

May 1, 2017

BY HAND DELIVERY AND ELECTRONIC MAIL

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

**RE: Docket 4636 – National Grid’s Response to Proposed Settlement Agreement
Between ISM Solar Development, LLC and The Pascoag Utility District
National Grid Response**

Dear Ms. Massaro:

I write in to submit National Grid’s¹ response to the Proposed Settlement Agreement between ISM Solar Development LLC (ISM) and the Pascoag Utility District (PUD) dated April 11, 2017 (Settlement).

ISM and PUD (Petitioners) seek the Rhode Island Public Utilities Commission (PUC’s) approval of their Settlement, which involves interconnection service for a proposed solar system planned for installation adjacent to 600 Broncos Highway in Burrillville, Rhode Island (Project). *See* Settlement at pgs. 1-2. As described in the Settlement, National Grid will interconnect the Project, and ISM will be eligible to participate in programs available to facilities in the Company’s service territory. *See* Settlement at p. 1 and 3. While Petitioners are correct that the Company remains neutral and did not wish to be a party to the Settlement, the Company wishes to clarify its position on two requests that ISM makes in the Settlement.

First, ISM requests that the PUC order the Company to expedite the Project’s interconnection review process so that the Project can participate in the earliest possible Rhode Island Renewable Energy Growth Program enrollment. *See* Settlement at p. 3, paragraph 3. National Grid objects to this request to the extent that ISM is requesting that the PUC order the Company to put the Project ahead of other projects that currently exist in the distributed generation (DG) interconnection queue. Indeed, this would not be fair to the existing customers in the DG queue. Moreover, while the Company uses its best efforts to move projects along in the fastest way possible and would do so for the Project here, the Company does not expedite the interconnection process by allowing one developer’s application to skip ahead of other applications in the queue. Instead, the Company processes applications based on the application dates, and the Project was no longer in the DG queue once the Company determined that the

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

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Project could not be interconnected to the Company's electric power system (EPS) since it was in PUD's service territory.

To support its request for the PUC to order the Company to expedite its interconnection process, ISM refers to the history of the interconnection activity involving the Project and its "burden to ISM." *See* Settlement at p. 3, paragraph 3. Surely, the Company did not impose any burdens on ISM. Instead, after examining the Project, as noted above, the Company determined that the Project could not interconnect to the Company's EPS since it was in PUD's service territory. The Company then discussed this matter with Petitioners, and, as explained in the Company's Motion to Intervene in this docket, indicated that it did not have any objections to the Project participating in the Company's programs as long as the Company receives full recovery for any related costs in connection with ISM's participation in the Company's programs. *See* National Grid's Motion to Intervene in this docket dated August 5, 2016 at pgs. 2-3. Accordingly, for the reasons described above, National Grid respectfully requests that the PUC deny ISM's request to order the Company to expedite the interconnection process for the Project.

Finally, ISM requests that the PUC support its appeal to the DG Board for a reasonable locational incentive, as detailed in the Settlement. *See* Settlement at p. 4, paragraph 4. The Company believes that this request is premature at this time since the Company is currently involved in discussions with the Rhode Island Office of Energy Resources regarding locational incentives and plans to, at a future date, present a proposal to the DG Board.

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

Very truly yours,



Raquel J. Webster

cc: Docket 4636 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

May 1, 2017
Date

ISM Solar Development & Pascoag Utility District – Docket No. 4636
List updated 8/25/16

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