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September 21, 2022

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

#### Re: In Re: Narragansett Electric Company, d/b/a Rhode Island Energy Docket 4978 – Last Resort Service Rate Filing

Dear Ms. Massaro:

Enclosed herewith please find an original and nine copies of the Rhode Island Office Of Energy Resources' Response To The Rhode Island Public Utilities Commission's Questions For The Parties in the above captioned filing.

Please be advised that an electronic copy of this document has been sent to the service list. Thank you for your attention to this matter.

Sincerely,

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Joseph A. Keough, Jr.

Enclosures

cc: Docket 4978 Service List (via electronic mail)

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

## STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

## IN RE: THE NARRAGANSETT ELECTRIC COMPANY'S : LAST RESORT SERVICE (LRS) : DOCKET NO. 4978 PROCUREMENT PLAN :

# THE RHODE ISLAND OFFICE OF ENERGY RESOURCES' RESPONSE TO THE RHODE ISLAND PUBLIC UTILITIES COMMISSION'S QUESTIONS FOR THE PARTIES

1. Is there substantial evidence that would support a Commission decision to deny all or part of the LRS increase which decision could be sustained on appeal based on prevailing legal standards?

**Response:** The Rhode Island Office of Energy Resources (OER) has not seen any evidence in the record, which would support a Commission decision to deny all or part of the Last Resort Service (LRS) increase that would likely be sustained on appeal based on the prevailing legal standards.

2. Should the Commission either defer all or part of the Last Resort Service commodity rate increase to a future period or spread it in LRS rates over 12 months?

• If yes, what should the Commission do with any stranded cost caused by customers leaving through aggregation in the summer period?

**Response:** Yes, the Commission should defer all or part of the LRS commodity rate increase to a future period or spread it out in LRS rates over 12 months. As for stranded costs, the Commission should wait to see if there are, in fact, any stranded costs. It may be that no costs are ultimately stranded, and if there are, the Commission can determine the magnitude of the stranded costs and how they should be recovered in a future proceeding.

3. How and when should the Attorney General's \$32 million credit be credited to customers?

- In one month or spread over multiple months?
- If one month, which month?

Response: Please see response to question 4.

4. How and when should the Governor's \$3.8 million credit for low-income A-60 rate customers be credited?

• In one month or two months? In which month(s)?

**Response:** The \$3.8 million of Regional Greenhouse Gas Initiative (RGGI) credits secured by Governor McKee for low-income A-60 rate customers and the \$32 million of credits resulting from the Rhode Island Attorney General's settlement with PPL should be distributed to benefit the most customers at the time of greatest need. OER notes that the George Wiley Center requested that the Attorney General's settlement credits be distributed as expeditiously as possible. These credits will apply to all customers, and Rhode Island Energy testified that the earliest it can distribute these credits is November 2022. Assuming this is the case, OER requests that the \$3.8 million in RGGI credits, which total approximately \$104.84 per A-60 customer, be distributed over at least two months in December and January during, and following, the holiday period when households could use the relief with their utility bills.

5. Would any party have an objection or substantial concerns to the following combined options being approved:

• The Attorney General's credit being applied to bills in January, and Governor McKee's \$3.8 million credit for A-60 customers being split between the bills rendered for the two months of February and March, on a rate class basis?

**Response:** Please see response to question 4.

6. Should the Commission also reduce the Residential and/or Small C&I Customer Charge of \$6.00 per month to zero for all customers, and charge this back over a later period?

- Or, alternatively, should the Commission reduce the \$6.00 customer charge only for the A-60 low-income class for any months? Or not at all?
- If yes, which months? Should it be only for the months in which neither the Attorney General Credit nor Governor's Credit is being applied?
- If this is ordered for A-60 customers only, should any such deferral be charged back to A-60 customers later or spread to all customers through some other rate mechanism in 2023?

**Response:** Yes, the Commission should reduce the Residential and Small C&I Customer Charge of \$6.00 per month to zero for *all* customers, and in all months from October to March. As for how this charge should be recovered, OER also suggests that the Commission examine the mechanism to recover this charge in a future proceeding. The Customer Charge should not automatically double beginning in April 2023.

The Rhode Island Office of Energy Resources By its Attorney,

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## **CERTIFICATION**

I hereby certify that on September 21, 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 first class mail.

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