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May 20, 2024

VIA HAND DELIVERY & ELECTRONIC MAIL

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

**RE: Docket No. 23-37-EL – The Narragansett Electric Company d/b/a
Rhode Island Energy’s Petition for Acceleration of a System Modification
Due to Distributed Generation Project
Tiverton Project
Responses to Division Data Requests – Set 5**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”), enclosed please find the Company’s responses to the Division of Public Utilities and Carriers’ (“Division’s”) Fifth Set of Data Requests concerning the Tiverton Project in the above-referenced docket.

Thank you for your attention to this filing. If you have any questions, please contact me at 401-784-4263.

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrew S. Marcaccio".

Andrew S. Marcaccio

Enclosures

cc: Docket 23-37-EL Service List

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 23-37-EL
In Re: Rhode Island Energy's Petition for Acceleration Due
To Distributed Generation Project – Tiverton Projects
Responses to the Division's Fifth Set of Data Requests
Issued on April 29, 2024

Division 5-1

Request:

Has the Company¹ ever discussed with Green and/or any other person or entity, either formally or informally, about the possibility of obtaining reimbursement from ratepayers for some or all of Green's expenditures on the Tiverton Project?

If so, (a) provide all written communications, *i.e.*, e-mails, correspondence, *etc.* reflecting the discussions and (b) describe in detail the discussions that occurred to the extent they are not reflected in the written communications provided.

Response:

Yes, the Company has discussed with Green the possibility of obtaining reimbursement from ratepayers for some of Green's expenditures for the Tiverton Project. As indicated in the Company's response to Division 5-2, the only formal arrangement that came out of the discussions is the Interconnection Service Agreement ("ISA") between the Company and Green attached as Exhibit EJRS-2 to the Pre-Filed Direct Testimony of Erica Russell Salk and Stephanie A. Briggs.

The Company notified the Customer that it would file a Petition with the Public Utilities Commission ("PUC") seeking reimbursement to Green from ratepayers for work that was identified in the Tiverton Area Study which benefits distribution customers and has been accelerated. R.I. Gen. Laws § 39-26.3-4.1 was the basis for the Company's reasoning to file the Petition. The Company informed Green that the Petition was subject to review and approval of the PUC.

In a prior meeting in the summer of 2022, Green indicated that it believed the extra duct work was a System Improvement and the Company agreed to that classification subject to discussing the appropriate course of action and subject to PUC review and approval. In this case, Green elected to self-build. As a condition to self-building, Green was required to build to the Company's standard including installing extra duct to accommodate future needs. The basis being the Company would have included the extra duct work if it built the investment itself. Building out the extra duct work is consistent with how the Company treats both load and distributed generation customers and is good utility practice as it saves customers money over

¹ As used herein, the term "Company" means RIE and National Grid, including any of their affiliates.

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Division 5-1, page 2

the long term. This extra duct work benefits all distribution customers and, had the work been performed by the Company, the Company would not have initially charged Green for the extra duct work and included it in the ISR reconciliation. Given the timing of the auditing of the duct bank costs and for administrative ease, the extra duct work was initially borne by Green through its self-build and requested reimbursement to Green for the extra duct work was included in the Petition for review and approval by the PUC.²

² Company counsel spoke with Division counsel to let the Division know the Engineering Team checked their emails and did not find any emails with the Customer discussing reimbursement from ratepayers. The Company believes the same applies to its Customer Energy Integration Team; however, the email search was ongoing and Division counsel indicated the ongoing email review is not necessary at this time.

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Division 5-2

Request:

Describe in detail all “arrangement(s)” the Company has reached with Green regarding ratepayer reimbursement for System Modifications and/or Improvements relating to the Tiverton Project.¹ Be sure to include in your response the date when the arrangement(s) was/were made, the names of the individual representative(s) who participated in arriving at the arrangement(s), all consideration for the arrangement(s) received and/or given, and the specific terms and/or conditions of the arrangement(s).

Response:

The only formal arrangement the Company has reached with Green in connection with the requested ratepayer reimbursement for System Modifications and/or Improvements relating to the Tiverton Project is the Interconnection Service Agreement between the Company and Green attached as Exhibit EJRS-2 to the Pre-Filed Direct Testimony of Erica Russell Salk and Stephanie A. Briggs.

¹ See Ursillo at 6-7 & 10-11.

The Narragansett Electric Company
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Division 5-3

Request:

Please provide the Company's best estimate of the date when the Tiverton Project will be "completed and placed in service" and provide a detailed description of the physical status of the Tiverton Project as of the date of the Company's response.

Response:

The Tiverton DG Project was authorized to interconnect on December 29, 2023 and is completed and in-service.

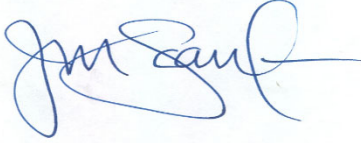
The area study Tiverton Project is a distribution line extension. Often projects of this type go into service shortly after specific equipment is installed, energized, and used by customers. The equipment does not all go into service at the time of total completion. While the total project completion date is currently March 2029, portions of the project will be in service prior to that date.

There are work orders in various stages for this project including design, pre-construction (environmental and permitting reviews), and construction. Materials have been ordered for most of the work orders.

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



Joanne M. Scanlon

May 20, 2024

Date

**Docket No. 23-37-EL Rhode Island Energy – Petition for Acceleration Due to DG Project –
Tiverton Projects
Service List updated 5/20/2024**

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