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May 21, 2024

VIA HAND DELIVERY & ELECTRONIC MAIL

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

**RE: Docket No. 23-38-EL – The Narragansett Electric Company d/b/a
Rhode Island Energy’s Petition for Acceleration of a System Modification
Due to Distributed Generation Project
Weaver Hill Project
Responses to Division Data Requests – Set 6**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”), enclosed please find the Company’s responses to the Division of Public Utilities and Carriers’ (“Division’s”) Sixth Set of Data Requests concerning the Weaver Hill Project in the above-referenced docket.

Thank you for your attention to this filing. If you have any questions, please contact me at 401-784-4263.

Sincerely,

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

Andrew S. Marcaccio

Enclosures

cc: Docket 23-38-EL Service List

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 23-38-EL
In Re: Rhode Island Energy's Petition for Acceleration Due
To Distributed Generation Project – Weaver Hill Projects
Responses to the Division's Sixth Set of Data Requests
Issued April 30, 2024

Division 6-1

Request:

Has the Company¹ ever discussed with Green, Revity, EPD and/or any other person or entity, either formally or informally, about the possibility of obtaining reimbursement from ratepayers for some or all of Green's, Revity's and/or EPD's expenditures for all or any part of the Weaver Hill Project²?

If so, (a) provide all written communications, *i.e.*, e-mails, correspondence, *etc.* reflecting the discussions and (b) describe in detail the discussions that occurred to the extent they are not reflected in the written communications provided.

Response:

Yes, the Company has discussed with Green, Revity, and EDP the possibility of obtaining reimbursement from ratepayers for some of Green's, Revity's, and EDP's (now under Revity's control) expenditures for the Weaver Hill Project. As indicated in the Company's response to Division 6-2, the only formal arrangements that came out of the discussions are the Interconnection Service Agreements ("ISA"s) attached as Exhibit EJRS-4, Exhibit EJRS-5, and Exhibit EJRS-6 to the Pre-Filed Direct Testimony of Erica Russell Salk and Stephanie A. Briggs.

The Company notified the Customers that it would file a Petition with the Public Utilities Commission ("PUC") seeking reimbursement to Green, Revity, and EDP (now under Revity control) from ratepayers for work identified in the Central RI West Area Study which benefits distribution customers and has been accelerated. R.I. Gen. Laws § 39-26.3-4.1 was the basis for the Company's reasoning to file the Petition. The Company informed Green, Revity, and EDP (now under Revity control) that the Petition was subject to review and approval of the PUC.

In this case, Green and Revity elected to self-build. As a condition to self-building, Green and Revity were required to build to the Company's standard including installing extra duct to accommodate future needs. The basis being the Company would have included the extra duct work if it built the investment itself. Building out the extra duct work is consistent with how the Company treats both load and distributed generation customers and is good utility practice as it saves customers money over the long term. This extra duct work benefits all distribution customers and, had the work been performed by the Company, the Company would not have initially charged Green and Revity for the extra duct work and included it in the ISR

¹ As used herein, the term "Company" means RIE and National Grid, including any of their affiliates.

² Includes the Nooseneck Project, the Robin Hollow Project and the Studley Solar Project.

The Narragansett Electric Company
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Division 6-1, page 2

reconciliation. Given the timing of the auditing of the duct bank costs and for administrative ease, the extra duct work was initially borne by Green and Revity through its self-build and requested reimbursement to Green and Revity for the extra duct work was included in the Petition for review and approval by the PUC.³

³ Company counsel spoke with Division counsel to let the Division know the Engineering Team checked their emails and did not find any emails with the Customers discussing reimbursement from ratepayers. The Company believes the same applies to its Customer Energy Integration Team; however, the email search was ongoing and Division counsel indicated the ongoing email review is not necessary at this time.

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Division 6-2

Request:

Describe in detail all “arrangement(s)” the Company has reached with Green, Revity, EPD and/or any other person or entity regarding obtaining ratepayer reimbursement for System Modifications and/or Improvements relating to the Weaver Hill Project. Be sure to include in your response the date when the arrangement(s) was/were made, the names of the individual representative(s) who participated in arriving at the arrangement(s), all consideration for the arrangement(s) received and/or given, and the specific terms and/or conditions of the arrangement(s).

Response:

The only formal arrangements the Company has reached with Green, Revity, and EDP (now under Revity control)¹ in connection with the requested ratepayer reimbursement for System Modifications and/or Improvements relating to the Weaver Hill Project are the Interconnection Service Agreements attached as Exhibit EJRS-4, Exhibit EJRS-5, and Exhibit EJRS-6 to the Pre-Filed Direct Testimony of Erica Russell Salk and Stephanie A. Briggs.

Please note that the Company and Revity are negotiating a revised Studley Solar Interconnection Service Agreement (Exhibit EJRS-6) to reflect current project updates. Those revisions are not expected to materially impact the requested approvals contained within the Petition. When a revised Interconnection Service Agreement is executed, the Company will file as “Exhibit ERJS-6B.”

¹ See correspondence from the Company dated April 26, 2024 which memorializes an update in ownership and control of the Studley Solar Project from EDP to Revity.

Division 6-3

Request:

Please provide the Company's best estimate of the date(s) when (a) the Robin Hollow Projects (Revity) and (b) the Studley Solar Project (EPD) will be "completed and placed in service" and provide a detailed description of the physical status of each project as of the date of your response.

Response:

The Robin Hollow Projects were authorized to interconnect on December 23, 2023 and are completed and in-service. The Studley Solar Projects are expected to interconnect and go in-service in December 2024.

The area study Weaver Hill Projects are expected to be completed and in-service as follows:

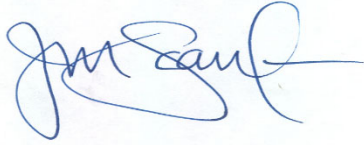
- Subtransmission
 - Substantial completion is estimated for middle to late calendar year 2027 with final completion by March 2029. The subtransmission work should go into service when the substation goes into service between mid to late calendar year 2027 and early calendar year 2029.
- Substation
 - Substantial completion is estimated for middle to late calendar year 2027 with final completion by March 2029. The substation work should go into service when energized and serving customers.
- Distribution Line
 - Projects of this type go into service shortly after specific equipment is installed, energized, and used by customers. While the total project completion date is currently March 2029, portions of the project will be in service prior to that date.

As of the date of this response, the work orders are in design with site delineation and cultural reviews in progress.

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

May 21, 2024
Date

Docket No. 23-38-EL Rhode Island Energy – Petition for Acceleration Due to DG Project – Weaver Hill Projects Service List updated 5/21/2024

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