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Also admitted in Massachusetts

April 19, 2024

VIA HAND DELIVERY & ELECTRONIC MAIL

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

**RE: Docket 23-44-REG 2024 Renewable Energy Growth Program
Tariff and Rule Changes
Response to PUC Record Request No. 4**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”), I have enclosed the Company’s response to Record Request No. 4 issued at the Public Utilities Commission’s Evidentiary Hearing on April 9, 2024 in the above-referenced docket.

Thank you for your attention to this matter. If you have any questions, please contact me at (401) 709-3337.

Very truly yours,



Leticia C. Pimentel

Enclosure

cc: Docket 23-44-REG Service List

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate were 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.

Heidi J. Seddon

April 19, 2024

Date

**Docket No. 23-44-REG – Renewable Energy Growth Program for Year 2024
The Narragansett Electric Company & RI Distributed Generation Board
Service List updated 3/4/2024**

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The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 23-44-REG

In Re: 2024-2026 Renewable Energy Growth Program – Classes, Ceiling Prices, and
Capacity Targets and 2024-2026 Renewable Energy Growth Program –
Tariffs and Solicitation and Enrollment Process Rules
Responses to Record Requests
Issued at the Commission’s Evidentiary Hearing
On April 9, 2024

Record Request No. 4

Request:

Please explain the Company’s process to identify projects exempt from the 275MWac cap in the net metering law; process to identify projects that contribute to the cap; process to notify developers; process to track progress toward the cap and to make public; and the timeline.

Response:

Background

In general, all ground-mounted systems within the net metering program associated with a distributed generation (“DG”) application that was submitted to the Company and not considered complete by April 15, 2023 will contribute towards the 275MWac cap (the “Cap”). However, there are several exemptions that apply.

Per the Net Metering Statute, specifically R.I. Gen. Laws §39-26.4-3(a)(1)(vi), the Cap does not apply to projects that:

- (1) Submitted a complete application to the appropriate municipality for any required permits and/or zoning changes as of April 15, 2023; or
- (2) Have requested an interconnection study as of April 15, 2023 for which payment has been received by the distribution company; or
- (3) If an interconnection study is not required, have a completed and paid interconnection application by the date of passage (June 24, 2023).

If any one of the actions above has been executed in time, that project is exempt from the Cap. The Company does not have visibility into exemption (1) above. Therefore, unless an applicant proactively provides documentation to the Company substantiating that exemption (1) has been satisfied, the Company will only focus on exemptions (2) and (3).

Also, per R.I. Gen. Laws §39-26.4-3(a)(1)(vi), the Cap does not apply to projects where:

- (A) The eligible-net metering system is interconnected behind the same meter as the net-metering customer’s load; and or

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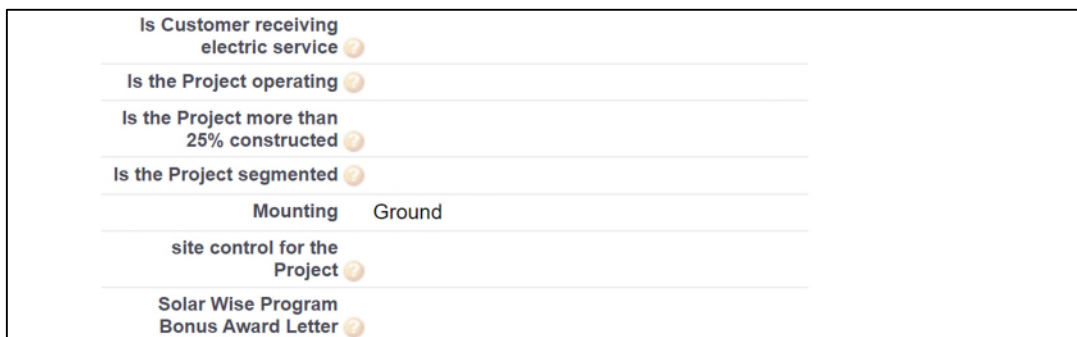
(B) The energy generated by the eligible net-metering system is consumed by net-metered electric service account(s) of the same owner of record that are actually located on the same or contiguous parcels as the eligible net-metering system.

If one of the two conditions above is applicable, the project is exempt from the Cap.

Company’s Process

For any DG application that is not considered complete by April 15, 2023 (including payment received), the Company will review the application to determine whether the associated DG system would contribute to the Cap or not.

The Company reviews the proposed interconnection and site location for the installation type (ground mount, rooftop, etc). If the location is identified as a ground-mount system, “Ground” is entered into a recently created new field within the Company’s Salesforce system entitled “Mounting”. See illustration below.



With this new “Mounting” field, the Company can create a report based on the mounting type. In addition to Mounting status, the Company can filter the report by System Configuration and Incentive. If Mounting is Ground, System Configuration is Standalone (as opposed to Behind Meter Systems), and Incentive is Net Metering Independent Power Producer or “IPP” (IPP reflects that the system is virtual), then the system will contribute to the Cap, subject to the review of the timing exemptions.

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In regard to the timing exemptions, when the Company receives a DG application, it conducts a preliminary screening to determine whether an interconnection study is needed. If one is required, it checks for exemption (2) above, specifically looking at when the interconnection study was requested and whether payment for that study has been received. If an interconnection study is not required, it checks for exemption (3) above, specifically when the application was completed and when payment was received. The date checks are done by running a report in the Company’s Salesforce system.

Notification to Developers

The Company will send an email, a template is currently being drafted, to notify the developer and applicant if the project will contribute to the Cap.

Tracking Progress and Reporting to Public

A report will be compiled on a monthly basis and uploaded to the Rhode Island Energy application website which will indicate 3 categories:

- a. Total number of KW that is in queue to contribute to the Cap;
- b. Total number of KW that is connected and has secured capacity within the Cap; and
- c. Total number of kw remaining which would be the difference between the Cap and a+b.

Timeline

The first report is anticipated to be completed and published on the Rhode Island Energy application website by May 17, 2024. The first batch of emails to developers and applicants notifying them that their project will contribute to the Cap is anticipated to be sent at the same time as the report is completed.

For order of magnitude, based on a preliminary analysis, the Company believes that around 12% of the Cap has been filled to date.