

February 23, 2018

**VIA HAND DELIVERY & ELECTRONIC MAIL**

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

**RE: Docket 4763 - Standards for Connecting Distributed Generation, RIPUC No. 2180 Responses to Hearing Record Requests**

Dear Ms. Massaro:

Enclosed please find 10 copies of National Grid's<sup>1</sup> responses to the record requests that were issued at the Commission's evidentiary hearing on January 25, 2018 in the above-referenced docket.

Thank you for your attention to this filing. Please contact me if you have any questions concerning this matter at 401-784-7288.

Very truly yours,



Jennifer Brooks Hutchinson

Enclosures

cc: Docket 4763 Service List  
Jon Hagopian, Esq.  
John Bell, Division  
Al Mancini, Division

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<sup>1</sup> 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.



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Joanne M. Scanlon

February 23, 2018

Date

**Docket No. 4763 – National Grid - Standards for Connecting Distributed Generation,  
RIPUC No. 2180**

**Service List updated 12/27/17**

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Record Request No. 1

Request:

How often over the past two years has National Grid included costs for 3V0 fault protection? Of these, how many were transmission and how many were distribution? Please include in the response how often a transmission upgrade been needed over the past two years.

Response:

- 1) Over the past two years, the Company identified 20 substations that required 3V0 protection scheme installations as a result of distributed generation (DG) interconnection requests, and the Company included such costs as system modification costs in the interconnecting customer's interconnection service agreement in accordance with the DG tariff. 3V0 protection requires work on both the high voltage side of the substation transformer and the low voltage side. In many cases, New England Power (NEP) owns and maintains the high voltage side, and The Narragansett Electric Company (TNEC) owns and maintains the low voltage side. In others cases, TNEC owns both the high and low voltage sides.
- 2) Of these 20 substations requiring 3V0 installations, 14 have high side ownership by NEP (i.e., transmission) and 6 have both high and low side ownership by TNEC.
- 3) Over the past two years, the NEP transmission upgrades that have been identified as a result of a DG interconnection request are typically part of the 3V0 protection scheme installations, but have also included some ancillary (and far less costly) upgrades such as meter work and regulators. The Company does not have readily available information that would enable it to determine how often transmission upgrades, other than those included as part of the 3V0 protection scheme, have occurred. However, the Company believes that such upgrades have been infrequent and diminimus.

Record Request No. 2

Request:

Provide clarification of when outreach to a customer will result in cancellation of a project and when it will result in continuation of a project under the Distributed Generation tariff and the RE Growth program.

Response:

Under the Company's Standards for Connecting Distributed Generation, RIPUC 2163 (DG Tariff), a customer applying for interconnection may be served a cancellation notice by the Company for their application if they have not responded to the Company's requests for information relating to the interconnection application and/or have failed to comply with the DG Tariff's timelines, such as for payments associated with system upgrades. The Company works with the interconnecting customer that is the subject of a possible termination if an extension is required, if the customer has a reasonable request, and if the extension is not affecting other Interconnection Applications from advancing or affecting the Company's ability to perform any studies or upgrades required for service to other customers. However, the Company will not grant extensions if such extension would impact the Company's ability to meet its statutory timeframes for processing an interconnection request.<sup>1</sup> Additionally, the Company may terminate a customer's Interconnection Service Agreement if the customer violates the terms of that agreement.

Under the RE Growth program, customers are issued a conditional Certificate of Eligibility (COE) upon acceptance of their application, for all classes and sizes of systems, which signifies their enrollment in the RE Growth Program, enabling payment under the terms of the RE Growth tariffs once all terms of the COE and tariff are met. Once issued, it is the customer's responsibility to construct their system within the timelines provided in the DG Tariff and follow other conditions in the DG Tariff to enable the Company to finalize the COE, triggering the tariff payment term of 15 or 20 years, and begin to pay the customer for their generation. The

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<sup>1</sup> The Company's interpretation of R.I. Gen. Laws § 39-26.3-4.1 is that notwithstanding the Company's statutory processing timelines, as with existing practice, delays caused by the interconnecting customer will interrupt the processing "clock" (i.e., the Company's processing time will be put on hold or be extended, as applicable), with the specific exception of customer delays in providing required information which will not extend system modification deadlines. To the extent the PUC has a different interpretation of the statutory processing requirements, this would impact the manner in which the Company works with interconnecting customers to continue a project in lieu of termination as described herein, and, in turn, would affect how the Company processes extension requests.

Record Request No. 2, page 2

Company cannot terminate a customer's COE without cause. If a customer wishes to terminate their COE at any time, the customer has the option to request that the Company terminate the COE. The Company could then terminate the COE enrollment at the Company's option, per the terms of the tariff.

The Company recently contacted 144 Small Scale Solar class conditional COE holders who were several installers identified as customers who would not likely move forward with the construction of their proposed facilities. See the letter from National Grid to the PUC dated December 20, 2017 and which is attached to this response as Attachment Post Hearing Request 1. The Company's efforts that are described in the attached letter resulted in only seven voluntary terminations from customers for 49 kW of terminated capacity. The Company is currently reviewing the outcome of this effort with the Office of Energy Resources and members of the DG Board.

The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 4763  
Standards for Connecting Distributed Generation, RIPUC No. 2180  
Responses to Record Requests  
Issued at the Commission's Evidentiary Hearing  
On January 25, 2018

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Attachment Post Hearing Request 1

Attachment Post Hearing Request 1 was provided in Docket No. 4774 on February 5, 2018.

Record Request No. 3

Request:

Please propose what would be a reasonable number of application reports to include in the language in Section 3.2 of the tariff.

Response:

National Grid can reasonably process approximately 10 pre-interconnection Application Report requests on a daily basis or on the order of approximately 50 per week.



Record Request No. 4

Request:

Please provide language to include in the tariff regarding the mechanics for notifying the PUC that Section 5.4 Separation of Costs has been implicated and specific system modifications have been accelerated.

Response:

**5.4 Separation of Costs**

Section 5.4, Separation of Costs, states that, for Renewable Interconnecting Customer Applications filed on or after July 1, 2017, "in the event that the Commission determines that a specific system modification of the electric distribution system benefiting other customers has been accelerated due to an interconnection request and orders the Renewable Interconnecting Customer to fund the modification, the Renewable Interconnecting Customer will be entitled to repayment of the depreciated value of the modification as of the time the modification would have been necessary as determined by the Commission."

The Company proposes that the process to comply with the above accelerated system modification cost provision be as follows: The Company will consider a system modification to be an accelerated modification if such modification is otherwise identified in the Company's work plan as a necessary capital investment to be installed within a five-year period as of the date the Company begins the impact study of the proposed distributed generation (DG) project (defined as an Accelerated Modification).<sup>1</sup> The Company will identify the Accelerated Modification and the cost thereof in the impact study. The Renewable Interconnecting Customer will be responsible for the identified Accelerated Modification costs less the depreciated value (Modified Costs), which Modified Costs will be estimated in the interconnection service agreement (ISA). Upon reconciliation, final labor, material and depreciation values will be provided based on the actual date of asset installation. The Company will file with the Commission all executed ISAs for Renewable Interconnecting Customer DG projects with an identified Accelerated Modification by July 1 of each year.

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<sup>1</sup> The tariff, as revised, defines a "System Improvement" to mean "[e]conomically justified upgrades determined by the Company in the Facility study phase for capital investments associated with improving the capacity or reliability of the EPS that may be used along with System Modifications to serve an Interconnection Customer." The Company has interpreted R.I. Gen. Laws §39-26.3-4.1(b), which addresses acceleration of system modifications, to mean those system improvements that are planned further out in time for the benefit of all customers, and would not otherwise be necessary at the time of the interconnection, but for the specific renewable energy interconnecting customer's project.

Record Request No. 4, page 2

Renewable Interconnecting Customers may also petition the Public Utilities Commission (PUC) directly if the customer believes it has been incorrectly charged for an Accelerated Modification under Section 5.4. In these cases, the Renewable Interconnecting Customer shall be responsible to pay for the cost of the system modification pursuant to the ISA, unless and until a determination has been made by the PUC.

In all cases, the Company will be entitled to recover the costs of any unpaid portion of an Accelerated Modification(s) in rates.

Record Request No. 5

Request:

How long is the look forward period for acceleration of system modifications?

Response:

The look-forward period is five (5) years from the date the impact study begins to align with the Company's distribution system work plan.