

## MEMORANDUM

April 30, 2015

**TO: RHODE ISLAND PUBLIC UTILITIES COMMISSION**

**FROM: RICHARD HAHN, LA CAPRA ASSOCIATES INC., ON BEHALF OF THE DIVISION OF PUBLIC UTILITIES AND CARRIERS**

**SUBJECT: NATIONAL GRID'S STREET LIGHT METERING PILOT PROGRAM PROPOSAL – DOCKET NO. 4513**

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On March 23, 2015, National Grid (“NGrid”) filed a revised version of its proposed street light metering pilot program. On March 25, 2015, the Rhode Island League of Cities and Towns and the Washington County Regional Planning Council (collectively the “Municipalities”) filed an objection to NGrid’s proposed pilot program. In this objection the Municipalities claimed that the proposed pilot exceeded the Commission’s expectation at unnecessary expense to the Municipalities. The Municipalities advocate reliance upon the DOT phase 1 program and the elimination of the single municipal pilot proposed by NGrid. On April 8, 2015, the Commission issued a memorandum seeking the Division’s position on two questions:

1. Is the latest version of the pilot program biased towards ultimate meter ownership by the utility?
2. Could limitations to the pilot, as proposed by the Municipalities, adequately assess “meter accuracy, ability to integrate with the billing system [even if the utility does not own the meters], and a comparison to the unmetered rates”? Can the goals set forth in the PUC Order No. 21704 be met with DOT Pilot Phase 1 or whether the revised pilot filed on National Grid on March 23, 2015 is necessary to meet the goals?

This memorandum presents my response to those questions.

Regarding the first question, I do not believe that the pilot program as proposed by NGrid in its March 23, 2015 filing is biased towards any party owning the meters. In their objection, the Municipalities state that the pilot “seeks to prepare for NGrid’s ownership of the streetlight controllers system by its very design”. The Municipalities also note that ‘the Executive Summary states that “...the Company proposes to investigate similar utility managed network-controlled street lighting infrastructure applications...” (p. 3/49)’. I do not see that the scope of the pilot or this reference biases the pilot towards utility ownership of meters, but the word “utility” can be removed from this sentence in the executive summary without changing the rest of the document.

Regarding the second question, the Municipalities state that National Grid’s proposed pilot has too broad a scope to answer the Commission’s concerns.<sup>1</sup> I disagree. The scope of the pilot is not

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<sup>1</sup> See page 7 of the Municipalities’ objection.

overly broad and is necessary to answer the Commission's questions. One of the key issues in this proceeding is a comparison of energy usage with unmetered LED street lights on a fixed, predetermined operating schedule to the energy usage of LED street lights with controllers and meters. This comparison will help inform whether the incremental cost of installing street light controllers and meters is offset by the additional energy reductions that become possible by individually controlling the output of any street light. Phase 1 of the DOT program involves the installation of 154 LED lights at an intersection of two major highways. There is no assurance that the street lights at a major intersection will be controlled in the same manner as street lights installed on local roads and streets. I would expect that there will be more flexibility, and more potential savings, in controlling street lights on local streets and roads than there will be on major highways, but clearly these two lighting systems are different. The pilot program proposed by NGrid will specifically evaluate street light usage and applications by one municipality, and gather the data needed to answer the Commission's questions.