



Memorandum

From: People's Power & Light,  
represented by Karina Lutz, Advocacy Consultant  
To: RI Public Utilities Commission  
Date: October 14, 2011  
Re: Docket No. 4276, Distributed Generation Interconnection

People's Power & Light's policy agenda in this matter is to see artificial barriers to distributed generation removed from the interconnection process, in order to encourage least cost renewable energy deployment.

The two primary barriers to be removed here are the uncertainty of cost of interconnect and the time to get interconnection study back from the utility. This was the intent of the law. Central to these are the "good faith" provisions of the law and tariff. Engineers may have different ideas of what would work and be safe on a particular project; the company's priority will be on safety over cost (as well it should), but there may be less expensive ways to interconnect that are just as safe. Therefore, there are liable to be disagreements and distrust; good faith is essential to negotiation to find the lowest cost, safe interconnection configuration. If possible, the tariff should describe what kind of evidence would prove "good faith" or lack thereof in interconnection process.

On Sheet 6: What is "the Company's Net Metering Provision," vs the net metering tariff. This language should be clarified to ensure it does not authorize the company to update the policy without coming back to the PUC for approval. Between this set of revisions and those of 2009, National Grid changed it's internal policy without authorization of the PUC or legislature, as indicated in their initial rejection of Church Community Housing Corporation's Sandywoods Farm application for net metering. We believe this section should just refer to the new RIPUC 2074. Also, this definition of net metering is irregular ("a customer" vs a practice) and should conform with statute.

Sheet 9 says, "The crossing of a public way by the Interconnecting Customer with any equipment is prohibited due to public safety reasons." This should cite the appropriate law vs. "public safety reasons." That law may someday change, in certain circumstances, if safety can be provided.

Also on Sheet 9: we ask the Company to spell out the special requirements for 3MW+.

Sheet 26. Presumably National Grid meant "use" not "sue" in: "The Company may, at its sole election, offset net metering credits or any standard contract payments until the full fee(s) is reimbursed, if it finds it administratively convenient to sue [sic] that means of billing for the balance of the fee for a given project."

Sheet 44: Customers should have the option to choose net metering or distributed generation standard contracts, or both (i.e., to contract for the net excess generation).