

December 11, 2014

**BY HAND DELIVERY & ELECTRONIC MAIL**

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

**RE: Docket 4536 - Tariff Advice Filing for Renewable Energy Growth Program and Solicitation and Enrollment Process Rules**  
**Responses to PUC Data Requests – Set 1**

Dear Ms. Massaro:

I have enclosed ten (10) copies of National Grid's<sup>1</sup> responses to the Rhode Island Public Utilities Commission's First Set of Data Requests issued on November 20, 2014 in the above-referenced docket.

Thank you for your attention to this matter. If you have any questions concerning this filing, please contact me at 781-907-2121.

Very truly yours,



Raquel J. Webster

Enclosures

cc: Steve Scialabba, Division  
Leo Wold, Esq., Division

---

<sup>1</sup>The Narragansett Electric Company d/b/a National Grid (National Grid).

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



**Joanne M. Scanlon**

December 11, 2014

**Date**

**Docket No. 4536 – National Grid Renewable Energy Growth Program Proposal  
Service List updated 11/17/14**

<b>Name/Address</b>	<b>E-mail</b>	<b>Phone</b>
Raquel J. Webster, Esq. National Grid 280 Melrose St. Providence, RI 02907	<a href="mailto:Raquel.webster@nationalgrid.com">Raquel.webster@nationalgrid.com</a>	781-907-2121
	<a href="mailto:Celia.obrien@nationalgrid.com">Celia.obrien@nationalgrid.com</a>	
	<a href="mailto:Joanne.scanlon@nationalgrid.com">Joanne.scanlon@nationalgrid.com</a>	
	<a href="mailto:corinne.didomenico@nationalgrid.com">corinne.didomenico@nationalgrid.com</a>	
Jon Hagopian, Sr. Counsel Division of Public Utilities and Carriers 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Jhagopian@dpuc.ri.gov">Jhagopian@dpuc.ri.gov</a>	401-784-4775
	<a href="mailto:Sscialabba@dpuc.ri.gov">Sscialabba@dpuc.ri.gov</a>	
	<a href="mailto:Acontente@dpuc.ri.gov">Acontente@dpuc.ri.gov</a>	
	<a href="mailto:Jshilling@dpuc.ri.gov">Jshilling@dpuc.ri.gov</a>	
Richard Hahn Lacapra Associates 1 Washington Mall, 9th floor Boston, MA 02108	<a href="mailto:rhahn@lacapra.com">rhahn@lacapra.com</a>	
	<a href="mailto:apereira@lacapra.com">apereira@lacapra.com</a>	
Karen Lyons, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	<a href="mailto:Klyons@riag.ri.gov">Klyons@riag.ri.gov</a>	401-222-2424
	<a href="mailto:dmacrae@riag.ri.gov">dmacrae@riag.ri.gov</a>	
	<a href="mailto:jmunoz@riag.ri.gov">jmunoz@riag.ri.gov</a>	
<b>File an original &amp; 9 copies w/:</b> Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a>	401-780-2107
	<a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov</a>	
	<a href="mailto:Todd.bianco@puc.ri.gov">Todd.bianco@puc.ri.gov</a>	
	<a href="mailto:Amy.Dalessandro@puc.ri.gov">Amy.Dalessandro@puc.ri.gov</a>	

COMM 1-1

Request:

- a) Please confirm that 1) the proposed tariff, R.I.P.U.C. No. 2151, allows a residential customer to install a small scale solar project (less than 25 kW) and 2) No other types of renewable technologies, other than solar, are allowed to be installed by an A-16 or A-60 customer.
- b) Please explain the policy reason for limiting residential customers to small scale solar, regardless of whether it is driven by statute.

Response:

- a) 1) The proposed Renewable Energy Growth (RE Growth) Program for Residential Customers tariff, RIPUC No. 2151 (Residential Tariff) only allows for the installation of small-scale solar projects that are less than 25 kW.  
  
2) A customer receiving retail delivery service on Rates A-16 or A-60 could potentially participate in the RE Growth Program under the proposed RE Growth Program for Non-Residential Customers tariff, RIPUC No. 2152 (Non-Residential Tariff), and install a generation resource other than solar as long as that resource is not used to provide the customer's on-site use, as provided for in Section 1 of the proposed Non-Residential Tariff.
- b) The provisions of the proposed Residential Tariff require the customer to utilize the installed generation resource to supply the customer's on-site load. Further, the proposed tariff provisions require that the customer must meet the eligibility criteria of the Company's Net Metering Provision, which requires that the size of the generating resource be no larger than what is required to meet the customer's historical three-year average on-site load. Because the proposed minimum size unit capacity of the renewable energy classes other than solar is likely to be too large to serve a residential customer's load requirements, from a practical perspective, the proposed Residential Tariff does not allow for the installation of renewable generation other than solar.

The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 4536  
In Re: Renewable Energy Growth Program Proposal  
Responses to Commission's First Set of Data Requests  
Issued on November 20, 2014

---

COMM 1-2

Request:

R.I.G.L. §39-26.6-5(c) states,

“In proposing the tariff(s) and solicitation rules applicable to each year, the tariff(s) and rules shall be developed by the electric distribution company and will be reviewed by the office and the board before being sent to the commission for approval. *The proposed tariffs shall include the ceiling prices and term lengths for each tariff that are recommended by the board.*”  
(Emphases added.)

Why weren't the ceiling prices included in the tariff proposal, as required by the foregoing statute?

Response:

The Rhode Island Distributed Generation Board is responsible for developing and proposing the ceiling prices and term lengths, which were not available when the Company was required to make its filing of the program documents on November 14, 2014. As soon as the ceiling prices and term lengths applicable to each renewable energy resource class are available, the Company will add them to the proposed tariff and make a supplemental tariff filing with the PUC. Please also see the Company's responses to COMM 1-3 and COMM 1-4.

The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 4536  
In Re: Renewable Energy Growth Program Proposal  
Responses to Commission's First Set of Data Requests  
Issued on November 20, 2014

---

COMM 1-3

Request:

The Company describes a statutory timeframe on page 10 of the filing. According to the timeline, the Board submits recommendations to the PUC “after November 15, 2014.” Provide the statutory citation requiring the Board to file recommendations “after November 15, 2014.”

Response:

The Renewable Energy Growth Program statute does not expressly require the DG Board to file its recommended ceiling prices or term lengths and targets for the first program year “after November 15, 2014”. The timeframe described on page 10 of the Company’s filing reflects the timeframe for filing the DG Board’s recommendations that was discussed at recent meetings of the DG Board.

The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 4536  
In Re: Renewable Energy Growth Program Proposal  
Responses to Commission's First Set of Data Requests  
Issued on November 20, 2014

---

COMM 1-4

Request:

Executive Summary, page 4, states that the Company will submit a supplemental filing after the PUC rules on the DG Board's ceiling price and targets recommendations. Cite the statutory provision(s) that require(s) the Company to file an initial tariff without the ceiling prices and targets and a second, amended tariff including the ceiling prices/targets.

Response:

The Renewable Energy (RE) Growth Program statute requires the Company to submit its initial tariffs and solicitation and enrollment process rules to the Rhode Island Public Utilities Commission (PUC) by November 15, 2014 (see R.I. Gen. Laws § 39-26.6-10(a)) and to include the ceiling prices and term lengths in the tariff provisions (see R.I. Gen. Laws § 39-26.6-5(c)). When the Company submitted its filing to the PUC on November 14, 2014, the ceiling price and term length recommendations applicable to each renewable energy resource had not yet been finalized. The Company understands that the DG Board plans to finalize its recommendations at its next meeting scheduled for December 15, 2014. Once the DG Board finalizes its recommendations, and files them with the PUC, the Company will submit a supplemental tariff filing to the PUC that includes the recommended ceiling prices and term lengths in the proposed tariff supplements initially filed with the PUC. As part of this proceeding, the PUC could establish a timeframe for filing the ceiling price and term length recommendations for future years.

COMM 1-5

Request:

Page 23 (lines 6 -9) of the joint testimony states that if the project does not provide an output certification by the applicable deadline, the COE will be voided and the performance guarantee deposit forfeited.

- a. Explain why R.I.P.U.C. No. 2152 does not contain a provision stating that the certificate of eligibility will be voided and the performance guarantee forfeited if the output certification is not provided on time. The tariff merely states that *if the customer terminates the DG project* prior to operation, the deposit is forfeited.
- b. If the premise of the question in paragraph (a) incorrect, and the tariff *does* contain a provision stating that the deposit is forfeited if the output certification is not provided on time, cite the page number of the tariff containing this provision.
- c. Referring to Sheet 7 of R.I.P.U.C. 2152, in the first paragraph, does the phrase "Output Certification" in this context refer to producing the output certification document or demonstrating the output projected in the certification document?

Response:

- a. The certificate of eligibility will be voided and the performance guarantee will be forfeited if the output certification is not provided on time. The Company will submit a revised version of RIPUC 2152 clarifying this treatment.
- b. RIPUC 2152 does not currently contain a provision stating that the certificate of eligibility will be voided and the performance guarantee will be forfeited if the output certification is not provided on time. The Company will submit a revised version of RIPUC 2152 clarifying this treatment.
- c. The phrase "Output Certification" in the first paragraph on Sheet 7 of RIPUC 2152 refers to the output certification document.

COMM 1-6

Request:

Complete the following.

- a. True/False. The customer is not eligible to received PBI until the output certification is received.
- b. True/False. A customer may take as long as 48 months (hydropower), or even longer if extensions of time are given, to provide the output certification.
- c. True/False. Assuming a customer that does not have a small or medium scale solar project provides the output certification within the appropriate time frame but does not demonstrate within 90 days of providing such certification that its operation has achieved "expected availability and capacity," as outlined in the output certification, the customer will not be eligible to receive PBI payments.

Response:

- a. True.
- b. True.
- c. False. Assuming that a customer has provided the Output Certification within the appropriate time frame, to be eligible to receive PBI payments, the customer has 90 days to meet the other conditions outlined in Sections 8.e and 9.c of proposed RIPUC 2152. The Company does not intend to include an additional requirement of achieving "expected availability and capacity" beyond the Output Certification. The Company will revise the proposed tariffs and rules to clarify this by removing the text in Section 3.e of the proposed tariff and Section 2.3.2 of the proposed rules regarding the operation at expected availability and capacity.



The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 4536  
In Re: Renewable Energy Growth Program Proposal  
Responses to Commission's First Set of Data Requests  
Issued on November 20, 2014

---

COMM 1-7

Request:

If commercial and large scale solar customers are not eligible to receive PBI payments unless they demonstrate the output specified in the output certification, this should be clearly stated in section 8.a. of R.I.P.U.C. No. 2152 which covers eligibility for receiving PBI payments. Explain why the Company has not made this clear in the section covering eligibility for PBI payments (R.I.P.U.C. No. 2152, Sheet 7).

Response:

Demonstration of output is not required for a customer to be eligible to receive PBI payments. Once the Company receives the Output Certification, and the customer meets the other requirements of Section 8.a., the customer will receive PBI payments based upon the actual generation of the resource.

COMM 1-8

Request:

The output demonstration test in the former standard contract program required a demonstration of 90% of proposed output for 4 consecutive hours, with adjustments allowed for factors beyond the developer's control. According to the definition of output certification in the tariff, it appears the 4-hour requirement and adjustments were eliminated. Why were these provisions eliminated? Will the new output certification lead to more forfeitures of deposits?

Response:

The requirement for an output demonstration test was eliminated to make the Renewable Energy Growth Program more user-friendly. Because of the intermittent nature of the projects eligible to participate in this program, it is difficult for a project to produce the output proposed at any certain time. To accommodate for this, the Company previously required a four-hour test that could be adjusted to account for the lack of motive energy (wind speed or insolation). To ease the administration of this requirement for projects, the Company is proposing to eliminate the requirement for an output demonstration test and instead require an Output Certification, which is a certification by a licensed engineer that the project is capable of the proposed output. The Company believes that this new output certification will benefit projects and will not lead to more forfeitures of deposits.

The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 4536  
In Re: Renewable Energy Growth Program Proposal  
Responses to Commission's First Set of Data Requests  
Issued on November 20, 2014

---

COMM 1-9

Request:

Does National Grid have a standard form for the output certification, or will each individual project submit a unique certification document? If each project will submit a unique output certification, will this lead to variations in the interpretation of output and inequitable results?

Response:

The Company will have a standard form for the output certification and will post this document to the Company's Renewable Energy Growth Program website prior to the first enrollment of the 2015 program year.

The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 4536  
In Re: Renewable Energy Growth Program Proposal  
Responses to Commission's First Set of Data Requests  
Issued on November 20, 2014

---

COMM 1-10

Request:

Referring to Sheet 4 of R.I.P.U.C. No. 2152, subparagraph (e), define in detail what the Company means by “expected availability and capacity.” Does it mean the availability and capacity of the energy output of the project as specified in the output certification, or does it mean the availability and capacity of the project measured by some other standard?

Response:

Please see the Company's response to COMM 1-6. The Company does not intend to include an additional requirement of achieving “expected availability and capacity” beyond the Output Certification. The Company will revise the proposed tariffs and rules to clarify this by removing the text in Section 3(e) of the proposed tariff and Section 2.3.2 of the proposed rules regarding the operation at expected availability and capacity.

COMM 1-11

Request:

Page 24, line 6, of the joint testimony, states that the output certification is required in lieu of the output demonstration test. If there is no test to determine whether the project is capable of producing the output claimed in the certification, other than the test(s) presumably performed as part of the output certification, how will the Company determine within 90 days whether the project has achieved operation "at expected availability and capacity" and satisfied the eligibility requirement in Section 3(e) of the tariff (R.I.P.U.C. 2152). How will the customer know it has satisfied this requirement and is eligible to receive PBI payments?

Response:

Please see the Company's response to COMM 1-6. The Company does not intend to include an additional requirement of achieving "expected availability and capacity" beyond the Output Certification. The 90-day period after Output Certification is intended to provide the project time to comply with the other requirements of the RE Growth Program. The Company will revise the proposed tariffs and rules to clarify this by removing the text in Section 3(e) of the proposed tariff and Section 2.3.2 of the proposed rules regarding the operation at expected availability and capacity.

COMM 1-12

Request:

Page 26 (lines 6-8) of the joint testimony states that an applicant may not terminate a project once a COE has been issued unless agreed by the Company. The testimony states the Company would agree to a termination if an extreme weather event destroys the project. Sheet 4 of R.I.P.U.C. No. 2152 simply states that if the applicant terminates the project, the deposit is forfeited.

- a) Cite the tariff provision stating that an applicant may not terminate a project once a COE has been issued unless agreed by the Company. If there is no such tariff provision, explain why.
- b) Explain why the tariff does not contain a provision stating that the Company will not unreasonably delay or withhold consent to termination by the Applicant?
- c) If a hurricane destroyed a project in the sixth month of the project, would the Company refund the last 6 months of the performance deposit?
- d) Explain why the tariff does not cover deposit forfeitures in the event of termination due to extreme weather events.

Response:

- a) Section 11 (Sheet 9) of proposed RIPUC No. 2152 (Non-Residential Tariff) contains the termination provisions of the tariff. The second sentence in section 11 states, "[t]he Applicant and the Customer may not terminate their obligations under this Tariff unless and until the Company consents to such termination."
- b) The third sentence in Section 11 of the Non-Residential Tariff states: "The Company will not unreasonably delay or withhold its consent to an Applicant's request to terminate if the Applicant cannot fulfill the obligations because of an event or circumstance that is beyond the Applicant's reasonable control and for which the Applicant could not prevent or provide against by using commercially reasonable efforts."
- c) No. Section 3 of the Non-Residential Tariff would require that the remaining amount of the Applicant's Performance Guarantee Deposit (Deposit) be forfeited in the event that the project is destroyed by a hurricane prior to the refund of the entire Deposit.

COMM 1-12, page 2

- d) Section 3 of the Non-Residential Tariff provisions reflect the statutory requirements of R.I. Gen. Laws § 39-26.2-7(2). The Company recognizes that there may be circumstances under which an Applicant/Customer may not be at fault for the non-performance or destruction of its project or facility. However, the statute at § 39-26.2-7(2)(iv) does not provide for exceptions to the forfeiture of the deposit for non-performance, such as *force majeure* events. An Applicant in the situation mentioned in COMM 1-12 c) would be able to rebuild the project, continue performing under the Certificate of Eligibility, and receive the rest of its Performance Guarantee Deposit. Each circumstance that may fall into this type of situation is also likely to have a unique set of facts and issues surrounding the Applicant/Customer's claims. Therefore, the Company has included a provision in Section 10 that provides that disputes of any nature that are not resolved between the Company and the Applicant/Customer may be brought to the PUC for resolution.

COMM 1-13

Request:

The following questions pertain to the DG informational website referred to on page 15, line 13.

- a) Pending completion of the website, does National Grid intend to give project developers a copy of the applicable tariff?
- b) Provide a date certain when the Company will be finished updating the website so that it contains all applicable tariffs, enrollment and solicitation rules, interconnection requirements and frequently asked questions.
- c) Provide the link to the DG informational website.
- d) Describe the type and number of employees (beyond "customer-facing") that will be required to have training to answer questions about the REG program. Provide the name and position title of the individual(s) who will conduct training.

Response:

- a) Yes, pending completion of the Company's Renewable Energy (RE) Growth Program website, the Company will provide copies of the approved tariffs to developers, or provide a link to the Company's website where the tariffs will be posted.
- b) The Company is targeting a launch date of April 1, 2015 for the website.
- c) The website is under development and there is not currently an established website link. When the website link is available, the Company will notify the PUC.
- d) In order to respond to customer inquiries regarding the RE Growth Program, the Company intends to provide training to individuals in the following departments:

Energy Procurement – This group will respond to requests from developers.

Customer Order Fulfillment – This group will be responsible for addressing issues related to residential customer interconnection and rate and tariff application.

Technical Sales and Engineering Services – This group will be responsible for addressing issues related to non-residential customer interconnection and rate and tariff application.



COMM 1-13, page 2

Customer Contact Center – This group will be responsible for responding to customer inquiries regarding billing.

The Company has not fully developed its RE Growth Program training and implementation plan at this time and, therefore, cannot provide the name of the person or persons responsible for performing the required training. The Company will provide periodic updates to the PUC regarding the status of the Company's training and implementation plans as the Company continues to develop its plans throughout the course of this proceeding.

COMM 1-14

Request:

The Company states on page 30 of the joint testimony that residential customers with small scale solar projects will not sell energy and capacity to the Company through the REG program. It also states that all energy produced will be deemed consumed on-site. Please clarify whether residential small scale solar projects will be allowed to net meter.

Response:

Residential Customers<sup>1</sup> who install small-scale solar projects are required to utilize the generation of the resource to supply on-site usage pursuant to R.I. Gen. Laws § 39-26.6-21 and the provisions of RIPUC No. 2151, Renewable Energy Growth Program for Residential Customers (Residential Tariff). Section 7 of the Residential Tariff also requires that Residential Customers meet the applicable requirements of the Company's Net Metering Provision. The Net Metering Provision requires that the customer's generation resource must be sized to be no larger than what is required to meet the customer's on-site load, as determined by the customer's historical three-year average kWh usage. The intent of this provision is to ensure that kWh generated by the customer's resource will be consumed on-site by the customer and to limit the net export into the Company's distribution system. While the Company expects that such a customer may have net export in certain months due to the type and operation of the customer's resource, over the duration of the Program Year, the Company expects that the net export will be minimal. Therefore, the Company will purchase only Renewable Energy Certificates from residential customers.

---

<sup>1</sup> Customers receiving retail delivery service on Rates A-16, Basic Residential, or Rate A-60, Low Income Residential.

The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 4536  
In Re: Renewable Energy Growth Program Proposal  
Responses to Commission's First Set of Data Requests  
Issued on November 20, 2014

---

COMM 1-15

Request:

Explain what is meant by “net of station service, if any” in R.I.G.L. 39-26.6-20(d).

Response:

Station service is energy produced by the DG Project that is used to operate auxiliary equipment and other load that is directly related to the production of energy by a DG Project and that reduces the gross electric output of the generator. Station service is sometimes referred to as parasitic load.

In Re: Renewable Energy Growth Program Proposal  
Responses to Commission's First Set of Data Requests  
Issued on November 20, 2014

---

COMM 1-16

Request:

Although zonal incentives (page 34) are not included in the proposal at this time, are there any geographical areas the Company has already identified for possibly implementing zonal incentives in subsequent program years? If yes, please identify these areas and the reason(s) they are considered appropriate for zonal incentives.

Response:

Yes, the Company has identified at least one area that may be a candidate for zonal incentives: the geographical area of the System Reliability Procurement (SRP) Pilot program, in part of Tiverton and all of Little Compton. A study conducted by Peregrine Energy Group for the Company and the Rhode Island Office of Energy Resources (OER), included as Attachment COMM 1-16, identifies how solar photovoltaics (PV) could be incentivized to provide optimal load relief in this area. The OER is currently implementing a SRP Solar Pilot utilizing funds from the Regional Greenhouse Gas Initiative credit sales, through which it will provide incentives to residents and business to invest in solar PV and provide additional load relief in the SRP Pilot footprint, with a goal of 250 kW of peak load reduction. Following the outcome of this initial Solar Pilot, the Company will assess any reports on the success of the pilot, and the status of the potential upgrade deferral. The Company will use this information to determine whether additional incentives in that area for load relief from solar PV installations would be cost effective. If so, the Company may propose to offer zonal incentives in the future in that area for that purpose.

Other areas of the state have recently been studied (Quonset Point and Pawtucket), but these areas were not found to be candidates for non-wires alternatives and, therefore, the Company concludes there are no opportunities for zonal incentives for load relief or other non-wires alternatives.



## Solar PV for Distribution Grid Support:

*The Rhode Island System Reliability Procurement  
Solar Distributed Generation Pilot Project*

*June 30, 2014*

Prepared by

Peregrine Energy Group, Inc.

2 Oliver Street, Boston MA 02109

Francis Cummings, Project Manager

with

Charles P. Salamone, PE, Cape Power Systems

Mark Farber

Richard C. Gross, PE

## Solar PV for Distribution Grid Support:

*The Rhode Island System Reliability Procurement  
Solar Distributed Generation Pilot Project*

### Contents

Introduction and Executive Summary	1
1. Solar Distribution Contribution	5
2. Developing a Grid Support Solar Field	11
3. Solarize Campaign For Rooftop Installations	17
4. Pilot Schedule	21

## INTRODUCTION AND EXECUTIVE SUMMARY

National Grid and the Rhode Island Office of Energy Resources (OER) have initiated this study to:

- 1) understand the extent to which solar distributed generation (DG) resources can provide 250 kW of reliable load relief at times of peak demand that could lead to a distribution investment deferral; and
- 2) gain insight into the associated costs and benefits of using DG resources as part of a distribution system reliability portfolio.

The context for this project is the System Reliability Procurement (SRP) Pilot that National Grid is conducting to assess load relief from energy efficiency and demand reduction in the communities of Tiverton and Little Compton, Rhode Island. <sup>[ES-1]</sup> This study outlines the potential for a pilot program of installing solar PV for load relief that is additive to and integrated with National Grid's existing SRP Program, but is funded by the OER and not through the existing SRP budget. Loads are more residential in composition here than the statewide or regional averages and therefore peak later on a summer day.

The capability of PV to generate power in the Pilot area is essentially known for each hour of the day during the summer under optimal conditions. The main factors subject to uncertainty for distribution planning are:

- the time of day at which the relevant load will reach its highest peak of the summer, <sup>[ES-2]</sup> and
- the extent of reduction in PV output that can be expected at that time, primarily due to cloud cover.

Solar Distribution Contribution. This study therefore analyzes the hourly load on the relevant portion of the distribution system ("feeder 4") for each hour of the 3-year period 2011 through 2013. For each of these hours we compared the load with the solar output that would have been achieved given actual historical conditions. <sup>[ES-3]</sup> Based on this historical data, we developed a method to calculate the Distribution Contribution Percentage or "DCP" of solar PV, to determine the level of solar capacity that would assure that the 250 kW deferral need could be met for the few highest-load summer hours when it is actually required.

The resulting DCP metrics are presented in Figures 7 and 8 on page 8. We used these DCP values to evaluate multiple solar DG configurations for each of the three years for which load data was available.

- *Example:* a solar configuration with a fixed solar array facing 200 degrees (almost southwest) would provide a DCP of 46% of the kW capacity of the array. This means that to provide 250 kW of sustained, reliable load relief, a total of 540 kW of solar would have to be installed (540 kW capacity x 46% DCP = 250 kW deferral).

The 46% Distribution Contribution Percentage in this example for a southwest orientation is substantially better than the 26% DCP of a typical south-facing PV array. The highest Distribution Contribution was 61% for a system with dual-axis tracking.

## Executive Summary (continued)

Cost of Optimizing PV for Distribution Support. To assess the net value of different PV configurations for load relief, one question is whether the value of the distribution deferral benefit from solar PV is greater than the cost of achieving it. The costs and benefits of using these solar DG resources as part of a distribution system reliability portfolio can be analyzed on the basis that the costs would include only the incremental costs of, or lost revenues from, optimizing the solar systems for distribution deferral, and not the base level of cost for a solar array built to maximize energy production. The solar system(s) would likely be owned by private companies or residents, and those private owners would realize the benefits of the energy generation and so would pay the conventional costs of the solar systems.

The cost to achieve the distribution deferral (from fixed-array configurations) is only the incremental cost of lower annual energy generation that results from facing the PV to the southwest (in the example above) instead of the south.<sup>[ES-4]</sup> This is discussed in Section 2.4, Incremental Incentives to Optimize Distribution Contribution.<sup>[ES-5]</sup>

- *Example:* in the Tiverton and Little Compton area, each kW of solar capacity will generate approximately 1,463 kWh if it is facing south (180 degrees), but only 1,309 kWh if it is facing 220 degrees – a modest 5% reduction of 74 kWh/year. This cost amounts to \$145/kW in present value terms (from Figure 13, page 13, columns E and F).<sup>[ES-5]</sup>

Distribution Benefits of Solar PV. The analysis of the distribution contributions of solar PV in this geographic area shows the potential for significant economic benefits from deferring the distribution investment that is the target of the SRP pilot.

- *Example:* The incremental benefit of changing the orientation from 180 to 220 degrees, to continue the example above, is estimated to be \$652 for each solar kW installed (from Figure 13, column D) -- significantly greater than the \$145/kW cost. This benefit is based on the difference between the Distribution Contribution Percentage of 46% for a 220 degree orientation and the 26% DCP for south (an increment of 20%) times the present value of the deferral savings and avoided distribution cost.

Economic Comparison of Solar PV Configurations. The different solar configurations have different levels of benefits for distribution deferral, as well as different levels of incentives to optimize these distribution contributions.

- Tracking configurations have relatively high DCPs in the range of 60%, though their viability for this Pilot in the short term will depend on incremental capital and operating costs that are difficult to predict meaningfully.
- For fixed solar arrays, there are diminishing returns as the azimuth orientation moves toward the west, with smaller and smaller increases in the DCP. At the same time, increasing incentives would be required to offset greater reductions in annual output as orientation nears the west. The highest level of net distribution benefits are obtained from orientations of approximately 220 degrees for residential projects (with DCP of approximately 46%) to 230 degrees for fixed-array commercial projects (with DCP of approximately 49%). These analyses are described in Sections 2.4 (for ground-mounted solar projects and 3.3 (for rooftop PV projects).



## Executive Summary (continued)

**Solar Pilot Resource Portfolio.** A portfolio was developed as a target for this SRP Solar Pilot or an example of what could be expected. These resources are sized to meet the 250 kW deferral goal based on the ranges of DCP values summarized above, as shown in the table below (Figure 1):

- *Grid Support Solar Field:* one commercial-scale ground-mounted solar project of approximately 280 kW, or greater, addressed in Section 2, providing over half of the deferral goal (approximately 140 kW based on a Distribution Contribution Percentage of 50%), or a small number of projects with the same total size;<sup>[ES-5]</sup>
- *Solarize Campaign:* a mix of residential PV systems (totaling 160 kW) and small nonresidential rooftop systems (averaging 25 kW), with a total of at least 200 kW and providing approximately 110 kW or more of distribution contribution based on an average DCP of 45%.<sup>[ES-6]</sup> These 30 to 35 smaller installations, discussed in Section 3, will diversify the portfolio to offset risks such as the possibility that one or more larger solar fields could be delayed in development.

**Figure 1: Solar / Storage Resource Portfolio**

	1	2	3	4
	Grid Support Solar Field(s)	Solarize Residential	Other Small Projects	Total
1 Gross Capacity (kW)	280	160	80	520
2 Average Distribution Contribution Percentage (DCP)	50%	45%	45%	
3 Distribution Contribution (kW)	142	72	36	250
4 Portfolio Allocation	57%	29%	14%	100%

These resources are described further in sections 2 and 3.

**PV Procurement for Distribution Contribution.** This portfolio can be used as a general guide to procure the most attractive distribution support options for this Pilot by offering incremental rebates designed to incent interested solar developers and owners to design PV systems with high distribution contributions.

- For the Solar Field, a competitive process would provide PV developers the opportunity to submit a bid for a grant to offset the incremental costs of optimizing the distribution contribution. Each bidder would propose a particular PV orientation or tracker configuration for a specific site in the Pilot areas, and would propose a grant amount. A grant would be awarded to the bidder whose bid is scored as providing the greatest net distribution benefit, and that bidder could then develop the PV project for submission in the next round of the DG Standard Contract process.
- For the Solarize Campaign, a rebate would be calculated for each 10 degrees of orientation to the west of south, and offered as an “instant rebate” directly to each of the 30 to 35 participating customers in the Pilot area. For purposes of this pilot, it is understood that the grant funding for any rebates and adders would be provided by the RI OER from funding available for this purpose.

**Implementation Schedule.** A schedule for the SRP Solar Pilot is provided at the conclusion of this report, in which 80% of the resource portfolio becomes operational for distribution support in approximately 12 months, before the summer of 2015. Success in meeting this schedule will depend on the response of the markets to the SRP procurements, and also the avoidance of delays in the development process.

## Executive Summary (continued)

Footnotes: Executive Summary

- ES-1: 2014 System Reliability Procurement Report, The Narragansett Electric Company d/b/a National Grid, R.I.P.U.C. Docket No. 4453
- ES-2: Solar PV generation corresponds well with the peak periods for the wholesale power markets and the transmission system. In fact, all the PV configurations studied for Tiverton generate at least 66% of their annual output during peak periods. However, to provide distribution system capacity, PV output is needed during just one or a few peak summer hours.
- ES-3: The analysis of hourly PV production for the SRP Pilot area was conducted by Clean Power Research with the SolarAnywhere® Data system. <http://www.cleanpower.com/products/solaranywhere/sa-data/>
- ES-4: For tracking configurations, output and DCP are high but there may be increases in capital and operating costs in order to achieve the incremental Distribution Contribution. These incremental costs are not reflected in the analysis of fixed arrays.
- ES-5: The 50% DCP used for the solar fields in the portfolio summary is approximately the DCP of the PV orientation (230 degrees) with the greatest Net Distribution Benefit in Figure 13 on page 13. 50% is also the expected value DCP based on an equal probability of development for each fixed orientation from 200 degrees through 260 degrees and for single-axis and dual-axis tracking.
- ES-6: “Solarize” is a term for local campaigns that increase penetration and drive down installation prices. For a description of the approach in Massachusetts, see <http://www.masscec.com/solarizemass>. The 45% DCP used for the solarize PV in the portfolio summary is approximately the DCP of the PV orientation (220 degrees) with the greatest Net Distribution Benefit illustrated in Figure 16 on page 18, and 45% is also the expected value DCP based on an equal probability of development for each fixed orientation from 200 degrees through 240 degrees.

## SECTION 1: SOLAR DISTRIBUTION CONTRIBUTION

### 1.1 Load Data for SRP Pilot Area

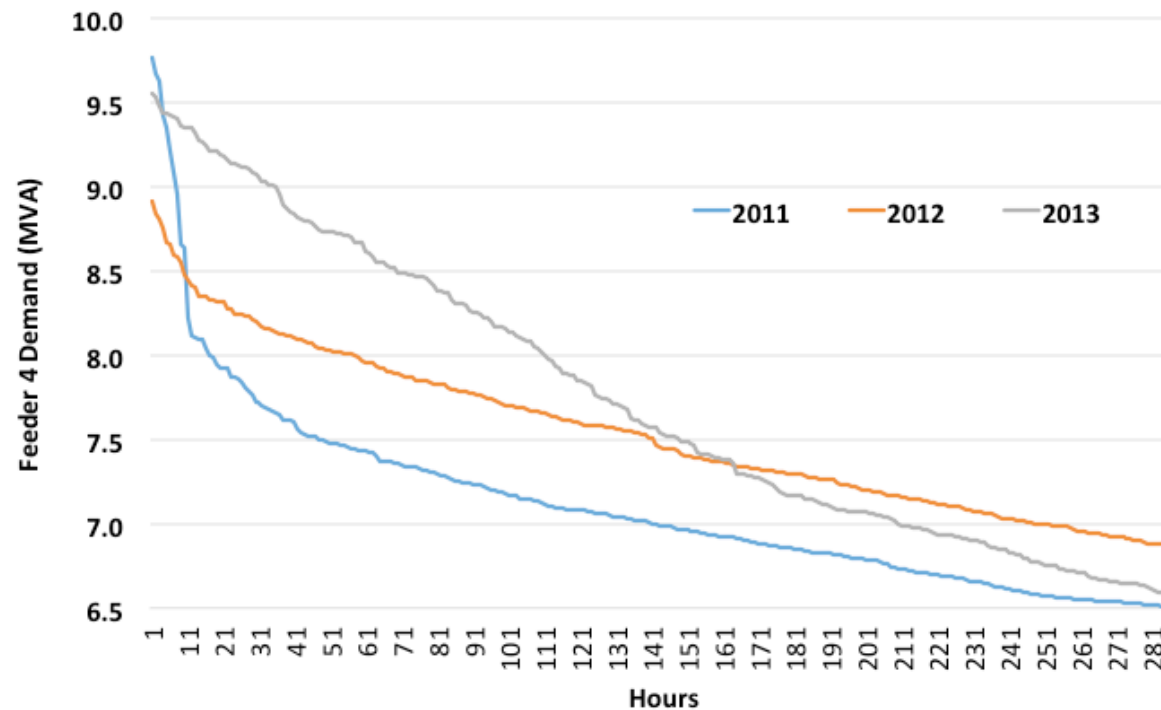
The starting point for this study is the need for sustained, reliable load relief that will allow for a distribution investment deferral. National Grid provided data on the hourly load on the relevant portion of the distribution system (“feeder 4”) for each hour of the 3-year period 2011 through 2013.<sup>[1-1]</sup>

Without significant solar distributed generation (DG), the peak load in the Pilot area reached 9,800 kVa in 2011, as shown in Figure 2. While the peak load was lower in 2012, it reached nearly the same peak again in 2013.

The summer months were the focus of this analysis: June, July, August and September. For each of the three years, we selected the highest 10 percent, or 288, of the hours out of the summer peak period to analyze the potential contribution of solar PV. This use of 10% is analogous to its use in “90/10” load forecasts. Figure 2 shows how these hours constitute the top of each year’s load duration curve.

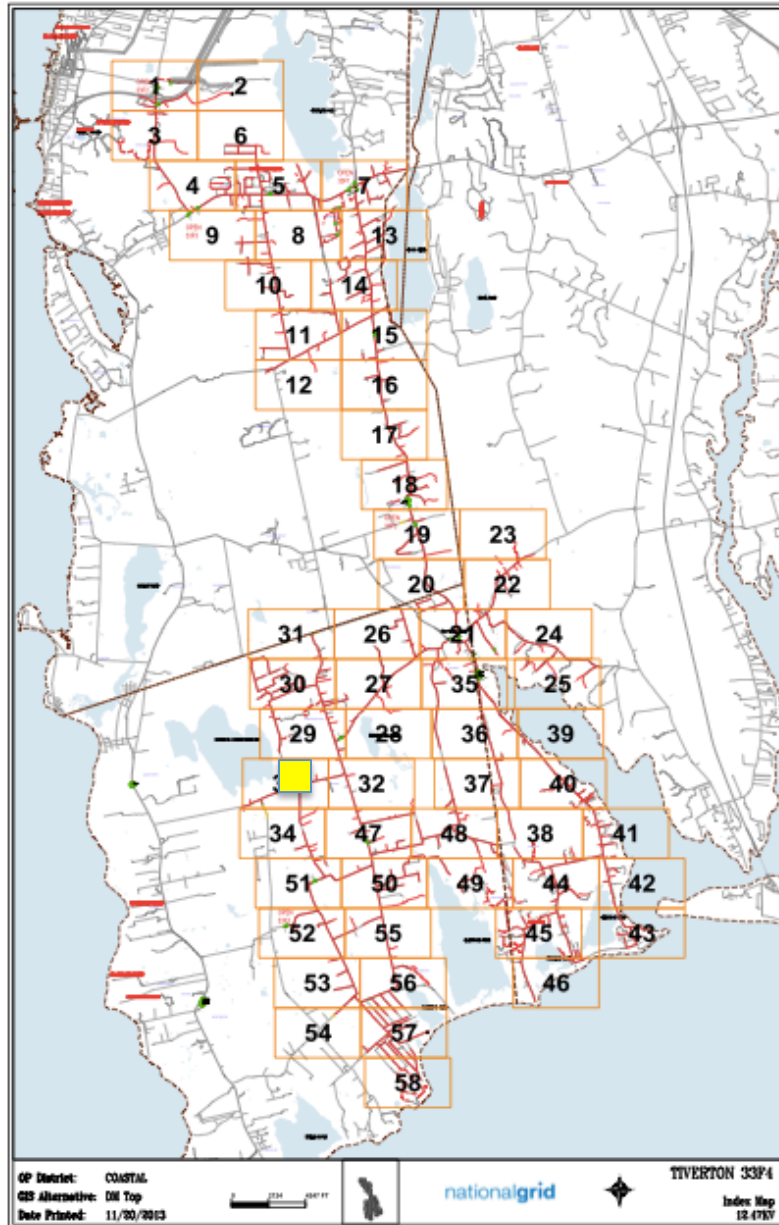
The location of feeder 4 is shown on the map on the next page, extending from Tiverton into Little Compton. This defines the Pilot area for this study.

**Figure 2: Feeder 4 Load for Top 10% of Summer Hours**



## Section 1: Solar Distribution Contribu

**Figure 3: Feeder 4**

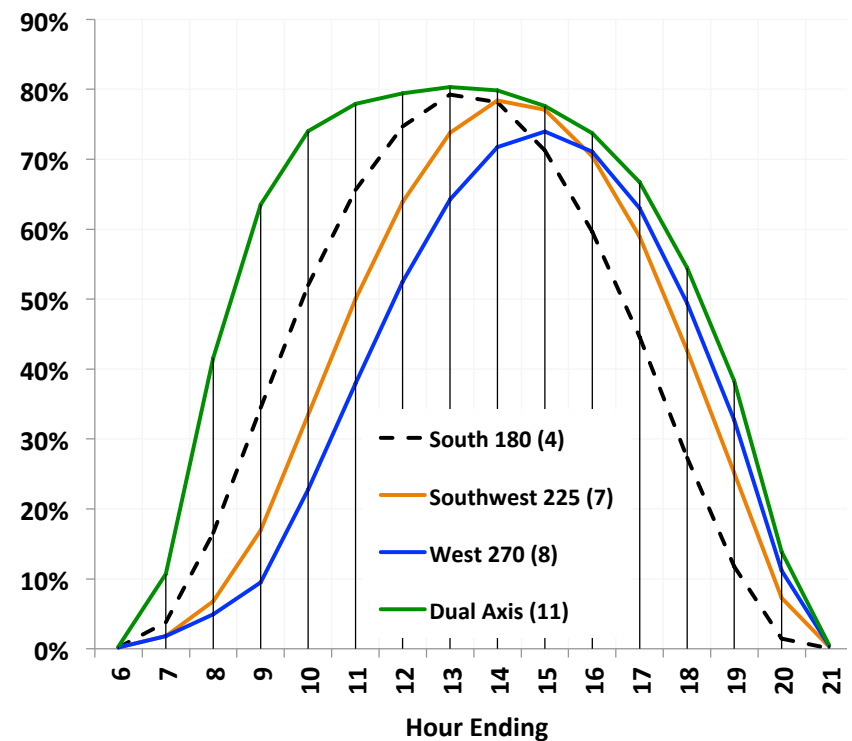


### 1.2 Historical Hourly Solar Generation in the Pilot Area

This study is based on the output that solar PV would have provided in the particular location of feeder 4 under the historical conditions in each hour of 2011 through 2013. The hourly PV production data was prepared by Clean Power Research for the SRP Pilot area with the SolarAnywhere® system.<sup>[1-2]</sup>

These PV data make it possible to compare the load relief that would have been provided to feeder 4 by different PV configurations. Figure 4 shows the increase in output in the critical late hours of the day from southwest and west-facing fixed arrays and from dual-axis trackers, compared with traditional south-facing fixed arrays.

**Figure 4: Output of Solar Configurations on July 22, 2011**



### 1.3 Distribution Contribution Methodology

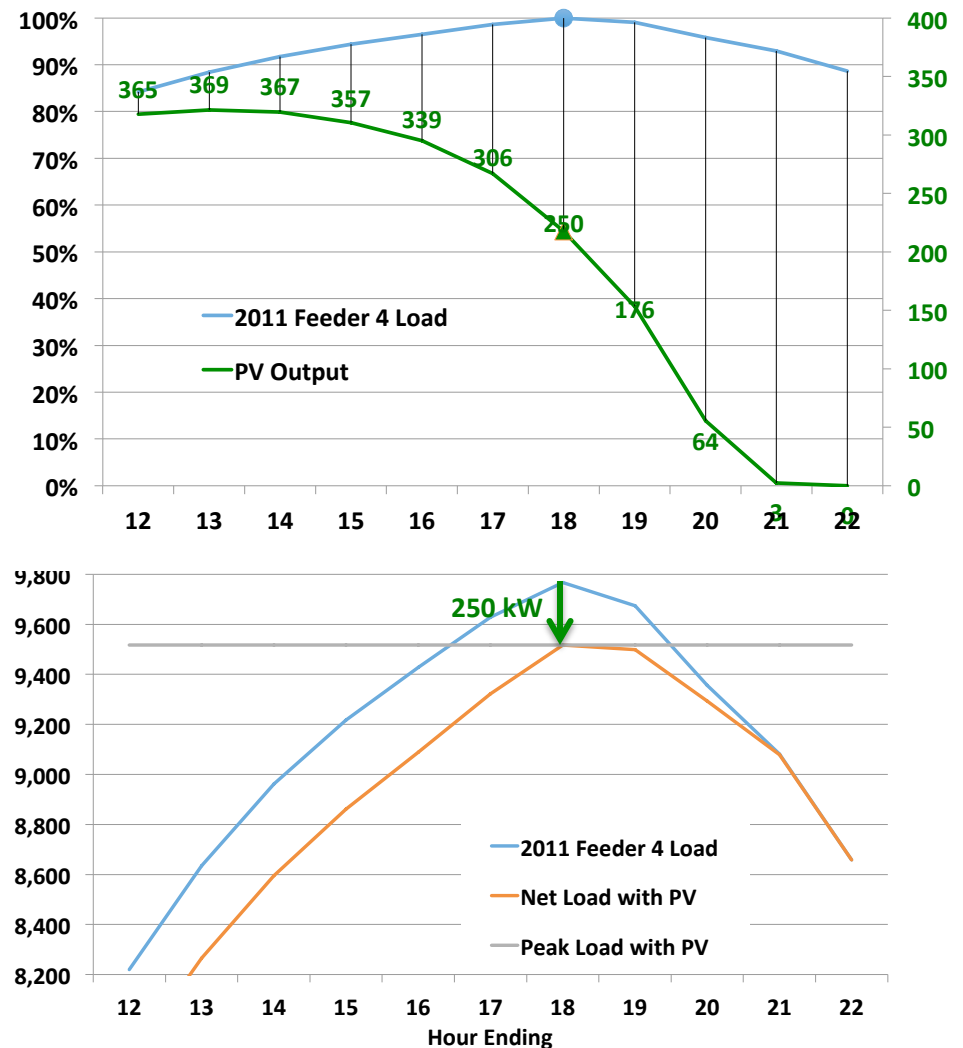
The Distribution Contribution of solar DG is its ability to provide reliable load relief, which depends on its output in the hours with the highest loads. The highest peak load on feeder 4 in the three year study period occurred on July 22, 2011 in the hour ending 18 (from 5:00 pm to 6:00 pm). The hourly generation levels of five different PV configurations are shown for that day in Figure 5 on the previous page.

Figure 6 to the right zooms into 11 hours during that day.<sup>[1-3]</sup> The comparison of the two lines in the top chart highlights the rapidly falling PV output at the time the load is reaching its peak, but also shows that just over half of the PV capacity remains available to provide load relief in that hour. Specifically, the blue lines in Figure 6 show the actual load without any new PV, in percentage terms in the top chart and in absolute terms in the lower chart.

The green line represents the output from one of the PV configurations: a dual-axis tracking system. Its output is plotted on the left axis as a percentage of the annual PV maximum output.

The basic approach of the Distribution Contribution Methodology is to identify the percentage of the PV's maximum output that would have been generated under historical peak conditions, and to size the PV resource to meet the need, which is to ensure that net loads will not be greater than the original maximum demand less the desired load relief (250 kW). In other words, the load must be kept at or below the horizontal line in Figure 6.<sup>[1-4]</sup> The orange line in Figure 6 is the result of this distribution contribution.

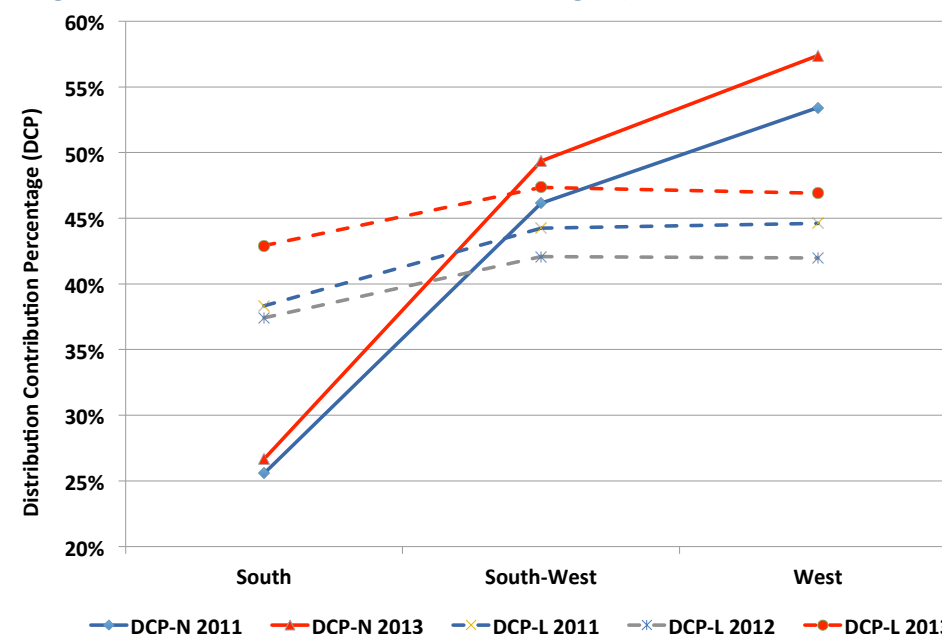
**Figure 6: PV required on July 22, 2011 peak day to provide 250 kW load relief**



The distribution contribution methodology summarized above is based on meeting a specified need, and the resulting DCP values are referred to as DCP-N (for Need). DCP-N values were calculated for each year and configuration <sup>[1-5]</sup> and are presented in the solid lines in Figure 7, and on the left side of Figure 8 below.<sup>[1-6]</sup> These DCP values are used in this report to develop a resource portfolio for the Pilot (Figure 1, page 3), and to estimate the economic value of the distribution contribution from PV resources (Section 2.4). For these purposes, an average DCP-N is computed for the two years with the lowest values, as shown in Figure 8; this metric is used in the rest of this report unless noted otherwise.

Since the DCP-N calculation hinges on relatively few hourly data points – albeit the ones that matter most – we have calculated an alternative version of the DCP which gives some consideration to the solar output in all of the top 288 hours for each summer. These values, called DCP-L (for Load-weighted), are shown on the right side of Figure 8 below. While they vary less between the PV configurations, they generally fall into the middle of the range of DCL-N values, as illustrated in Figure 7 to the right.

**Figure 7: Distribution Contribution Percentages (DCP)**



**Figure 8: Distribution Contribution Percentages (DCP) for Selected PV Configurations**

	DCP-N (Need)				DCP-L (Load-weighted)			
	2011	2012	2013	Average of 2 Lowest Years	2011	2012	2013	Average of 2 Lowest Years
<b>4 South 180</b>	25.6%	67.3%	26.7%	<b>26.1%</b>	38.3%	37.4%	42.9%	<b>37.9%</b>
<b>7 SW 225</b>	46.1%	79.5%	49.3%	<b>47.7%</b>	44.2%	42.1%	47.3%	<b>43.2%</b>
<b>8 West 270</b>	53.4%	69.9%	57.4%	<b>55.4%</b>	44.6%	42.0%	46.9%	<b>43.3%</b>
<b>9 1-Axis</b>	55.7%	72.0%	60.0%	<b>57.9%</b>	49.0%	46.1%	53.5%	<b>47.6%</b>
<b>11 2-Axis</b>	58.9%	83.4%	63.5%	<b>61.2%</b>	50.3%	47.4%	55.1%	<b>48.9%</b>

## Section 1: Solar Distribution Contrib

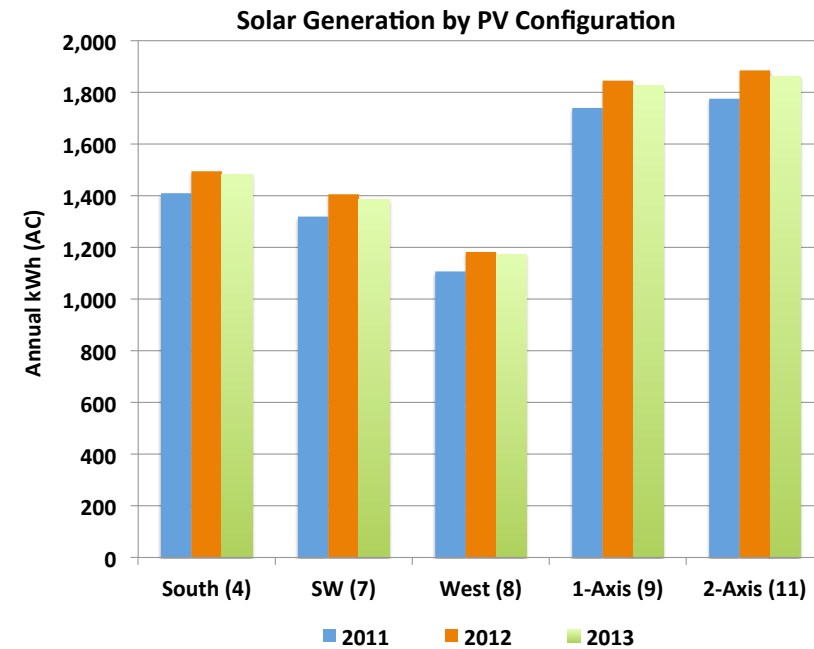
### 1.4 PV Energy and Capacity Values

The fixed PV array configurations that are oriented to the west of south generate less electricity, as shown in the bar chart in Figure 9. However, they provide a greater distribution contribution and more generation capacity, as shown in the table in Figure 10 below. Tracking configurations provide high values for both generation and T&D.

Figure 10 shows the energy and capacity characteristics that depend on PV output as it varies in each hour; these values are based on all three years 2011 through 2013.<sup>[1-7]</sup> These are in the same format as the corresponding inputs to the screening model for the Rhode Island Cost Test used to evaluate energy efficiency measures.

Peak energy is based on an average of PV output values for weekday hour ending 8 through hour ending 23. Coincidence for capacity is calculated as the median of PV output for weekday hour ending 14 through hour ending 18 for the summer months or, for winter, hour ending 18 through hour ending 19.<sup>[1-8]</sup>

**Figure 9: Annual Output of Key PV configurations**



**Figure 10: Energy and Capacity Parameters for PV in Pilot Area**

	Energy Savings					Capacity Savings				
	Gross Annual kWh	Winter Peak Energy %	Winter Off-Peak Energy %	Summer Peak Energy %	Summer Off-Peak Energy %	Summer Coincident (%)	Winter Coincident (%)	Annual Median (%)	Trans. Coincident (%)	Distribution Coincident DCP-N (%)
<b>1 Flat</b>	1,240	36.5%	18.9%	30.7%	13.9%	40.2%	2.3%	24.3%	37.3%	34.4%
<b>4 South 180</b>	1,463	40.2%	20.8%	27.0%	12.1%	42.6%	3.0%	24.4%	34.4%	26.1%
<b>7 SW 225</b>	1,371	39.4%	20.1%	27.9%	12.5%	51.4%	4.4%	33.7%	49.6%	47.7%
<b>8 West 270</b>	1,154	37.0%	18.8%	30.4%	13.8%	54.3%	4.7%	34.7%	54.8%	55.4%
<b>9 1-Axis</b>	1,805	39.6%	21.0%	27.0%	12.5%	57.6%	4.9%	36.6%	57.7%	57.9%
<b>11 2-Axis</b>	1,841	39.5%	20.9%	27.0%	12.6%	59.0%	5.0%	38.4%	60.1%	61.2%



**Footnotes: Section 1**

- 1-1: Feeder 4 was directly metered for most of the hours in these three years. For some hours, to adjust for anomalies, metered loads for two transformers were combined and allocated to feeder 4. The revised data is in an excel file named “2014-1-23\_cps\_Revised\_Calcs\_Tiverton 33F3 33F4\_MW-MVAr\_rc”.
- 1-2: The SolarAnywhere® Data system utilized by Clean Power Research is described at: <http://www.cleanpower.com/products/solaranywhere/sa-data/>. The PV configurations were defined by Mark Farber for this SRP Solar Pilot project. These data are in the file “master-file\_PV-output.xlsx”
- 1-3: The 11 hours in Figure 6, all on July 22, constitute the top 11 hours of the load duration curve for the summer of 2011.
- 1-4: The new maximum hourly demand with the PV contribution must be 250 kW (in this case) lower than the original maximum demand. The original maximum demand and the reduced maximum demand may or may not occur in the same hour, especially when the original loads in hours adjacent to the peak are not much different from the peak load itself. For this reason, the calculation of DCP-N values is set up with iterative adjustments of the needed PV, with a “solver” in the spreadsheet.
- 1-5: The calculations are performed for the top 288 hours of each summer in the excel file named “Sum\_Load\_PV\_Size\_DCP”, which looks up load data and PV output values from two other files.
- 1-6: These DCP figures in Figures 7 and 8 take into account the reduction in local line losses that is estimated to result from each PV configuration in each summer hour. This methodology is presented in the “losses” sheet of the file “Sum\_Load\_PV\_Size\_DCP.” The fixed-array configurations compared in these Figures were all assumed to be at a tilt of 30 degrees. Data on other tilt angles and configurations are included in the file “master-file\_PV-output.xlsx”
- 1-7: In Figure 10, transmission coincidence is assumed to be an average of the coincidence figures for summer generation and distribution.
- 1-8: Various market rules and regulations govern eligibility for a solar generator or other participant to actually receive value for these energy or capacity attributes; see Section 2, footnote 2-2.



## SECTION 2: DEVELOPING GRID SUPPORT SOLAR FIELD(S)

### 2.1 Characteristics of Solar Fields for SRP Pilot

The largest component of the portfolio of solar resources described in the Introduction (Figure 1) is the Grid Support Solar Field (or fields), with a target of 280 kW. This resource is targeted to meet a majority (approximately 57% or 140 kW) of the distribution need, as shown in the resource portfolio in Figure 1 (page 3).

The actual kW size of the project(s) will depend on which solar configurations are bid or installed by potential developer(s), and their Distribution Contribution Percentages (DCP). The most attractive configurations are discussed in Section 2.4 below.

This portion of the solar resource portfolio is anticipated to be ground-mounted because the installation(s) can be designed and monitored to focus on the distribution support objective.<sup>[2-1]</sup> This PV generation field could be interconnected behind a customer meter or directly to feeder 4.<sup>[2-2]</sup>

A single facility or a small number of relatively larger facilities will be more cost-efficient than multiple smaller solar projects, as well as being more convenient to monitor.

One or more solar PV vendors could develop and finance these ground-mounted projects, or National Grid could seek approval to construct and own such PV facilities. The following sections review potential ownership and procurement options.

#### How much land may be required?

250 kW to 300 kW of solar fields would likely require approximately 2 to 3 acres for the solar arrays and all other land enclosed by the site boundary, based on an NREL study of the size of actual projects.\* Single-axis tracking requires slightly less land since it requires less capacity to provide the same distribution contribution, even though it uses more land for the same kW capacity compared to fixed ground-mounted arrays. A 2-axis tracking system would require more land, which could vary significantly according to the design and manufacturer of the equipment. The accompanying table compares the acres needed for key configurations to provide a distribution contribution of 140 kW, based on the DCP metric and the NREL data on actual project sizes.<sup>[2-3]</sup>

**Figure 11: Land Requirements for Solar Field(s)**

	<b>Total Acres/MWac</b>	<b>DCP</b>	<b>Capacity to contribute 140 kW to need</b>	<b>Total Acres Needed</b>
<b>Fixed SW</b>	<b>7.6</b>	<b>48%</b>	<b>292</b>	<b>2.2</b>
<b>1-axis</b>	<b>8.7</b>	<b>58%</b>	<b>242</b>	<b>2.1</b>
<b>2-axis</b>	<b>13.0</b>	<b>61%</b>	<b>229</b>	<b>3.0</b>

\* Land-Use Requirements for Solar Power Plants in the United States, Ong et. al., June 2013, NREL/TP-6A20-56290

## Section 2: Developing a Grid Support Solar Field (continued)

**2.2 Ownership Options for Grid Support Solar Field**

National Grid Ownership Option. If National Grid is to construct and own or lease a 250 kW to 300 kW PV facility, it could follow procedures that it has used in other states to procure and install PV systems. The company owns property adjacent to its substation which could potentially be used for this grid support solar field, although various development and interconnection issues would need to be addressed. Subject to resolution of these issues, this property could possibly be made available for lease to a PV developer, which would help accelerate development.

National Grid could pay a turnkey price for the total installed cost of the PV facility, or could enter into a commercial lease for the equipment, and would follow appropriate regulatory procedures for recovery and accounting for capital and operating costs and the value of the facility's capacity and energy generation. The RI OER would determine the extent to which its budget for the SRP Solar Pilot would be used to cover any of the PV net costs under this approach.

Non-Utility Ownership Option. An alternative would be for one or more PV vendors to develop one or more Grid Support Solar Field(s), in which case each owner would presumably seek a DG Standard Contract, or its successor program, in the first Open Enrollment opportunity, and would seek any other financial assistance or incentives that would apply to any similar solar project at the time.

A PV developer or owner would incur incremental costs to configure the PV arrays to optimize Distribution Contribution, potentially including increased capital or other costs (e.g., for tracking systems) or a reduction in revenues (e.g., for orientation to the southwest or west). The SRP Solar Pilot budget would be used by RI OER to compensate the PV owner for these costs, and potentially to provide an additional positive incentive to encourage participation in this Pilot.

**2.3 Procurement Options for Solar Field Developer**

There are two options for a competitive procurement process:

- 1.) Selection of a PV developer through the procurement process for the solarize solar vendor. The solarize campaign is addressed below.
- 2.) RFP to select a PV developer with the best qualifications to optimize Distribution Contribution and/or the best bid for the incremental incentive required to optimize Distribution Contribution.

1.) Selection of a PV developer through the procurement process for the solarize solar vendor. A primary selection criterion in this approach would be the vendor's ability not only to sell and install the rooftop systems but also to develop and construct the Grid Support Project. It is not clear whether a single contractor that is currently active in the Rhode Island market has experience in all of these areas, but a team might be assembled to do both. This might also complicate the solarize development process.

2.) RFP to seek bids for the incremental costs required to optimize Distribution Contribution. In this option, an RFP would be issued by the state and/or by National Grid to select a PV developer to receive a grant for incentives specific to the SRP Solar Pilot. The evaluation of bids would be based in part on a metric of the pre-calculated \$/kW distribution deferral benefit for each solar configuration minus the \$/kW incremental cost bid by the PV developer. Each proposal would consist of the \$/kW cost bid, the solar configuration selected, the kW capacity and the total grant requested. Each bid would also document the qualifications of the PV developer, and selection could be based in part on experience installing trackers and/or working with distribution-related applications.

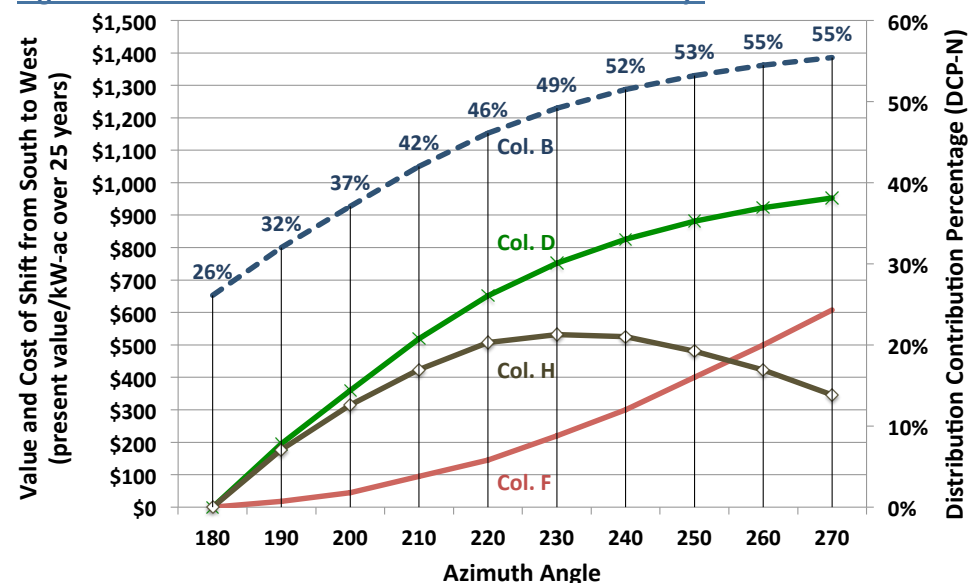
## Section 2: Developing a Grid Support Solar F

## 2.4 Incremental Incentives to Optimize Distribution Contribution

The distribution contribution increases as azimuth orientation moves toward the west, although with diminishing returns after a certain point. The avoided distribution cost is shown in Column C in the table below (Figure 13). The incremental distribution value, compared with a south orientation, is shown in column D and in the **green** line in Figure 12. [2-4], [2-5]

As the orientation of a fixed array moves toward the west, electricity generation falls off, as shown in Figures 9 and 10 on page 9, so a PV developer loses revenue, if it is based on the quantity of kWh sold. A grant could be provided that would represent the present value of this loss, so the PV owner would be indifferent to PV orientation and willing to improve the contribution to distribution.

**Figure 12: Incremental Costs and Benefits – Fixed Arrays**



**Figure 13: Incremental Costs and Benefits per kW-ac**

A	B	C	D	E	F	G	H	I	J
Azimuth Orientation	Distribution Contribution (DCP-N)	Avoided Distribution \$/kW	Incremental Distribution Value	Reduced Generation (kWh/year)	Incremental Cost/Bid to Optimize DC	Cost as % of Value (Col. F/D)	Net Distribution Benefit/kW	Capacity to contribute 140 kW to need	Total Incremental Cost/Bid
180	26%	\$ 840	\$ -	0	\$0	0%	\$ -	544	\$0
190	32%	\$ 1,035	\$ 195	9	\$18	9%	\$ 177	444	\$7,988
200	37%	\$ 1,200	\$ 360	23	\$45	13%	\$ 315	383	\$17,224
210	42%	\$ 1,359	\$ 519	48	\$95	18%	\$ 424	338	\$32,119
220	46%	\$ 1,492	\$ 652	74	\$145	22%	\$ 507	308	\$44,664
230	49%	\$ 1,592	\$ 752	112	\$220	29%	\$ 532	289	\$63,496
240	52%	\$ 1,666	\$ 826	153	\$300	36%	\$ 526	276	\$82,718
250	53%	\$ 1,721	\$ 881	204	\$400	45%	\$ 481	267	\$106,767
260	55%	\$ 1,763	\$ 923	254	\$500	54%	\$ 423	261	\$130,275
270	55%	\$ 1,793	\$ 953	309	\$607	64%	\$ 346	256	\$155,608
1-axis	58%	\$ 1,870	\$ 1,030					245	
2-axis	61%	\$ 1,980	\$ 1,140					232	

- Distribution Contribution % (DCP-N)
- x— Incremental Distribution Value
- Incremental Cost/Bid to Optimize DC
- ◇— Net Distribution Benefit/kW

The amount of such a grant could be based on developer bids. The **red** line, based on column F of Figure 13, represents an estimate of this incentive or cost on a per-kW basis that the pilot would incur to encourage an increase in distribution contribution, based on lost revenue.<sup>[2-6]</sup> The final column (J) in Figure 13 indicates the possible dollar amount of this cost for each PV orientation, based on the size of solar installation that would be required to meet the need.

The space between these **red** and **green** lines represents the net distribution benefit, which is also graphed in the **brown** line and shown in Column H of the table. This net benefit is greatest (\$532/kW) at an orientation of 230 degrees (approximately southwest), where the DCP is 49%. This maximum net benefit could be obtained at an incremental cost or incentive of approximately \$220/kW-ac. (The net benefit does not differ significantly between the orientations of 230 and 240 degrees.)

The net benefit is still substantial (approximately \$423/kW) at 260 degrees, but diminishing returns have set in; this orientation provides a higher distribution benefit, with a DCP of 55%, but at a higher cost.

**Figure 14: Potential Bids to Optimize Distribution Contribution**

A Configuration / Azimuth	B DCP	C Distribution Value	D Bid Example (\$/kW)	E Unit Score (C - D)	F kW (140 / B)	G Award (D x F)
2-axis	61.2%	\$ 1,140	\$ 360	\$ 780	232	\$ 83,551
1-axis	57.9%	\$ 1,030	\$ 330	\$ 700	245	\$ 80,997
2-axis	61.2%	\$ 1,140	\$ 450	\$ 690	232	\$ 104,439
240	51.5%	\$ 826	\$ 325	\$ 501	276	\$ 89,612
1-axis	57.9%	\$ 1,030	\$ 550	\$ 480	245	\$ 134,996
220	46.1%	\$ 652	\$ 200	\$ 452	308	\$ 61,605
240	51.5%	\$ 826	\$ 400	\$ 426	276	\$ 110,291
260	54.5%	\$ 923	\$ 500	\$ 423	261	\$ 130,275
200	37.1%	\$ 360	\$ 100	\$ 260	383	\$ 38,275

## 2.5 Competitive Bidding for Incremental Grant(s)

If a competitive bidding process is used to award a grant for the incremental incentive for the Grid Support Solar Field(s), the goal would not be to select the lowest grant bid, but could be to find the highest net benefit, as indicated above.

The table on this page (Figure 14) illustrates one way in which such a selection criteria could be established and applied in the bidding process. As stated above, under procurement option 2, the evaluation of bids to the Solar Field Developer would be based in part on a metric of:

- the pre-calculated incremental \$/kW distribution deferral benefit for each solar configuration, illustrated in:
  - the **green** line in the chart and Column D in the table in Figures 12 and 13 above, and
  - Column C in the table on this page (Figure 14);

minus:

- the \$/kW incremental cost which might be bid by PV developers, which is illustrated by:
  - the lower/**red** line in the Figure 12 chart and Column F in Figure 13, which are based on estimates of what a PV developer would need to stay whole financially as a result of reduced generation, and
  - Column D in the table on this page, which is a set of hypothetical bids to illustrate a potential scoring mechanism; bids may differ from the costs estimated in the previous table for various reasons, which could include the proposer's internal assessment of additional incentive needed to assign resources to developing a project of this relatively small size in this location.

## Section 2: Developing a Grid Support Solar Farm

In other words, each bid would be given a score calculated as column C minus column D of Figure 14, indicative of a net distribution benefit. In this example, a hypothetical bid of \$360/kW is submitted by a developer proposing a dual-axis tracking configuration, which has a winning score of \$780/kW.

Column G (on the right of Figure 14) illustrates an award that could be made (approximately \$83,000), based on 232 kW of PV -- the quantity of PV that is necessary with its DCP of 61% to achieve the 140 kW of deferral designated in the potential resource portfolio (in Figure 1 on page 2). The calculation is the 142 kW need divided by the 61.2% DCP = 232 kW PV size needed.

The procurement could also allow larger PV sizes to be bid.

Alternatively, the above score could be adjusted by weighing the distribution value more heavily than the bid amount, within an appropriate range.

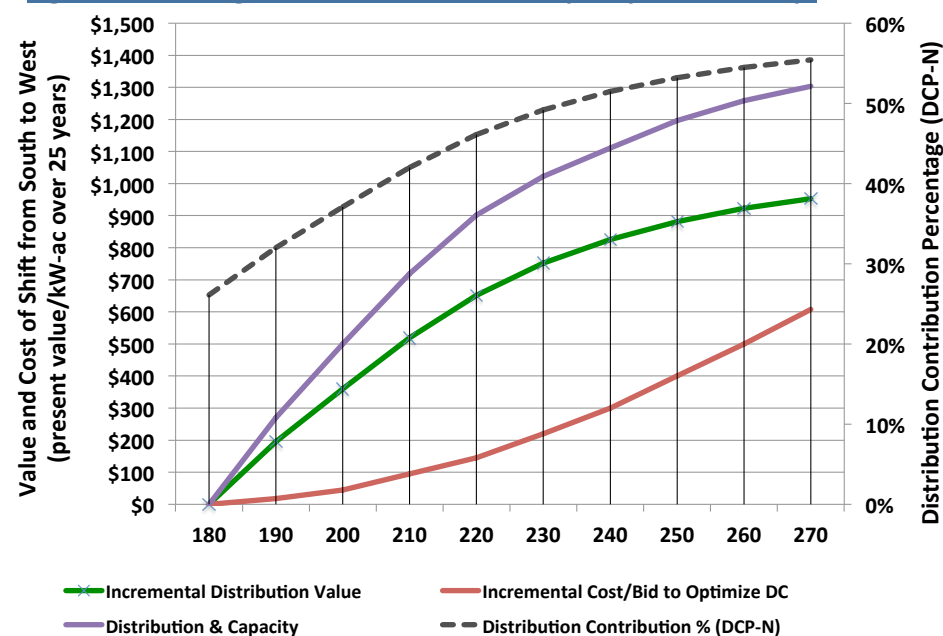
Bids could be submitted at levels higher (or lower) than estimated here as a result of differing developer assessments of risk and cost tradeoffs. For example, the incremental cost represented by the red line in Figure 12 (and replicated in Figure 15 here) is based on 25 years of reduced PV generation at a discount rate of 11.5%, which might be an appropriate discount rate for a solar developer or owner of commercial scale PV projects. However, lower discount rates for the lost revenue could lead to a higher incremental cost to improve the distribution contribution.

One procurement option to address the potential of high bids would be to set a cap on awards, most likely on a per-kW basis. A cap could be set at the level of the incremental distribution benefit shown in the green line in Figure 12 (replicated in Figure 15 here). However, there are also other benefits that might warrant paying higher incentives, either to deal with high bids or in order to obtain higher distribution contributions.<sup>[2-7]</sup>

For example, if the value of the incremental generation capacity (based on capacity values from Figure 10) is added to the distribution value, as diagrammed with the purple line in Figure 15, that combined value would warrant procuring the output of system(s) with higher DCPs to increase the contribution of solar PV to distribution, since the total benefit could be measured at a higher level. In order to realize this capacity benefit with current ISO-NE Forward Capacity Market rules, however, it might be necessary for the PV to be connected behind the meter of a retail customer where the generation is coincident with on-site load.

For a fixed array with an orientation of 230 degrees, the combined distribution and capacity value is approximately \$1,000/kW. For a due west orientation, this value would be about \$1,300. These values (plus any other incremental benefits that may be included) provide an upper level of incentives that would be paid in a procurement.

**Figure 15: Adding Benefits of Generation Capacity – Fixed Arrays**





## Section 2: Developing a Grid Support Solar F

**Footnotes: Section 2**

- 2-1: Ground-mounted systems could be fixed arrays or trackers. One benefit of a solar field is the potential for the use of solar tracking systems. The solar tracking configurations have high DCP distribution contribution percentages, but they do not incur the reductions in annual generation that come with orienting fixed PV systems to the southwest or the west. In fact, tracking systems generate approximately 25% more electricity over the year than fixed systems. While there is not enough regional experience to make reliable estimates of capital or operating costs, trackers may have somewhat better economics than fixed systems. In view of the cost uncertainties, it is not clear what bids developers will submit for trackers in a competitive procurement; this is one reason to hold a competitive procurement for incremental grant(s).
- 2-2: Under current market rules, subject to interpretation and changes, a solar generator, or an electric distribution company which has purchased solar generation, may not be eligible to participate in the ISO-NE capacity market. However, capacity costs may be reduced if the solar is connected behind a customer meter and reduces the measured peak demand.
- 2-3: The NREL data in Figure 11 is only used for comparative purposes; the kind of PV projects planned for the Pilot area may have different requirements. Based on visual inspection of portions of the Pilot area, including along Route 81, and on review of on-line real estate offerings, it appears that (a) some parcels may currently be for sale with sufficient acreage, and (b) significant land resources may be available for solar generation uses.
- 2-4: The analyses in Section 2.4 are performed in the sheet "Incremental" in the file "SRP-PV-Screening-Model-Structure". The values in Figures 12 and 13 for each 10 degrees of azimuth orientation for fixed arrays are estimated on curves based on the values for orientations of 180, 225 and 270 degrees. For trackers, see footnote 2-1.
- 2-5: The Avoided Distribution Cost and the Incremental Distribution Value in Figure 12, Columns C and D are based on the incremental Distribution Contribution Percentages times the present value of the deferral savings and avoided distribution cost. The deferral savings are computed by

National Grid in the 2014 System Reliability Procurement Report (page 20), as the present value achieved in each year through 2017 by avoiding the wires solution for another year. For the remaining years of the life of the solar installation, the benefit is based on the annual avoided distribution cost of \$152 per kW that is used for statewide analysis of energy efficiency measures. The \$152/kW figure was developed by National Grid, before the inflation and discounting that is done for the energy efficiency cost analysis. After the 2017 end of the SRP deferral period, the local SRP distribution investment is assumed to be made. Other distribution costs may still be avoided between 2018 and 2038 by reducing load growth; these are assumed to be 25% of the statewide avoided cost for the next 5 years, and then 50% for 5 years, and then 100% through 2038.

- 2-6: The Incremental Cost/Bid to Optimize DC in Figure 13, Column F is based on lost potential revenue from reduced PV generation. This simple methodology is presented in the sheet "lost revenue" in the file "SRP-PV-Screening-Model-Structure". An example is discussed in the Executive Summary (see page 2) of the \$145/kW present value cost for an orientation of 220 degrees due to a reduction of 74 kWh/year. This reduction is valued at 25 cents/kWh every year for 25 years (with a degradation of PV output of 0.5%/year), assuming these annual values would then be discounted at 11.5% (such as by a solar developer or owner of commercial scale PV projects). Lower discount rates for 25 years of lost generation would indicate a higher incremental cost to improve the distribution contribution. This assumption of 25 cents/kWh is a straight-line extrapolation to the 280 kW size of a Grid Support Solar Field in the portfolio summarized in Figure 1, based on the prices bid into the third 2013 RI DG Enrollment for the nearest PV project sizes, specifically (a) a price of approximately 19 cents/kWh for a PV project sized at 500 kW and (b) a price of 28 cents/kWh for a 150 kW PV project. Source: [http://www.nationalgridus.com/non\\_html/4277-4288-3rd%202013%20DG%20Enroll%20%28PUC%201-6-14%29.pdf](http://www.nationalgridus.com/non_html/4277-4288-3rd%202013%20DG%20Enroll%20%28PUC%201-6-14%29.pdf)
- 2-7: Some of these benefits have not been quantified for this report. Examples include transmission benefits, the option value of demand reductions, or the potential to reduce the length of time that demand response is asked of participating customers on the feeder.

## SECTION 3: SOLARIZE CAMPAIGN FOR ROOFTOP INSTALLATIONS

### 3.1 Solarize Campaign

An important component of the solar resource portfolio for this pilot is a set of rooftop installations on homes, small businesses and public buildings that take load from feeder 4. Rhode Island OER and National Grid could work with government officials and community groups in Tiverton and Little Compton to initiate a “solarize” campaign based in part of the solarize model in Massachusetts and elsewhere.

A unique element in this case will be the targeting of rooftops facing to the west of south, in order to improve the distribution contribution. To achieve this goal, incremental incentives can be offered that increase with the azimuth orientation, as described below.

Residential and other small rooftop solar installations are not as cost-effective as most configurations for a larger solar field. Also, a solarize program and marketing campaign takes months to organize and implement.

Nevertheless, the solarize portion of the solar portfolio has several important advantages. Each small PV project can be installed much faster than larger and more complex projects, and project costs are better known. These multiple locations may diversify the potential impact of passing clouds on partly-sunny days.

These rooftop systems will provide valuable data for future initiatives to use new or existing solar PV for distribution planning. In particular, this SRP pilot is a good opportunity to test the effectiveness of outreach targeted to roofs oriented to the west of south.

The solarize-style campaign could be implemented over a two year period to take into account the limited residential PV market to date in the area. The campaign would launch in 2014 to test the interest and ability of the local community to mobilize a campaign and to achieve some early residential installations. During 2015, changes could be made to increase installations before summer of 2016.

### 3.2 Penetration Rates

According to National Grid, there are 2,450 residential customers on feeder 4. Of these, 51% are located in Tiverton, and the other half in Little Compton. There are also 188 nonresidential customers.

One source of relevant experience to inform predictions of penetration in the SRP Pilot area is that of the early solarize communities in Massachusetts. The number of contracts signed in 2012 was approximately 0.74% of the households in a set of ten communities analyzed for this study.<sup>[3-1]</sup> For the four smallest communities, which had an average of 3,010 households (Mendon, Shirley, Lincoln, and Montague), the penetration rate of PV contracts was higher, at 0.91%, for an average of 27 contracts per community.

For a longer period of two to three years through May of 2014, the total number of contracts signed reached approximately 1.14% of the households in the same 10 communities.<sup>[3-2]</sup> For the four smallest communities, the penetration rate reached 1.38%, for an average of 41 contracts per community.

Based on this experience, it is reasonable to expect that a successful outreach campaign could attract 1.25% residential penetration, for approximately 31 PV participants in the pilot area over two years. If the average system is 5 kW in size, that would represent 155 kW of residential PV capacity. If penetration of 1.5% could be achieved for nonresidential customers, that would be 3 PV installations, which should average at least 25 kW, for another 75 kW of capacity. This would be a total of 230 kW of PV capacity.

### 3.3 Incentives for Degrees of Orientation to West

The solarize component of the SRP Solar Pilot should be designed to achieve a significant distribution contribution by encouraging the enrollment of homes and small businesses with roofs that face to the west of south.

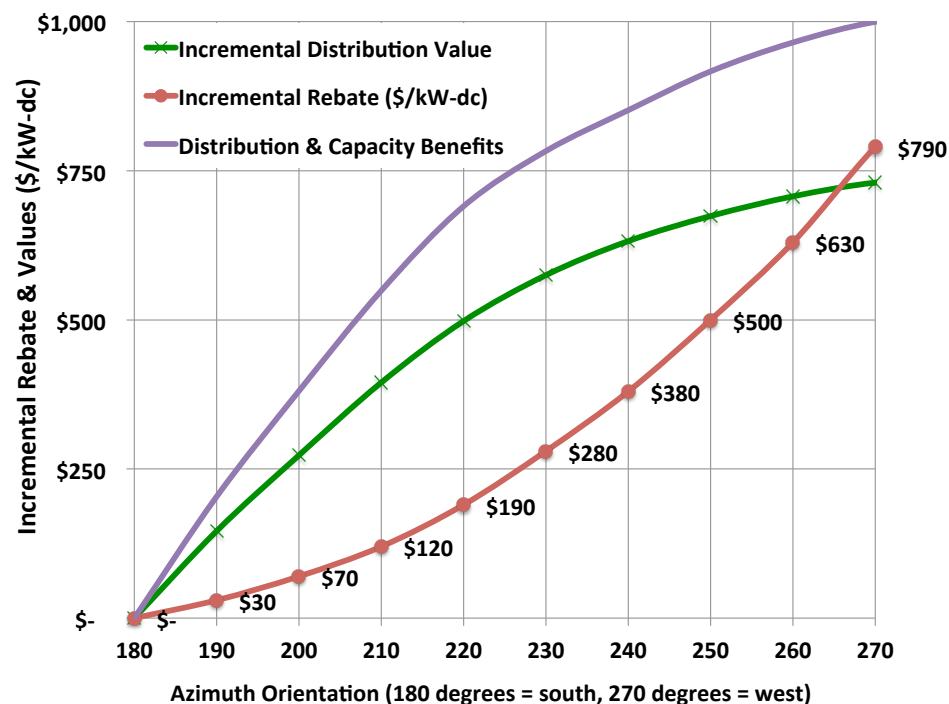
To do this, incremental rebates could be offered that would approximate the present value to homeowners of the reduction in the future savings in their electric bills (including though net metering). The levels of these incremental rebates are estimated in the red, bottom line in Figure 16 for residential customers. This chart is in units of \$/kW-dc (unlike Figures 12 and 13) to be comparable with existing incentives that are based on kw-dc. These rebates are based on the assumptions that electricity savings are valued at 17 cents/kWh in 2014, escalating at 2.5% and discounted at 4.6%/year.<sup>[3-3]</sup> These rebates should be fixed and offered in advance as a function of azimuth orientation.

These incremental rebates could be paid directly to each participating homeowner in the pilot area who installs PV that is oriented significantly to the west of south, perhaps as an “instant rebate”. As part of the solarize campaign planning, it would be important to simplify the messaging and participation requirements so that added complexity does not reduce participation.

Once the orientation reaches 260 degrees azimuth, we estimate that homeowners would require \$630/kW-dc to compensate them for these lost savings – a level which has nearly reached the value of the distribution deferral for that azimuth, which is shown in the green line.

If the value of the incremental generation capacity (described in Section 2.5 above) is added to the distribution value, as diagrammed with the purple line, that combined value would provide a rationale for offering rebates that are at the high end of

**Figure 16: Incremental Costs and Benefits for Residential Fixed Arrays (\$/kW-dc)**



the range of distribution benefits, in order to increase the solar distribution contribution.<sup>[3-4]</sup>

The total payments of incremental incentives for the rooftop solarize projects can be estimated by assuming that there is an equal probability of installations from 200 degrees to 240 degrees.<sup>[3-5]</sup> This leads to an expected value of \$208/kW-dc for the incremental rebate. Applied to 240 kW of rooftop projects, this is a total expenditure of only \$50,000.

In addition to the above rebates to offset reduced PV output and increase DCP, it may also be desirable for this solar pilot to offer an additional bonus to motivate customers to “act now”. Incentives are addressed further in Section 3.5 below.



## Section 3: Solarize Campaign For Rooftop Installations (continued)

### 3.4 Initial Community Planning for Solar Outreach

Massachusetts experience suggests that local support and a time- and-geography-bounded marketing program is key to residential market penetration. The backing of state and/or local parties substantially boosted market interest beyond the marketing pitch of the private installer. RI OER, or a non-developer independent consultant, could introduce the solar grid-support concept to the target communities, to prepare for subsequent outreach and procurement steps for both residential and other solar projects. The following issues need to be addressed at the local level:

- *Community awareness.* Hold one or more public meetings to alert the residential and business community of the coming program. Informally solicit any interest in potential sites for the ground-mounted facility(ies).
- *Solar champion(s).* Explore, and preferably identify, individual(s) or small groups that can become solar champions during a limited-term solarize-style program. These champions have been one of the keys to market participation in MA programs.
- *Property tax.* Meet with town officials to urge them to clarify solar property tax policies for user-owned and for third-party-financed systems, residential and commercial. Towns are allowed by RI statute to extend a property tax exemption for solar, at the discretion of the town.<sup>[3-6]</sup> Property tax can be a determining factor in PPA rates, as much as \$.10/kWh for high tax rates and full-commercial-value assessments.
- *Permitting, safety and zoning.* Assess the interest and capabilities of town electrical inspectors and fire departments. Provide networking, training, or backup engineering support, if needed. The goal is to get local officials up the learning curve, and to clarify procedures and rules, to speed up and lower the cost of installations without compromising quality or safety.

### 3.5 Outreach and Contracting

The goal of the community campaign will not be so much to boost competition as to buy down or drive down soft costs and to fast-track a local market. Steps will include:

- Undertake a competitive procurement to offer a temporary monopoly in the target area to a single solarize contractor. Pick a winner based on bid pricing (e.g., in volume tiers) as well as business experience and solarize marketing plan, so it's not just based on the lowest bidder.
- Engage a local solar champion(s) to facilitate community involvement. Solarize developers in MA have identified this as the most important ingredient of success.
- Offer a small grant to the local champion(s) to facilitate local support, accelerate the startup of the local campaign, and increase the overall penetration over one or two years.
- Coordinate solarize outreach with the marketing of SRP efficiency and demand response options in the pilot area. This integrated approach was tested and found to be successful in NSTAR's Marshfield Energy Challenge.
- Design and run the solarize campaign like the pilot that it will be. Cap the program term and volume at the outset so it doesn't become a runaway.

During the second year (after the beginning of the summer of 2015), changes could be considered in incentive levels, outreach strategies or PV contractor(s). PV installation prices may fall, and penetration patterns will begin to emerge. Customer incentives could be revised downward or upward based on experience to date.

## Section 3: Solarize Campaign For Rooftop Installations (continued)

**3.6 Solarize Implementation Costs**

Rebates to solarize customers were discussed in Section 3.3 to offset reduced PV output and increase DCP, and it was estimated that rebates for 240 kW of rooftop projects could total only \$50,000 based on an equal probability of installations from 200 degrees to 240 degrees, which results in an expected value of \$208/kW-dc for the average incremental rebate. An “act-now” bonus of 50% of the base rebate would increase the outlay to \$75,000.

That calculation was based on an estimate of a residential discount rate; assuming a higher discount rate for the other portion (33%) of the solarize rooftop PV would reduce the rebate amount by almost 20% to about \$60,000. This would be a suitable low estimate for the funding required for incremental rebates and bonuses.

As noted above, customer incentives could be revised downward or upward based on initial penetration levels. A higher estimate for rebate and bonus funding could be \$125,000, based on the following alternative assumptions:

- a rebate that is 20% higher if needed to achieve penetration, or a penetration rate that is 20% higher than assumed here, and
- a change in the probabilities of adoption to 20% for orientations of 220 and 230 degrees and 30% for 240 and 250 degrees.

Funding will be required to engage the local solar champion(s) and/or to cover their out of pocket expenses, to develop and refine marketing messages and design and print collateral materials for the solar campaign, to plan and coordinate interactions between the selected solarize contractor and all the other entities involved in outreach and implementation, etc. These planning and marketing costs may reach \$100,000 to \$200,000. Together with the rebate and bonus outlays discussed above, this would bring the budget for solarize portion of the solar portfolio to a range of \$175,000 to \$325,000.

**Footnotes: Section 3**

- 3-1: 2012 Solarize Massachusetts Program Update:  
<http://images.masscec.com.s3.amazonaws.com/uploads/attachments/Create%20Basic%20page/2012%20Solarize%20Massachusetts%20Program%20Update%20FINAL.pdf>
- 3-2: RPS Solar Carve-Out Qualified Renewable Generation Units, Updated June 6, 2014, excel spreadsheet:  
<http://www.mass.gov/eea/docs/doer/rps-aps/solar-carve-out-units.xlsx>
- 3-3: The calculations of present value of lost revenue are done in the sheet “lost revenue” in the file “SRP-PV-Screening-Model-Structure”.
- 3-4: There are also other benefits, as noted in Section 2.5 above, that might warrant further increasing the contribution of solar PV to distribution, which have not been quantified in this analysis, such as the potential to reduce the amount of time that demand response is asked of participating customers.
- 3-5: For additional information on the total rooftop capacity and DCP calculations, see footnote ES-7 on page 4.
- 3-6: For Rhode Island tax information, see:  
<http://webserver.rilin.state.ri.us/Statutes/TITLE44/44-3/44-3-21.HTM>

## SECTION 4: SCHEDULE FOR SOLAR PILOT

### 4.1 Schedule

Before the peak loads of the summer of 2015, National Grid would welcome as much as possible of the load relief from solar that is contemplated in the resource portfolio in Figure 1. However, the resources in the portfolio will require significant time for marketing, development, design, contracting and installation. Therefore, the summer of 2016 is a more realistic time to expect full implementation.

The schedule in Figure 17 is designed to achieve solar installations as soon as possible by issuing the procurements described in this report by August and September of 2014.

- With this schedule, some of the solarize rooftop installations could be online before next summer, but another year will likely be required to achieve the resource portfolio targets – i.e., before the 2016 peak load.
- For the Solar Fields, it would be challenging for developers to be ready for the October 2014 DG contract enrollment unless systems were already in development. Even if that schedule is met, it is not certain that one or a few projects totaling 280 kW could be approved and constructed before the summer of 2015, so the spring of 2016 is a more likely time to complete these installation(s) as well.

**Figure 17: Potential Schedule for SRP Solar Pilot**

					The Narragansett Electric Company RIPUC Docket 4536 Attachment COMM 1-16 Page 1 of 23											
		Responsibility			3 Sep	4 Oct	5 Nov	6 Dec	7 Jan	8 Feb	9 Mar	10 Apr	11 May	12 Jun		
Solarize Campaign:																
A	Community Solar Planning	State & Towns	July	December												
B	Solar Coach Outreach	State & Towns	August	Ongoing		Δ										
D	Solarize RFP Release, Selection	RI OER	September	November			Δ	Δ								
E	Contracting & Installation	Solarize Contractor	January	Ongoing												
Grid Support Solar Field(s):																
F	SRP PV RFP Release, Selection	RI OER/NG	August	September		Δ	Δ									
G	Preparation for DG Enrollment	PV Developers	October	October												
H	DG Contract Open Enrollment	National Grid	October	November				Δ	Δ							
I	PV Financing & Construction	PV Developers	December	June										Δ		

COMM 1-17

Request:

Page 34. Give an example of a technical objective the Company would attempt to achieve through an incentive adder.

Response:

One technical objective that the Company would hope to achieve through an incentive adder would be load relief on a particular feeder or substation. Attachment COMM 1-16 is a study by Peregrine Energy Group that describes how solar photovoltaic(s) (PV) could be used to provide reliable load relief in a localized area. As the report illustrates, the peak load on the feeders studied and the peak output from solar PV as modeled are not entirely coincident. However, during the top demand hours studied over the three-year period, a substantial portion of the nameplate capacity of solar PV is modeled to be available to reduce peak load. This contribution can be increased with slight changes in the compass direction and tilt of the panels, or the use of tracking systems, which swivel to orient the solar PV panels toward the sun throughout the day.

Other technical objectives could include voltage regulation and/or reactive power support. However, these forms of support would require the use of functionality of so-called advanced inverters, and at present, no advanced inverters are available that have the requisite UL 1741 certification to allow interconnection to the Company's electric distribution system. If they become available, the Company will then consider whether and how it could provide an added incentive for customers to provide such support services.

The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 4536  
In Re: Renewable Energy Growth Program Proposal  
Responses to Commission's First Set of Data Requests  
Issued on November 20, 2014

---

COMM 1-18

Request:

Does the Company plan to submit a rate design proposal to the PUC pursuant to RIGL 39-26.6-24(a)?

Response:

Yes. The Company intends to submit a rate design and cost allocation proposal to the PUC.

COMM 1-19

Request:

Page, 36, footnote 17. Why is the Company purchasing RECs only from residential customers? Please provide the policy reason for this decision, regardless of whether it is driven by statute.

Response:

R.I. Gen. Laws § 39-26.6-21 requires that the Company purchase only Renewable Energy Certificates from residential customers that install small-scale solar projects. The Company has structured its tariffs to reflect this statutory requirement. As explained in the Company's response to COMM 1-14, as a practical matter, the Company expects that net exports from customers who utilize their generating resource to supply on-site usage will be minimal.