

June 29, 2018

VIA HAND DELIVERY & ELECTRONIC MAIL

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

RE: Docket 4790 - Net Metering Provision, RIPUC No. 2207
Responses to PUC Data Requests – Set 1

Dear Ms. Massaro:

I am enclosing ten (10) copies of National Grid's,¹ responses to the first set of data requests issued by the Public Utilities Commission 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 4790 Service List
Jon Hagopian, Esq.
John Bell
Al Mancini

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

June 29, 2018
Date

**Docket No. 4790 – National Grid – Net Metering Provision, RIPUC No. 2207
Service List updated 4/2/18**

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PUC 1-1

Request:

Please explain why the proposed tariff revisions filed with the Commission on April 27, 2018 (Revisions), are in the best interest of developers and ratepayers.

Response:

The tariff revisions arose as a result of the limited intervention by the Coalition for Community Solar Access (CCSA) in which they sought to allow an extension of the cap allocation deadline as a result of project delays that are beyond the control of the developer. The Company worked collectively with CCSA, the Office of Energy Resources (OER), and the Rhode Island Division of Public Utilities and Carriers (Division) to reach agreement on the proposed tariff language. The Company understands the challenges that permitting can have on the financing and development of renewable energy projects. While the Company would have preferred to limit the timeframe for ongoing permitting delays, on balance, the proposed tariff revisions provide certainty for developers that they can still receive an allocation on the capped amount for the Community Net Metering program during certain specific and limited circumstances. The tariff revisions also include specific protections and controls where a delay event or permit delay occurs by requiring, among other things, that the developer certify to the existence of a delay event or permit delay, and provide monthly status updates to the Company and OER. In total, these tariff revisions are designed to take into account the interests of developers and other customers as a whole.

PUC 1-2

Request:

Did National Grid solicit comments/feedback regarding the Revisions from developers who were not a party to this docket? If no, please explain how the interests of these developers were considered and addressed.

Response:

No. As discussed in the Company's response to PUC 1-1, the proposed tariff revisions arose as a result of the limited intervention by the Coalition for Community Solar Access (CCSA), a national business-led trade organization comprised of over forty member companies. Please see CCSA's response to PUC 1-2 for additional information regarding their representation of the interests of the broader developer community, as well as their efforts to solicit feedback from developers who are not a party to this docket. The Company took this feedback into account in submitting the proposed tariff revisions.

PUC 1-3

Request:

Please explain how the Revisions ensure fair access to capacity under the 30 MW cap if the deadlines are extended indefinitely pending resolution of litigation proceedings?

Response:

Please see the Company's response to PUC 1-1. In addition, any project that is provided a cap allocation under the program is also required to work with the Company for interconnection services under RI PUC No. 2163, Standards for Connecting Distributed Generation. This tariff has specific timelines associated with the execution of an Interconnection Services Agreement (ISA), payment terms, and construction milestones for both the Company and the customer. Failure to adhere to these timelines will result in cancellation of the project. If this occurs, any cap allocation provided to a customer immediately terminates. The interrelationship of the proposed tariff revisions and the Interconnection tariff help to ensure fair access to capacity under the 30 MW cap even in the event of an ongoing permit delay, such as pending litigation or other legal challenges.

PUC 1-4

Request:

Please comment on the following approaches to address the concern of fair access to capacity that is raised in Data Request 1-3, above:

- a. A developer may receive only one extension for a Permit Delay at a time. If a developer is awarded capacity for a second project, the developer would not be eligible to receive an extension for a Permit Delay for a subsequent project.
- b. Limit the total capacity allocation any one developer may be awarded under the 30 MW cap.
- c. Is there a better approach to ensure fair access to capacity?
- d. Since this is a limited capacity program, did the parties consider stricter requirements to be eligible to receive an award of capacity?

Response:

(a) through (d)

Please see the Company's responses to PUC 1-1 and PUC 1-3. The Interconnection tariff timelines help to ensure that no developer retains a cap allocation for an indefinite period of time, as the project will time out of the interconnection queue and be cancelled in accordance with the Interconnection tariff, at which time any cap allocation under the Net Metering tariff will also terminate.