

July 5, 2022

VIA ELECTRONIC MAIL

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

**RE: Docket 5206 - DG Interconnection Projects
Review of Administrative Issues Related to Interconnection Process
Responses to PUC Data Requests – Set 4**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”), enclosed please find the electronic version of the Company’s response to the Public Utilities Commission’s Fourth Set of Data Requests in the above-referenced matter.

Please be advised that the Company is seeking confidential treatment of confidential Attachment PUC 4-1-1, Attachment PUC 4-1-2, and Attachment PUC 4-1-3 (“Confidential Attachments”) in response to data request PUC 4-1. As such, the enclosed represents a public redacted version of these Confidential Attachments. An unredacted version of these Confidential Attachments will be sent electronically via the Company’s encryption link.

Pursuant to 810-RICR-00-00-1.3(H)(3) and R.I. Gen. Laws § 38-2-2(4)(B), the Company respectfully requests that the Commission treat the Confidential Attachments as confidential. In support of this request, the Company has enclosed a Motion for Protective Treatment for the Confidential Attachments. In accordance with 810-RICR-00-00-1.3(H)(2), the Company also respectfully requests that the Commission make a preliminary finding that the Confidential Attachments are exempt from the mandatory public disclosure requirements of the Rhode Island Access to Public Records Act (“APRA”).

Thank you for your attention to this transmittal. If you have any questions, please contact me at 401-784-7263.

Sincerely,



Andrew S. Marcaccio

Enclosure

cc: Docket 5206 Service List
Jon Hagopian, Esq.
John Bell, Division (w/confidential attachments)

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION

In Re: Review of Administrative Issues Related to the Interconnection Process)))))	Docket No. 5206
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**MOTION OF THE NARRAGANSETT ELECTRIC COMPANY D/B/A
RHODE ISLAND ENERGY FOR PROTECTIVE TREATMENT OF
CONFIDENTIAL INFORMATION**

The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”) hereby respectfully requests that the Public Utilities Commission (“PUC”) grant protection from public disclosure certain confidential information submitted by the Company in the above referenced docket. The reasons for the protective treatment are set forth herein. The Company also requests that, pending entry of that finding, the PUC preliminarily grant the Company’s request for confidential treatment pursuant to 810-RICR-00-00-1.3(H)(2).

The records that are the subject of this Motion that requires protective treatment from public disclosure are a System Impact Study for Distributed Generation Interconnection and two Interconnection Service Agreements related to Green Development’s Tiverton distributed generation projects attached to the Company’s response to PUC 4-1 (referred to herein as the “Confidential Attachments”). The Company requests protective treatment of the Confidential Attachments in accordance with 810-RICR-00-00-1.3(H) and R.I. Gen. Laws § 38-2-2-(4)(B).

I. LEGAL STANDARD

For matters before the PUC, a claim for protective treatment of information is governed by the policy underlying the Access to Public Records Act (APRA), R.I. Gen. Laws § 38-2-1 et seq. See 810-RICR-00-00-1.3(H)(1). Under APRA, any record received or maintained by a state or

local governmental agency in connection with the transaction of official business is considered public unless such record falls into one of the exemptions specifically identified by APRA. See R.I. Gen. Laws §§ 38-2-3(a) and 38-2-2(4). Therefore, if a record provided to the PUC falls within one of the designated APRA exemptions, the PUC is authorized to deem such record confidential and withhold it from public disclosure.

II. BASIS FOR CONFIDENTIALITY

The Confidential Attachments, which are the subject of this Motion, are exempt from public disclosure pursuant to R.I. Gen. Laws § 38-2-2(4)(B) as “[t]rade secrets and commercial or financial information obtained from a person, firm, or corporation that is of a privileged or confidential nature.” The Rhode Island Supreme Court has held that this confidential information exemption applies where the disclosure of information is likely either (1) to impair the government’s ability to obtain necessary information in the future; or (2) to cause substantial harm to the competitive position of the person from whom the information was obtained. *Providence Journal v. Convention Center Authority*, 774 A.2d 40 (R.I. 2001). The first prong of the test is satisfied when information is provided to the governmental agency and that information is of a kind that would customarily not be released to the public by the person from whom it was obtained. *Providence Journal*, 774 A.2d at 47. In this case, the Company would not customarily release the Confidential Attachments to the public.

In addition, the release of the Confidential Attachments is likely to cause substantial harm to the competitive position of the Company. The Confidential Attachments includes sensitive distributed generation customer and developer information and other commercial details regarding the distribution generation customer and developer. Disclosing this information to the public could harm the Company’s and the developer’s ability to advance distributed generation in the most cost-

effective manner.

III. CONCLUSION

For the foregoing reasons, the Company respectfully requests that the PUC grant this motion for protective treatment of the Confidential Attachments.

Respectfully submitted,

RHODE ISLAND ENERGY
By its attorney,

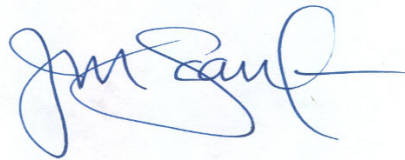


Andrew S. Marcaccio (#8168)
Rhode Island Energy
280 Melrose Street
Providence, RI 02907
(401) 784-4263

Dated: July 5, 2022

CERTIFICATE OF SERVICE

I hereby certify that on July 5, 2022, I delivered a true copy of the foregoing Motion via electronic mail to the parties on the Service List for Docket No. 5206.

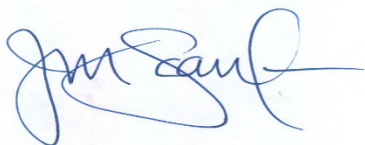


Joanne M. Scanlon

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

July 5, 2022

Date

Docket No. 5205 - Review of the Cost Allocation and Recovery of Ongoing Operation and Maintenance Expenses Related to the Interconnection of Distributed Generation Projects (National Grid)

Docket No. 5206 - Review of Administrative Issues Related to the Interconnection Process (National Grid)

Service List as of 6/14/2022

Name/Address	E-mail Distribution	Phone
The Narragansett Electric Company d/b/a Rhode Island Energy Andrew Marcaccio, Esq. Celia O'Brien, Esq. 280 Melrose Street Providence, RI 02907 Jack Habib, Esq. Keegan Werlin LLP 99 High Street, 29th Floor Boston, MA 02110 Kathy Castro Ryan Constable Ali Atash Eric Hanlon National Grid Kevin Kelly John Isberg Theresa Burns Scott McCabe	amarcaccio@pplweb.com ;	401-784-4263
	cobrien@pplweb.com ;	
	jhabib@keeganwerlin.com ;	
	jscanlon@pplweb.com ;	
	krcastro@rienergy.com ;	
	rconstable@rienergy.com ;	
	aatash@rienergy.com ;	
	ehanlon@rienergy.com ;	
	john.isberg@nationalgrid.com ;	
	Theresa.Burns@nationalgrid.com ;	
Kevin.Kelly2@nationalgrid.com ;		
Scott.Mccabe@nationalgrid.com ;		

Division of Public Utilities (Division) Margaret Hogan, Esq. 89 Jefferson Blvd. Warwick, RI 02888	jon.hagopian@dpuc.ri.gov ; John.bell@dpuc.ri.gov ;	
	Margaret.l.hogan@dpuc.ri.gov ; Linda.george@dpuc.ri.gov ;	
	Paul.Roberti@dpuc.ri.gov ;	
	gboothpe@gmail.com ; Mikebrennan099@gmail.com ;	
	fwatson924@gmail.com ; Lkushner33@gmail.com ;	
Office of Energy Resources (OER) Al Vitali Nick Ucci Chris Kearns Carrie Gill Shauna Beland	Albert.vitali@doa.ri.gov ; Nicholas.ucci@energy.ri.gov ;	
	Christopher.Kearns@energy.ri.gov ; Carrie.gill@energy.ri.gov ;	
	Shauna.beland@energy.ri.gov ;	
	jkennerly@seadvantage.com ; swollenburg@seadvantage.com ;	
	wswanson@seadvantage.com ; alidington@seadvantage.com ; tarmstrong@seadvantage.com ; cbrown@seadvantage.com ; tmichelman@seadvantage.com ;	
SEA Advantage Jim Kennerly Stephan Wollenburg Witter Swanson Andrew Lidington Tobin Armstrong Cal Brown Tim Michelman	doug@newportsolarri.com ;	
Newport Solar Doug Sabetti	frank@edp-energy.com ;	
Energy Development Partners Frank Epps	unger@hrtwd.com ;	
Heartwood Group Fred Unger	pfennessey@kearsargeenergy.com ; Ayoung@kearsargeenergy.com ;	
Kearsarge Energy LP Patricia Fennessey Alex Young	ms@green-ri.com ;	
Green Development Matt Sullivan	seth@handylawllc.com ;	
Seth Handy, Esq.	Luly.massaro@puc.ri.gov ; Cynthia.WilsonFrias@puc.ri.gov ; Todd.bianco@puc.ri.gov ; Alan.nault@puc.ri.gov ;	401-780-2107
File an original w/: Luly E. Massaro, Commission Clerk Cynthia Wilson-Frias, Esq. Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888		
PPL Electric Utilities Ronald Reybitz	rjreybitz@pplweb.com ;	

Stephen Breininger	skbreininger@pplweb.com ;	
ISO-NE Kerry Schlichting	kschlichting@iso-ne.com ;	
Tori Scott	Victoria.Scott@governor.ri.gov ;	
Christian Capizzo, Esq.	ccapizzo@psh.com ;	

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 5206
In Re: Review of Administrative Issues
Related to the Interconnection Process
(Non-Decisional Staff Review)
Responses to the Commission's Fourth Set of Data Requests
Issued on June 14, 2022

PUC 4-1¹

Request:

RR-11 (The background for this question is set forth here with the questions starting at RR-11(a))

PUC 2-40, includes the following as part of the response:

Tiverton 33F6 circuit – Tiverton area study: As explained in response to DIV 5-1, all four Tiverton 12.47kV feeders exceed the 16MWh threshold described in the Distribution Planning criteria. Installing a new 33F6 circuit at Tiverton substation is the recommended alternative to address these issues. There are two Distributed Generation (DG) projects currently in design that require the construction of a new 33F6 circuit for interconnection. If the DG project does not proceed, this 33F6 circuit will still be needed to address the area contingency loading concerns, and the same route would be followed as the least-cost solution. However, the new 33F6 will need to be extended past the proposed DG site to address the contingency load-at-risk issue. Since the DG project is on a different schedule, which is earlier than the Company's recommended plan, the DG developer will be responsible for the costs to serve their project. Cost sharing will apply to this portion of work once the 33F6 circuit is being used to serve load as per the Standards for Interconnecting Distributed Generation (RIPUC 2244) Section 5.4 (b). This project will be described in more detail in the Tiverton area study report.

DIV 5-1 includes the following:

¹ The Company's response begins on page 5.

PUC 4-1, page 2

Division 5-1, page 18

8. Tiverton Area Study:

- a) All four Tiverton substation feeders exceed the 16MWh threshold described in the Distribution Planning criteria. See tables below for details.

Substation	Feeder	MWh	Feeder Load at Risk in MVA
Tiverton	33F1	26.3	5.8
Tiverton	33F2	25.2	5.6
Tiverton	33F3	27.9	6.2
Tiverton	33F4	25.6	5.9

- b) The approximate customers associated with the unserved load for each feeder and transformer are shown in the table below.

Substation	Feeder	Number of Residential Customers Associated w/ Unserved Load	Number of Commercial Customers Associated w/ Unserved Load
Tiverton	33F1	1,390	169
Tiverton	33F2	1,546	132
Tiverton	33F3	1,633	148
Tiverton	33F4	1,962	146

- c) The recommended plan to address the contingency load-at-risk issues on all four of the Tiverton substation feeders includes installing a new Tiverton 33F6 circuit.

There are two Distributed Generation (DG) projects currently in design that require the construction of a new 33F6 circuit for interconnection. If the DG project does not proceed, this 33F6 circuit will still be needed to address the area contingency loading concerns, and the same route would be followed as the least-cost solution. However, the new 33F6 will need to be extended past the proposed DG site to address the contingency load-at-risk issue.

Since the DG project is on a different schedule, which is earlier than the Company’s recommended plan, the DG developer will be responsible for the costs in the table below to serve their project. Cost sharing will apply to this portion of work once the 33F6 circuit is being used to serve load as per the Standards for Interconnecting Distributed

PUC 4-1, page 3

Division 5-1, page 19

Generation (RIPUC 2244) Section 5.4 (b). This estimate does not include the civil work that is being performed in coordination with the DG project.

	Distribution Total (\$M)	Substation (D) Total (\$M)	Total (\$M)
CapEx	3.097	1.022	4.119
OpEx	0.000	0.002	0.002
Removal	0.000	0.000	0.000
Total	3.097	1.024	4.121

The estimates for the work required to extend the 33F6 further south to pick up load from the other Tiverton circuits is included in the table below.

Spend	Distribution Total (\$M)
CapEx	1.907
OpEx	0.063
Removal	0.211
Total	2.181

- d) There were no reasonable alternatives identified to address the MWh violations. The 33F3 and 33F4 extend approximately 10 miles further south than the other feeders and are both heavily loaded so another feeder needs to be brought further south to offload that supply. The closest other substation is Bates Street 115, which is located in Massachusetts and is out of phase with the Tiverton substation.
- e) The contingency load-at-risk issues in the Tiverton area study were identified when the study was completed in 2021. As noted in the response to 4e, above, the Company is currently evaluating the scheduling of all recommendations from the recently completed area studies. The project schedule will be established as a result of this prioritization effort.
- f) The Tiverton projects are all driven solely by contingency load-at-risk issues. The Company has no beneficial electrification opportunity criteria at this time, but this project will increase hosting capacity in the area as well as improve the area's ability to serve additional load anticipated from beneficial electrification.

PUC 4-1, page 4

This question and response has also been asked in Docket No. 5209, In re: The Narragansett Electric Company FY 2023 Electric ISR. The response should be filed in both dockets.

- RR-11(a): Referencing the tables above in DIV 5-1c), what portion of the costs is directly related solely to the system modifications needed for the two identified DG projects?
- (b) What portion of the costs is related to the acceleration of the system improvements?
 - (c) When is the projected in-service date for the DG projects?
 - (d) When did the Tiverton Area Study deem the new 33F6 to be needed to be in service to address reliability concerns?
 - (e) The tables do not include civil work that is being performed in coordination with the DG project.
 - i. At the technical session, Ms. Castro indicated that the civil work would be performed by the developer.
 - ii. Please provide the scope of the civil work being performed, separating out the system modification portion and costs directly necessary to interconnect the two DG projects and additional civil work being performed by the developer, if any, at the same time.
 - iii. If the scope of the civil work is for more than is directly necessitated to connect the two DG projects, please indicate who is paying for the costs initially.
 - (f) In Docket No. 4763, in response to Record Request 4, [http://www.ripuc.ri.gov/eventsactions/docket/4763-NGrid-RR\(2-23-18\).pdf](http://www.ripuc.ri.gov/eventsactions/docket/4763-NGrid-RR(2-23-18).pdf) the Company stated:

“The Company will consider a system modification to be an accelerated modification if such modification is otherwise identified in the Company’s work plan as a necessary capital investment to be installed within a five-year period as of the date the Company begins the impact study of the proposed distributed generation (DG) project (defined as an Accelerated Modification). [footnote omitted] The Company will identify the Accelerated Modification and the cost thereof in the impact study. The Renewable Interconnecting Customer will be responsible for the identified Accelerated Modification costs less the depreciated value (Modified Costs), which Modified Costs will be estimated in the interconnection service agreement (ISA). Upon reconciliation, final labor, material and depreciation values will be provided based on the actual date of asset installation. The

PUC 4-1, page 5

Company will file with the Commission all executed ISAs for Renewable Interconnecting Customer DG projects with an identified Accelerated Modification by July 1 of each year. Renewable Interconnecting Customers may also petition the Public Utilities Commission (PUC) directly if the customer believes it has been incorrectly charged for an Accelerated Modification under Section 5.4. In these cases, the Renewable Interconnecting Customer shall be responsible to pay for the cost of the system modification pursuant to the ISA, unless and until a determination has been made by the PUC.”

- i. Is this explanation consistent with the Company's current approach in the Tiverton case? If not, please explain.
- ii. Please provide a copy of the final System Impact Study and ISA for the DG projects.

Response:

- a. The entirety of the first table in DIV 5-1c (showing a total of \$4.121M) is required both to interconnect the two identified DG projects and to serve new load. All of these costs are required to serve the DG projects and the DG developer will be responsible for paying these costs (totaling \$4.121M). This does not include additional work required solely to interconnect the DG projects which is detailed in the system impact study. The second table showing a total of \$2.181M is required solely for the purpose of serving load. This \$2.181M is in addition to the \$4.121M and will not be paid for by the DG developer.
- b. The costs identified in the first table in DIV 5-1c (showing a total of \$4.121M) all are related to the acceleration of system improvements arising from the DG projects.
- c. The latest in-service date for the project is 11/2022. This date is subject to timely completion of civil design and construction by the Customer and procurement of materials by the Company.
- d. After the Tiverton Area Study was completed, it was identified that the contingency load-at-risk issues exist and, based on subject matter expertise and resource planning, the new 33F6 feeder was scheduled to start design in FY 2024, to start construction in FY 2025, and placed into service in FY2028.
- e.
 - i. The civil work will be performed by the Customer per their request.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 5206
In Re: Review of Administrative Issues
Related to the Interconnection Process
(Non-Decisional Staff Review)

Responses to the Commission’s Fourth Set of Data Requests
Issued on June 14, 2022

PUC 4-1, page 6

ii. The scope of the civil work is shown in the table below.

Scope	System Modifications	Portion to Directly Interconnect DG Projects	Notes
Install (4) - Manholes and (1,100 feet) - 9-way, 5" PVC DB-60 concrete encased duct bank	78%	22%	Duct occupancy (7/9 and 2/9 respectively)
Install (2) - Manholes and (1,000 feet) - 6 way, 5" PVC DB-60 concrete encased duct bank	67%	33%	Duct occupancy (4/6 and 2/6 respectively)
Install (25) - Manholes and (15,000 feet) - 4 way, 5" PVC DB-60 concrete encased duct bank	50%	50%	Duct occupancy (2/4 and 2/4 respectively)
Install 800 feet - 2 way, 5" PVC DB-60 concrete encased duct bank (MHs to various riser poles)	50%	50%	Based on linear feet

iii. The Customer is paying for the cost of the civil work initially.

f.

i. No, because the project does not meet the definition of an Accelerated Modification under Section 5.4(c) of the Standards for Connecting Distributed Generation, R.I.P.U.C. No. 2244 (“DG Tariff”) because installation falls outside the five-year period as of the date the Company began the impact study for the project. The Company proposes to reimburse the DG developer as described in Section 5.4(b) of the DG Tariff, which reads as follows:

Effective for Renewable Interconnecting Customer Applications filed on or after July 1, 2017, in the event that the Commission determines that a specific System Modification of the electric distribution system benefits other customers and has been accelerated due to an interconnection request and orders the Renewable Interconnecting Customer to fund the modification, the Renewable Interconnecting Customer will be entitled to repayment of the depreciated value of the modification as of the time the modification would have been necessary as determined by the Commission. Subsequent Renewable Interconnecting Customers will be responsible for prorated payments within ten (10) years of the earlier Renewable Interconnecting Customer’s payment toward System Modifications.

The Narragansett Electric Company
d/b/a Rhode Island Energy
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In Re: Review of Administrative Issues
Related to the Interconnection Process
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Responses to the Commission's Fourth Set of Data Requests
Issued on June 14, 2022

PUC 4-1, page 7

- ii. The latest revision of the System Impact Study and the fully executed Interconnection Service Agreements are attached hereto as Confidential Attachments PUC 4-1-1; PUC 4-1-2; and PUC 4-1-3.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 5206
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Attachments PUC 4-1-1 through PUC 4-1-3

REDACTED