

KEOUGH + SWEENEY, LTD.

ATTORNEYS AND COUNSELORS AT LAW
41 MENDON AVENUE
PAWTUCKET, RHODE ISLAND 02861
TELEPHONE (401) 724-3600
FACSIMILE (401) 724-9909
www.keoughsweeney.com

RAYNHAM OFFICE:
90 NEW STATE HIGHWAY
RAYNHAM, MA 02109
TEL. (508) 822-2813
FAX (508) 822-2832

JOSEPH A. KEOUGH JR.*
JEROME V. SWEENEY III*

SEAN P. KEOUGH*

JEROME V. SWEENEY II
OF COUNSEL

*ADMITTED TO PRACTICE IN
RHODE ISLAND & MASSACHUSETTS

BOSTON OFFICE:
171 MILK STREET
SUITE 30
BOSTON, MA 02109
TEL. (617) 574-0054
FAX (617) 451-1914

March 9, 2022

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

Re: *The Narragansett Bay Commission - Docket 5224*
In Re: Miscellaneous Petition To Recover Electronic Payment Transaction Fees

Dear Ms. Massaro:

Enclosed herewith please find an original and nine copies of the following document:

1. The Narragansett Bay Commission's Response to the Rhode Island Public Utilities Commission's Data Requests (Second Set).

An electronic copy of this document has been sent to the service list. Thank you for your attention to this matter.

Sincerely,



Joseph A. Keough, Jr.

Enclosure
cc: Service List via electronic mail

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION
DOCKET 5224

Response of Narragansett Bay Commission
to the Rhode Island Public Utilities Commission's
Second Data Request
Issued March 7, 2022

Comm. 2-1: Please provide the actual incurrence of waived Electronic Payment Transaction fees incurred in February 2022.

Response: The actual incurrence of waived Electronic Payment Transaction fees incurred in February 2022 is \$39,098.90.

Prepared by: Michael Cook

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION
DOCKET 5224

Response of Narragansett Bay Commission
to the Rhode Island Public Utilities Commission's
Second Data Request
Issued March 7, 2022

Comm. 2-2: Assuming the PUC issues a decision approving the tariff for effect April 1, 2022, would NBC seek to withdraw the incremental expense incurred between December 31, 2021, and March 31, 2022 (estimated)? If so, please provide an updated Schedule KG-1.

Response: Yes, assuming the PUC issues a decision approving the tariff for effect April 1, 2022, NBC would seek to withdraw the incremental expense incurred between December 31, 2021, and March 31, 2022 (estimated). This would bring the total withdrawal from the Stabilization Account to \$741,435. Please see updated Schedule KG-1 below.

Narragansett Bay Commission			
Convenience Fees to be Recovered Through Fund Transfer			
Date	Convenience Fees	Actual Growth Based on Totals	Act/Fcst
4/30/2020	6,354.50		Act
5/31/2020	20,688.50	225.6%	Act
6/30/2020	20,411.75	-1.3%	Act
7/31/2020	23,237.35	13.8%	Act
8/31/2020	25,599.05	10.2%	Act
9/30/2020	26,528.35	3.6%	Act
10/31/2020	28,488.50	7.4%	Act
11/30/2020	25,765.35	-9.6%	Act
12/31/2020	28,939.30	12.3%	Act
1/31/2021	31,987.90	10.5%	Act
2/28/2021	28,717.40	-10.2%	Act
3/31/2021	34,505.75	20.2%	Act
4/30/2021	32,375.45	-6.2%	Act
5/31/2021	31,960.85	-1.3%	Act
6/30/2021	32,288.00	1.0%	Act
7/31/2021	35,104.25	8.7%	Act
8/31/2021	35,723.60	1.8%	Act
9/30/2021	35,972.95	0.7%	Act
10/31/2021	37,134.65	3.2%	Act
11/30/2021	36,372.15	-2.1%	Act
12/31/2021	39,654.45	9.0%	Act
1/31/2022	41,510.45	4.7%	Act
2/28/2022	39,098.90	-5.8%	Act
3/31/2022	43,015.50	10.0%	Fcst
Total Through March 2022:	741,434.90		
Average Monthly Growth 11/2020 - 12/2021:		2.7%	
<small>⁽¹⁾ Used average from November 2020 through December 2021 (14 months) for estimated % increase</small>			

Prepared by: Michael Cook

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION
DOCKET 5224

Response of Narragansett Bay Commission
to the Rhode Island Public Utilities Commission's
Second Data Request
Issued March 7, 2022

Comm. 2-3: Can NBC continue to track the monthly credit card expenses going forward as it has since April 2020?

Response: Yes.

Prepared by: Leah Foster

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION
DOCKET 5224

Response of Narragansett Bay Commission
to the Rhode Island Public Utilities Commission's
Second Data Request
Issued March 7, 2022

Comm. 2-4: Please be prepared to explain whether NBC believes it would be reasonable to provide for a mechanism to return or recover the difference between the amount built into rates through this filing and the actual amount of the expense with a bandwidth? Why or why not? If so, what would be an appropriate bandwidth?

Response: NBC plans to file an application with the RIPUC for rate relief in the fall of 2022 for new rates effective July 1, 2023. As part of that application, NBC will include electronic payment transaction fees ("fees") expense as it would any other expense.

If, in the event that NBC does not file such an application, the NBC is not opposed to an annual true-up. NBC believes that any associated rate adjustment should be greater than \$10,000, which is the approximate cost to ratepayers for such an application.

Prepared by: Karen Giebink

CERTIFICATION

I hereby certify that on March 9, 2022, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Luly Massaro, Commission Clerk, by electronic mail and by hand delivery on March 10, 2022.

Parties/Address	E-mail Distribution	Phone
Karen L. Giebink, Director of A&F Narragansett Bay Commission One Service Road Providence, RI 02905	Kgiebink@narrabay.com ;	401-461-8848
	gdegnan@narrabay.com ;	
Division of Public Utilities: Mark A. Simpkins, Esq.	Mark.A.Simpkins@dpuc.ri.gov ;	401-222-2424
	EGolde@riag.ri.gov ;	
	MFolcarelli@riag.ri.gov ;	
	Margaret.L.Hogan@dpuc.ri.gov ;	
	Al.mancini@dpuc.ri.gov ;	
	pat.smith@dpuc.ri.gov ;	
	John.bell@dpuc.ri.gov ;	
Original and nine (9) copies w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov ;	401-780-2107
	Alan.nault@puc.ri.gov ;	
	Cynthia.WilsonFrias@puc.ri.gov ;	
Jennifer Wood, Esq. Center for Justice	jwood@centerforjustice.org ;	



Joseph A. Keough, Jr., Esquire # 4925
KEOUGH & SWEENEY, LTD.
41 Mendon Avenue
Pawtucket, RI 02861
(401) 724-3600 (phone)
(401) 724-9909 (fax)
jkeoughjr@keoughsweeney.com