Date Filed: May 28, 2026

Witness: Rice, Brian J
Request from: Public Utilities Regulatory Authority

Question:

Motion No. 26, Docket No. 25-08-02, pp. 9-10. Provide a cost and timeline estimate for billing system updates to enable automated calculation and tracking for non-bypassable charges and incentive adders, if UI's proposal for using proxy production data for RRES customers with DC-coupled solar and storage systems were approved by the Authority. In the response, describe the methodology used to develop these estimates, including: (i) key assumptions; (ii) identification of system components and workflows affected; and (iii) labor, software, and integration cost drivers.

Response:

It is not feasible for the Company to produce a cost and timeline estimate for a complex new billing solution within the time provided to respond to the interrogatory. Such estimates require business leads to clearly define requirements with technical experts, and further development and review of assumptions, impacted systems, testing requirements and other cost drivers. However, the Company previously undertook steps to estimate the cost and timeline for billing a fixed nonbypassable charge based on the nameplate capacity of a renewable energy system that is somewhat comparable to UI's proposal.

"Option 2" presented in the Order No. 18 compliance filing in Docket No. 20-07-01 in January 2022 was estimated to cost $1.75 million and require 7 months to complete and includes similarities to UI's proposal. Both solutions are ultimately based upon the nameplate capacity of a customer's PV system, with the UI proposal adding further steps of estimating production each month based on nameplate capacity in order to assess a charge expressed in $/kWh instead of $/kW. These additional features as well as general cost increases from 2022 would likely result in a higher cost estimate, but Eversource proposes that the $1.75 million estimate provided for a comparable billing solution is a reasonable minimum for the expected costs of implementing UI's proposal.