

KEEGAN WERLIN LLP

ATTORNEYS AT LAW
265 FRANKLIN STREET
BOSTON, MASSACHUSETTS 02110-3113

—
(617) 951-1400

TELECOPIERS:
(617) 951-1354
(617) 951-0586

April 24, 2015

BY HAND DELIVERY AND ELECTRONIC MAIL

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

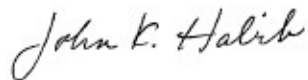
RE: Docket 4483 – In Re: Petition of Wind Energy Development, LLC and ACP Land, LLC Relating to Interconnection

Dear Ms. Massaro:

On behalf of National Grid¹, please find attached the Direct Testimony of Timothy R. Roughan and John C. Kennedy in the above-referenced proceeding.

Please contact me at (617) 951-1400, or Raquel J. Webster at (781) 907-2121 if you have any questions.

Very truly yours,



John K. Habib

cc: Docket 4483 Service List
Leo Wold, Esq.
Steve Scialabba, Division

¹ The Narragansett Electric Company d/b/a National Grid (National Grid or Company).

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.

Copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and the Rhode Island Division of Public Utilities and Carriers.

Joanne M. Scanlon

April 24, 2015
Date

**Docket No. 4483 – Wind Energy Development LLC & ACP Land, LLC –
Petition for Dispute Resolution Relating to Interconnection
Service List updated 4/1/15**

Name/Address	E-mail Distribution List	Phone
Seth H. Handy, Esq. HANDY LAW, LLC 42 Weybosset St. Providence, RI 02903	seth@handylawllc.com	401-626-4839
John K. Habib, Esq. Keegan Werlin LLP 265 Franklin St. Boston, MA 02110-3113	jhabib@keeganwerlin.com	617-951-1400
Raquel Webster, Esq. National Grid 280 Melrose St. Providence, RI 02907	Raquel.webster@nationalgrid.com	401-784-7667
	Thomas.teehan@nationalgrid.com	
	Joanne.scanlon@nationalgrid.com	
	Celia.obrien@nationalgrid.com	
Jon Hagopian, Esq. Division of Public Utilities & Carriers	Jon.hagopian@dpuc.ri.gov	401-784-4775
	Al.contente@dpuc.ri.gov	
	Steve.scialabba@dpuc.ri.gov	
	John.spirito@dpuc.ri.gov	
Original & 9 copies to be filed w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov	401-780-2107
	Amy.dalessandro@puc.ri.gov	
	Todd.Bianco@puc.ri.gov	
	Alan.nault@puc.ri.gov	
Karen Lyons, Esq. Dept. of Attorney General	Klyons@riag.ri.gov	401-222-2424
	jmunoz@riag.ri.gov	
	dmacrae@riag.ri.gov	
Kearns, Christopher, OER	Christopher.Kearns@energy.ri.gov	

**THE NARRAGANSETT ELECTRIC COMPANY
d/b/a NATIONAL GRID
RIPUC DOCKET NO. 4483
IN RE: WIND ENERGY DEVELOPMENT, LLC AND ACP LAND, LLC
PETITION FOR DISPUTE RESOLUTION RELATING TO INTERCONNECTION
WITNESSES: TIMOTHY R. ROUGHAN
AND JOHN C. KENNEDY**

JOINT PRE-FILED DIRECT TESTIMONY

OF

TIMOTHY R. ROUGHAN

AND

JOHN C. KENNEDY

**THE NARRAGANSETT ELECTRIC COMPANY
d/b/a NATIONAL GRID
RIPUC DOCKET NO. 4483
IN RE: WIND ENERGY DEVELOPMENT, LLC AND ACP LAND, LLC
PETITION FOR DISPUTE RESOLUTION RELATING TO INTERCONNECTION
WITNESSES: TIMOTHY R. ROUGHAN
AND JOHN C. KENNEDY**

TABLE OF CONTENTS

I.	Introduction and Qualifications of Timothy R. Roughan	1
II.	Introduction and Qualifications of John C. Kennedy	2
III.	Purpose of Joint Testimony	3
IV.	Conclusion	5

1 **I. Introduction and Qualifications of Timothy R. Roughan**

2 **Q. Mr. Roughan, please state your name and business address.**

3 A. My name is Timothy R. Roughan, and my business address is 40 Sylvan Road, Waltham,
4 Massachusetts 02451.

5
6 **Q. Mr. Roughan, by whom are you employed and in what position?**

7 A. I am employed by National Grid USA Service Company, Inc. (the Service Company) as
8 the Director of Energy and Environmental Policy. My responsibilities include providing
9 regulatory and policy direction on issues relative to distributed generation (DG). I have
10 worked extensively on procedures for interconnecting DG to National Grid USA
11 subsidiaries' electric distribution systems both for Federal Energy Regulatory
12 Commission (FERC) jurisdictional projects at the ISO-NE and NYISO level and for state
13 jurisdictional projects in Rhode Island, Massachusetts, and New York.

14
15 **Q. Mr. Roughan, please describe your educational background and professional
16 experience.**

17 A. I am a 1982 graduate of Worcester Polytechnic Institute (WPI) with a BSME, and have
18 worked for the Service Company or its predecessors for 32 years. During 2002 - 2003, I
19 served as the northeast regional utility representative for a FERC interconnection
20 working group that developed the predecessor to the tariff discussed in this filing. In

1 addition, on behalf of The Narragansett Electric Company d/b/a National Grid (National
2 Grid or the Company), I worked with a DG working group in Rhode Island during 2005 -
3 2006 to develop the original Standards for Connecting Distributed Generation (RIPUC
4 No. 2007), and also the most recent version (RIPUC No. 2078) that was approved by the
5 Rhode Island Public Utilities Commission (PUC) in 2011 (Docket No. 4276).

6
7 **Q. Have you previously testified before the PUC?**

8 A. Yes. I have testified most recently in the Company's 2015 System Reliability
9 Procurement Report proceeding (Docket No. 4528), the Company's fiscal year 2016
10 Electric Infrastructure, Safety, and Reliability (ISR) Plan proceeding (Docket No. 4539),
11 and the tariff advice filing to amend RIPUC No. 2099, Net Metering Provision
12 proceeding (Docket No. 4549).

13
14 **II. Introduction and Qualifications of John C. Kennedy**

15 **Q. Please state your full name and business address.**

16 A. My name is John C. Kennedy, and my business address is 280 Melrose Street,
17 Providence, Rhode Island 02907.

18
19 **Q. Please state your position.**

20 A. I am a Lead Technical Support Consultant – RI, in Technical Sales and Engineering
21 Support group for the Company, a position I have held since September 26, 2011. In this

1 role, I am the Company's liaison to developers and customers seeking to interconnect
2 distributed generation to the Company's electric power system in Rhode Island. In this
3 role, I am familiar with the content and requirements of Tariff No. RIPUC 2078, The
4 Narragansett Electric Company Standards for Connecting Distributed Generation (the
5 DG Tariff).

6
7 **Q. Please describe your educational background and professional experience.**

8 A. I have an Associate Degree in Electrical Engineering from the Community College of
9 Rhode Island. I also have a Certificate in Industrial Management from WPI. I have 31
10 years of experience working for the Company and its predecessor companies in various
11 positions associated with distribution engineering, operations management and
12 emergency planning. Most recently, my responsibilities have focused on customer care
13 associated with distributed generation.

14
15 **Q. Have you previously testified before the PUC?**

16 A. Yes. Most recently, I submitted an Affidavit in Docket No. 4547 regarding a Petition for
17 Dispute Resolution filed by WED Coventry One, LLC.

18
19 **III. Purpose of Joint Testimony**

20 **Q. Mr. Roughan and Mr. Kennedy, what is the purpose of your joint testimony?**

THE NARRAGANSETT ELECTRIC COMPANY
d/b/a NATIONAL GRID
RIPUC DOCKET NO. 4483
IN RE: WIND ENERGY DEVELOPMENT, LLC AND ACP LAND, LLC
PETITION FOR DISPUTE RESOLUTION RELATING TO INTERCONNECTION
WITNESSES: TIMOTHY R. ROUGHAN
AND JOHN C. KENNEDY
PAGE 4 OF 5

1 A. The purpose of our joint testimony is to adopt the Company's January 15, 2015 letter to
2 the PUC in which the Company enclosed and explained its revisions to the DG Tariff,
3 and as further explained in the Company's responses to the PUC's Sixth Set of Data
4 Requests to the Company in this proceeding. As explained in its January 15 letter, the
5 Company made the revisions to the DG Tariff based on feedback it received from
6 developers and other stakeholders at the Company's DG seminars, workshops, and
7 webinar. WED Energy Development, LLC, a party in this proceeding, was among the
8 attendees.

9

10 **Q. Mr. Roughan and Mr. Kennedy, who led the DG seminars, workshops and**
11 **webinar?**

12 A. Both of us led the DG seminars, workshops, and webinar. At these seminars, workshops,
13 and webinar, the Company discussed its current proposed revisions to the DG Tariff with
14 attendees and considered their comments concerning modifications they would like to see
15 in the DG Tariff.

16

17 **Q. Do you have any additional information that you would like to offer through direct**
18 **testimony?**

19 A. We believe that the information provided by the Company in its January 15, 2015 filing
20 letter, along with its responses to the PUC's Sixth Set of Data Requests to the Company,
21 provides the PUC and interested stakeholders with a comprehensive and substantive list

THE NARRAGANSETT ELECTRIC COMPANY
d/b/a NATIONAL GRID
RIPUC DOCKET NO. 4483
IN RE: WIND ENERGY DEVELOPMENT, LLC AND ACP LAND, LLC
PETITION FOR DISPUTE RESOLUTION RELATING TO INTERCONNECTION
WITNESSES: TIMOTHY R. ROUGHAN
AND JOHN C. KENNEDY
PAGE 5 OF 5

1 of changes offered by the Company in its revised DG Tariff. However, to the extent that
2 parties to this proceeding offer testimony that the Company determines is necessary to
3 rebut, the Company will submit rebuttal testimony to address other parties' direct
4 testimony.

5

6 **IV. Conclusion**

7 **Q. Does this conclude your testimony?**

8 **A. Yes.**