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May 24, 2021

VIA E-MAIL AND FIRST CLASS MAIL

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

Re: *Episcopal Diocese of Rhode Island – Petition for Declaratory Judgment on Transmission System Costs and Related “Affected System Operator” Studies*, PUC Docket No. 4981

Dear Ms. Massaro:

This letter is The Narragansett Electric Company d/b/a National Grid’s (the “Company”) response to the May 19, 2021 Notice of Inclusion of Certain Documents from Docket 4973 Into the Record and Request to Update Information Stated in Petitioner’s Brief (the “Notice”).

First, the Company has reviewed the documents from Docket 4973 identified in the Notice for inclusion “as a record of the travel of the case that occurred earlier, to inform the Supreme Court of how the dockets proceeded in parallel.” The Company has no objection to the inclusion of any of the Docket 4973 documents in the record of the travel of the case.

Second, enclosed please find an original plus nine copies of the Company’s response to the Information Request included in the Notice. The Company reserves its right to oppose inclusion and consideration of this response as part of the record in this docket.

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Adam M. Ramos".

Adam M. Ramos

Enclosure

cc: Docket No. 4981 Service List

PUC Docket No. 4981 - Episcopal Diocese of RI – Petition for Declaratory Judgment on Transmission System Costs and Related "Affected System Operator" Studies Service List Updated 4/27/2021

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In Re: Petition of the Episcopal Diocese of Rhode Island for Declaratory Judgment on Docket
No. 4981 Transmission System Costs and Related “Affected System Operator” Studies
Response to the Commission’s Informal Information Request
Issued on May 19, 2021

Informal Information Request

Request:

Referring to the Petitioner’s Brief on page 19 that states: “The transmission system improvements at issue in Docket 4981 are far far removed from the customer’s premises,” please indicate the status of the transmission impact study and describe:

- (i) where the referenced transmission improvements or modifications are proposed to be made and the relative distance from the Eastern Array,
- (ii) the facilities that will be improved or modified, including voltage and whether they are classified as transmission or distribution used for transmission,
- (iii) the specific legal entity-owner of the facilities to be improved or modified for transmission purposes (i.e., Narragansett Electric, New England Power Company, or an owner not affiliated with National Grid, if known),
- (iv) the nature of the improvements or modifications, and
- (v) the estimated cost (if any) that Narragansett Electric maintains should be allocated to the Petitioner from the referenced transmission system improvements or modifications.

Response:

The Episcopal Diocese of Rhode Island (Petitioner) proposed two solar projects at issue in Docket 4981: a proposed 2.4 MW Eastern Array under Case Number RI-25728432; and a proposed 3.8 MW Western Array under Case Number 25674190. The distribution system impact study for the Western Array found that no system modification could be performed that would allow interconnection of a 3.8 MW project in a way that would ensure the safe and reliable operation of the system. Therefore, the project was not feasible. The distribution system impact study for the Eastern Array suggested reducing the system size to 2.2 MW to avoid certain upgrades.

The Eastern Array was also identified by New England Power Company and ISO-New England as requiring review for potential impacts to the transmission system in accordance with Section I.3.9 of the ISO New England Inc. (ISO-NE) Transmission, Markets, and Services Tariff (the Affected System Operator (ASO) Study). The Commission’s Declaratory Ruling in Docket No. 4981 (Order No. 23811) ruled that the costs for the ASO Study may be assessed to the Petitioner. Accordingly, the Mediator’s Recommendation in Docket No. 4973 issued on April 22, 2020 directed the Petitioner to pay \$3,300 for its share of the ASO Study costs within 10 days of the recommendation. Petitioner made payment for the ASO Study on June 6, 2020.

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The ASO Study commenced on June 31, 2019 and consisted of approximately 228 MW of distributed generation proposed to interconnect to The Narragansett Electric Company distribution system in Western Rhode Island. The primary objective of the ASO Study was to determine if interconnecting the 228 MW of proposed distributed generation projects created any adverse impacts on the reliability, stability, and operating characteristics of any ASO including the New England Power Company transmission facilities, the facilities of any other transmission owner, or the system of any market participants.

The results of the ASO Study were recommended for ISO-NE approval by the NEPOOL Reliability Committee on May 19, 2020.

- (i) The steady state analysis in the ASO Study identified certain adverse impacts and determined that 132 MW of the projects studied can connect to the transmission system without triggering any transmission system improvements, but the last 96 MW of projects that sought to connect south of Drumrock Substation require transmission system improvements. The modifications required are located between the Kent County Substation and the Drumrock Substation. These improvements are needed to serve only projects in the ASO Study that are interconnecting south of the Drumrock substation. The Eastern Array is located 19.98 miles north of the Drumrock substation and therefore does not require any transmission system improvements to interconnect. The Petitioner will not be assessed any costs for the transmission system improvements required as a result of the ASO Study.
- (ii) The two 115 kV transmission lines (G-185N and K-189) between the Kent County Substation and Drumrock Substation will be upgraded.
- (iii) The Narragansett Electric Company owns the facilities to be improved or modified for transmission purposes (i.e. the G-185N and K-189 lines).
- (iv) The required transmission system improvements are:

G-185N:

Reconductor the entirety of the 115kV G-185N line from Drumrock to Kent County Substation with 1590 kcmil 54/19 “Falcon” ACSS conductor (approximately one circuit mile).

K-189:

Increase the emergency thermal rating of the 115kV K-189 line from 100°C to 140°C. In order to increase the thermal rating, replace seven insulator discs per phase, add three insulator discs, and replace hot line clevis ball, hot line socket clevis, yoke plate, clevis

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balls, hot line socket eyes, and compression deadends on two substation deadend structures.

- (v) None of the costs of the referenced transmission system improvements or modifications are allocated to the Petitioner. The reason is that only the last 96 MW of projects that seek to connect south of the Drumrock Substation contribute to the overloads on the G-185N and K-189 lines, as the overloads occur only for a power flow direction from Kent County to Drumrock (south to north). The Petitioner’s transmission system interconnection point is north of the Drumrock Substation. The costs of the referenced transmission system improvements will be allocated to the 96 MW of projects that seek to connect south of the Drumrock Substation.