

July 16, 2014

**VIA HAND DELIVERY & ELECTRONIC MAIL**

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

**RE: Docket Nos. 4277 and 4288**  
**Legislative Amendments to the Distributed Generation (“DG”)**  
**Standard Contracts Program**  
**Revised Enrollment Application and Enrollment Process Rules and Standard Contracts**  
**Responses to PUC Data Requests – Set 1**

Dear Ms. Massaro:

Enclosed are ten (10) copies of National Grid’s<sup>1</sup> responses to the Public Utilities Commission’s First Set of Data Requests concerning the above-reference proceeding.

Thank you for your attention to this filing. Please feel free to contact me if you have any questions concerning this matter at (401) 784-7288.

Very truly yours,



Jennifer Brooks Hutchinson

Enclosures

cc: Dockets 4277 and 4288 Service Lists  
Steve Scialabba, Division  
Leo Wold, Esq.

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<sup>1</sup> The Narragansett Electric Company d/b/a National Grid (“National Grid” or the “Company”).  
280 Melrose Street, Providence, RI 02907  
T: 401-784-7288 ■ jennifer.hutchinson@nationalgrid.com ■ www.nationalgrid.com

Certificate of Service

I hereby certify that a copy of the cover letter and/or any materials accompanying this certificate was electronically transmitted and sent via U.S. Mail to the individuals listed below. Copies of this filing were hand delivered to the RI Public Utilities Commission and to the RI Division of Public Utilities and Carriers.



July 16, 2014

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Joanne M. Scanlon

**Docket No. 4288 – Office of Energy Resources Filings: 1) Proposed Distributed Generation (DG) Standard Contract Act Classes and Ceiling Prices; and 2) Proposed DG Standard Contract; and**

**Docket No. 4277 – National Grid National Grid – Distributed Generation Enrollment Application & Enrollment Process Rules**

**Service Lists updated 3/20/14**

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The Narragansett Electric Company  
d/b/a National Grid  
R.I.P.U.C. Docket Nos. 4277 and 4288  
In Re: Revised Distributed Generation (“DG”)  
Enrollment Application, Process Rules, and Standard Contracts Filed July 9, 2014  
Responses to the Commission’s First Set of Data Requests  
Issued on July 10, 2014

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PUC 1-1

Request:

The form of progress report (Exhibit A) has been re-inserted into the contract for small projects. Please explain why it was previously removed.

Response:

Exhibit A was inadvertently omitted in the previously-filed version and, therefore, is included in the current version of the contract for completeness.

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PUC 1-2

Request:

Please cite the legislative amendment, including title, chapter and section of the general laws, that precipitated the commercial operation dates for hydro and anaerobic digestion (Section 3.1(a)(v) of the Large DG Contract and Section 3.3(c) of the Small DG Contract). If there is no corresponding legislative amendment, what is the reason for this change?

Response:

Rhode Island General Laws §39-26.2-7(2)(iv) states, as amended by the Renewable Energy Growth Act, in part:

“[T]hat if the distributed generation facility has not generated ninety percent (90%) of the output proposed in its enrollment application within eighteen (18) months after execution of the contract, the contract shall be terminated and the performance guarantee shall be forfeited. An eligible small-scale hydropower distributed generation facility that has not generated ninety percent (90%) of the output proposed in its enrollment application within forty-eight (48) months after execution of the contract shall result in the contract being terminated and the performance guarantee being forfeited. An eligible anaerobic digestion distributed generation facility that has not generated ninety percent (90%) of the output proposed in its enrollment application within thirty-six (36) months after execution of the contract shall result in the contract being terminated and the performance guarantee being forfeited.”

With respect to Section 3.1(a)(v) of the Large DG Contract and Section 3.3(c) of the Small DG Contract, the first version of the approved Standard Contract allowed an additional two (2) months to achieve the Commercial Operation Date, beyond the required eighteen (18) month deadline to perform the output demonstration test (i.e. for a total of 20 months). The Company revised Section 3.1(a)(v) of the Large DG Contract and Section 3.3(c) of the Small DG Contract accordingly to allow projects with different statutory deadlines an additional two (2) months to achieve the Commercial Operation Date.

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PUC 1-3

Request:

Are administrative costs associated with distributed generation contracts included in the long-term contract recovery factor pursuant to R.I.G.L. §39-26.2-9 and §39-26.1-5(f)?

Response:

The Company’s Long-Term Contracting for Renewable Energy Recovery Reconciliation Provision, R.I.P.U.C. No. 2125, and Long-Term Contracting for Renewable Energy Recovery Provision, R.I.P.U.C. No. 2127, do not provide for the recovery of the costs associated with administering the long-term contracts and DG standard contracts, with the exception of the administrative costs specific to the Town of New Shoreham and the Town of Johnston projects as specified in Rhode Island General Laws §39-26.1-7 and §39-26.1-9, respectively.

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PUC 1-4

Request:

What is the basis for the change to the Large Solar size (Enrollment Rules, Schedule 2)?  
Cite the title, chapter and section of general laws, if applicable.

Response:

The change corrected an error in the last filed version. The PUC approved the Large Solar Class size from 501-1,250 kW in Order No. 21507, dated July 2, 2014.



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d/b/a National Grid  
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PUC 1-5

Request:

Please confirm whether the definitions for project and class sizes established in the Renewable Energy Growth Act are intended to replace the existing definitions found in §39-26.2-3.

Response:

No, the Renewable Energy Growth Program pertains to a separate tariff program that commences in 2015.

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PUC 1-6

Request:

Will the upcoming tariff to be filed November 15, 2014 pursuant to the Renewable Energy Growth Act replace the existing enrollment rules and standard contract?

Response:

No. The existing Enrollment Rules and Standard Contract are for the current RI DG Standard Contracts program pursuant to Rhode Island General Laws §39-26.2, the RI DG Standard Contracts Act and are applicable for the remainder of the 2014 program year. Rhode Island General Laws §39-26.2-4 of the RI DG Standard Contracts Act states that the program expires by the end of 2014, unless extended by the DG Board.

Additionally, §39-26.6-12(e) explains that any shortfall in the DG Standard Contracts program may be added to the Renewable Energy Growth Program. Unless extended by the Board, it is anticipated that the RI DG Standard Contracts program will no longer be available after 2014.

The Solicitation and Enrollment Rules to be filed November 15, 2014 will be used for the Renewable Energy Growth Program, which commences in 2015.

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PUC 1-7

Request:

Once approved, how long will the Company continue to use the proposed enrollment application, rules and standard contract for distributed generation enrollments?

Response:

The Company will use the DG Standard Contract Enrollment and Process Rules for the remainder of the 2014 program year.

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PUC 1-8

Request:

If not already provided, please explain the effect, if any, of the recently enacted §39-26.6-11 (Renewable Energy Growth Act) on the currently proposed revised DG Standard Contract.

Response:

Please see the Company’s responses to PUC 1-5 and PUC 1-6.

The Narragansett Electric Company  
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PUC 1-9

Request:

Is an expedited approval needed for this filing prior to the beginning of the next enrollment period on July 21, 2014?

Response:

The Company did not anticipate requiring approval for the discreet changes required by the recently amended law. If the PUC determines approval is needed, the Company requests an expedited approval for the next enrollment period on July 21, 2014.