

November 30, 2016

BY HAND DELIVERY AND ELECTRONIC MAIL

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

**RE: Renewable Energy Resource Eligibility Applications
Docket 4645 - Town of West Warwick for WED Coventry Two Facility;
Docket 4649 - WED Coventry Six, LLC for WED Coventry Six Facility; and
Docket 4650 - Narragansett Bay Commission for Coventry 3 and Coventry 4 Facilities
Responses to PUC Data Requests – Set 1**

Dear Ms. Massaro:

I have enclosed ten copies of National Grid's¹ responses to the first set of data requests issued by the Rhode Island Public Utilities Commission in the above-referenced matter.

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

Sincerely,



Raquel J. Webster

Enclosures

cc: Dockets 4645, 4649, and 4650 Service List
Leo Wold, Esq.
Steve Scialabba, Division

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

Certificate of Service

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

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

November 30, 2016
Date

**Renewable Energy Resource Eligibility Applications
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Docket 4650 - Narragansett Bay Commission for Coventry 3 and Coventry 4
Facilities
List updated 11/16/16**

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COMM 1-1

Request:

Are the above-captioned facilities interconnected to National Grid's distribution system at a single interconnection point, for the purposes of ISO-NE tariffs and related rules and procedures? If the answer is "yes":

- a. Is the aggregated system a modeled generator?
- b. Who is the Lead Market Participant?
- c. Has or will National Grid establish an ISO-NE Market Settlement System (MSS) asset for the aggregated facility?
- d. Can individual owners of the behind-the-MSS-asset generators register to self-report NEPOOL GIS Certificates (RECs) with NEPOOL GIS, or does some GIS rule in this instance prevent that registration?
- e. Can and will the MSS asset be the point at which RECs are generated? If so, what entity will apply for eligibility as a renewable energy resource with the Commission and in other jurisdictions?
- f. If National Grid controls the MSS asset, what entity will control the GIS account into which RECs are initially generated?

Response:

For the purposes of setting up a wholesale asset at ISO-NE, ISO-NE considers the six wind turbine projects included in the captioned projects, which are connected at a single new delivery point on the Company's local distribution system, as a single project. However, National Grid considers this to be six individual interconnections to the Company's distribution system.

- a. Yes, under Operating Procedure 14 of the ISO-NE Operating Procedures, the aggregated system is a modeled generator.
- b. Wind Energy Development (WED) is the lead market participant. Given that a modeled generator is required to accept and act on dispatch orders from ISO-NE and the fact that the Company neither owns nor controls the wind turbines in question, ISO-NE has required WED be the Lead Market Participant
- c. National Grid has worked with WED as the LMP to set up a single MSS asset for the aggregated facility.

COMM 1-1, page 2

- d. In this case individual owners of the behind-the-MSS-asset generators cannot register to self-report NEPOOL GIS Certificates (RECs) with NEPOOL GIS because there are net metered and non-net metered projects behind the MSS asset. Rule 2.3(d) of the New England Power Pool Generation Information System Operating Rules (GIS) allows behind-the-meter generators that are net metered to self-report generation data. However, since these facilities include non-net metered projects, they are not eligible to self-report pursuant to Rule 2.3(d).
- e. Yes, the RECs will be generated from the energy reported to the MSS asset. WED, as the LMP for the MSS asset, will apply for the required eligibility.
- f. National Grid does not control the MSS asset.

COMM 1-2

Request:

Should the RECs generated by the individual facilities be accounted for at a single interconnection point through an MSS asset, has National Grid developed a verification plan to disaggregate the RECs to individual generation owners' GIS accounts? If so, please provide the plan or any supporting documentation (e.g. contracts, memoranda of understanding, etc.).

Response:

WED will manually allot the RECs generated by the two REG projects to National Grid's GIS REC account. An agreement to this effect is being drafted and will be available shortly.

COMM 1-3

Request:

Has National Grid developed a plan to keep the Commission informed about any changes to the individual generators (including the addition and removal of turbines) per Rule 6.5 of the Commission's Rules and Regulations Governing the Implementation of a Renewable Energy Standard?

Response:

No, WED, as the LMP for the projects, has this responsibility.