energy Program Tariff
	42235	\$ 1,547.79			Legal research and drafting acknowledgement between Pascoag and New England Battery Storage re Interconnection service agreement between National Grid
Mar-21	25690	\$ 1,041.64		\$ 2,809.81	Consulting & Advisory Services: Legal Cost for Filing of comments and protest of ISO New England's Proposed Interim Energy Program Tariff March Invoice
	42344	\$ 87.99			Legal and Professional services rendered in connection with Mystic RMR
Apr-21	42494	\$ 850.41		\$ 1,129.63	Legal and Professional services rendered in connection with cases related to Exe Pursuit of RMA agreement for Mystic 8 and 9 and Jump Ball filing by ISO-NE and NE POOL in FERC Docket No. ER21-1637-000
	25946	\$ 484.32			Consulting & Advisory Services: Legal Cost for Filing of comments and protest of ISO New England's Proposed Interim Energy Program Tariff April Invoice
May-21	26183	\$ 178.81		\$ 1,334.73	Consulting & Advisory Services: Legal Cost for Filing of comments and protest of ISO New England's Proposed Interim Energy Program Tariff May Invoice
	42614	\$ 541.09			Legal and Professional services rendered in connection with Mystic RMR & Mystic 8 & 9 2021
	202114203A	\$ 182.39			Legal and Professional service Rendered in connection with NYPA Hydro and FCM qualifications
Jun-21	42721	\$ 103.29	\$ 1,561.75		Legal and Professional services rendered in connection with Mystic RMR & Mystic 8 & 9 2021 and RM20-10 Transmission Incentive
	210214323	\$ 4.85			Professional Fees NE Pool Filing
	2102114388-A	\$ 5.10			Professional Fees NYPA Contracts
Jul-21	42875	\$ 757.72	\$ 705.91	\$ 1,674.99	Legal and Professional services rendered in connection with Mystic RMR & Mystic 8 & 9 2021 and Behind the meter and RM20-10 Transmission Incentive
Aug-21	412982	\$ 343.42	\$ 410.20	\$ 1,463.63	Legal and Professional services rendered in connection with Mystic General & Mystic 8 & 9 2021 and Behind the meter and RM20-10 Transmission Incentive
Sep-21	43136	\$ 470.66	\$ 153.73	\$ 753.62	Legal and Professional services rendered in connection with Mystic RMR & Mystic 8 & 9 2021 and RM20-10 Transmission Incentive
Oct-21	43258	\$ 1,760.25	\$ 607.10	\$ 624.39	Legal and Professional services rendered in connection with Mystic General & Mystic 8 & 9 2021 and Behind the meter and RM20-10 Transmission Incentive
		\$ 1,001.25			Legal - Niagara Contract Extension
		\$ 11.18		\$ 3,379.78	Legal - NYPA Agreement

Month	Invoice	Power Supply Legal	Transmission Legal	Total Per Month	Description
Nov-21					
Dec-21					
		\$ 12,505.60	\$ 3,438.69	\$ 15,944.29	
	Proof				
Jan	\$ 1,871.42				
Feb	\$ 2,809.81				
Mar	\$ 1,129.63				
Apr	\$ 1,334.73				
May	\$ 902.29				
Jun	\$ 1,674.99				
Jul	\$ 1,463.63				
Aug	\$ 753.62				
Sep	\$ 624.39				
Oct	\$ 3,379.78				
				\$ 15,944.29	

Div. 1-2 Please provide an estimate of legal fees that will be charged to Last Resort Service and/or Transmission Service for calendar year 2022. Include a brief description of the purpose of the fees. Also include the amount of legal fees included in the current reconciliation filing for 2022 and an explanation of any differences between the estimate and the amount included in the filing.

Response Div.1.2: (MRK and HY)

In preparation of the 2022 purchased power budget, Pascoag and its consultant, Energy New England (ENE) did not project purchased power legal fees. Since Pascoag decides to enter into certain FERC filings on a case by case basis, we decided not to budget for such expenses since they are unknown at this time. Additionally, we include legal fees as they occur in the future associated with new contracts we may negotiate, but we did not project what may come up as new contract opportunities in creation of the forecast.

Div. 1-3 According to Page 5 of Harle Round's testimony, PUD received \$120,366.62 related to the sale of RECs in 2021. PUD's estimate for 2022 related to the sale of RECs is \$87,000. Please explain the projected decrease in REC revenues for 2022.

Response Div. 1-3: (MRK and ENE)

The estimate for 2022 is for Canton and Spruce production and a low REC value of \$25.00/REC. It was forecast as a conservative value with little risk of under collecting on REC sales. These resource are intermittent assets and highly dependent on the weather coupled with the fact that the value of RECs are quite variable. Just a couple of years ago Class I RECs were less than \$10/REC and ME Class II RECs were \$0.25/REC.

Div. 1-4 With respect to the PUD's battery storage project, does the charging and discharging of the battery have any impact on the 2022 filing? If so, what is the impact? If not, why not?

Response Div. 1-4: (MRK)

The battery storage project in effect moves kilowatt-hours (kWh) from one period to another within a period of time, but there is a zero sum game at the end of the day. As an example, if 1,000 kilowatthours are used to charge the battery during the off-peak period, then 1,000 kilowatthours would then be discharged during the on-peak period. There may be differences in locational market prices during the charging vs. discharging cycles, but Pascoag would like to gain experience in battery storage operation prior to attempting to forecast such price differences and the magnitude of the kWh involved. We believe the changes will be minor except for the few peak days of the year when temperature extremes prevail.