

From the Office of Christopher Warfel



November 10, 2021

Christopher Warfel
PO Box 871
Block Island, RI 02807

Ms. Luly Massaro, Clerk of RI PUC
State of Rhode Island and Providence Plantations
RI Public Utilities Commission, 89 Jefferson Boulevard, Warwick, RI 02888

Dear Ms. Massaro:

I am requesting that this letter be distributed to the Staff and Division. Thank you in advance for your assistance.

I have been assisting Block Island Power Company with its Net Metering policy and Energy Conservation policies since we became a cooperative. Most of this has been through the public forum afforded by the Board's monthly meetings.

Mr. Wright has often mentioned that he has discussions with the PUC on a variety of matters. We know that we most likely cannot pick up the phone and have similar access, so I am writing this letter to you so that you have more than one perspective on an issue that has come to the forefront, and that is Net Metering.

I have gone through the net metering list that BIPCo inherited from the previous owners; adding correction and insight as to how this technology actually works to ensure that the 3% cap is accurate. We did not complete that work as BIPCo was supposed to review the list against exporting meter data so that it could be verified that systems were still working. We know some are not, but are still in the cap. The supposition was that at some time, a working solar electric system connected to the grid, will export.

More importantly, I have asked BIPCo to obtain expertise in renewable energy technology as I don't think it is appropriate for Entech to be the "canary in the coal mine", when BIPCo's understanding or policies could be better. We have consistently had to vocalize our objections or opinions, and frankly, it seems to have not been entirely welcome. This has put us as being perceived as adversarial I believe, when all we are trying to do is help develop informed and well thought out policies.

Recently, we found out that the Town of New Shoreham Building Official and BIPCo were coordinating permits with BIPCo's net metering policy. (This person was recently elected to the BIPCo Board.) This resulted in permits being held up, with conflicting explanations as to why. After two months, we were told because we did not have the correct metering plan. We had submitted it though, and then were told that we could not install because of the cap being reached. I had submitted the applications noting several projects on the old list had been dismantled and asked if we could replace those projects until the cap was actually reached. We did not receive a response to that, so we thought this was a good and prudent solution.

At the last Board meeting I pointed out (again) that these solar energy technologies can be programmed to not export to the utility. My reading of the statutes on net metering indicate that if we did this, we would not be considered net metering as we are not exporting or "banking" any electricity to be credited back at a later time. Mr. Wright said as long as we were connected we were net metered. I think that is wrong. I further offered to not connect multimode

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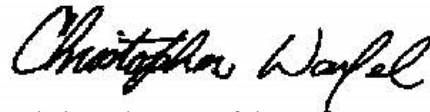
systems to the utility main service panel if that would be acceptable, but I still told BIPCo that as long as the system did not export, we were not net metering and not part of the cap. I said that once the PUC sorts out and approves the new Net Metering tariff, that then these systems could interconnect for net metering and be counted towards the new cap, whatever that may be.

I just want you to be aware of another perspective and that I hope that the definition of Net Metering is such that the system has to export in order to be so defined. This option has been available for several years now, and BIPCo's lack of understanding of this, is why I have asked them to obtain expertise so that they just don't have my "word" on these issues.

Thank you for your time.

cc: Commissioners, Staff

Sincerely,

A handwritten signature in black ink that reads "Christopher Warfel". The signature is written in a cursive, flowing style.

Christopher Warfel, P.E.
President, EEInc.
(401) 447-5773 (m)