



**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS**  
**Department of Administration**  
DIVISION OF LEGAL SERVICES  
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March 2, 2018

Via Regular U.S. Mail & Email

Luly Massaro, Commission Clerk  
RI Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

**Re: PUC Docket No. 4790 - The Narragansett Electric Co. d/b/a National Grid's Tariff  
Advice Net Metering Provision RIPUC No. 2207**

Dear Ms. Massaro:

This correspondence serves as the Office of Energy Resources' ("OER"s) position statement being offered in response to the proposed Net Metering Provision RIPUC No. 2207 that was filed by The Narragansett Electric Company ("National Grid" or the "Company") on January 26, 2018. OER supports utilizing this docket to amend the Community Remote Net Metering System's 24-month Cap Expiration Date and requests additional time to work with National Grid and the Coalition for Community Solar Access ("CCSA") for purposes of drafting tariff language agreeable to all parties.

Specifically, OER supports a tariff amendment that will extend and/or permit the issuance of an extension to the current 24-month Cap Expiration Date to provide solar developers with reasonable time to address local or state permitting matters that may arise.

The current procedural schedule for this docket sets forth a deadline of March 2, 2018 for intervenors to provide position statements or testimony; a deadline of March 9, 2018 for the Division of Public Utilities and Carriers ("Division") to issue a memorandum; and a deadline of March 21, 2018 for National Grid to issue a rebuttal memorandum. OER offers the following proposal which would not have a major impact to the current schedule. The Division issues its memorandum as currently scheduled and National Grid issues its rebuttal memorandum as currently scheduled. Those documents would address the proposals/positions that are filed by the end of today's position paper deadline. In addition, OER is given until March 21, 2018 to work with National Grid and CCSA to introduce draft tariff language limited to the narrow issue of extending and/or permitting the issuance of an extension to the 24-month Cap Expiration Date. If no such language is introduced on or by March 21, 2018, then the current schedule remains unchanged. If such language is introduced by National Grid or OER or CCSA on or by March 21, 2018, then any opposing parties and the Division would be afforded the necessary time to respond and amend or supplement their position papers or memorandum.

We thank you for considering our position and OER is available to address any questions or concerns that the parties or the Commission may have.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew S. Marcaccio". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Andrew S. Marcaccio  
Senior Legal Counsel

cc: Service List (Email only)