



TOWN OF PORTSMOUTH  
ECONOMIC DEVELOPMENT COMMITTEE

2200 EAST MAIN RD · PORTSMOUTH, RHODE ISLAND 02871

Dec. 11, 2008

RI Public Utilities Commission  
99 Jefferson Blvd.  
Warwick, RI 02888

Re: Docket 3999

Honorable Commissioners:

The town of Portsmouth provides the following additional comments in the discussion regarding Docket 3999, regarding the changes in the net metering tariff due to the legislation passed in the last session.

We have several comments and suggestions regarding the National Grid filing and the Division responses.

- We are in agreement with the RI PUC Division regarding the statute 39-26-6(g)(3) referring to an unlimited number of accounts, not one or five as per National Grid's tariff filing. Many towns and cities in RI have 20 plus accounts (including Portsmouth) and clearly they are all part of the "Municipal" energy consumption calculation. The intent of the "net billing" section of the new legislation, is to allow municipalities, affordable housing developers, farms, educational institutions, or the Narragansett Bay Commission to apply the energy generated at a site to multiple accounts.
- In the case of a municipality, farm, educational institution, or NBC, the entity producing the electricity and using it or paying the bill would be one in the same. In those cases, then, simplifying the crediting process by applying it to a list of accounts one at a time, would be satisfactory.
- One potential way to avoid the costs associated with manual billing of the multiple accounts would be to allow the utility to pay the qualified entity (a municipality, farm, educational institution, or NBC ) in money rather than credits, and allow the entity to distribute the proceeds.
- We also share the concerns of other commenter's that "the Company and Division's reading of the recovery of costs in 39-26-6(h) is simply the costs to the Company, rather than considering any potentially cost-offsetting benefits such as avoided distribution costs."

We expect that these and other comments will be part of the discussions at the technical review and look forward to this meeting.

Respectfully,  
(Signed)  
Gary Gump  
Chairman PEDC Sustainable Energy Subcommittee

Cc: Dave Faucher  
Richard Talipsky