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August 17, 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 5 (Complete Set)

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 responses to the Public Utilities Commission’s Fifth Set of Data Requests in the above-referenced matter.

The Company is including its response to PUC 5-1 in this transmittal, which was previously submitted on August 10.

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

Sincerely,

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

Andrew S. Marcaccio

Enclosure

cc: Docket 5205/5206 Service List
Jon Hagopian, Esq.
John Bell, Division

PUC 5-1

Request:

The Company's response to PUC 2-1 states that "[t]he ESB applied to any new applications received after the effective date of the ESB." The last sentence references "applications that have already entered the queue." Response to PUC 2-3 states "Dec: Official Release "Official publication of updated ESB, which applies to all new applications received after the official release date." Company personnel have previously testified that a project does not enter the queue until the application is deemed complete. Under the following hypothetical, which ESB standards apply? ESB standards are updated with an Official Release date of January 2, 2023. An application is submitted on December 30, 2022 but is not deemed complete until January 9, 2023. Which ESB applies (the 2022 version or 2023 version)?

Response:

The 2023 version of the Electric Services Bulletin ("ESB") standards would apply.

Although the application would have been initially submitted prior to the official release date, the interconnection applicant would have had advance notice of the 2023 version of the ESB and its contents approximately 90 days prior to the official release date which, in this hypothetical, would have been around October 4, 2022. The advance notice is consistent with the Standards for Connecting Distributed Generation, R.I.P.U.C. No. 2244,¹ Section 9.4, which describes the establishment of the Interconnection Technical Standards Committee ("ITSC"). Specifically, Section 9.4, in part, provides that:

"When the Company is considering changes that are likely to materially impact proposed Facilities or future applications in this Interconnection Tariff, the Company shall provide a draft of the proposed changes to its standards to the ITSC and Interconnecting Customers with potentially impacted applications prior to those changes going into effect. In non-emergency scenarios, the Company will make reasonable efforts to provide such proposed changes no less than ninety (90) calendar days prior to implementation, and where practicable the Company will take into consideration feedback from the ITSC about how such changes would impact Interconnecting Customers."

¹ Standards for Connecting Distributed Generation, R.I.P.U.C. No. 2244, may be viewed at: https://www.rienergy.com/media/ri-energy/pdfs/billing-and-payments/tariffs/standards_for_connecting_dg.pdf

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PUC 5-2

Request:

Referencing PUC 4-1(a), does the \$4.121M include any of the costs associated with the duct banks in the (e)ii. table?

Response:

No, the \$4.121M referenced in the Company's response to PUC 4-1, part (a) does not include any of the costs associated with the duct banks referenced in the table provided in response to PUC 4-1, part (e)ii. This is consistent with the Company's response to Division 5-1, page 19 in Docket 5209 ("This estimate does not include the civil work that is being performed in coordination with the DG project.").

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PUC 5-3

Request:

Referencing PUC 4-1(e)ii table, please provide more explanation of the column headers "System Modifications" and "Portion to Directly Interconnect DG Projects."

Response:

The column header "System Modifications" is used to designate the portion of the duct bank system that should be installed at the time of DG interconnection but would not be used directly by the DG interconnection. The column header "Portion to Directly Interconnect DG Projects" is used to designate the two ducts (one active and one spare) dedicated to the interconnection.

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PUC 5-4

Request:

Please explain the difference under Tariff RIPUC No. 2244 between the defined term “System Modifications” and the term “Portion to Directly Interconnect DG Projects.”

Response:

As defined in R.I.P.U.C. No. 2244, the term “System Modification” means “[m]odifications or additions to Company facilities that are integrated with the Company EDS for the benefit of the Interconnecting Customer.” The term “Company EDS” refers to the distribution assets owned and operated by the Company, consistent with the Institute of Electrical and Electronics Engineers (“IEEE”) Standard for Interconnecting Distributed Resources with Electric Power System 1547-2003.

The term “Portion to Directly Interconnect DG Projects” is not expressly defined in R.I.P.U.C. No. 2244.

When the Company used these two terms as column headers in the table provided in response to PUC 4-1, part (e)ii., it did not intend to use the applicable tariff definition of such terms and apologizes for any resulting confusion. Please refer to the Company’s response to PUC 5-3 for additional explanation regarding how each term was used in the response to PUC 4-1, part (e)ii.

PUC 5-5

Request:

Using the PUC 4-1(e)ii table, assume the total cost is \$4M, \$1M for each line. Assume further that the cost is exactly the same whether the Company performs the civil work or if the interconnecting customer/developer constructs the civil work.

- a. If the Company was performing the civil work, would the items listed under "Scope" be the same or different? Please explain.
- b. Is the requirement to build a 9-way duct bank (on the first line) when it appears the project does not require all 9 to interconnect a design standard or a construction standard? Please explain. If these are the wrong terms, please clarify and explain.
- c. If the Company was performing the civil work, how would the items listed under Scope be enumerated in the Impact Study and ISA? What cost would be charged in the ISA? Please provide any calculations, referencing the table.
- d. If the interconnecting customer/developer was performing the civil work, is the civil work included in the Impact Study or ISA? Please explain (and if not, please explain how the Scope is communicated to the interconnecting customer/developer).
- e. If the interconnecting customer/developer was performing the civil work, what is the cost responsibility of the developer? Please provide any calculations, referencing the table.
- f. If the responses to 5-5c. and 5-5e. are different, please explain the rationale.

Response:

- a. If the Company was performing the civil work, the items listed under "Scope" would be the same. The duct bank size and configuration are determined by Engineering personnel based on the proximity to the substation and type of street (i.e., main, secondary, etc.).
- b. A 9-way duct bank is typical duct bank configuration near a substation and along main roadways. It is neither a design standard nor construction standard. Duct bank configurations are determined by Engineering. The main costs for a civil installation are the excavation, concrete, road restoration, and traffic protection. Generally, additional ducts add incremental cost to these items in the near-term and provide significant savings in the long term. Because of municipal road cut moratoria and that adding new conduits at a later date to an energized underground system is significantly more expensive, the Company installs an appropriate duct bank for long term cost efficiency.
- c. If the Company was performing the civil work, the items listed under "Scope" would be enumerated in the Impact Study and ISA as shown in the PUC 4-1, part (e)ii table. The cost charged would be the duct bank cost times the percent value in the "Portion to Directly Interconnect DG Projects."

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- d. If the interconnecting customer/developer was performing the civil work, the required civil work is included in the Impact Study or ISA.
- e. If the interconnecting customer/developer was performing the civil work, the developer is responsible for the entire cost of the duct bank.
- f. The Company understands that the responses to parts c. and e. above result in a cost allocation difference between a Company-built duct bank and developer-built duct bank; however, the Company sees no other way than to require the developer to pay for the complete duct bank when self-performing. Currently, the Company would reimburse the developer upon use of the remaining ducts for a system improvement project. The Company is receptive to a different cost recovery method as may be determined in this docket.

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PUC 5-6

Request:

Using the same hypothetical as PUC 5-5, if the Company was performing the civil work using the same Scope as in the table, and assuming further that the customer would only be charged for 2/9 of the 9-way duct bank listed in the first line, where would the Company recover the cost for the remaining 7/9? Please include the timing of that cost recovery. (If the premise of this question is incorrect and the interconnecting customer would be charged for the entire 9-way duct bank, please advise).

Response:

If the Company was performing the civil work using the same Scope as in PUC 4-1, part (e)ii, and the customer would only be charged for 2/9 of the 9-way duct bank listed in the first line, the Company would recover the remaining cost in the infrastructure, safety, and reliability plan for the fiscal year that coincides with the duct bank installation.

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PUC 5-7

Request:

Using the same hypothetical as PUC 5-5, if the interconnecting customer/developer was performing the civil work using the same Scope as in the table, and assuming further that the interconnecting customer would be charged for 9/9 of the 9-way duct bank listed in the first line, how would the interconnecting customer be refunded for the 7/9? Please explain the process and timing. If there might be more than one right answer, please explain.

Response:

The Company believes that R.I.P.U.C. No. 2244, Section 5.4(b) is the applicable provision of the Company's tariff. When the Company determined the scope of work to interconnect the Renewable Interconnecting Customer, it had not conducted the Area Study that identified the needed System Improvements for the 33F6 feeder expansion. Because (1) the in-service date of the study-related 33F6 feeder expansion work is beyond five years from the Impact Study and was not included the Company's work plan to interconnect the Renewable Interconnecting Customer at that time and (2) the study-related 33F6 feeder expansion work is within 10 years of the Renewable Interconnecting Customer's payment toward their System Modifications, the Company would determine the customer's refund amount in accordance with R.I.P.U.C. No. 2244, Section 5.4(b). The Company would evaluate the Renewable Interconnecting Customer's cost of the project when it is placed in service. Upon completion of the study-related 33F6 feeder expansion work, the Company would determine the depreciated value of the original scope installed by the Renewable Interconnecting Customer and refund the remaining value in 2028.

The Company understands that this represents a difference in cost to the Renewable Interconnecting Customer between Company-build and self-build scenarios. Rhode Island Energy is receptive to further discussions on alternative methods of reimbursement to the Renewable Interconnecting Customer than the method currently provided under R.I.P.U.C. No. 2244, Section 5.4(b).

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PUC 5-8

Request:

Did the Company provide a cost estimate for the civil work shown in the PUC 4-1(e)ii table to the interconnecting customer/developer either prior to or after the customer sought to perform the civil work? If so, what was the estimate? If not, why not?

Response:

The Company did not provide a cost estimate for the civil work shown in the table provided in its response to PUC 4-1, part (e)ii. The developer in question requested responsibility for the civil work during the impact study process prior to when estimates are generated.

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PUC 5-9

Request:

Referencing PUC 4-1(f), the Company explained that it would apply Tariff RIPUC No. 2244 Section 5.4(b) Separation of Costs because the System Modification does not fall under the Section 5.4(c) time period. The Company had previously indicated that the expected in-service date for the DG project was November 2022 while the Tiverton Area Study identified the 33F6 feeder to commence design in FY 2024, start construction in FY 2025, and be placed into service in FY 2028.

- a. Using these dates, please explain the process the Company would follow under RIPUC No. 2244 Section 5.4(b).
- b. Please explain if there is any difference between the process and timing for the \$4.121M System Modification Cost and the civil work.

Response:

- a. Please see the Company's response to PUC 5-7.
- b. There is no difference between the process and timing of reimbursement for the \$4.121M System Modification Cost and the civil work.

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PUC 5-10

Request:

With respect to any DG interconnection project to date, including the Tiverton project identified in these data requests has the Company requested a Commission determination “that a specific System Modification of the electric distribution system benefits other customers and has been accelerated due to an interconnection request”?

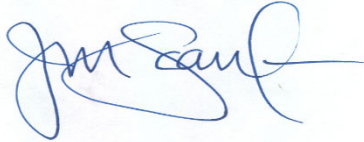
Response:

No, the Company has not requested a Commission determination “that a specific System Modification of the electric distribution system benefits other customers and has been accelerated due to an interconnection request” to date. The Company, however, plans to submit such a request for the Tiverton project identified in these data requests pending the outcome of this docket.

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

August 17, 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 8/11/2022

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