

November 7, 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 4743 - In Re: Petition of Tesla, Inc. and Sunrun, Inc.  
For Declaratory Judgment or an Advisory Ruling on R.I. Gen. Laws § 39-26.4  
National Grid Comments**

Dear Ms. Massaro:

On behalf of National Grid,<sup>1</sup> I write to submit comments in the above-referenced docket. As background, on September 28, 2017, Tesla Inc. and Sunrun Inc. (Petitioners) filed a Petition for Declaratory Judgment, or in the alternative, an Advisory Ruling, regarding the eligibility for net metering of certain solar power generation systems paired with battery storage where: (1) the solar power generating system is no greater than 25 kW alternating current (AC); (2) the battery storage charges only from the solar power generation system; and (3) the customer-host does not take electric supply service under a time-varying or time-of-use (TOU) rate (Rhode Island Small Scale Solar+Storage). National Grid supports the Petitioners' request for clarification of the net metering eligibility of Rhode Island Small Scale Solar+Storage because it is unclear whether such systems are eligible as solar net metering facilities under the Net Metering Statute, R.I. Gen. Laws § 39-26.4-2 (Net Metering Statute). Moreover, as described below, there are numerous policy and other considerations that must be examined in determining whether (and, if so, the extent to which) solar+storage systems are eligible for net metering.

In general, National Grid views the pairing of solar power generation with battery storage (Solar+Storage) as a means for offering a wide range of potential benefits for customers and the electric power system (EPS). These systems can be interconnected to National Grid's EPS subject to National Grid's interconnection requirements. As noted above, however, it is unclear whether such Solar+Storage systems are eligible as solar net metering facilities under the Net Metering Statute, which does not expressly include Solar+Storage as an eligible renewable resource.<sup>2</sup> If National Grid had provided Solar+Storage facilities with net metering services, it would have been compelled to unilaterally define any restrictions and eligibility requirements

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

<sup>2</sup> To the extent the battery included in a Solar+Storage facility charges off the EPS, in whole or in part, the Solar+Storage facility would not qualify as a renewable resource.

needed to ensure that such systems comply with the Net Metering Statute and prevent any manipulation and gaming of the net metering system. Instead, given the nature and scale of the issues presented, National Grid views it as more appropriate for the Public Utilities Commission (PUC) to determine whether Solar+Storage facilities are eligible solar net metering facilities and, if so, to define the parameters for eligibility of such Solar+Storage facilities.

In addition to the requirements in the Net Metering Statute, National Grid has identified a number of policy and other considerations that should be evaluated in determining whether (and, if so, the extent to which) Solar+Storage systems are eligible for net metering. These policy and other considerations include rate treatment, ISO-NE participation requirements, conditions and criteria imposed on eligibility (such as, among other things, system size, battery charging, and energy exports) and the means for enforcing such criteria,<sup>3</sup> and technical and interconnection requirements (collectively, Policy and Technical Concerns).<sup>4</sup>

For the most part, National Grid's Policy and Technical Concerns are mitigated where the Solar+Storage facility is 25 kW (AC) or less, the battery charges only from the solar facility, and either the battery does not export to National Grid's EPS or the battery exports to the EPS subject to specific limitations on rate classification for such exports in essence, the Rhode Island Small Scale Solar+Storage facilities that are the subject of Tesla and Sunrun's Petition. As such, the Company agrees that a narrow advisory ruling by the PUC addressing whether Rhode Island Small Scale Solar+Storage facilities are eligible for net metering services as a solar net metering facility is appropriate at this time.<sup>5</sup>

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

Sincerely,



Raquel J. Webster

cc: Docket 4743 Service List  
Jon Hagopian, Esq.  
Steve Scialabba, Division

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<sup>3</sup> See the Company's Response to Division 2-1 in this docket, dated October 18, 2017.

<sup>4</sup> For a description of the Company's Policy and Technical Concerns, see the Company's Supplemental Response to Division 1-1 in this docket, dated November 7, 2017.

<sup>5</sup> To the extent that the PUC is inclined to examine the net metering eligibility of other paired system sizes or configurations, the Company respectfully requests that the PUC conduct such an examination in a separate proceeding taking into consideration the Policy and Technical Concerns the Company identified in this docket.

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.



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Joanne M. Scanlon

November 7, 2017  
Date

**Tesla, Inc. & Sunrun, Inc – Petition for Declaratory Judgment –  
Docket No. 4743**

**List updated 10/7/17**

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