

April 7, 2016

BY HAND DELIVERY AND ELECTRONIC MAIL

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

**RE: Docket 4536-C – Renewable Energy Growth Program
Small-Scale Solar Projects Aggregation Summaries
Process Change Request to PUC**

Dear Ms. Massaro:

National Grid writes this letter to request that the Rhode Island Public Utilities Commission (PUC) permit National Grid to discontinue submitting Renewable Energy Certificate (REC) Assignment Forms with its quarterly aggregation summaries for Small-Scale Solar projects. Instead, National Grid requests that it be permitted to submit a list of all projects that have been either added to or removed from the certified aggregation and that have reached commercial operation, as previously agreed to with the PUC. Such a list would include the same project information that is included in the REC Assignment Forms. This process change would result in smaller paper submissions to the PUC when National Grid files its quarterly aggregation summaries. Moreover, National Grid will no longer be required to redact customer information in the hundred pages of REC Assignment Forms, as it is currently required to do in order to protect its customers' privacy. In further support of this request, National Grid has provided some background information below.

As reflected in PUC Order No. 22015 (*see* Attachment 1), National Grid committed to filing with the PUC, on a calendar-year quarterly basis, a list of all the Renewable Energy (RE) Growth Program Small-Scale Solar projects that have been either added to or removed from the certified aggregation and that have reached commercial operation. (*See* Attachment 1 at p. 5). In addition to this list, the Company also committed to filing the associated REC Assignment Form for each new project that is added to the aggregation. The REC Assignment Forms serve as a simplified authorization form for each project owner to sign as a replacement for Appendix A of the Renewable Energy Resources Eligibility Form.

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Based on the first two aggregation summaries that National Grid has filed with the PUC for the third and fourth quarters of 2015, it anticipates growing participation in the RE Growth Program, and consequently, a larger volume of REC Assignment Forms for participating projects. The Company, therefore, believes that it would be more efficient and much less of an administrative burden if it could provide the PUC with the list of the projects in a spreadsheet instead of providing confidential and redacted versions of the associated REC Assignment Forms for each new project. As noted above, the spreadsheet will include the same information that is included in the REC Assignment Forms. In addition, National Grid will still collect the REC Assignment Forms from customers and would be able to produce them to the PUC, if required to do so.

For these reasons, National Grid respectfully requests that the PUC permit it to discontinue submitting the REC Assignment Forms with its quarterly Small-Scale Solar aggregation summaries. Instead, the Company respectfully requests that it be permitted to submit a list of all projects that have been either added to or removed from the certified aggregation and that have reached commercial operation, as previously mandated under PUC Order No. 22015.

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

Very truly yours,



Raquel J. Webster

Enclosures

cc: Docket 4536 Service List
Leo Wold, Esq.
Steve Scialabba, Division

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

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



Joanne M. Scanlon

April 7, 2016

Date

Docket No. 4536-A National Grid Tariff Advice Filing for Renewable Energy Growth Program (RE Growth Program) and Solicitation & Enrollment Process Rules for 2015

Docket No. 4536-B RI Distributed Generation Board (DG Board) Report and Recommendation Regarding 2015 Renewable Energy Growth Classes, Ceiling Prices and Targets

Service List updated 9/24/15

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STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: APPLICATION FOR CERTIFYING THE : DOCKET NO. 4536-C
RENEWABLE ENERGY GROWTH SMALL SCALE :
SOLAR AGGREGATION AS AN ELIGIBLE :
RENEWABLE ENERGY RESOURCE FILED :
BY THE NARRAGANSETT ELECTRIC COMPANY :
d/b/a NATIONAL GRID – NEW GENERATION :

ORDER

WHEREAS, On June 26, 2015, The Narragansett Electric Company d/b/a National Grid¹ (Company), filed with the PUC an application seeking certification for its National Grid Renewable Energy Growth (RE Growth) Small Scale Solar Aggregation, a 12 MW aggregation of customer-sited, behind-the meter, small-scale solar projects located in Rhode Island, as an eligible New Renewable Energy Resource in accordance with the PUC’s Rules and Regulations Governing the Implementation of a Renewable Energy Standard (RES Regulations) and the Renewable Energy Standard Act, R.I. Gen. Laws §39-26-1 et seq.; and

WHEREAS, The Rhode Island RE Growth Statute (R.I. Gen. Laws §39-26.6-12(c)) requires that at least 3 MW of nameplate capacity be carved out exclusively for small-scale solar projects in each of the first four program years; and

WHEREAS, Assuming that an average small-scale solar project is 10 kW, the PUC could receive up to 300 applications for certification per year, requiring 300 associated dockets each year; and

WHEREAS, The Company’s application proposes a streamlined solution for individual customers in a manner that is consistent with the policy and provisions of the

¹ The authorized representative was identified as Kris Hornberger, Senior Trader, 100 Old Country Road, Second Floor, Hicksville, New York, 11801, Phone: (516) 545-4563, Email: kris.hornsberger@nationalgrid.com.

RE Growth Statute and the PUC's RES Regulations. The Company's application is intended to avoid delays in the Company's ability to pay new projects for their output, and includes the following components:

- A simplified authorization form for each project owner to sign as required by the NEPOOL GIS, the Rhode Island Public Utilities Commission and the Massachusetts Department of Energy Resources that would serve as a replacement for Appendix A of the PUC's Renewable Energy Resources Eligibility Form.
- Creation of a single NEPOOL GIS Generation Unit Asset ID number for the aggregation (NON51802).
- A request that the PUC certify the aggregation under one Rhode Island certification number.
- Capping the aggregation at 12 MW for all small-scale solar projects, pursuant to R.I. Gen. Laws §39-26.6-12(c) of the RE Growth Statute, with ability for the Company to seek to increase the cap if the Rhode Island Distributed Generation Contracts Board increases the capacity of small-scale solar projects under the RE Growth Program.
- A request that the PUC approve the Company's role as Verifier for reporting meter data from the aggregation to the NEPOOL GIS, with details provided in the Aggregation Agreement included as Appendix D of the Company's Renewable Energy Resources Eligibility Form.

- Recognition of the Company as Aggregator Owner with an obligation to sell the RECS as required by the RE Growth Statute and credit the proceeds back to Rhode Island distribution customers in rates.
- Plans for the Company to update the PUC quarterly with a list of all projects that have been either added to or removed from the certified aggregation and that have reached commercial operation. An illustrative example of the form and content of these quarterly updates was provided in the Company's application.

WHEREAS, The application specifies that no projects under the aggregation have reached commercial operation to date, and that the Company will provide quarterly updates of the projects added in the aggregation as the program continues, where such updates will also include Commercial Operation Dates and signed Appendix A authorizations from project owners that have been added to the certified aggregation; and

WHEREAS, After examination, the PUC is of the opinion that the application, including the Company's streamlined solution and additional quarterly update requirements is proper and reasonable, comports with the policy and provisions of the RE Growth Statute, and is in substantial compliance with the RES Regulations. The PUC, therefore, grants the Company certification as an eligible renewable energy resource pursuant to the Renewable Energy Standard Act, R.I. Gen. Laws §39-26-1 et seq.; and

WHEREAS, The PUC's determination in this docket is based on the information submitted by the Company. The PUC may reverse its ruling or revoke the Company's certification if any material information provided by the Company proves to be false or misleading.

Accordingly, it is

(2015) ORDERED:

1) National Grid's Renewable Energy Growth Small Scale Solar Aggregation meets the requirements for eligibility as a New Eligible Solar Renewable Energy Resource with its up to 12 MW aggregation of Customer-Sited (behind-the-meter) small-scale solar Generation Units, all of which have been assigned a single NEPOOL GIS Generation Unit Asset ID number (NON51802), will have Commercial Operation Dates on or after June 15, 2015, and will be located within the NEPOOL Control Area at customer facilities physically in Rhode Island.

2) The PUC grants the Company's request to certify the aggregation under one Rhode Island certification number and hereby assigns unique certification number RI-4536-N15 for all small-scale, Rhode Island customer sited, solar generation units to be included in the Company's aggregation over the RE Growth program period up to the stated 12 MW installed capacity cap.

3) In the event the Rhode Island Distributed Generation Contracts Board increases the current capacity cap of small-scale solar projects specified under the Rhode Island RE Growth Program, the PUC will allow the Company to seek an increase above the 12 MW aggregation cap approved in this Order through submission of a revised RES application and subject to associated public comment and PUC review requirements.

4) That Renewable Energy Certificates ("RECs") from the Company's aggregation become Rhode Island-eligible effective as of the date of this Order. Only RECs associated with the production of eligible energy that are minted on or after the Effective Date are eligible for the RES.

5) The PUC recognizes the Company as Aggregator Owner with an obligation to sell the RECS as required by the RE Growth Statute and credit the proceeds back to Rhode Island distribution customers in rates.

6) The PUC approves the Company's role as Verifier for reporting meter data from the aggregation to the NEPOOL GIS.

7) The Company shall update quarterly, the list of all projects that have been either added to or removed from the certified aggregation and that have reached commercial operation. These quarterly updates shall be provided in paper and electronic (EXCEL spreadsheet) formats no later than the 15th day of the month following the close of each calendar quarter and must use the form and content specified in the illustrative example provided by the Company as part of its application in this docket which, in addition to project specific details and status, will include the following components:

- The simplified authorization form for each project owner to sign as a replacement for Appendix A of the Renewable Energy Resources Eligibility Form
- Total kilowatt count in the certified aggregation
- Total kilowatts that have been removed (projects that have left the program)
- Total kilowatt count for projects that have begun commercial operation
- Total kilowatt count for projects that have been added, but have not yet begun commercial operation

8) Although the PUC will rely upon the NEPOOL GIS for verification of production of energy from the Company's Generation Unit certified as eligible in this Order, the Company will provide information and access as necessary to the PUC, or persons acting at its behest, to conduct audits or site visits to assist in verification of continued eligibility for and compliance with RI RES Certification at any time at the Commission's discretion. Such continuing verification shall include the quarterly aggregation updates detailed in Order Paragraph No. 7 above or any subsequent revisions that may be requested by PUC staff hereto.

9) Outside of the quarterly updates, the Company shall notify the PUC in the event of eligibility status changes associated with the Company's aggregation.


EFFECTIVE AT WARWICK, RHODE ISLAND ON JULY 31, 2015
PURSUANT TO AN OPEN MEETING DECISION. WRITTEN ORDER ISSUED
JULY 31, 2015.

PUBLIC UTILITIES COMMISSION




Margaret E. Curran, Chairperson


Paul J. Roberti, Commissioner


Herbert F. DeSimone, Commissioner

NOTICE OF RIGHT OF APPEAL: Pursuant to R.I. Gen. Laws § 39-5-1, any person aggrieved by a decision or order of the PUC may, within seven days (7) from the date of the order, petition the Supreme Court for a Writ of Certiorari to review the legality and reasonableness of the decision or order.