

August 27, 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 4847 - 2018 Renewable Energy (RE) Growth Program Factor Filing
Responses to PUC Data Requests – Set 1**

Dear Ms. Massaro:

I have enclosed ten (10) copies of the Company's¹ 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 matter. If you have any questions, please contact me at 781-907-2121.

Very truly yours,



Raquel J. Webster

Enclosures

cc: Docket 4847 Service List
Leo Wold, Esq.
Jon Hagopian, Esq.
John Bell, Division

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

August 27, 2018

Date

Docket No. 4847– National Grid’s 2018 Renewable Energy (RE) Growth Program Factor Filing - Service List updated 7/20/18

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The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4847
In Re: 2018 Renewable Energy Growth Program Factor Filing
Responses to Commission's First Set of Data Requests
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PUC 1-1

Request:

Referencing Schedule NG-2, page 6 of 7 (Bates page 41), please reconcile each item on this schedule with the Estimated Administrative Costs schedule filed in Docket No. 4774 (RE Growth Program Year 2018 Budget Estimate Attachment A), explaining the reason for any variance.

Response:

Below is a table comparing the Estimated Administrative Costs for the RE Growth Program Year ending March 31, 2019, which was filed in RIPUC Docket No. 4774 as Attachment A, Page 1. The Estimated Administrative Costs were filed in Docket No. 4847 as Schedule NG-2, Page 6 of 7. The table below includes explanations of any existing variances.

Line Number	Description	Docket No. 4774	Docket No. 4847	Variance
(1)	Billing System Modifications - Estimated CapEx Spend FY19	\$321,300	\$164,010	(\$157,290)
(2)	Billing System Modifications - FY19 O&M Budget Estimate for Additional Modifications	\$103,000	\$28,500	(\$74,500)
(3)	Incremental Labor Resources	\$660,663	\$865,999	\$205,336
(4)	Estimated Solar Marketplace Program Implementation/Support Costs	\$145,000	\$145,000	\$0
(5)	DG Board Expense	\$213,000	\$213,000	\$0
(6)	Revenue Requirement - Meter Investment	TBD	\$49,721	\$49,721
(7)	Estimated Remuneration	TBD	N/A	\$0
(8)	Total	\$1,442,963	\$1,466,230	\$23,267

Line (1) – At the time of the budgetary filing in Docket No. 4774 (December 18, 2017), the implementation timeline for the modifications to the Company's billing system required to implement the new Shared Solar and Community DG project types estimated a total Capital Expense of ~ \$1.227M, and a Placed in Service (PIS) date of March 2018, which resulted in a higher estimated revenue requirement.

PUC 1-1, page 2

As shown in Docket 4847, Schedule NG-4A, Page 16 of 17, Line (38), the revised estimated total CapEx is now ~\$1.3M, with a planned PIS date of December 2018. As a result of the revised implementation date, the estimated revenue requirement associated with recovery of CapEx incurred related to billing upgrades has decreased to \$164,010.

Line (2) – Similarly to CapEx Spend in Line (1), the revised budget related to billing systems upgrades includes a reduced anticipated Operational Expense, from an estimated \$103,000 to \$28,500, as shown in Docket 4847, Schedule NG-4A, Page 19 of 20, Column (o), Line (30).

Line (3) – At the time of the Estimated Administrative Cost filing in Docket No. 4774, the Company intended to include incremental labor associated with support of the RE Growth Program in the general rate case Cost of Service, and as such had estimated labor expense for six functions through only through a portion of the Program Year 2018 (through August 31, 2018). This resulted in a reduced estimated Labor resource expense of \$660,663. Since then, it has been determined that the incremental labor associated with RE Growth will not be included in the general rate case cost of service. Thus, Docket No, 4847, Schedule NG-2, Page 6 of 7, Footnote (A) calculates estimated labor resource expense for the entire Program year, ending March 31, 2019, resulting in an increased estimated expense. Additionally, the anticipated percent of time allocated to RE Growth for Billing Implementation/Support, Forward Capacity Market (FCM) Administration, and Energy Procurement were decreased between the Estimated Administrative Cost filing in Docket No. 4774 and Docket No. 4847.

Line (6) – A revised Revenue Requirement related to meter investment was not available at the time of the budgetary filing, and was not included. The revised Revenue Requirement related to meter investment is included in Docket No. 4847, Schedule NG-4B.

Line (7) – A revised estimate of Performance-Based Incentive Payments was not available at the time of the budgetary filing. As a result, estimated Company Remuneration could not be calculated, and, therefore, was not included.

Pursuant to the PUC's Order from the February 9, 2018 Open Meeting in Docket No. 4774, and reflected in the RE Growth Provision, the Company no longer includes an estimate of remuneration at 1.75% of estimated Total PBI Payments in the RE Growth Factors for concurrent cost recovery.

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PUC 1-2

Request:

Please provide an itemization of the administrative costs for the 2018 program year to date.

Response:

The table below provides an itemization of administrative costs for the 2018 RE Growth Program Year as of July 31, 2018:

(1)	Remuneration	\$78,816
(2)	Billing System Modifications	\$85,010
(3)	DG Board Invoiced Expenses	\$189,422
(4)	Program Year 4 Ending March 2019 Meter Revenue Requirement	\$16,574
(5)	Solar Marketplace Invoiced Expenses	\$1,964
(6)	Direct Company Labor Expense w/ OH - Program O&M	\$202,776
(7)	Other Expenses	\$120
(8)	Forward Capacity Market Administrative Expenses	<u>\$10,743</u>
(9)	Total Administrative Expense	\$585,425

Line (1): 1.75% of total PBI payments from April 1, 2018 through July 31, 2018 of \$4,503,758.

Line (2): Includes \$27,152 of revenue requirement on CapEx related to billing systems upgrades, and \$57,858 in billing system contractor expenses.

Line (3): Includes invoices to date from the Office of Energy Resources (OER) for DG Board's first and second phase Cadmus quality assurance studies.

Line (4): 4 months of annualized Meter Revenue Requirement of \$49,721, as per Schedule NG-4B, Page 1, Column (d), Line (5).

Line (5): Paid Invoices to EnergySage related to SolarWise program.

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Line (6): Incremental labor resource expenses from April 1, 2018 through July 31, 2018 for the resources identified in Docket No. 4847, Page 6 of 7, Footnote (A), Columns (a) through (f), and (h).

Line (7): Training expenses.

Line (8): Incremental labor resource expenses from April 1, 2018 through July 31, 2018 related to the Company's participation in the ISO-NE Forward Capacity Market.

PUC 1-3

Request:

Please provide job descriptions for each of the FTEs included in the Detail of Incremental Labor Resources.

Response:

Below are job descriptions for each FTE included in Schedule NG-2, Page 6 of 7, Footnote (A):

Accounts Processing (Column (a)):

POSITION TITLE: RS-2 Revenue Services Associate (AMO)

REPORTS TO: Revenue Services Supervisor (AMO)

JOB PURPOSE: Under general supervision, perform administrative and complex revenue cycle management duties. Performs a full range of assignments consisting of related steps, processes or methods; Exercises initiative and judgment in resolving non-recurring work; requires knowledge of the end to end order to cash processes. Ability to utilize complex decision making, financial calculations and understand technical & legal concepts. These are employees share knowledge and provide one to one job training opportunities for other employees to develop their skills. In addition, perform work including, but not limited to, the following:

Same as RS-1 with particular focus on more complex and higher revenue transactions such as:

Complex back billing activities related to stopped meters, mixed meters, long term errors and other irregular conditions including any interest calculations

System specialized billing exceptions for demand, smart meters, DG/Net Metering and time of use rate customers

PUC 1-3, page 2

Analyze, root cause and fix complex multi-usage billed channel accounts (Large Interval Commercial & Industrial)

Analyze, root cause and fix No Bill accounts

Share knowledge and provide one to one job shadowing opportunities for other employees to develop their skills.

Customer Solutions (Column (b)):

Job Purpose:

National Grid is looking for a customer-facing professional who will own and manage the relationship with complex distributed generation applicants throughout the company's E2E interconnection process. Successful candidates will have strong technical and project management skills, enabling customer sponsored DG projects to be interconnected cost effectively, within state regulated timelines, while achieving high customer satisfaction. The professional will act as the customer's primary point of contact guiding them through regulatory, legislative and technical obligations, obtaining and interpreting technical documentation, performing preliminary screenings/feasibility reviews as necessary, drafting contractual agreements, and coordinating complex DG projects with multitude of internal and external stakeholders throughout the construction process. As a DG subject matter expert, the candidate will also be expected to provide outreach and educate others on DG initiatives. This position may also get involved in the preliminary (Step 0) stages of large complex gas and electric projects in assisting customers with evaluating the feasibility of such projects.

Key Accountabilities:

Manage DG projects with customers, external vendors, contractors and consultants to ensure timely delivery of utility services and completion of the project.
Conduct engineering screenings/feasibility reviews, maintain work management system and update procedures to support the design solutions that enhance Distributed Generation programs.
Develop and maintain effective relationships with network strategy, account development, inside and outside sales, regulatory, energy product & program management, jurisdictional teams and

PUC 1-3, page 3

external vendors in order to facilitate communications, integrate work and ensure the successful delivery of company's products and programs.

Challenge existing policies and procedures to continuously seek ways to enhance customer service and cost-effectiveness.

Coordinate internal and external resources assigned to perform comprehensive engineering studies (i.e. Impact, CESIR, etc), commissioning analysis and reports in order to ensure timely delivery of DG projects per applicable jurisdictional tariffs.

Provide technical guidance, support and coaching to others, both internally and externally) in order to share knowledge and increase understanding of Distributed Generation programs and services.

Analyze and evaluate developments in Distributed Generation and Renewable Energy technologies in order to identify impact of different scenarios on the business and strategies for integrating cost efficiencies.

Ensure projects are following appropriate accounting procedures.

Negotiate, develop and administer all aspects of interconnection related agreements.

Provide energy efficiency and growth leads to the sales organization as applicable.

Update and maintain company websites with latest program information.

Represent National Grid as needed in various industry associations

Billing/Implementation Support (Column (c)):

This is a contractor position, and is therefore not employed directly by the Company.

PUC 1-3, page 4

Billing/Implementation Support (Column (d)):

About the Position:

Analyze and interpret data, procedures, activities, and pertinent documents to provide relevant and up to date information to support decision-making and the effective working of National Grid. At the higher levels this role will also design and implement procedures and policies within their area of work to improve the working of National Grid. At the higher levels this role will also manage relevant projects to add or improve functions of the department.

Position Responsibilities (including but not limited to):

- Independently collate, analyze and interpret work unit operational and/or financial data, procedures, activities, and pertinent business documents within one or multiple areas using pre-determined tools, methods and formats in order to support the department's decision making process.
- Prepare and write relevant documentation in order that all stakeholders are fully informed and all evidence or statistics are documented.
- Execute instructions and requests, plan and organize resources and make appropriate arrangements to ensure that work is carried out efficiently and in line with relevant policies and processes.
- Maintain and provide information such as regulatory or business essential information in order to ensure regulators and other stakeholders are kept up to date with relevant National Grid policies, processes and programs.
- Monitor and review financial information, updating where necessary in order to identify any anomalies or discrepancies and ensure management has access to up to date and accurate information. (FM1)
- Build upon technical / professional skills within own area of specialism or of other processes in order to continually grow your personal contribution to the business.
- Develop relationships with internal and external stakeholders in order to obtain and share information that will benefit National Grid.
- Monitor and review work undertaken by project team in order to provide feedback on the appropriate use of materials, tools, equipment or resources and adherence to schedules.

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DG Customer Facilitator (Column (e)):

Job Purpose:

National Grid is looking for a Customer Facilitator (CF) who will support the processing of Distributed Generation (DG) applications and projects. The position will work in a cross functional environment to ensure that customer projects brought to the company are processed within state regulated timelines. The CF will act as the customer's primary point of contact for small to mid-size projects, guiding them through the distributed generation process, obtaining required documentation, perform preliminary screenings and helping coordinate internal functions to meet customer expectations. The CF will also support the department's Customer Engineers in their management of larger, complex DG projects. Support will include monitoring of work management requirements and preparation of various agreements, as well as other duties as assigned.

Key Accountabilities:

Manage projects by utilizing and properly maintaining the company's work management system.

Develop and maintain effective relationships within TSES, RCE, account development, inside and outside sales, energy product & program management, jurisdictional teams and external vendors in order to facilitate communications, integrate work and ensure the successful delivery of customer organization products and programs.

Challenge existing policies and procedures to continuously seek ways to enhance customer service and cost-effectiveness.

Provide process and technical guidance to others in order to share knowledge and increase understanding of Distributed Generation programs and services.

Analyze and evaluate developments in Distributed Generation and Renewable Energy technologies in order to identify impact of different scenarios on the business and strategies for integrating cost efficiencies.

Support internal and external outreach sessions to educate various DG stakeholders on DG process and policy.

Negotiate, develop and administer all aspects of interconnection related agreements.

Provide energy efficiency and growth leads to the sales organization as applicable.

Update and maintain company websites with latest program information.

PUC 1-3, page 6

DG Interconnection Consultant (Column (f)):

Job Purpose:

National Grid is looking for a customer-facing professional who will own and manage the relationship with complex distributed generation applicants throughout the company's E2E interconnection process. Successful candidates will have strong technical and project management skills, enabling customer sponsored DG projects to be interconnected cost effectively, within state regulated timelines, while achieving high customer satisfaction. The professional will act as the customer's primary point of contact guiding them through regulatory, legislative and technical obligations, obtaining and interpreting technical documentation, performing preliminary screenings/feasibility reviews as necessary, drafting contractual agreements, and coordinating complex DG projects with multitude of internal and external stakeholders throughout the construction process. As a DG subject matter expert, the candidate will also be expected to provide outreach and educate others on DG initiatives. This position may also get involved in the preliminary (Step 0) stages of large complex gas and electric projects in assisting customers with evaluating the feasibility of such projects.

Key Accountabilities:

Manage DG projects with customers, external vendors, contractors and consultants to ensure timely delivery of utility services and completion of the project.

Conduct engineering screenings/feasibility reviews, maintain work management system and update procedures to support the design solutions that enhance Distributed Generation programs.

Develop and maintain effective relationships with network strategy, account development, inside and outside sales, regulatory, energy product & program management, jurisdictional teams and external vendors in order to facilitate communications, integrate work and ensure the successful delivery of company's products and programs.

Challenge existing policies and procedures to continuously seek ways to enhance customer service and cost-effectiveness.

Coordinate internal and external resources assigned to perform comprehensive engineering studies (i.e. Impact, CESIR, etc), commissioning analysis and reports in order to ensure timely delivery of DG projects per applicable jurisdictional tariffs.

Provide technical guidance, support and coaching to others, both internally and externally) in order to share knowledge and increase understanding of Distributed Generation programs and services.

PUC 1-3, page 7

Analyze and evaluate developments in Distributed Generation and Renewable Energy technologies in order to identify impact of different scenarios on the business and strategies for integrating cost efficiencies.

Ensure projects are following appropriate accounting procedures.

Negotiate, develop and administer all aspects of interconnection related agreements.

Provide energy efficiency and growth leads to the sales organization as applicable.

Update and maintain company websites with latest program information.

Represent National Grid as needed in various industry associations

Forward Capacity Market (FCM) Administration (Column (g)):
Background Information:

National Grid is seeking an individual to play a primary role in implementing and developing its strategy for the management of distributed generation resources in ISO-New England's (ISO-NE) Forward Capacity Market (FCM). National Grid implements and manages a significant amount of sustainable energy resources such as energy efficiency, solar generation, demand response, and combined heat and power. These sustainable resources supply capacity to the electric grid and National Grid monetizes that capacity by bidding the resources into ISO-NE's Forward Capacity Market. Successful candidates will contribute to the success and expansion of National Grid's sustainable energy programs through participation in the ISO-NE Forward Capacity Market.

About the Position:

This Analyst position will focus on implementing the bidding and hedging strategies, as well as reporting and forecasting methods required for FCM resource management. Successful candidates will have the opportunity to play a key role in the further development and expansion of National grid's wholesale electricity market participation strategies. The Analyst will partner with other internal teams and ISO-NE regarding strategies and data management.

PUC 1-3, page 8

Position Responsibilities (including but not limited to):

Core Responsibilities

- Implement the strategies and forecasting methods required for FCM resource management.
- Manage current assets and look for ways in which to grow the Company's participation in order to maximize monetization of the Company's solar DG resources.
 - Potential areas for growth include expanding the Company's resource portfolio to include Demand Response and battery storage technologies.
 - Opportunities for further monetization include bidding currently uncommitted capacity into reconfiguration auctions and brokering bilateral agreements with itself as well as with other market participants.
- Participate in ISO-NE Working Group meetings, Forward Capacity Auctions, and other ad hoc meetings as necessary.
- Attain a deep understanding of the Market Rules, ISO New England Manuals and intricacies of the market and apply them in strategy development and execution.
- Interface with other departments within the Company (Regulatory Strategy, Electric Supply, Load Forecasting) to leverage knowledge and information to the Company's advantage as well as to maintain consistency in external messaging.
- Oversee the FCM resource lifecycle and be primarily responsible for submitting required information for each of these: Show of Interest, New Resource Qualification, Forward Capacity Auction, Critical Path Schedule monitoring, Renewable Technology Resource elections.
- Implement a process for monitoring the ongoing performance of DG resources in the FCM.
- Work with other individuals responsible for FCM data submissions and strategy development.

General Accountabilities and Tasks

- Proactively develop and maintain effective relationships with internal and external stakeholders.
- Represent National Grid values when meeting with key internal and external stakeholders such as ISO-NE or regulatory agencies. Manage the day-to-day relationship with other external stakeholders engaged in FCM operations.
- Deliver high quality work with adherence to internal and external deadlines.
- Develop and maintain a solid understanding of the business by staying abreast of industry trends, and learning and sharing best practices.

PUC 1-3, page 9

- Develop and maintain a technical understanding of energy efficiency and solar Distributed Generation services in relation to the Forward Capacity Market.
- Research primary data sources, identify key themes, analyze trends, and present to senior management in defining the approach for the FCM.
- Appropriately challenge existing work practices and continuously seek ways to make improvements and drive greater efficiencies.
- Make projections for FCM performance on an ongoing basis to support senior management in defining resource planning strategies.

Lead Renewable Energy Trader - Energy Procurement - Environmental Transactions (Column (h)):

Key Accountabilities:

Evaluates applications received during Open Enrollments

Assists with Program reporting,

Supports regulatory filings such as summaries of Open Enrollment results
Manages customer communications, such as announcements of Open Enrollments,

Leads presentations at DG Interconnection Seminars

Updates and maintains the RE Growth Program webpage and web application,

Answers RE Growth customer questions.

Provides input regarding revisions to proposed Company tariffs and rules related to the Program.

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PUC 1-4

Request:

How many additional FTEs or consultants have been hired or will be hired during the 2018 program year and that are included in the Detail of Incremental Labor Resources?

Response:

To date, one additional FTE has been hired in Program Year 2018 to support the Company's efforts in participating in the ISO-New England Forward Capacity Market (FCM) on behalf of qualified RE Growth and DG Standard Contract projects. The estimated allocation of effort specific to the RE Growth Program is 47.6% of an FTE, with the remaining estimated efforts allocated to the Rhode Island DGSC program, and Rhode Island and Massachusetts Energy Efficiency Programs.

There is an anticipated new hire in the Company's Bill Project Management & Services department, with an estimated target hire date of October 2018. This new hire will support the Company's ongoing projects related to upgrades and maintenance of the billing systems.

PUC 1-5

Request:

Please provide the rationale for each of the FTEs or consultants hired during the 2018 program year. If the rationale is related to new program elements, please explain in detail. If the rationale is related to increased workload, please provide evidence of the increase in workload.

Response:

The Company hired one incremental FTE and utilized contractors in the 2018 program year to support the Company's efforts in participating in the ISO-New England Forward Capacity Market (FCM) on behalf of qualified RE Growth and DG Standard Contract projects. The work required to participate in the FCM on behalf of RE Growth and DG Standard Contract projects continues to scale because new RE Growth projects continue to come online and are entered into the FCM and will require continued contractor and FTE support.

The Company plans to hire one incremental FTE in the 2018 program year to support the Company's efforts to manage the RE Growth programs from a billing and systems perspective. Due to the complexity of the RE Growth programs, the Company needs a dedicated resource to support the operational departments, manage the programs, enhance the monitoring of the programs, and support any new enhancements to the RE Growth programs.

PUC 1-6

Request:

Please provide the number of applications under the Renewable Energy Growth Program for each of the program years broken out by competitive and non-competitive enrollment solicitations, including the 2018 program year to date.

Response:

Please see the table below, which excludes Small-Scale Solar applications. For the 2018 Program Year, this summary contains applications submitted into the 2018 First Open Enrollment and 2018 Second Open Enrollment. Also, starting with the 2018 Program Year, the Medium-Scale Solar Renewable Energy Class has shifted to competitive bidding. For reference, there were a combined 26 Medium-Scale Solar applications submitted into the 2018 First and 2018 Second Open Enrollments.

Program Year	Non-Competitive (Medium-Scale Solar)	Competitive	Total Applications
2015	11	13	24
2016	19	16	35
2017	20	37	57
2018	Not Applicable	46	46

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PUC 1-7

Request:

For the 2018 program year to date, please provide the number of applications for which a Certificate of Eligibility has been awarded. Please provide the number of applications not accepted into the program.

Response:

In the 2018 First Open Enrollment, 23 projects were awarded a Certificate of Eligibility (COE) and 6 applications were not accepted into the Program. The 17 applications received in the 2018 Second Open Enrollment are currently being evaluated, and the Company has not yet selected projects that will receive COEs.

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PUC 1-8

Request:

For the 2018 program year to date, please provide an update on actual enrollments to date by technology and class.

Response:

Program Year 2018 Year to Date Enrollment									
Class	Technology	Nameplate (kW DC)	Number of Projects	Operational Projects (kW DC)	Operational Projects	Pending Projects (kW DC)	Pending Projects	Cancelled Projects (kW DC)	Cancelled Projects
Small-Scale	Solar	6,674	910	1,929	290	4,746	620	27	4
Medium-Scale	Solar	2,563	14	0	0	2,563	14	0	0
Commercial-Scale	Solar	2,648	3	0	0	2,648	3	0	0
Large-Scale	Solar	11,549	3	0		11,549	3	0	0
Wind II (3,000-5,000 kW; 2-turbine)	Wind	6,000	2	0	0	6,000	2	0	0
CRDG Large Solar	Solar	1,199	1	0	0	1,199	1	0	0
Total		30,633	933	1,929	290	28,705	643	27	4

Small-Scale Data as of 8/1/2018. Small-Scale Program fully subscribed 7/25/18. Commercial-Scale Data as of 8/22/18

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PUC 1-9

Request:

Please provide an estimate of the expected number of applications for the remainder of the 2018 program year.

Response:

If recent Open Enrollments are any indication, the Company expects that the remaining competitive class capacity, of the 33.45 MW available for the Program Year, to be awarded in the 2018 Third Open Enrollment and/or transferred to the Small-Scale Solar class, which is already fully subscribed.

PUC 1-10

Request:

In Docket No. 4770, National Grid, in response to post-hearing data request 1-2 stated that none of the incremental Distributed Generation FTEs in Docket No. 4770 will be supporting the Renewable Energy Growth Program. What employees are working on the interconnection applications, studies, and physical interconnection work for projects interconnecting through the Renewable Energy Growth Program?

Response:

National Grid understood post-hearing data request 1-2 to explore whether there was a potential overlap in recovery for FTEs proposed in Docket No. 4770 versus those proposed in Docket No. 4847. In its response, the Company explained that there is no overlap. FTEs considered in the Renewable Energy Growth Program (Docket No. 4847) are those FTEs necessary to run the program. The departments or roles include: Accounts Processing, Customer Solutions, Billing Implementation/Support, DG Customer Facilitator, Interconnection Consultant, Forward Capacity Market Administration, and Energy Procurement. The Docket No. 4847 FTEs do not include employees to perform the studies or physically interconnect the projects.

Although the engineering and physical interconnection work could result from any program, including the Renewable Energy Growth Program, the more complicated work is currently associated with the Net Metering Credit program which is the driver of the Docket No. 4770 FTEs.