

January 23, 2018

BY HAND DELIVERY AND ELECTRONIC MAIL

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

RE: Docket 4774 - Proposed 2018 Renewable Energy Growth Program Tariff and Rule Changes
National Grid's Reply to Sunrun Inc.'s Comments and New Energy Rhode Island's Objection

Dear Ms. Massaro:

On behalf of National Grid¹ I have enclosed two letters from Ian Springsteel, Director of U.S. Regulatory Strategy at National Grid, in response to Sunrun Inc.'s comments dated December 20, 2017 and New Energy Rhode Island's objection dated December 13, 2017 in the above-referenced docket. Mr. Springsteel will be available to answer questions regarding the enclosed letters at the hearing on January 24, 2018.

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

Very truly yours,



Raquel J. Webster

Enclosures

cc: Docket 4774 Service List
Leo Wold, Esq.
Jon Hagopian, Esq.

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

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RE: Docket 4774 - Proposed 2018 Renewable Energy Growth Program Tariff and Rule Changes
National Grid's Response to SunRun Inc.'s Comments

Dear Ms. Massaro:

On behalf of National Grid,¹ I am submitting this letter in response to SunRun Inc.'s December 20, 2017 comments in the above-referenced docket. SunRun's comments involve two areas: capacity tracking and system sizing rules. Regarding capacity tracking, SunRun notes that the current Renewable Energy (RE) Growth Program system for reporting available remaining capacity for small scale solar I + II systems is unpredictable and irregular. (SunRun comments at p. 2). SunRun further notes that this creates uncertainty for developers regarding when sales and customer expectations of the RE Growth Program should be adjusted. Id. SunRun, therefore, recommends that National Grid institute a live or bi-weekly capacity allocation tracker on its online RE Growth Program website. Id.

A. Capacity Tracking

As noted above, SunRun has commented that the current Renewable Energy (RE) Growth Program system for reporting available remaining capacity for small scale solar I + II systems is unpredictable and irregular. National Grid understands that this perception may be due to the way in which the Company has reported this capacity in the past, including during the 2017 RE Growth Program Year. The National Grid Customer Solutions team updates the capacity available on its "Interconnection Process"² website weekly, and has done so for the past two program years. On the "RE Growth" website,³ in a drop down box for the Small-Scale Solar class, capacity information was initially updated on a monthly basis in the 2017 RE Growth Program year in May, June, July and August 2017. In September 2017, it became apparent to

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

² Please see this webpage at https://www9.nationalgridus.com/narragansett/home/energyeff/4_interconnection-process.asp

³ Please see this webpage at http://www9.nationalgridus.com/narragansett/business/energyeff/4_dist_gen.asp

the Company that capacity was being allocated more quickly than in 2016-2017. The Company responded to this rapid allocation by updating its website on September 21, 2017, September 29, 2017, October 5, 2017, and October 16, 2017. Consequently, these two sites were occasionally out of sync. The Company plans to remedy this situation in the 2018 RE Growth Program year by providing updates only on the Interconnection Process page. The RE Growth webpage will include a direct link to the interconnection Process site, which will serve as a single source of updated information for customers regarding available capacity. The Company will update this information weekly.

B. System Sizing

The Rhode Island net metering and RE Growth statutes require that solar arrays be sized no greater than necessary to supply the three-year average annual usage of the customer’s load at which the solar array is being installed. The law also provides some flexibility to the utility when such information is not available. In early 2017, the Company provided new guidance regarding system sizing to correct differences in how RE Growth systems and net metered systems could be sized. Because RE Growth systems are measured in Direct Current (DC), the sizing for such arrays requires the use of a capacity factor that is applicable for DC kW nameplate to AC output in kWh. Net metered systems are measured by the AC rating of their inverter and, therefore, must use a capacity factor that is applicable to the AC kW nameplate of the solar array to AC output in kWh. The Company presented this change to the Rhode Island Distributed Generation (DG) Board at a public meeting in July 2017, and the calculation of how to properly size a customer system was included in that presentation. Please see the Company’s presentation to the DG Board, which is attached to these comments as Attachment 1. Both programs use a single capacity factor number to establish the size of the customer’s allowed system. Although this does not allow for a custom designed system that suffers from extensive shading of the panels, reducing the average capacity factor, the numbers used represent an average capacity factor of 14% that is used by the DG Board in setting the residential ceiling prices.

When it first entered the market, SunRun had to make several resizing adjustments when it submitted applications to the Company for net metered systems. During recent discussions with the Company, SunRun explained that it has now embedded the proper sizing methodology into a tool that its Rhode Island sales team will use. National Grid has not received any applications from SunRun for systems in the RE Growth program, which are the subject of this docket.

To the Company’s knowledge, most of the other solar installers who are active in Rhode Island have not had a similar experience in sizing adjustments because they have used the Company’s sizing methodology prior to submitting their applications and have accurately received or estimated customer usage history. Every installer is responsible for properly sizing the system being sold to the customer by using the appropriate metrics and formulas. Regarding the customer’s access to its usage history, please note the following:

- 1) Three years of customer use data is readily available from National Grid’s Customer Contact Center, which the customer can reach by calling the Company’s 800 number and providing their account number and other identifying details, if the account has been established for three or more years.
- 2) The company has flexibility to use less than a three-year history of usage if information regarding three years of usage is not available and currently does so on a regular basis for customers and installers. This requires interaction with the Company’s Customer Solutions DG application team to develop an annualized usage number, and the Company encourages SunRun and other installers to contact that department prior to finalizing any customer contract.
- 3) The Company regularly works with installers presenting engineering estimate-based information on newly installed loads, such as air source heat pumps, or newly enclosed space (i.e., a home addition) at a customer location to accommodate load that is not available in the customer’s usage history or for a second solar facility.

The Company agrees that further clarity and streamlined methodology in applying estimated data for new load and estimating annual usage for customers with short periods of billing activity (e.g., less than one year) would be useful enhancements to the implementation of the RE Growth program. With the introduction of the automated interconnection portal, which is now largely complete, the Company will begin to develop such process improvements and will have guidance and estimation tools available to installers during the 2018 Program Year. Further, the automated interconnection portal will soon (during the 2018 program year) have the capability to provide customers with three years of usage history when customers begin their interconnection applications.

Finally, the Company is open to exploring how it may be able to incorporate a system-specific sizing methodology through the use of integrated software that is fed by data from the automated interconnection portal and customer usage history to allow for a real time and streamlined system sizing calculation. This could allow for systems to be sized taking into account such factors as tilt and azimuth and overall efficiency of the inverter the customer selects. The Company would also need to investigate with the DG Board whether shading should be allowed in such calculations. This potential automated solution would likely entail additional integration and deployment costs, and the Company would collect such costs as part of the RE Growth factor if expended. The Company proposes that it can explore these issues between now and when the Company files the proposed 2019 RE Growth Program Plan with the DG Board and the PUC in October 2018 and November 2018, respectively.

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Page 4 of 4

As noted above, the Company is willing to take the steps noted above regarding the current processes involving capacity tracking and system sizing. Thank you for your attention to this matter.

If you have any questions, please contact me at 781-907-2131.

Very truly yours,

A handwritten signature in black ink, appearing to read "Ian Springsteel". The signature is written in a cursive style with a large, stylized "I" and "S".

Ian Springsteel

Enclosures

cc: Docket 4774 Service List
Leo Wold, Esq.
Jon Hagopian, Esq.

Rhode Island Renewable Energy Growth Program

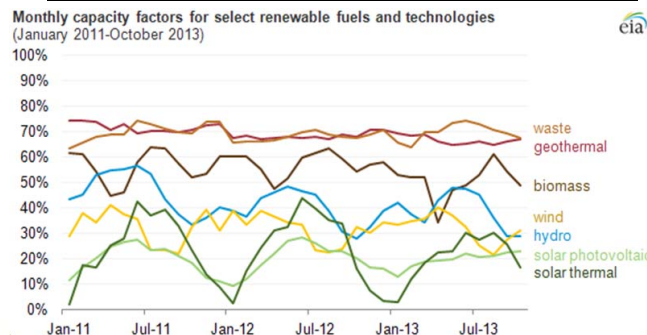
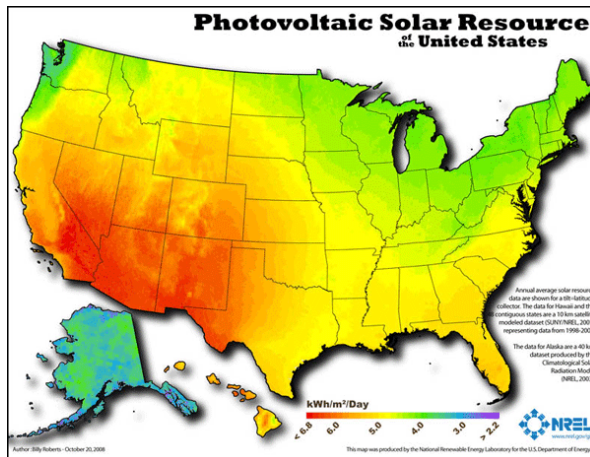
nationalgrid
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Overview of Solar PV Capacity Factor And System Sizing Issues July 24, 2017



What is Capacity Factor for Solar PV?



- Capacity factor is a measure of the percentage of time a system can operate at its peak nameplate rating over a period of time on average
- Solar PV capacity factor is the result of system losses and solar insolation, driven by latitude, cloud and snow cover, shading, and orientation of any tilt
- Capacity factor varies by hour, day and month, and averages out to an annual number
- The peak rating and efficiency of a panel has more to do with power density (kWp/ sq. meter)
- An easy measure of capacity factor is kWh AC/kW-DC per year divided by total hours
 - $1226 \text{ kWh AC} / 1 \text{ kW DC} / 8760 = 14\%$

RE Growth System Sizing Highlights



- To receive bill credits, RE Growth systems must be sized like Net Metering systems to not produce more than the 3-year annual average use of the customer
- Net Metered systems are measured in Alternating Current (AC)
- RE Growth Systems are measured by Direct Current (DC)
- Capacity factor between DC and AC accounts for losses in the system and inverter efficiency, and inverter sizes are typically smaller than the DC rating of the panels
 - RE Growth average is 115% DC/AC ratio, or an 87% derate
- **An average Rhode Island capacity factor for DC nameplate is 14%**
- **The AC capacity factor is this rate divided by the derate (.14/.87) or 16.1%**



Class Qualification and Sizing



- The RE Growth program classes for solar are all measured in peak power DC, and include all fractions up to the next kW of total DC nameplate
 - Systems in the 1-10 kW class include 10.9 kW DC; systems in 26-250 kW class include 250.9 kW DC; etc.
- Sizing of maximum allowed system is calculated to the DC nameplate using 14% capacity factor. The following example illustrates:
 - $9,000 \text{ kWh avg. 3-yr annual use} / 14\% \text{ capacity factor} / 8,760 \text{ hours/year} = 7.34 \text{ kW DC (round to } 1/100^{\text{th}})$

Net Metering Application



- Sizing of maximum allowed system for Net Metering uses the AC nameplate of the inverter, for which we now use a 16.1% capacity factor. The following example illustrates:
 - $9,000 \text{ kWh avg. 3-yr annual use} / 16.1\% \text{ capacity factor} / 8,760 \text{ hours/year} = 6.38 \text{ kW AC (round to } 1/100^{\text{th}})$
 - This maximum AC inverter size would be serving panels totaling approximately 7.34 kW DC at the 115% DC/AC average ratio



Former Sizing by Comparison



- PV Watts shows for a 20% tilt, 180 degrees south 1 kW DC array an average annual output of 1,332 kWh AC, or 15.2% capacity factor
- Previously to the recent change, the Company had been using 13.5% for Net Metered systems on the AC rating of the inverter:
 - $9,000 \text{ kWh avg. 3-yr annual use} / 13.5\% \text{ capacity factor} / 8,760 \text{ hours/year} = 7.61 \text{ kW AC (round to } 1/100^{\text{th}})$
 - If this system had panels of 115% AC rating, or 8.44 DC, its output would be 10,350 kWh, or even 11,238 kWh at the PV Watts rate, which is greater than 3-year avg.
 - This old CF was underestimating how much a typical residential system actually produces, and allowed customers to oversize their systems
 - 13.5% was an acceptable DC capacity factor before recent improvements in inverter and system efficiency, but should not have been applied to the AC inverter rating

Review of Suggested Method



- Consideration of a more detailed capacity factor calculation for RE Growth and Net Metering, as suggested by Newport Solar, is ongoing
- Would take into account system tilt and azimuth, and perhaps DC/AC ratio, all of which have an impact on the output and capacity factor
- Need to review integration of PV Watts or similar sizing tool into our process (version control, underlying data, input control, etc.)
- Process will undergo some changes with release of online application and interconnection portal, and we are reviewing the coordination of this potential process change with that release

Other Sizing Issues



- Appreciate comments on consistent approach to estimation of use when three year history is not available
- New construction load at an existing residence is allowable if 1) construction is complete, and 2) modeled load estimate is available and provided
- We will launch a process improvement effort to determine a better way to estimate the usage of a customer when load history is not available or meaningful, and a streamlined process for customers to obtain their own usage history
 - We will explore a consistent means to providing permission for a vendor to obtain customer usage history as part of this

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RE: Docket 4774 - Proposed 2018 Renewable Energy Growth Program Tariff and Rule Changes
National Grid's Response to New Energy Rhode Island's Objection

Dear Ms. Massaro:

On behalf of National Grid¹ I am submitting this letter in response to New Energy Rhode Island's (NERI) December 13, 2017 objection in this docket. NERI begins its objections by arguing that "National Grid should not serve in a gatekeeping function for the renewable industry." (NERI Comments at p.1). NERI also offers suggestions regarding the organization and administration of the Renewable Energy (RE) Growth Program which are contrary to the RE Growth statute. National Grid serves as the administrator of the RE Growth Program, which is highly prescriptive in its statutory structure and requirements. National Grid is administering the RE Growth Program based on the RE Growth law, PUC orders, and decisions the DG Board makes regarding, among other things, ceiling prices. National Grid's main priority is to provide its customers with safe, reliable, and affordable electric service, which includes the provision and delivery of increasing amounts of distributed, clean energy. In its role as the administrator of the RE Growth Program, National Grid does not serve as "gatekeeper"; within any proscribed program year or enrollment period, the Company is focused on enrolling, connecting, and paying for the renewable output of all eligible projects.

NERI claims that projects are not being built in a timely manner after customers enroll in the RE Growth Program and that projects are terminating their COEs in large numbers. However, the facts suggest otherwise. Of the 84 projects larger than 25 kW DC or of other technologies than solar in the RE Growth program, only two projects have canceled their enrollment in RE Growth. Please see Attachment PUC 1-1-b to the Company's response to PUC 1-1 in this docket for a list and status of all projects that have received a conditional Certificate of Eligibility (COE) or final COE with commercial operation. Although the majority of the enrolled projects have not yet become operational, development of these kinds of facilities requires many milestones to be completed, such as local permitting and zoning, negotiation of land rights, and finding and securing appropriate financing terms, which can take some time to accomplish, especially in a relatively new market such as Rhode Island.

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

Regarding project terminations, NERI claims that there is excessive delay of projects because the ceiling prices recommended by the DG Board and approved by the PUC have been too low. This is also unfounded. All projects over 250 kW have been competitively bid since the establishment of the program, and these bids have been regularly below the ceiling prices allowed. The average prices and range of discount to the ceiling price for all projects 26 kW or greater in size that have been awarded Certificates of Eligibility in each Open Enrollment are shown in the table below. While some participants may have some “bidder’s remorse” from providing an aggressive price to enroll, it is not yet known if such systems will not be built at all. What we do know is that multiple parties participated in the enrollments, with the majority of them providing bids that were well below the maximum price allowed, over multiple years and solicitations. This is the benefit of competition that the design of the RE Growth program provides to Rhode Island customers. Moreover, even if the DG Board had recommended prices that were higher, the evidence from knowledgeable and commercially active bidders indicates that the gap between ceiling price and winning bids would simply have been larger.

Data Related to RE Growth Program Projects ≥ 26 kW Awarded Certificates of Eligibility		
Open Enrollment	Nameplate Capacity Weighted Average of Performance Based Incentives (¢/kWh)	Range of Performance Based Incentives Below Ceiling Price (%)
2015-1	18.92	-0.7% to -9.3%
2015-2	21.57	-6.4% to -14.8%
2016-1	17.24	-4.5% to -19.7%
2016-2	13.84	-3.0% to -24.5%
2016-3	20.57	-0.5% to -4.5%
2017-1	15.00	-3.7% to -20.6%
2017-2	18.42	-0.1% to -12.8%
2017-3	17.79	-2.2% to -6.7%

Regarding program capacity, NERI claims there is unused capacity in the current program year that the Company did not actively enroll with the use of the flexibility mechanisms that the Company had given the DG Board’s annual capacity allocation recommendation and PUC order. As is evident on the Company’s filings with the PUC regarding each of the three open enrollment results in 2017, and as summarized in the Company’s response to PUC 1-1-a in this docket, the capacity available in 2017 was fully utilized and actually over-enrolled in the Small-Scale Solar class. The discussions that NERI alludes to in its comments regarding a presentation at a stakeholder meeting are incorrectly summarized; the Company is aware of some yet-to-be determined number of Small-Scale Solar class projects that have been accepted in the 2017-18 program year that appear not to be moving forward based on information from installers that submitted the original applications. The Company is actively soliciting the termination of such COEs and intends to determine the terminated 2017 Small Scale Solar capacity that is then available under the 6.55 MW cap and reissue that capacity to the market in February 2018. The Company described this plan of action in a letter to the PUC in December 2017, which is provided here as Attachment 1.

The suggestion by NERI to “offer up” unused capacity at the end of each program year is equally uninformed. This is actually how the program is currently operated: all capacity is on offer in each open enrollment, aside from amounts set aside for Small-Scale Solar; capacity is freely shifted between classes in the third open enrollment to classes with over-enrollment from those that are under-enrolled; any amounts then remaining after the third enrollment can be made available to the Small Scale Solar class, as they were in 2016. In short, NERI’s concerns are unwarranted.

Finally, NERI makes comments that National Grid solely wants to invest in transmission and distribution assets, is conflicted from supporting renewable and distributed energy development as a result, and thus will not offer to pay locational incentives as it sees DG resources as a threat to the Company’s ability to invest in wires infrastructure. These claims lack any merit. National Grid has been an active and supportive partner of multiple Rhode Island administrations and legislatures in establishing the broad framework of renewable standards, programs, contracting requirements, community renewables, and the RE Growth program. More recently, the Company has actively engaged with Rhode Island’s regulators and stakeholders, including the members of NERI, in Power Sector Transformation, and has proposed numerous new initiatives that will modernize the electric grid, support new services, and provide performance incentive mechanisms for a variety of program, policy and environmental goal achievements as a form of innovative regulation that is not focused on infrastructure deployment.

The Company also actively investigated the potential for a locational incentive scheme in 2017, and provided regular updates on this work to staff from the Division and OER. The conclusion of this analysis was that no locational incentives presently make economic sense in Rhode Island outside of the System Reliability Plan area because none of the feeders aside from the two identified in Tiverton and Little Compton are predicted to be overloaded in the current planning horizon. As a result, solar and other distributed energy resources generally as a non-wires solution to reduce thermal loading are not needed, and has no value to the Company that would make sense to share with would-be developers at this time. Conditions may certainly change in the future (such as should economic growth accelerate or EV adoption drive new peak load growth), and the Company is committed to reviewing the issue again during the 2018 program year, as it indicated to the OER and the Division at the conclusion of the Company’s initial work in August 2017. In addition, the recently-approved 2018 System Reliability Plan includes a number of initiatives that the Company will undertake in calendar year 2018, with the determination of the process to properly develop locational incentives as one of the key components. Finally, the proposal of such locational incentives is the responsibility and option of the Company by statute, and cannot be taken on by the DG Board or any other party without a change in the law.

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In summary, NERI has used a scattering of numbers and loosely formed opinions to cast aspersion on the activities and work of the DG Board, the Company and the PUC in managing the RE Growth program without the benefit of accurate information or sound conclusions. Therefore, NERI’s objections should be disregarded.

Thank you for your attention to this matter. If you have any questions, please contact me at 781-907-2131.

Very truly yours,

A handwritten signature in black ink, appearing to read "Ian Springsteel". The signature is written in a cursive, flowing style.

Ian Springsteel

Enclosure

cc: Docket 4774 Service List
Leo Wold, Esq.
Jon Hagopian, Esq.



Raquel J. Webster
Senior Counsel

December 20, 2017

BY ELECTRONIC MAIL AND HAND DELIVERY

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

RE: Docket 4672 Renewable Energy Growth Program for 2017

Dear Ms. Massaro:

I write this letter regarding the Rhode Island Renewable Energy Growth Program (RE Growth program) for 2017 Residential Small Scale Solar Class Projects (Small Scale Solar equal to or less than 25 kW DC) in Docket 4672. National Grid is aware through communications with staff of the Rhode Island Office of Energy Resources (OER) and participating solar installers in the RE Growth program that a material number of RE Growth program certificates of eligibility (COEs) for Small Scale Solar projects that have been awarded in the 2017 program year may not be utilized.¹ Importantly, because the Small Scale Solar class of the RE Growth program reached its maximum capacity of 6.55 MW of enrolled small solar systems in October 2017, the application process is closed.

The Company and the OER, in consultation with Kenneth Payne, Chair of the Rhode Island Distributed Generation Board, believe that, given this information, it would be appropriate to reach out to all installers to identify applicants who have been granted and hold a provisional Certificate of Eligibility (COE holders) in the 2017-2018 program year who they understand will not be moving forward to determine the full extent of the enrolled Small Scale Solar capacity that those COE holders want to terminate.² The Company will request that COE holders provide a response to its inquiry if they desire to terminate their enrollment within a certain period of time. However, COE holders who do not respond within the requested time period will be presumed to retain their respective COEs and remain enrolled in the RE Growth program pursuant to the Tariff. If the COE holder confirms that it will not move forward with its project and decides to terminate its COE, the capacity will be totaled together, potentially allowing this class to be reopened. This terminated capacity would then be available until such capacity is fully enrolled or the end of the program year.

¹ One installer has represented that approximately 900 kW of awarded COEs may not be going forward.

² The Company recognizes that the individual applicants and/or customers who received the COEs are the rightful holders of those COEs, not the installers, and only the holders can propose to terminate such enrollments with the Company. The COE holders may also choose to maintain their COE and potentially work with a different installer.

Luly E. Massaro, Commission Clerk
Docket 4672 – RE Growth for 2017
December 20, 2017
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Accordingly, in order to effectuate the above, the Company, OER, and DG Board wish to inform the PUC that the Company has begun the following steps:

- *Issue a request for information from installers:* The Company has sent an e-mail to all active small-scale solar installers who are identified in COEs for Small-Scale Solar projects during this program year, requesting that the installer identify any COE holders who they believe do not plan to move ahead with their projects;
- *Send project status inquiry to identified COE holders:* The Company will send an email to those COE holders inquiring as to the status of their projects and providing the process for terminating their COEs and enrollment in RE Growth if they do not intend to move forward with their projects. The e-mail will also inform these COE holders of their rights to retain their COEs and remain enrolled in the RE Growth program in accordance with the Tariff;
- *Determine available capacity:* The Company will send a confirmation e-mail to those respondents who have elected to terminate their COEs, which will include the Company's consent to such termination. The Company will determine the aggregated capacity of terminated projects to determine how much of the 6.55 MW allocation may be reinstated;
- *Announce available capacity and enrollment date:* The Company will send an e-mail to all active installers regarding any planned reopening and the capacity to be made available. The Company will also provide such information to OER to be shared via its email lists. The Company anticipates providing approximately two weeks' notice before the opening date;
- *RE Growth Filing:* The Company will include a summary of the terminated COEs in its next applicable filing with the PUC.

Estimated Schedule:

Dec. 18, 2017 - E-mail to installers with return of applicant/customer names requested by Jan. 5
Jan. 9, 2018 - E-mail to targeted applicants/customers, with follow up one week later
Jan. 25, 2018 - Date by which the Company requests replies, followed by confirmation e-mail
By Feb. 1, 2018 - Determine aggregate capacity of available kW to reinstate
By Feb. 8, 2018 - Announce available capacity and date for enrollment
By Feb. 22, 2018 - Reopen Small-Scale Solar program with available capacity

Luly E. Massaro, Commission Clerk
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December 20, 2017
Page 2 of 2

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

Very truly yours,



Raquel J. Webster

cc: Docket 4672 Service List
Steve Scialabba, Division
Leo Wold, Esq.

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

December 20, 2017

Date

**Docket No. 4672 – Renewable Energy Growth Program for Year 2017
RI Distributed Generation Board and National Grid**

Service List updated 1/5/17

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