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July 22, 2015

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

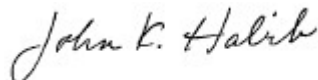
Re: National Grid, Docket 4483

Dear Ms. Massaro:

On behalf of Narragansett Electric Company d/b/a National Grid (the "Company"), please find enclosed the Company's responses to data requests COMM 6-3, COMM 8-1, and COMM 8-2 in the above-referenced proceeding.

Thank you for your attention to this matter. Please contact me if you have any questions regarding the filing.

Very truly yours,



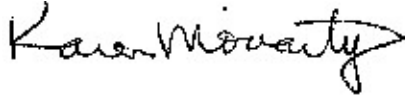
John K. Habib

Enclosures

cc: Docket 4483 Service List  
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Steve Scialabba, Division  
Raquel Webster  
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Certificate of Service

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



July 22, 2015

**Docket No. 4483 – Wind Energy Development LLC & ACP Land, LLC – Petition  
for Dispute Resolution Relating to Interconnection  
Service List updated 4/10/15**

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The Narragansett Electric Company d/b/a National Grid  
R.I.P.U.C. Docket No. 4483  
In Re: Distributed Generation Interconnection Dispute between  
Wind Energy Development, LLC, ACP Land, LLC and  
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Responses to Commission's Sixth Set of Data Requests  
Issued on April 9, 2015

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COMM 6-3

Request:

Section 1.2. Definitions. Sheet 8. Provide the definition of commissioning testing as it appears in IEEE Standard 1547-2003.

Response:

IEEE Standard 1547-2003 is copyrighted by IEEE. Accordingly, the Company is required to seek permission from IEEE to replicate any material included in the document. The Company has attempted several times to reach the appropriate representative of IEEE to acquire the necessary authorization but has been unsuccessful.

To date, the Company has not been asked by applicants to provide the document in the context of processing an applicant's interconnection application. Given that the document is available in the marketplace to engineers, the Company presumes that customers may already have access to the document in the normal course of their businesses. However, given that the document is referenced in the Company's Standards for Connecting Distributed Generation, the Company will work with any customer seeking the document to provide them information how to access it without requiring the Company to violate IEEE's copyright of the material.

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Responses to Commission's Eight Set of Data Requests  
Issued on July 21, 2015

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COMM 8-1

Request:

Reproduce the chart provided in Attachment COMM 7-6, page 2 of 2, with the following two additional rows appearing underneath the row entitled "Interconnected kW." The first row should be labeled, "Time Allowed for Interconnection," which will identify the maximum time allowed for interconnection, pursuant to the terms of the DG Interconnection Tariff, for each of the three categories (expedited, simple and standard). Beneath this row should be an additional row entitled, "Time to Interconnect," which identifies the average number of days the projects in each of the 3 categories (expedited simple and standard) actually took to achieve authority to interconnect.

Response:

The question asks the Company to revise the chart in Attachment COMM 7-6, page 2 of 2, first by adding a row labeled "Time Allowed for Interconnection" which will identify the maximum time allowed for interconnection, pursuant to the terms of the DG Interconnection Tariff...'. However, the DG tariff does not include the times allowed for interconnection. Rather, the timelines in the tariff (see Table 1, Sheet 24), represent the times allowed to process an application, conduct all relevant screens or studies, and deliver an executable interconnection service agreement (ISA), not to interconnect a DG project. So the row "Time Allowed for Interconnection" cannot be determined from the tariff. The time needed for construction is based on the customer and Company construction milestone schedule provided in the ISA, and is determined on a project by project basis. The tariff does not establish a set time allowed for interconnection because it depends on many variables, including, the date when a customer executes the offered ISA, when full payment is made (only the initial payment is due upon execution of the ISA, other payments are detailed in the milestone construction schedule provided within the ISA), weather and permitting, among other factors. On the Company's side, until payment is made complete, construction cannot begin. The Company does begin other work needed (writing of work orders, ordering equipment, and filing for needed permits, such as pole petitions by town, and other local permits) upon receipt of initial payment to comply with the milestone construction schedule provided. In some cases, outages need to be scheduled that can affect other customers, and/or need to be coordinated with the ISO-NE for any project that requires substation upgrades, and other scheduling tasks.

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COMM 8-1, page 2

The Company did analyze the time taken for construction for a limited number of DG Contract projects at the request of the OER last spring, and it averaged approximately 100 business days for those projects with variations between them from customer delays to delays in local permitting. Simplified projects (which rarely require any Company construction) typically only take 1-3 business days to approve for interconnection, but as it is then up to the customer to install the approved system. It is out of the Company's control when such projects actually come on-line.

In order to provide an average numbers of days between the filing of an application and interconnection, the Company would need to research each and every project folder, given that that the time to interconnect each project is project specific. Accordingly, the Company would need additional time to provide this information. The Company does not have an estimate of the time it would take to perform this analysis, but it would be further complicated by the fact that the analysis would be need to be performed by the same personnel who process interconnections applications, which recently have increased significantly due to the opening of the REG program.

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COMM 8-2

Request:

COMM 7-6(c) asks, "For projects that were canceled, include in the chart the specific reasons why any project was cancelled and specify whether the cancellation occurred before or after receiving interconnection approval." Attachment COMM 7-6 (page 2 of 2) shows a number of solar projects that were cancelled without any explanation. Please provide a response to the question posed in COMM 7-6(c).

Response:

Most projects that are cancelled are due to the fact that the customer did not elect to move forward when asked by the Company for either additional information or to move to a next step (i.e., executing study agreements, executing an offered ISA, etc.). None were cancelled after receiving interconnection approval, all were cancelled prior to receiving interconnection approval.

Once a project is studied, the customer then makes a determination whether it wants to move forward. An applicant may or may not proceed through the application process for many reasons. Ultimately, the applicant will decide whether its project is financially viable or not. Once a project is studied, the customer then determines whether it wants to move forward by executing an Interconnection Service Agreement, and then proceeding to construct its project. Although, in most instances, the Company does not have direct information why an applicant may choose not to proceed to execute an ISA, or ultimately construct a project, it appears that many proposed projects simply are not financeable.

The Company has also found that in many instances, applicants simply refuse to provide the Company with information necessary to proceed with studying the applicant's project, or fail to respond to repeated attempts by the Company to contact them. In these instances, such applications become "stale". Although the Company makes every effort keep such projects in the queue, if the presence of an inactive application will affect the Company's study of a different project proposed for interconnection on the same circuit (and likely, the proposed cost to interconnect that second project), the Company must remove such "stale" applications from the queue. The Company routinely removes such "stale" projects from the queue when customers do not meet their applicable timeframes

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COMM 8-2, page 2

for getting information back from the customer, in order to allow more viable projects to move forward.

To provide reasons for any particular cancellation, the Company needs to research every project folder as each project has its unique issues and would need additional time to provide this information. Moreover, the Company may not have any information regarding a customer's motivation for not moving forward with one of its applications, because customers are not required to provide the Company with such information.

Similar to the Company's response to COMM 8-1, the Company does not have an estimate of the time it would take to perform this analysis, but it would be further complicated by the fact that the analysis would be need to be performed by the same personnel who process interconnections applications, which recently have increased significantly due to the opening of the REG program.