

March 15, 2017

VIA HAND DELIVERY & ELECTRONIC MAIL

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

**RE: Docket 4688 – Block Island Power Company’s Petition for Declaratory Judgment
National Grid’s Objection to Block Island Company’s Petition for Declaratory
Judgment**

Dear Ms. Massaro:

I have enclosed 10 copies of National Grid’s¹ memorandum of law in support of its objection to Block Island Company’s petition for declaratory judgment in the above-referenced docket.

Thank you for your attention to this filing. If you have any questions, please contact me at 401-784-7288.

Very truly yours,



Jennifer Brooks Hutchinson

Enclosures

cc: Docket 4688 Service List
Leo Wold, Esq.
Steve Scialabba, Division

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

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

March 15, 2017
Date

Docket No. 4688 – Block Island Power Co. - Petition for Declaratory Judgment Service List as of 2/27/17

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**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

IN RE: PETITION FOR DECLARATORY JUDGMENT FILED BY BLOCK ISLAND POWER COMPANY : : **DOCKET NO. 4688**

**THE NARRAGANSETT ELECTRIC COMPANY D/B/A
NATIONAL GRID'S OBJECTION TO PETITION FOR DECLARATORY JUDGMENT
BY BLOCK ISLAND POWER COMPANY**

Pursuant to the Notice of Filing issued by the Rhode Island Public Utilities Commission (PUC) on February 17, 2017, and the Rule 1.15(d) of the PUC's Rules of Practice and Procedure, The Narragansett Electric Company d/b/a National Grid (the Company) objects to the Petition for Declaratory Judgment (Petition) by Block Island Power Company (BIPCo). BIPCO has taken the position that the costs of BIPCO's interconnection facilities, listed under Part II, Section 3.i. of BIPCO's Local Service Agreement, and the cost of a spare transformer should be socialized as part of the costs of the undersea transmission cable that interconnects Block Island with the mainland under the Town of New Shoreham Project statute, R.I. Gen. Laws § 39-26.1-7.¹ While BIPCO recognizes that interconnection costs are generally charged directly to a new transmission customer, BIPCO takes the position that the Town of New Shoreham Project statute overrides the ISO-NE Tariff.² BIPCO also concludes that the undersea cable and National Grid's substation on Block Island are for BIPCO's sole use and cannot be distinguished from BIPCO's interconnection costs and the cost of a spare transformer.³

¹ BIPCO Petition at ¶ 3.

² BIPCO Petition at ¶ 19.

³ BIPCO Petition at ¶ 18.

For the reasons set forth in the accompanying Memorandum of Law, BIPCo's interpretation of R.I. Gen. Laws § 39-26.1-7 is inconsistent with the ISO-NE Tariff and FERC precedent. BIPCo's interconnection facilities and spare transformer qualify as Direct Assignment Facilities under the terms of the ISO-NE Tariff consistent with FERC precedent and, therefore, are the direct cost responsibility of BIPCo. The Company, therefore, respectfully requests that the PUC deny BIPCo's request for a judgment declaring that the costs associated with the interconnection of BIPCo with the submarine transmission cable that will connect Block Island to the mainland, and the costs to purchase a back-up transformer for the new BIPCo substation must be socialized to all electric distribution ratepayers pursuant to § 39-26.1-7(d), and not imposed solely on BIPCo and its ratepayers. Rather, the Company requests that the PUC issue a judgment declaring that such costs are solely the financial responsibility of BIPCo (and, in turn, its customers).

Respectfully submitted,

NATIONAL GRID

By its attorney,



Jennifer Brooks Hutchinson (RI Bar #6176)
National Grid
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(401) 784-7288

Dated: March 15, 2017

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

IN RE: PETITION FOR DECLARATORY :
JUDGMENT FILED BY BLOCK ISLAND : **DOCKET NO. 4688**
POWER COMPANY :

MEMORANDUM OF LAW IN SUPPORT OF
THE NARRAGANSETT ELECTRIC COMPANY D/B/A
NATIONAL GRID’S OBJECTION TO PETITION FOR DECLARATORY JUDGMENT
BY BLOCK ISLAND POWER COMPANY

The Narragansett Electric Company d/b/a National Grid (Narragansett or the Company) submits this memorandum of law in support of its objection to the Petition for Declaratory Judgment (Petition) by Block Island Power Company (BIPCo). The Company objects to BIPCo’s Petition on the grounds that BIPCo’s interpretation of the Town of New Shoreham Project statute, R.I. Gen. Laws § 39-26.1-7, is inconsistent with the terms of the ISO New England Inc. Transmission, Markets and Services Tariff (ISO-NE Tariff) and Federal Energy Regulatory Commission (FERC) precedent. The Company also objects to the Petition on the grounds of statutory interpretation, in that the statute does not contemplate socialization of the costs related to BIPCo’s interconnection facilities and spare transformer. BIPCo’s interconnection facilities and spare transformer qualify as Direct Assignment Facilities under the terms of the ISO-NE Tariff and, therefore, are the direct cost responsibility of BIPCo. Accordingly, such costs should be charged to BIPCo (and, in turn, its customers) and should not be socialized to all electric distribution customers of Narragansett, as BIPCo asserts. For the reasons set forth herein, BIPCo’s Petition should be denied.

I. BACKGROUND

New England Power Company (NEP) and Narragansett are wholly-owned subsidiaries of National Grid USA (National Grid). NEP is a public utility subject to the jurisdiction of FERC that owns transmission facilities located in New England. NEP's primary business is the transmission of electricity at wholesale to electric utilities and municipalities in New England. NEP operates transmission facilities that it owns directly as well as certain transmission facilities owned by its distribution affiliates in New England pursuant to integrated facilities agreements under NEP's FERC Electric Tariff No. 1 (Tariff No. 1). NEP acts as the transmission provider for itself and its New England distribution affiliates, including the Company. All of NEP's transmission facilities, including those owned by its New England distribution affiliates, are subject to the operating authority of ISO New England Inc. (ISO-NE) and are available for open access transmission service under the rates, terms and conditions of the ISO-NE Tariff.

Narragansett is a public utility primarily in the business of providing electric and gas distribution service in the State of Rhode Island. Pursuant to state law, Narragansett owns all National Grid transmission facilities located in Rhode Island. Pursuant to Schedule III-B of Tariff No. 1, NEP operates and controls the transmission facilities of itself and its distribution affiliates, including Narragansett, on an integrated basis. Schedule III-B of Tariff No. 1 includes a formula rate under which NEP reimburses Narragansett for NEP's use of Narragansett's facilities to provide FERC jurisdictional transmission service.

There are presently four executed service agreements on file with FERC that implement the rates, terms and conditions of transmission and interconnection service for Deepwater Wind Block Island, LLC (Block Island Wind) and BIPCo as new customers taking wholesale transmission and interconnection service from NEP and ISO New England under the ISO-NE

Tariff. There is also a fifth service agreement, SA No. 23, between Narragansett and NEP under the integrated facilities provisions of Tariff No. 1, whereby NEP supports the cost of Narragansett-owned facilities, including the Block Island cable and associated facilities that are necessary for NEP and ISO-NE to provide transmission and interconnection service to Block Island Wind and BIPCO. These agreements are listed in Attachment A to this response. All of these agreements have been accepted by FERC to become effective as of the dates shown in the attachment.

II. LEGAL STANDARD

PUC Rule 1.10(c) provides that “a petition for a declaratory judgment pursuant to R.I. Gen. Laws §42-35-8 shall set forth the rule or statutory provision in question and shall state in detail, with appropriate citations, whether the rule or provision should or should not apply.” Rhode Island General Laws §42-35-8 provides, in part, that “a person may petition an agency for a declaratory order that interprets or applies a statute administered by the agency or states whether, or in what manner, a rule, guidance document, or order issued by the agency applies to the petitioner.”

III. ARGUMENT

BIPCO has taken the position that the costs of BIPCO’s interconnection facilities, listed under Part II, Section 3.i. of BIPCO’s Local Service Agreement, and the cost of a spare transformer should be socialized as part of the costs of the undersea transmission cable that interconnects Block Island with the mainland under the Town of New Shoreham Project statute.¹ While BIPCO recognizes that interconnection costs are generally charged directly to a new transmission customer, BIPCO takes the position that the Town of New Shoreham Project statute

¹ BIPCO Petition at ¶ 3.

overrides the ISO-NE Tariff.² BIPCO also concludes that the undersea cable and Narragansett's substation on Block Island are for BIPCO's sole use and cannot be distinguished from BIPCO's interconnection costs and the cost of a spare transformer.³

The Company objects to BIPCO's Petition on the grounds that BIPCO's interpretation of R.I. Gen. Laws § 39-26.1-7 is inconsistent with the ISO-NE Tariff and FERC precedent. The Company also objects to the Petition on the grounds that the statutory intent of this provision did not contemplate socialization of the costs related to BIPCO's interconnection facilities and spare transformer. As discussed more fully below, BIPCO's interconnection facilities and spare transformer qualify as Direct Assignment Facilities under the terms of the ISO-NE Tariff consistent with FERC precedent and, therefore, are the direct cost responsibility of BIPCO. Accordingly, the PUC should deny BIPCO's request for a judgment declaring that the costs associated with the interconnection of BIPCO with the submarine transmission cable that will connect Block Island to the mainland, and the costs to purchase a back-up transformer for the new BIPCO substation must be socialized to all electric distribution ratepayers pursuant to § 39-26.1-7(d), and not imposed solely on BIPCO and its ratepayers. Rather, the PUC should issue a judgment declaring that such costs are solely the financial responsibility of BIPCO.

A. BIPCO's interconnection facilities listed under Part II, Section 3. i. of its Local Service Agreement qualify as Direct Assignment Facilities consistent with the terms of the ISO-NE Tariff and FERC precedent and, therefore, are appropriately the direct cost responsibility of BIPCO.

In establishing the applicable rates to be charged to BIPCO under the ISO-NE Tariff, NEP has been guided by the Town of New Shoreham Project statute, the ISO-NE Tariff and FERC precedent. As explained in more detail below, the principles applied by NEP to determine cost assignment to BIPCO under the ISO-NE Tariff are as follows:

² BIPCO Petition at ¶ 19.

³ BIPCO Petition at ¶ 18.

1. Consistent with the ISO-NE Tariff, if facilities constructed to serve BIPCO qualify as Direct Assignment Facilities⁴ under the “sole use” test, but are not recovered under one of the rate surcharges applicable under the ISO-NE Tariff, the costs are to be directly assigned to the customer under a Direct Assignment Facility (DAF) Charge;⁵

2. If the cost of facilities to be constructed would not have been incurred “but for” the Town of New Shoreham Project statute, but do not qualify under the ISO-NE Tariff as Direct Assignment Facilities and/or are not recovered through other rate surcharges under Schedule 21 of the ISO-NE Tariff, the costs are to be rolled-in to the Block Island Transmission System (BITS) Cable Surcharge, the costs of which are allocated to Narragansett and BIPCO according to the terms of the Town of New Shoreham Project statute as accepted by FERC in Narragansett’s and BIPCO’s Local Service Agreements under Schedule 21 of the ISO-NE Tariff.

⁴ As defined in the ISO-NE Tariff, Direct Assignment Facilities are “facilities or portions of facilities that are constructed for the sole use/benefit of a particular Transmission Customer requesting service under the OATT or a Generator Owner requesting an interconnection. Direct Assignment Facilities shall be specified in a separate agreement among the ISO, Interconnection Customer and Transmission Customer, as applicable, and the Transmission Owner whose transmission system is to be modified to include and/or interconnect with the Direct Assignment Facilities, shall be subject to applicable Commission requirements, and shall be paid for by the Customer in accordance with the applicable agreement and the Tariff.” See ISO-NE Tariff, Section I.2.2. Definitions. The pro forma tariff approved by FERC under Order No. 888 defines Direct Assignment Facilities as, “Direct Assignment Facilities: Facilities or portions of facilities that are constructed by the Transmission Provider for the sole use/benefit of a particular Transmission Customer requesting service under the Tariff. Direct Assignment Facilities shall be specified in the Service Agreement that governs service to the Transmission Customer and shall be subject to Commission approval.” See Promoting Wholesale Competition Through Open Access Non-discriminatory Transmission Services by Public Utilities; Recovery of Stranded Costs by Public Utilities and Transmitting Utilities, Order No. 888 at Appendix D, Section 1.10, 61 Fed. Reg. 21,540 (May 10, 1996).

⁵ In accordance with Schedule 21-NEP of the ISO-NE Tariff, Section 22.1, “In cases in which the Transmission Customer intends to interconnect new network load to the Transmission System or Distribution System, the interconnection: (i) shall require the construction of interconnection facilities and associated equipment and (ii) may require the construction or installation of facilities and/or associated equipment in addition to the interconnection facilities on the Transmission System or Distribution System or the transmission system of another utility. These interconnection facilities and additional facilities shall be the financial responsibility of the Transmission Customer, to the extent consistent with Commission policy.” Pursuant to Section 24.6 of Schedule 21-NEP, the Direct Assignment Facility Charge “compensates NEP for the annual costs of the facilities, expansions and upgrades that may be directly assigned by NEP or by the ISO, as appropriate, to the Transmission Customer. These costs may include, but are not limited to, the capital carrying cost, income tax, depreciation, operation and maintenance, administrative and general expenses and property tax. The Direct Assignment Facility Charge shall be calculated as specified in Attachment DAF to this Schedule.”

BIPCO's interconnection facilities listed under Part II, Section 3. i. of its Local Service Agreement - one 34.5kV breaker, one 34.5/14.16kV/2.4kV transformer, the 5kV insulated line to BIPCO's substation, and associated equipment – all qualify as Direct Assignment Facilities because they exist for the sole use and benefit of BIPCO. No other customer shares in the use or benefit of these facilities. Therefore, under the terms of the ISO-NE Tariff and FERC precedent, they are appropriately the direct cost responsibility of BIPCO, and should not be rolled-in to the BITS Cable Surcharge. Conversely, BIPCO's assertion that the undersea cable and the substation on Block Island are for BIPCO's sole use is incorrect. With the exception of the interconnection equipment identified in Section 3.i. of BIPCO's Local Service Agreement, and similar interconnection equipment for the sole use of the Block Island Wind Farm being similarly supported through DAF Charges under a Large Generator Interconnection Agreement (LGIA), the use and benefits of the undersea cable and the substation on Block Island are shared by BIPCO and the Block Island Wind Farm, and, therefore, they do not qualify as Direct Assignment Facilities.

B. A Spare Transformer for BIPCO would also qualify as a Direct Assignment Facility consistent with the terms of the ISO-NE Tariff and FERC precedent and, therefore, would appropriately be the direct cost responsibility of BIPCO.

Subsequent to the execution of a Local Service Agreement with BIPCO in 2014, communications took place between representatives of NEP and BIPCO concerning the procurement of a spare transformer that would be made available as a backup to replace the 34.5/14.16kV/2.4kV transformer serving BIPCO's load that is already installed at the Narragansett substation on Block Island. At this time, there is no agreement among ISO-NE, NEP and BIPCO that authorizes the procurement of a spare transformer or determines how BIPCO would be charged for a spare transformer. However, NEP has determined that a spare

transformer with the configuration needed to serve BIPCO would be unique and there would be no other possible purpose for such a transformer anywhere else on National Grid's system in the New England control area. Therefore, it has been NEP's position that purchasing such a spare transformer would be for the sole use and benefit of BIPCO and, therefore, would qualify it to be treated as a Direct Assignment Facility.

Representatives of NEP previously discussed two options with BIPCo for the purchase of this transformer. NEP offered that BIPCO could either purchase and own the spare transformer itself or pay a Direct Assignment Facility Charge to support the cost of a spare transformer. BIPCo declined both options.

C. BIPCo's interconnection facilities and a spare transformer do not constitute "related facilities" of the transmission cable under R.I. Gen. Laws § 39-26.1-7(f) and, therefore, should not be socialized throughout Rhode Island.

In enacting the Town of New Shoreham Project statute, the legislature expressly found that it was in the public interest to construct an offshore wind demonstration project off the coast of Block Island, which included an undersea transmission cable and identified several state policy objectives, among which was to connect the Town of New Shoreham to the mainland of the state.⁶ Subsection (f) of the statute explicitly authorizes Narragansett to "own, operate, or otherwise participate in such transmission cable project."⁷ Narragansett owns the new substation

⁶ See R.I. Gen. Laws § 39-26.1-7(a) ("The general assembly finds it is in the public interest for the state to facilitate the construction of a small-scale offshore wind demonstration project off the coast of Block Island, including an undersea transmission cable that interconnects Block Island to the mainland in order to: position the state to take advantage of the economic development benefits of the emerging offshore wind industry; promote the development of renewable energy sources that increase the nation's energy independence from foreign sources of fossil fuels; reduce the adverse environmental and health impacts of traditional fossil fuel energy sources; and provide the Town of New Shoreham with an electrical connection to the mainland.").

⁷ On January 30, 2015, National Grid purchased the engineering, permits, property rights and other development work for the Block Island Transmission System (BITS) project from Deepwater Wind Block Island Transmission, LLC pursuant to a Transmission Facilities Purchase Agreement, dated June 30, 2014. The Rhode Island Division of

on Block Island, as well as the submarine cable and the related facilities necessary to interconnect Deepwater Wind Block Island, LLC and BIPCo to existing facilities.⁸ It is these facilities to which the language “transmission cable and related facilities” in the statute refers, and not to BIPCo’s interconnection facilities that relate solely to BIPCo’s interconnection to the transmission system, or to the spare transformer that solely benefits BIPCo and is not otherwise needed in the system.

1. The PUC must give effect to the plain language of R.I. Gen. Laws § 39-26.1-7(f), which does not provide for socialization of costs related to BIPCo’s interconnection facilities and spare transformer.

BIPCo emphasizes the use of the phrase, “related facilities” in the statute to argue that the phrase “transmission cable and related facilities” includes not only the cable and the substation, but also the spare transformer and BIPCo’s interconnection facilities.⁹ Under the well-known rules of statutory construction, when the language of a statute is clear and unambiguous, the PUC must enforce the statute as written by giving the words of the statute their plain and ordinary meaning. *Harvard Pilgrim Health Care of New Eng., Inc. v. Gelati*, 865 A.2d 1028, 1036 (R.I. 2004). Also, when the meaning of a word or phrase in a statute is questionable or doubtful, courts will ascertain the meaning by reference to the meaning of other words or phrases associated with it under the doctrine of “noscitur a sociis.”¹⁰ *State v. DiStefano*, 764 A.2d 1156, 1161 (R.I. 2000).

The references to the language “transmission cable and related facilities” in subsection (f) of the statute should be interpreted to mean those facilities that relate to and are part of the

Public Utilities and Carriers consented to the execution of the Transmission Facilities Purchase Agreement in their written Order dated April 2, 2014 in Docket No. D-14-20.

⁸ The Block Island Transmission System project also includes a new 34.5KV substation on the mainland that will interconnect the submarine transmission cable with National Grid’s existing network, as well as 4 miles of underground infrastructure and upgrades at the existing Wakefield and West Kingston substations.

⁹ BIPCo Petition at ¶ 24.

¹⁰ Translated literally from Latin, this phrase means “it is known by its associates.” See *DiStefano*, at 1161 (quoting Black’s Law Dictionary 1060 (6th ed. 1990)).

transmission cable project that Narragansett has constructed, and will own and operate, consistent with the plain language of the statute,¹¹ and not to those interconnection facilities or equipment that are for the sole use and benefit of BIPCo. This interpretation is supported by use of the conjunctive “and” in the phrase “transmission cable and related facilities”. If the legislature had intended for the costs of BIPCo’s interconnection and back-up facilities to be socialized throughout Rhode Island, as BIPCo asserts, the legislature could have stated as such when providing for the allocation of costs between BIPCo’s customers in the Town of New Shoreham and Narragansett’s customers. Instead, the legislature deliberately used the word “transmission cable.”¹² It is not the role of the PUC to re-write or expand the scope of the statute beyond its plain and ordinary meaning. To construe the meaning of the provision “transmission cable and related facilities” to include the costs of BIPCo’s interconnection facilities and spare transformer in the costs of the transmission cable would be to re-write the law to include costs that were not otherwise contemplated by the legislature.

Even if the plain and ordinary meaning of the language “transmission cable and related facilities” could arguably be construed to include BIPCo’s interconnection facilities and spare transformer, such interpretation would lead to an absurd and unintended result. Courts will not construe a statute to reach an absurd or otherwise unintended result. *Hargreaves v. Jack*, 750 A.2d 430, 435 (R.I. 2000) (quoting *Kaya v. Partington*, 681 A.2d 256, 261 (R.I. 1996)).

Socialization of such costs is inconsistent with the ISO-NE Tariff and overlooks established

¹¹ See e.g., R.I. Gen. Laws § 39-26.1-7(f) (“The electric distribution company may elect to purchase the **transmission cable and related facilities** from the developer or an affiliate of the developer. . . .”(Emphasis added.). “[T]he electric distribution company and its transmission affiliate are authorized to make a filing with the federal energy regulatory commission to put into effect transmission rates to recover all of the costs associated with the **purchase of the transmission cable and related facilities** and the annual operation and maintenance.” (Emphasis added.)).

¹² See *Id.* (“The allocation of the **costs related to the transmission cable** through transmission rates or otherwise shall be structured so that the estimated impact on the typical residential customer bill for such transmission costs for customers in the Town of New Shoreham shall be higher than the estimated impact on the typical residential customer bill for customers on the mainland of the electric distribution company.”) (Emphasis added.).

FERC precedent, both of which require that interconnection facilities and associated equipment are the financial responsibility of the transmission customer. Rhode Island customers are already sharing in the cost of the transmission cable, the use of which is shared between BIPCo and Block Island Wind. This was a policy decision by the legislature. It would be nothing short of absurd to also require Narragansett's customers to share in the cost of facilities that only serve BIPCo, contrary to the established precedent. This, the legislature did not intend.

2. BIPCo's interconnection facilities and spare transformer do not benefit Narragansett's customers and, therefore, should not be socialized throughout Rhode Island.

In interpreting a statute, courts will give meaning and effect to the language of a statute as a whole such that provisions will be read together in a consistent manner. *See Harvard Pilgrim Health, 865 A.2d, at 1038*. It is clear from the stated public policy purpose in subsection (a) of the Town of New Shoreham Project statute that the legislature intended for the transmission cable to be part of the offshore wind project that would benefit, not only the Town of New Shoreham, but the entire state. Accordingly, the legislature found that it was appropriate to socialize the costs of the transmission cable and the related facilities to all customers in Rhode Island.¹³ Conversely, BIPCo's interconnection facilities and spare transformer do not benefit any other customers, except BIPCo. Therefore, it would be inconsistent with the statute as a whole for the PUC to interpret the language "transmission cable and related facilities" to require that the costs for BIPCo's interconnection facilities and spare transformer be socialized to all customers in Rhode Island. The PUC must implement the law as written and in a manner consistent with its stated purpose.

¹³ See R.I. Gen. Laws § 39-26.1-7(f).

IV. CONCLUSION

For the reasons set forth herein, the Company objects to BIPCo's Petition, and the PUC should deny BIPCo's request for a judgment declaring that the costs associated with the interconnection of BIPCo with the submarine transmission cable that will connect Block Island to the mainland, and the costs to purchase a back-up transformer for the new BIPCo substation must be socialized to all electric distribution ratepayers pursuant to § 39-26.1-7(d). Instead, the PUC should issue a judgment declaring that such costs are solely the financial responsibility of BIPCo (and, in turn, its customers).

Respectfully submitted,

NATIONAL GRID

By its attorney,



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National Grid
280 Melrose Street
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(401) 784-7288

Dated: March 15, 2017

**Summary of Service Agreements Submitted to the Federal Energy Regulatory Commission
Implementing Rates, Terms and Conditions of Transmission and Interconnection Service over the
Block Island Cable and Associated Facilities**

Contract Description	Parties	FERC Docket	Status	Effective Date
Local Service Agreement under the ISO-NE Tariff (TSA-NEP-83)	BIPCO NEP ISO-NE	Docket No. ER15-1466	Accepted by Delegated Letter Order on June 22, 2015	June 7, 2015
Local Service Agreement under the ISO-NE Tariff (TSA-NEP-86)	Narragansett NEP ISO-NE	Docket No. ER15-1466	Accepted by Delegated Letter Order on June 22, 2015	June 7, 2015
Local Service Agreement under the ISO-NE Tariff (TSA-NEP-92)	BI Wind Farm NEP ISO-NE	Submitted by Electric Quarterly Report (EQR) # C447	Accepted	June 10, 2016
Large Generator Interconnection Agreement ("LGIA") under the ISO-NE Tariff	BI Wind Farm NEP	Docket No. ER14-2496	Accepted by Delegated Letter Order on September 2, 2014	September 23, 2014
Integrated Facilities Agreement under NEP Tariff No. 1 (SA No. 23)	Narragansett NEP	Docket No. ER14-2493	Accepted by Delegated Letter Order on September 2, 2014	September 23, 2014