

September 25, 2019

**BY HAND DELIVERY AND ELECTRONIC MAIL**

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

**RE: Docket 4954 - 2019 Renewable Energy (RE) Growth Program Factor Filing Responses to PUC Requests – Set 2**

Dear Ms. Massaro:

On behalf of National Grid,<sup>1</sup> I have enclosed the Company's response to PUC 2-10.

This transmittal completes the Company's responses to the Public Utilities Commission's Second Set of Data Requests in the above-referenced matter.

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 4954 Service List  
Jon Hagopian, Esq.  
John Bell, Division

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

PUC 2-10

Request:

For the Program Year ending March 31, 2019, did any class exceed its allocation approved by the PUC? If so, please provide an explanation for the exceedance, the number of systems, total exceedance, and the expected program costs associated with these facilities.

Response:

Yes, for the Program Year ending March 31, 2019 Small-Scale Solar, Medium Scale Solar, Commercial-Scale, and Large-Scale solar classes exceeded their allocations approved by the PUC.

Small-Scale Solar exceeded the Annual Enrollment Target due to customers submitting applications prematurely. RE Growth projects are eligible for interconnection in the order in which applications are submitted to National Grid. Therefore, customers are motivated to apply as soon as possible. The Company anticipates attrition before the end of a program year, and, initially enrolls an excess of projects assuming some of those projects will cancel. Customers have expressed satisfaction with the process that allows them to update the details of their applications after they initially submit the application to National Grid. National Grid has accommodated this preference in the interest of maintaining positive customer relationships.

The Medium-Scale Solar, Commercial-Scale Solar, and Large-Scale Solar classes exceeded their Annual Enrollment Targets due to re-allocation during the Third Open Enrollment, which is completed three months prior to the end of the program year. The program rules specify that if there is an over-subscription in one class and an undersubscription in an enrollment MW target, then National Grid, the OER, and the Board may mutually agree to allocate megawatts from one class to another without Commission approval if the re-allocated targets would not exceed the annual MW Target.<sup>1</sup>

The tables below describe over-enrollment capacity, cost, and quantity of projects at the end of the Program Year (03/30/2019) and according to the most recent data (09/01/2019).

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<sup>1</sup> See R.I. Gen. Laws § 39-26.6-12 (b).

The Narragansett Electric Company  
d/b/a National Grid  
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The following table summarizes the 2018 Program Year results at the end of the program year and as of September 1, 2019.

<b>Renewable Energy Class</b>	<b>Annual Enrollment Target (Nameplate kW)</b>	<b>Total Enrollment (Ending 3/31/2019)</b>	<b>2018 Program Year Over/Under Enrollment (Ending 3/31/2019)</b>	<b>2018 Program Year Projects Pending/Operational (as of 9/1/2019)</b>	<b>2018 Program Year Over/Under Enrollment (as of 9/1/2019)</b>
Small-Scale Solar	6,550	7,011	-461	6,801	-251
Medium-Scale Solar	3,000	3,102	-102	2,852	148
Commercial-Scale Solar	5,000	5,110	-110	3,147	1,853
Large-Scale Solar	12,050	14,479	-2,429	14,479	-2,429
Small Wind	400	0	400	0	400
Large Wind	6,000	6,000	0	6,000	0
CRDG Commercial Solar	3,000	997	2,003	997	2,003
CRDG Large Solar	3,000	2,999	1	2,999	1
Anaerobic Digestion/Hydropower	1,000	740	260	740	260
2018 Program Year:	40,000	40,438	-438	38,015	1,985

The number of systems, per Renewable Energy Class, which were over-enrolled are as follows:

<b>Renewable Energy Class</b>	<b>Number of Systems Exceeding Target (as of 3/31/2019)</b>	<b>Number of Systems Exceeding Target (as of 9/1/2019)</b>
Small-Scale Solar	53	36
Medium-Scale Solar	2	0
Commercial-Scale Solar	1	0
Large Scale Solar	1	1

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Based on available data as of September 1, 2019, the estimated annual cost to the program due to over-enrollments are:

<b>Renewable Energy Class</b>	<b>Capacity Over-Enrolled</b> <i>(as of 9/1/2019)</i>	<b>Price per kWh</b>	<b>Capacity Factor</b>	<b>Estimated Annual Output (kWh)</b>	<b>Estimated Annual Cost of Over-enrolled</b>
Small-Scale Solar	251	\$0.31	14.0%	308,378	\$96,146
Medium-Scale Solar	0	\$0.22	14.0%	0	\$0
Commercial-Scale Solar	0	\$0.17	14.0%	0	\$0
Large-Scale Solar	2,429	\$0.15	14.0%	2,978,926	\$439,392