Direct Testimony

of

Jeffery M. Wright, President

Block Island Utility District d/b/a Block Island Power Company

Docket No. 5192

- 1 Q. Please state your name and business address for the record.
- 2 A. My name is Jeffery M. Wright. My principal business address is 100 Ocean Avenue,
- Block Island, Rhode Island 02807.

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- 5 Q. By whom are you employed and in what capacity?
- 6 A. I am the President of the Block Island Utility District d/b/a Block Island Power Company
- 7 (BIUD). Additionally, I represent Rhode Island on the National Rural Electric
- 8 Cooperative Association (NRECA) Board of Directors.

9

- 10 Q. Can you please describe your education and experience?
- 11 A. I have an Associate Degree in Accounting and have worked for electric utilities since
- 1984 in various roles. I have been the President of the Block Island Power Company and
- the newly formed Block Island Utility District since February 2017.

14

- Prior to coming to Block Island, I was Chief Operating Officer at Vermont Electric
- 16 Cooperative (VEC), the state's second largest utility and largest electric cooperative
- which served approximately 40,000 electric meters across nearly 1/3 of Vermont. I was
- responsible for the company's operations, including transmission and distribution
- operations, substations, and system operations and engineering. I worked closely with the
- company's CFO in developing long range capital plans, long range financial forecasting,
- 21 negotiating long term real estate leases for siting utility scale solar projects, and joint
- 22 ownership agreements for transmission assets necessary to connect several large
- renewable projects, such as the 63 MW Kingdom Community Wind Project located
- 24 within our service territory.

Prior to working for VEC, I worked at Vermont Electric Power Company (VELCO). In 1999, I became a member the company's senior leadership team and was responsible for managing the company's assets including over 35 high voltage transmission substations, more than 700 miles of high voltage transmission lines, all rights of way and the company's facilities and fleet assets. I also managed the assets of Vermont Electric Transmission Company (VETCO) which owns and maintains Vermont's portion of the 450 kV DC "Phase One" line.

Α.

Q. What is the purpose of your testimony?

The purpose of my testimony is to sponsor BIUD's new net metering tariff for projects submitted beyond the 3% cap. This is an important program for BIUD as there is strong support for the development of renewable energy on the island through net metering. The overwhelming support for local renewable resources comes from decades of running diesel generators to power the island. As a result, the local culture has become one of efficiency and a willingness to do most anything to reduce the amount of fossil fuel the island burns for energy. Price also plays a big part in this as the electric rates on the island are high compared with other electric utilities.

Equally important to some is that development of renewable resources does not unnecessarily create a cost shift, or subsidy borne by members who do not net meter.

This sentiment was clear in all board meetings in which the new tariff was discussed.

Q. Can you explain how BIUD calculated the 3% cap?

A. BIUD calculated its 3% cap by using the latest peak data from 2021 -- 3% of the 5.017

1 MWH peak is equal to 151 kilowatts.

BIUD's peak loads for the past five years are shown below:

DATE	DAY	HR ENDING	MWH
7/20/2017	Thu	21	4.893
8/17/2018	Thu	20	4.831
7/20/2019	Sat	19	5.082
7/30/2021	Thu	19	4.749
7/17/2021	Sat	19	5.017

Q. Is the total installed net metering capacity at or greater than the 3% cap? If so, by how much and how did you calculate the installed capacity?

A. Yes. BIUD presently has 52 residential systems that fall into the existing net metering policy which is capped at 3% of our peak. The total installed DC nameplate capacity of these systems is 149.95 kW. There are also 3 pending projects that were approved under the existing net metering policy but have not been installed yet. The total capacity of these projects is an additional 15.5 kW. This will bring our total of residential installed capacity to 165.45 kW.

Additionally, there are 8 projects owned by local non-profits and the Town of New Shoreham. These projects total 56.93 kW of installed capacity. BIUD did not consider these in their calculations of the 3% cap because they were non-residential systems approved for net metering by BIPCo under the old ownership prior to 2016.

The full list of projects is included in Attachment JMW-1.

Т	Ų.	has the bIOD board of Commissioners approved the proposed liet metering tarin:
2	A.	Yes. The BIUD Board of Commissioners approved the proposed tariff on July 28, 2021.
3		
4		BIUD Commissioners began working on this proposal in 2019 when we realized BIUD
5		would soon reach the 3% state mandated cap. Net metering appeared on most BIUD
6		board meeting agendas since late 2019. As expected, there was great interest from our
7		membership and local solar developers in the new tariff structure, pricing and future caps
8		
9		During our February 28, 2020 board meeting, a proposal was approved by the Board in
10		anticipation of the net metering statute being amended. BIUD Commissioners received a
11		lot of feedback regarding the proposed tariff they approved in February 2020.
12		
13		The pandemic prevented the legislators from meeting after the bill was submitted in the
14		2020 session and therefore the bill was not passed until the 2021 session. After the law
15		was changed in June of 2021, the Board placed the item on several subsequent agendas in
16		2021 to hear from members and address their concerns. The net metering tariff was
17		modified in response to issues raised by our members.
18		
19	Q.	Is BIUD allowing all customer classes to participate in the program?
20	A.	Yes. We are proposing that the tariff be open to all Residential, Commercial and General
21		Services Demand members.
22		
23	Q.	Will current net metering members remain on the existing net metering policy?
24	A.	Yes. BIUD will maintain its existing net metering policy for current net metering

members. However, when an existing project connected under the existing net metering policy is modified or upgraded, then the requirements of the new tariff will need to be met for interconnection. The existing policy is included as Attachment JMW-2.

Α.

Q. Can you describe the credit system under the existing net metering policy?

Yes. The existing net metering policy allows a member to supply their own load while their solar is producing. Only one meter is used, but it has two indexes. Any energy provided by BIUD to the residence is registered in the first meter index and recorded as "consumed". Any excess energy generated and not used by the residence (pushed to BIUD) is recorded in the second meter index as "delivered". At the end of the month, the two indexes are netted out. If the "consumed" index is greater than the "delivered" index, then the member is billed at the applicable rates for the "net energy" they consumed. When a member delivers more energy to BIUD than they consume, credit is banked to the member's account equal to the total of BIUD's power supply, transmission and FAC (if applicable) rates. This is not a true avoided cost because certain fixed interconnection charges in the transmission rate have not been excluded.

A.

Q. Can you describe the credit system that is proposed in the new tariff?

Yes. The metering proposed in the new tariff will use the same two indexes "consumed" and "delivered", but from two separate meters. The member will pay the applicable rate for all energy they consume. They will then be credited for all energy produced and delivered to BIUD. We have calculated BIUD's true avoided cost and will apply that rate to both the existing net metering policy and the proposed tariff, if approved. The calculation for determining the Net Metering Rate is further explained below.

Q. Can you explain why the proposed tariff measures solar output via a separate remote disconnect meter?

Yes. This will be done for the primary purpose of installing a remote disconnect meter (using BIUD's AMI system) so that BIUD can control the level of solar generation (1) to prevent back feed onto National Grid's submarine cable during low load periods and (2) to ensure system stability in the event we must feed the island using our backup generators.

A.

The second meter also allows full visibility into the solar array's output. Despite metering the "consumed" and "delivered" energy separately with two separate indexes under the current net metering policy, the self-supply of energy allows the member to produce and use energy which is not metered. This is referred to as "behind the meter" and often leads to confusion with net metering billing questions. The dual meter system avoids that.

A.

Q. Can you explain BIUD's concerns with high penetrations of solar on the island?

BIUD's lowest day time hourly load in 2021 was 887 kWh set on April 9 - hour ending 1400. If fully subscribed and built out at 10%, 500 kW of net metering plus BIUD's 94.1 kW of roof top solar would amount to 594.1 kW at full production. This is roughly 67% of the total island load. This is normally not a problem unless we are serving the island load from the local diesel generators. On a partly cloudy day, when loads are at their lowest, the intermittency of the solar output will reach a point that the local generation would not be able to respond adequately which could lead to system instability.

The other limitation we need to be concerned with is when connected to the submarine cable, we cannot back-feed from BIUD to the National Grid system. We are not allowed to back-feed onto the cable and therefore must ensure that our local generation output never exceeds the island load.

6 Q. What is BIUD doing to address the stability issue?

7 A. We have been advised by our engineers to turn off the BIUD solar array when on local
8 diesel generation during light load periods. To address this issue BIUD will utilize the
9 remote disconnect meters to turn off solar if necessary. The terms of the new tariff allow
10 for this during operational emergencies.

- Q. Has BIUD considered in its tariff development how a second meter socket could pose interconnection difficulties and additional costs that could impact the cost effectiveness of a net metering project?
- Yes. In most cases, the existing consumption meter is not located on the building
 structure due to BIUD's historical policy of requiring meters used on underground
 services to be located as close to the pole or road as possible. In many cases, the existing
 meter will need to be relocated closer to where the generation will be metered, on or near
 the structure/building which will result in additional costs borne by the member. To
 respond to this, BIUD is proposing to reimburse the net metering member up to \$1,000 to
 help defray the cost of the second meter.

Q. Does BIUD have an estimate of what the second meter socket and co-locating with the consumption meter will cost, and did BIUD consider exempting smaller projects

from this requirement?

A. Yes. We believe that the second meter socket and the re-wiring and co-location with the consumption meter could cost between \$300-\$2,500. Each case is so different that there is a wide range of possible costs and we felt that the \$1,000 reimbursement would help alleviate the impact on the economic analysis of the project.

BIUD did consider exempting smaller projects during the development of this tariff but the need to disconnect future solar projects during certain system conditions was too important to ignore. Our goal of promoting and connecting locally owned renewable generation can only be realized with certain safety measures being in place such as remote disconnects. Block Island is truly unique in that it is an island and its electric grid acts as micro-grid, similar to Kauai Electric Cooperative. Without a mainland connection, Kauai Electric Cooperative learned quickly how important it was balance load with locally owned and hard to control generation. The entire electric industry has learned from Kauai's experiences. Battery storage and remote disconnects were both part of their solution. During light load periods, Block Island will be faced with the same challenges and the second meters will ensure we can manage this high of a level of variable output from local renewable generation.

Α.

Q. Will BIUD limit the size of new projects?

Yes. The maximum project size will be limited by the member's annual consumption history. The total estimated annual output of a net metering system shall not exceed 125% of the member's annual consumption history. Projects included with new building construction will use estimated consumption data. Each project will also be limited to no

1		more than 10% of the available remaining capacity. BIUD also has the right to limit
2		project size based on location and other interconnection concerns.
3		
4	Q.	Does the new tariff proposal include a cap on net metering?
5	A.	Yes. The new tariff sets a 10% cap which is based on BIUD's summer-time peak. In
6		2021, BIUD set its summer-time peak at 5.017 MW on July 17 – hour ending 1900. The
7		new cap will allow up to roughly 500 kW of net metering. This 10% cap will be an
8		opportunity to pause and consider next steps.
9		
LO	Q.	Does the new cap include BIUD's roof top solar project?
l1	A.	No. BIUD's roof top array of 94.1 kW is not included in the 10% cap but was considered
12		when analyzing the effects of high penetrations of solar on the island.
13		
L4	Q.	Can you estimate how soon BIUD will reach the 10% cap?
15	A.	We are estimating 24-36 months. We have approximately 50 kW of pending applications
L6		waiting for the new tariff to be implemented. In addition to those, we believe there is
L7		another 100-150 kW of pent-up demand that could be built in the next 18-24 months,
L8		mostly from the projects that the local island philanthropist is supporting.
19		
20	Q.	Can you explain how BIUD calculated its avoided cost which will be the basis for the
21		Net Metering Credit going forward?
22	A.	BIUD is proposing that the Net Metering Credit will be based on its most recent Last
23		Resort and Transmission Reconciliation filing. The rate would be adjusted each year
24		using the most recent approved reconciliation data and rates. The formula for calculating

the Net Metering Rate is the sum of the (Last Resort Rate plus the Transmission Rate) 1 minus the (DAF/kWh plus BITS/kWh plus BIUD Interconnect/kWh) charges. Our 2 regulatory accountant David Bebyn helped develop the rate. The proposed rate using this 3 year's reconciliation data is \$0.1260/kWh. See Schedule DGB-1. 4 5 6 In developing the rate formula, BIUD sought to create a rate that was as close to an avoided cost concept as possible while keeping the calculation simple, easy for our 7 8 members to understand, and adjustable to fairly compensate net metering members over 9 the life of their project. BIUD also strived to set a rate that was fair to members who do not net meter. We believe we have developed the fairest rate for every member. 10 11 How often does BIUD plan to review its net metering tariffs? 12 Q. BIUD will review its net metering program annually and will file a new tariff if changes 13 A. are made. BIUD will recalculate the new Net Metering Credit annually in conjunction 14 with the Last Resort and Transmission Reconciliation. 15 16 17 Q. Does this conclude your testimony? A. Yes. 18

IN SERVICE NET METERING **NET METERING (INSTALLED NAMEPLATE CAPACITY) EXISTING OLD TARIFF - SINGLE METER SYSTEM Customer Name** Location Kilowatts Date of Installation Type RES Solar 6.840 9/16/2015 1 2 RES 2.160 10/25/2013 Solar 3 RES Solar 3.040 3/21/2013 4 1.020 4/2/2013 RES Solar 5 RES Solar 1.530 2/2/2015 6 RES Solar 3.120 3/1/2013 7 RES Solar 2.100 10/26/2011 8 RES Solar 3.420 3/11/2016 9 RES Solar 2.850 12/28/2016 10 RES Solar 4.200 12/21/2000 11 RES 6.700 1/20/2015 Solar 12 RES 2.500 4/2/2013 Solar 2.520 4/2/2013 13 RES Solar RES 2.565 7/15/2016 14 Solar 15 RES Solar 2.300 5/1/2013 RES Solar 0.510 4/2/2013 16 4/2/2013 17 RES Solar 2.500 RES 8/25/2014 18 Solar 4.800 RES 6/22/2013 19 Solar 1.020 20 RES Solar 2.500 6/1/2013 21 RES Solar 5.250 6/1/2013 9/16/2015 22 RES Solar 3.120 23 RES Solar 2.500 1/1/2013 24 RES Solar 1.336 1/1/2012 25 RES 7/31/2016 Solar 1.440 26 RES Solar 1.900 4/2/2013 27 RES 0.950 5/29/2013 Solar 28 RES Solar 1.000 29 RES Solar 3.000 30 RES Solar 1.000 31 RES Solar 0.900 8/11/2013 32 RES Solar 2.070 33 RES Solar 4.830 34 RES Solar 3.480 3.480 35 RES Solar 36 RES Solar 4.000 37 RES Solar 3.480 5/1/2020 38 RES Solar 5.120 RES Solar 2.300 39 6/23/2020 RES 40 Solar 2.300 6/23/2020 RES 2.300 41 Solar 6/23/2020 42 RES Solar 2.600 8/1/2020 RES 3.060 43 Solar 8/1/2020 44 RES 10/23/2020 Solar 2.600

45		RES	Solar	2.54	10/23/2020
46		RES	Solar	5.2	10/23/2020
47		RES	Solar	5.2	10/23/2020
48		RES	Solar	2.5	10/23/2020
49		RES	Solar	2.5	10/23/2020
50		RES	Solar	2.6	10/23/2020
51		RES	Solar	2.6	10/23/2020
52		RES	Solar	2.6	10/23/2020
	Total Residential Net Metering			147.951	

	PENDING APPROVED RESIDENTIAL APPLICATIONS											
	Customer Name	Location	Rate	Type	Туре	Kilowatts (DC)						
1			RES	R	Solar	4.000						
2			RES	R	Solar	7.700						
3			RES	R	Solar	3.800						
	Total Pending					15.500						

	IN SERVICE OTHER												
	NET METERING (INSTALLED NAMEPLATE CAPACITY)												
	Customer Name	Location	Rate	Type	Kilowatts	Date of Installation							
1			COM	Solar	3.220	12/11/2012							
2			COM	Solar	1.200								
3			СОМ	Solar	1.170								
4			СОМ	Solar	0.000								
5			COM	Solar	12.000								
6			COM	Solar	30.000								
7			COM	Solar	8.200								
8			COM	Solar	4.360								
	Total NON-Residential (Public Sector) Ne	t Metering	•	•	56.930								

BLOCK ISLAND POWER COMPANY

Net Metering Policy, effective January 1, 2018

Approved by BIPCo Board of Directors, December 20, 2017

The Board of Directors of the Block Island Power Company (BIPCo) hereby ratifies BIPCo's voluntary Net Metering Policy as follows, effective January 1, 2018 for a period of one (1) year.

Eligible Installations: All installations that use renewable energy resources as defined in R.I.G.L. § 39-26.4-2(1) are eligible for net metering only if they are:

privately owned and located on parcels for that customer's residential use exclusively, and conform to Block Island Ordinances, including all Planning and Zoning requirements, and Block Island's Comprehensive Plan, and are

certified by the Town Building Inspector and BIPCo to be a proper installation, and are

installed by an electrician who is licensed by the State of Rhode Island to install solar units or any other appropriate electrical generating units that rely on renewable energy resources and that

the installer must possess and furnish to BIPCo proof of all required licenses, to include, but not limited to a current Rhode Island Renewable Energy Professional license, and that the

total wattage by plate of all units does not exceed 3% of BIPCo's yearly peak.

The Block Island Post Office Building is an eligible grandfathered installation.

No installations that service non residential customers are allowed to be net metered.

All installations must have "smart meters" that will allow BIPCo to measure the amount of electricity delivered and received. (NOTE: The three existing wind turbines on Block Island have dual meters because of their age and configuration but function in the same manner as the newer smart meters and will be considered to be smart meters for this purpose).

All accounts will be reconciled monthly.

The total capacity of the current, non-grandfathered accounts plus future installations of all types may not exceed 3% of BIPCo's previous year's peak. Once the cap is reached, BIPCo will not allow additional net metering, unless the cap is increased by BIPCo.

Net Metering Credit-""Excess Renewable Net Metering Credit" means a credit that applies to each eligible net metering system for that portion of the renewable self-generator's production of electricity beyond one hundred percent (100%) of that generator's individual consumption. The self-generator will not be given any credit for the production of electricity greater than one hundred twenty-five percent (125%) of the renewable self-generator's own consumption. This production and consumption of electricity must take place at the eligible net metering system site during the applicable billing period.

The applicable billing period is monthly.

Such Excess Renewable Net Metering Credit shall be equal to BIPCo's avoided cost.

The customer must install equipment approved by BIPCo which prevents the flow of electricity into BIPCo's system when BIPCo's supply is out of service.

BIPCo shall have the right to disconnect any facility if in BIPCo's opinion the facility interferes or is likely to interfere with BIPCo's service to other customers.

All interconnection costs associated with the facility shall be borne by the customer.

		Est Sales per		
		Settlement	Cost per	Cost per
	Costs	Schedule-1	MWH	KWH
Power Supply Costs per Settlement Schedule-1	1,114,007	13,069	\$ 85.24	\$ 0.0852
BIUD interconnection per Settlement Attachment-2	(45,542)	13,069	\$ (3.48)	\$ (0.0035)
Power Supply Service portion of Net Metering Credit	1,068,465		_ _	\$ 0.0818
				_
Transmission Costs per Settlement Schedule-1	967,572	13,069	\$ 74.04	\$ 0.0740
DAF Costs per Settlement Attachment-1	(338,136)	13,069	\$ (25.87)	\$ (0.0259)
BITS Costs per Settlement Attachment-2	(51,000)	13,069	\$ (3.90)	\$ (0.0039)
Transmission portion of Net Metering Credit	578,436		_	\$ 0.0443
				·
Total Net Metering Credit				\$ 0.1260

Power Supply Service & Transmission Cost Rate Calculation Block Island Power Company

Docket # 5141 Settlement Schedule-1

Power Supply Service

Total Energy Costs Total Capacity/Other Costs Total Other Costs Less Over Collections April 2020 Reconciliation estimates to actual variance April 2021 Reconciliation (net of Reserve request) Subtotal Subtotal to recover (No Gross Receipts Tax)		523,975 564,890 45,542 16,647 3,753 1,114,007	See Settlement Attachment-1 See Settlement Attachment-1 See Settlement Attachment-2 See Settlement Attachment-5 See Settlement Schedule-4
Estimated Sales (MWH) to Customers		13,069	See Settlement Schedule-2
Cost per MWH Cost per KWH	\$ \$	85.24 0.0852	
<u>Transmission Charges</u>			
Transmission costs Less Over Collections		1,041,346	See Settlement Attachment-1
April 2020 Reconciliation estimates to actual variance April 2021 Reconciliation (net of Reserve request) Subtotal		(2,741) 76,515 967,572	See Settlement Attachment-5 See Settlement Schedule-4
Subtotal to recover (No Gross Receipts Tax)		967,572	
Estimated Sales (MWH) to Customers		13,069	See Settlement Schedule-2
Cost per MWH Cost per KWH	\$ \$	74.04 0.0740	
Total Cost per MWH Cost per KWH	\$ \$	159.28 0.1593	

Purchase Power Projection	15																									
		May-21		Jun-21		Jul-21		Aug-21		Sep-21		Oct-21		Nov-21		Dec-21		Jan-22		Feb-22		Mar-22		Apr-22		Totals
Load (Energy Purchased)		1,090		1,447		2,415		2,560		1,539		1,025		891		886		955		770		856		831		15,264 * -
MWH																										-
Bilateral Purchase		981		1,302		2,177		2,301		1,385		924		677		674		564		454		505		490		12,433
NYPA Purchase		127		136		146		155		144		133		125		120		137		131		139		148		1,640
BIUD Solar (Project)		12		9		15		12		9		8		5		4		4		6		9		10		102
Cabot/Tuners		-		-		-		-		-		-		-		-		134		106		145		167		553
ISO Adjusted net Interchange		(29)		(0)		78		93		0		(39)		84		88		116		72		58		16		537
Total Net Purchases MWH		1,090		1,447		2,415		2,560		1,539		1,025		891		886		955		770		856		831		15,264
Energy Costs	500	Attach	mar	nt_3																						
Shell	366	34.85	mei	34.85		34.85		34.85		34.85		34.85		40.23		40.23		40.23		40.23		40.23		40.23		
Official		34.03		34.03		34.03		34.03		34.03		34.03		40.23		40.23		40.23		40.23		40.23		40.23		
py BIUD SO rate		167.25		167.25		167.25		167.25		167.25		167.25		167.25		167.25		167.25		167.25		167.25		167.25		
Bilateral Purchase	Ś	34.175	\$	45,370	Ś	75,854	\$	80,179	\$	48,277	Ś	32.189	Ś	27,224	\$	27,099	\$	22,691	Ś	18,279	\$	20,323	Ś	19.712	Ś	451,372
NYPA Purchase		622	\$	668	\$	717	\$	761	\$	711	\$	655	\$	617	\$	589	\$	673	\$	646	\$	682	\$		\$	8,067
BIUD Solar (Project)	\$	1,924	\$	1,547	\$	2,439	\$	1,956	\$	1,565	\$	1,263	\$	861	\$	694	\$	635	\$	1,047	\$	1,458	\$	1,668	\$	17,057
Cabot/Tuners	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	5,762	\$	4,563	\$	6,184	\$	7,020	\$	23,529
ISO Net Position		(828)	\$	(138)		2,402	\$	2,645	\$	(130)	_	(1,135)	_	3,170	\$	4,435	\$	6,972	\$	4,184	\$	2,189	\$	185		23,951
Total Energy Costs	\$	35,894	\$	47,447	\$	81,411	\$	85,541	\$	50,423	\$	32,972	\$	31,872	\$	32,817	\$	36,731	\$	28,719	\$	30,835	\$	29,312	\$	523,975
Capacity/Other Costs ISO FCM Charges net of																										
NYPA CAP credit	\$	42,742	\$	33,940	\$	33,940	\$	33,940	\$	33,940	\$	33,940	\$	33,940	\$	33,940	\$	33,940	\$	33,940	\$	33,940	\$	33,940	\$	416,077
NYPA Fixed Costs ISO Ancillary/Schedule	\$	1,222	\$	1,222	\$	1,222	\$	1,222	\$	1,222	\$	1,222	\$	1,222	\$	1,222	\$	1,222	\$	1,222	\$	1,222	\$	1,222	\$	14,663
Charges	\$	3,947	\$	5,240	\$	8,761	\$	9,260	\$	5,576	\$	3,718	\$	3,225	\$	3,211	\$	3,636	\$	2,929	\$	3,257	\$	3,159	\$	55,919
ISO Annual Fee	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	500	\$	-	\$	-	\$	-	\$	500
Projected ENE Fees	\$	6,079	\$	6,793	\$	8,737	\$	9,013	\$	6,978	\$	5,953	\$	5,681	\$	5,673	\$	5,912	\$	5,540	\$	5,712	\$	5,661	\$	77,732
Total Capacity/Other Costs	\$	53,990	\$	47,194	\$	52,659	\$	53,434	\$	47,716	\$	44,832	\$	44,068	\$	44,045	\$	45,210	\$	43,631	\$	44,131	\$	43,981	\$	564,890
Transmission Costs																										
ISO Transmission Charges	\$	24,623	\$	42,711	\$	56,694	\$	56,764	\$	46,706	\$	24,088	\$	20,633	\$	22,102	\$	21,902	\$	18,801	\$	18,954	\$	17,096	\$	371,074
NYPA Transmission Costs National Grid Connection	\$	1,513	\$	2,066	\$	1,863	\$	1,210	\$	1,324	\$	1,518	\$	1,761	\$	2,104	\$	3,818	\$	3,237	\$	1,715	\$	1,997	\$	24,126
DAF Charges National Grid Cable	\$	28,178	\$	28,178	\$	28,178	\$	28,178	\$	28,178	\$	28,178	\$	28,178	\$	28,178	\$	28,178	\$	28,178	\$	28,178	\$	28,178	\$	338,136
Surcharges National Grid Transformer	\$	4,250	\$	4,250	\$	4,250	\$	4,250	\$	4,250	\$	4,250	\$	4,250	\$	4,250	\$	4,250	\$	4,250	\$	4,250	\$	4,250	\$	51,000
Surcharges National Grid Meter	\$	2,000	\$	2,000	\$	2,000	\$	2,000	\$	2,000	\$	2,000	\$	2,000	\$	2,000	\$	2,000	\$	2,000	\$	2,000	\$	2,000	\$	24,000
Surcharge National Grid Rolled in	\$	65	\$	65	\$		\$	65	\$		\$		\$	65	\$	65			\$	65	\$	65	\$	65	\$	775
Distribution National Grid PTF, Non-PTF										14,078				14,078								14,078				168,936
and Load Dispatch Charges	<u> </u>	5,275	\$	5,275	\$	5,275	\$	5,275	\$	5,275	\$	5,275	\$	5,275	\$	5,275	\$	5,275	\$	5,275	\$	5,275	\$		\$	63,300
Total Transmission Costs	\$	79,981	\$	98,623	\$:	112,402	\$1	11,820	\$1	101,876	\$	79,451	\$	76,239	\$	78,051	\$	79,566	\$	75,884	\$	74,515	\$	72,939	\$	1,041,346
Total All-In Costs	\$1	.69,866	\$ 1	193,264	\$ 2	246,472	\$ 2	50,795	\$ 2	200,014	\$1	157,255	\$:	152,179	\$ 1	154,913	\$ 1	161,507	\$1	.48,234	\$1	149,480	\$ 1	.46,232	\$	2,130,211

^{*} This line item represents the Purchased KHW.

The difference between this line item and the estimated kwh sales on DGB-2 represents the estimated KWH line losses.

	(Atta	ichment-6)	Amotization Period (years)			
Other Costs-BIPCo Interconnection		273,254	6	\$ 45,542	:	
Amortized Interconnect Cos	ts				\$	45,542
Total Other Costs					\$	45,542

	Load by Month						
	per Attachment		То	tal Cost by	12	month May	
	1	% per month		Month	19-Apr 20		
May-21	1,090	7.14%	\$	3,251	\$	3,251	
Jun-21	1,447	9.48%	\$	4,316	\$	4,316	
Jul-21	2,415	15.82%	\$	7,205	\$	7,205	
Aug-21	2,560	16.77%	\$	7,639	\$	7,639	
Sep-21	1,539	10.08%	\$	4,592	\$	4,592	
Oct-21	1,025	6.72%	\$	3,058	\$	3,058	
Nov-21	891	5.84%	\$	2,658	\$	2,658	
Dec-21	886	5.80%	\$	2,643	\$	2,643	
Jan-22	955	6.25%	\$	2,848	\$	2,848	
Feb-22	770	5.05%	\$	2,298	\$	2,298	
Mar-22	856	5.61%	\$	2,555	\$	2,555	
Apr-22	831	5.44%	\$	2,479	\$	2,479	
Totals	15,264	100.00%	\$	45,542	\$	45,542	