

# KEEGAN WERLIN

LLP

ATTORNEYS AT LAW

99 High Street, Suite 2900

BOSTON, MASSACHUSETTS 02110-3113

---

(617) 951-1400

TELECOPIERS:

(617) 951-1354

(617) 951-0586

October 29, 2018

## **VIA HAND DELIVERY & ELECTRONIC MAIL**

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

RE: Solicitation of Long-Term Contracts for Renewable Energy and Renewable Energy Certificates (“RECs”), Pursuant to the Long-Term Contracting Standard (“LTCS”), R.I. Gen. Laws § 39-26.1-1 *et seq.*

### **REVISED FILING LETTER<sup>1</sup>**

Dear Ms. Massaro:

As directed by the Rhode Island Public Utilities Commission (“Commission”) by unanimous approval at an Open Meeting held on August 27, 2018 (“Open Meeting”), enclosed are ten (10) paper copies of a compliance filing, which contains the evaluation protocols to be used by The Narragansett Electric Company d/b/a National Grid (“Narragansett” or “Company”). Also, the attachments are being submitted as confidential information, per the Commission’s direction at the Open Meeting.

The three attachments include: (1) the protocol for the quantitative evaluation (or price analysis), marked as Attachment A; (2) the protocol for the qualitative evaluation (or non-price analysis), marked as Attachment B; and (3) a reference document, marked as Attachment C. Narragansett intends to use the quantitative and qualitative evaluation protocols to evaluate bids that are submitted in response to its Request for Proposals for renewable energy supply as well as renewable energy certificates and related attributes for up to 400 megawatts (“MW”) of newly developed renewable energy resources (“RFP”). At the Open Meeting, the Commission directed Narragansett to submit its evaluation protocol prior to beginning the evaluation of bids. Under the RFP, the deadline for the submission of bids in response to the RFP is October 29, 2018 at noon (12:00 PM) EPT.

In addition, the Company has reviewed and updated its evaluation protocols against the Benefit-Cost Framework that was approved by the Commission in docket No. 4600. Accordingly, the Company has attached a reference document, called “2018 Rhode Island Long-

---

<sup>1</sup> This filing letter has been revised from the version submitted on October 26, 2018, only by adding the last full paragraph, addressing the submittal of confidential information.

October 29, 2018

Page 2

Term Contracts for Renewable Energy Solicitation: Docket 4600 Benefit-Cost Framework Applicable Category Summary.” This reference document lists where the various elements of the docket No. 4600 Benefit-Cost Framework will be considered during the evaluation.

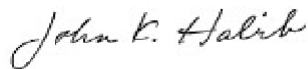
I have enclosed one confidential copy and one redacted copy of Attachments A, B and C. The attachments contain confidential evaluation protocols that will be used by Narragansett to evaluate competitively sensitive bids submitted to the Company in response to the Company’s September 12, 2018 Request for Proposals for Long Term Contracts for Renewable Energy, approved in Dkt. 4822. In compliance with PUC Rule 1.2(g) and R.I. Gen. Laws Sec, 38-2-2(4)(B), I have included a confidential copy of the attachments in a sealed envelop marked, **“Confidential and Privileged Information-Do Not Release.”**

Thank you for your consideration of this request.

Respectfully Submitted,

**THE NARRAGANSETT ELECTRIC  
COMPANY d/b/a NATIONAL GRID**

By its attorney,



---

John K. Habib, Esq.  
Keegan Werlin LLP  
99 High Street, Ste. 2900  
Boston, MA 02110  
(617) 951-1400

**REDACTED**

**Attachment A: 2018 Rhode Island Long-Term Contracts for Renewable Energy  
Solicitation: Protocol for Quantitative Evaluation/ Price Analysis  
(Redacted Pages 1 through 7)**

**REDACTED**

**Attachment B: 2018 Rhode Island Long-Term Contracts for Renewable Energy  
Solicitation: Protocol for Qualitative Evaluation/ Non-Price Analysis  
(Redacted Pages 1 through 16)**

**REDACTED**

**Attachment C: 2018 Rhode Island Long-Term Contracts for Renewable Energy  
Solicitation: Docket 4600 Benefit- Cost Framework Applicable Category Summary  
(Redacted Pages 1 through 3)**

**Docket No. 4822 -- National Grid – RFP for Long-Term Contracting for Renewable Energy and RECs up to 400 MW**

**Service List updated 6/22/18**

<b>Name/Address</b>	<b>E-mail Distribution</b>	<b>Phone</b>
<b>National Grid</b> John K. Habib, Esq. Keegan Werlin LLP 99 High Street, Suite 2900 Boston, MA 02110	<a href="mailto:jhabib@keeganwerlin.com">jhabib@keeganwerlin.com</a> ;	617-951-1354
	<a href="mailto:kmahoney@keeganwerlin.com">kmahoney@keeganwerlin.com</a> ;	
	<a href="mailto:Laura.Bickel@nationalgrid.com">Laura.Bickel@nationalgrid.com</a> ;	
	<a href="mailto:Joanne.scanlon@nationalgrid.com">Joanne.scanlon@nationalgrid.com</a> ;	
Jon Hagopian, Esq. <b>Division of Public Utilities &amp; Carriers</b> 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Jon.hagopian@dpuc.ri.gov">Jon.hagopian@dpuc.ri.gov</a> ;	401-784-4775
	<a href="mailto:John.bell@dpuc.ri.gov">John.bell@dpuc.ri.gov</a> ;	
	<a href="mailto:Jonathan.Schrag@dpuc.ri.gov">Jonathan.Schrag@dpuc.ri.gov</a> ;	
	<a href="mailto:Al.contente@dpuc.ri.gov">Al.contente@dpuc.ri.gov</a> ;	
Ellen Cool Levitan & Associates	<a href="mailto:egc@levitan.com">egc@levitan.com</a> ;	
James Crowley, Esq. <b>Conservation Law Foundation</b> 235 Promenade St., Suite 560 Providence, RI 02908	<a href="mailto:jcrowley@clf.org">jcrowley@clf.org</a> ;	401-228-1905
	<a href="mailto:jelmer@clf.org">jelmer@clf.org</a> ;	
<b>NextEra Energy Resources, LLC</b> Joseph A. Keough Jr., Esquire Keough + Sweeney, Ltd.  Brian J. Murphy Esq. NextEra Energy Resources, LLC	<a href="mailto:jkeoughjr@keoughsweeney.com">jkeoughjr@keoughsweeney.com</a> ;	401-724-3600
	<a href="mailto:Brian.J.Murphy@nexteraenergy.com">Brian.J.Murphy@nexteraenergy.com</a> ;	
<b>FirstLight Power Resources</b> Edward D. Pare, Esq. Jesse S. Reyes, Esq. Brown Rudnick LLP  Marc Silver, FirstLight Power Resources	<a href="mailto:EPare@brownrudnick.com">EPare@brownrudnick.com</a> ;	401-276-2639
	<a href="mailto:JReyes@brownrudnick.com">JReyes@brownrudnick.com</a> ;	
	<a href="mailto:PAfonso@brownrudnick.com">PAfonso@brownrudnick.com</a> ;	
	<a href="mailto:Marc.Silver@firstlightpower.com">Marc.Silver@firstlightpower.com</a> ;	
	<a href="mailto:Len.Green@firstlightpower.com">Len.Green@firstlightpower.com</a> ;	
<b>Vineyard Wind, LLC</b> Seth Handy, Esq. Handy Law, LLC  Emily Rochon, Vineyard Wind LLC	<a href="mailto:seth@handylawllc.com">seth@handylawllc.com</a> ;	401-626-4839
	<a href="mailto:erochon@vineyardwind.com">erochon@vineyardwind.com</a> ;	
<b>Office of Energy Resources</b> Andrew Marcaccio, Esq. Carol Grant, Commissioner Christopher Kearns, OER Nicholas Ucci, OER	<a href="mailto:Andrew.Marcaccio@doa.ri.gov">Andrew.Marcaccio@doa.ri.gov</a> ;	
	<a href="mailto:Christopher.Kearns@energy.ri.gov">Christopher.Kearns@energy.ri.gov</a> ;	
	<a href="mailto:Nicholas.Ucci@energy.ri.gov">Nicholas.Ucci@energy.ri.gov</a> ;	
	<a href="mailto:Carol.Grant@energy.ri.gov">Carol.Grant@energy.ri.gov</a> ;	
<b>File an original &amp; 9 copies w/:</b> Luly E. Massaro, Commission Clerk Linda George, PUC Counsel Public Utilities Commission	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a> ;	401-780-2017
	<a href="mailto:Linda.george@puc.ri.gov">Linda.george@puc.ri.gov</a> ;	
	<a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov</a> ;	
	<a href="mailto:Todd.bianco@puc.ri.gov">Todd.bianco@puc.ri.gov</a> ;	

89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Cynthia.WilsonFrias@puc.ri.gov">Cynthia.WilsonFrias@puc.ri.gov</a> ; <a href="mailto:Margaret.Hogan@puc.ri.gov">Margaret.Hogan@puc.ri.gov</a> ;	
Francis Fullaro, Executive Director RENEW Northeast	<a href="mailto:fpullaro@renew-ne.org">fpullaro@renew-ne.org</a> ;	646-734-8768
Melissa Reynolds, Director Bus. Dev.	<a href="mailto:Melissa.reynolds@eversource.com">Melissa.reynolds@eversource.com</a> ;	860-728-4637
David Peloquin, Eversource	<a href="mailto:david.peloquin@eversource.com">david.peloquin@eversource.com</a> ;	860-665-3554
Steven Zuretti, Director, Gov. Affairs Brookfield Renewable	<a href="mailto:Steven.Zuretti@brookfieldrenewable.com">Steven.Zuretti@brookfieldrenewable.com</a> ;	310-849-3210
Sebastian Hald Buhl, Orsted	<a href="mailto:sehb@orsted.com">sehb@orsted.com</a> ;	857-260-8362
Frederick Zalcman, Orsted	<a href="mailto:FRZAL@orsted.com">FRZAL@orsted.com</a> ;	617-792-4333
Liam Paskvan	<a href="mailto:lpaskvan@PierceAtwood.com">lpaskvan@PierceAtwood.com</a> ;	207-791-1306
Michelle Carpenter, Green Development	<a href="mailto:mc@green-ri.com">mc@green-ri.com</a> ;	401-295-4998
Buzz Becker, Hexagon Energy	<a href="mailto:bbecker@hexagon-energy.com">bbecker@hexagon-energy.com</a> ;	434-326-4623
Seth Handy, Esq.	<a href="mailto:seth@handylawllc.com">seth@handylawllc.com</a> ;	401-626-4839
Ram Seetharaman, Solar Micronics	<a href="mailto:ramsec72@gmail.com">ramsec72@gmail.com</a> ;	
Ganesan Visvabharathy, Solar Micronics	<a href="mailto:visva@solarmicronics.co">visva@solarmicronics.co</a> ;	
Yolanda Yolanda, Solar Micronics	<a href="mailto:yolanda@solarmicronics.co">yolanda@solarmicronics.co</a> ;	
Jamie Dickerson, NECEC	<a href="mailto:jdickerson@necec.org">jdickerson@necec.org</a> ;	
Janet Besser, NECEC	<a href="mailto:jbesser@necec.org">jbesser@necec.org</a> ;	