

**Econox Renewables Inc  
48 Waterfield Road PO Box 808  
Winchester, MA 01890**

**Attn:** RIPUC

**Re:** Docket 4981

Econox Renewables, Inc. solar project on Howard Lane in Glocester , RI has followed a similar path and timeline as the Diocese of Rhode Island Project (Docket 4981).

Econox project Case RI-2560083, 97 Howard Lane in Glocester, RI has been thru the same Interconnection issues and is currently in the same Transmission study group as the Diocese project.

The 97 Howard Lane North Scituate RI 3,120 kW AC solar project is ready for construction and has all required town approvals, RI DEM permits in place and also a Certificate of Tariff with the RI Regrowth program. The project has taken significant financial losses due the Interconnection and Transmission System Study delays.

The time line of our project is below

- Econox applied to interconnect this 3,960 kW project on January 18, 2018, requesting an impact study.
- NGrid completed its impact study on June 14, 2018. The project was found to be feasible and interconnection was authorized. The impact study did not mention need for any transmission level study.
- The land use approval process required Econox to reduce the project size to 3120 kW and Econox requested any necessary revision to the impact study on December 17, 2018.
- By statute, NGrid's restudy was due on March 7, 2019. It was issued months late.
- On July 2, 2019, NGrid advised Econox that it will require a Transmission System Impact Study that will take 6 to 9 months to complete.

Econox agrees and supports the with the Diocese of Rhode Island requests below:

- (1) That transmission system impact study costs may not be assessed to interconnecting distributed generation customer.
- (2) That transmission system impact studies may not delay the issuance of an interconnection impact study which must issue within ninety days
- (3) That costs of transmission system upgrades are solely the subject of federal jurisdiction and may not be imposed under Narragansett's Standards for Connecting Distributed Generation
- (4) That Narragansett may not impose the cost of any required upgrades to New England Power Company's transmission system under Narragansett's Standards for Connecting Distributed Generation.

- (5) That Narragansett must apply the Standards for Connecting Distributed Generation in effect at the time of an interconnection application and the tariff in effect when Petitioner applied for interconnection did not authorize transmission system impact studies or the assessment of costs for transmission system upgrades to respond to impacts.
- (6) That even if the PUC had jurisdiction to authorize New England Power Company to impose the costs of transmission system upgrades on interconnecting customers under the Standards for Connecting Distributed Generation, neither ISO-NE tariff I.3.9 nor ISO-NE OP5-1 nor any other ISO Operating Procedure authorize Narragansett or New England

Thanks Scott Milnes

A handwritten signature in black ink, appearing to read "Scott Milnes", written over the printed name.

Econox Renewables Inc.-President

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