



MEMORANDUM

TO: RHODE ISLAND PUBLIC UTILITIES COMMISSION

FROM: CARRIE GILBERT—DAYMARK ENERGY ADVISORS ON BEHALF OF THE DIVISION OF PUBLIC UTILITIES AND CARRIERS

DATE: JANUARY 23, 2020

SUBJECT: DOCKET NO. 4983 – PROPOSED 2020 RENEWABLE ENERGY GROWTH TARIFF AND RULE CHANGES

National Grid filed its proposed 2020 Renewable Energy Growth (REG) Tariff and Rule Changes on November 15, 2019. The filing includes the Pre-Filed Direct Testimony of Ian Springsteel in support of the changes, a redline and clean version of the tariff and rules themselves, and a memo to the Distribution Generation Board describing the changes.

The Tariff and Rule Changes proposed include two major changes:

- Carport Solar Incentive. The Company is proposing separate incentive or adder for project that include a carport.
- Customer Disclosure Requirement. The Company is proposing adding customer disclosure requirement for Small Solar project.

In addition to these major changes the Company is proposing a number of minor changes including:

- A change from the requirement to submit Solar Permits for each project to a requirement to submit General Contractor registration and Electrician license numbers;
- A new exception to allow multiple projects on same parcel when they do not together qualify as a larger project class;
- Specific provisions to guide the crediting of A-60 customers from community remote distributed generation (CRDG) or Shared Solar facilities;
- Guidance for how Energy Storage Systems can be connected to RE Growth facilities, in terms of meter and connection location;
- The options for residential customers seeking expansion/additional systems;

- Clarification regarding the location of meters to comply with changes in the Company's Electric Service Bulletin (ESB) 750; and
- Other minor changes to definitions and wording for clarity.

All of the changes are reasonable.

CARPORT SOLAR INCENTIVE

The Company is proposing to add a Carport Solar Incentive or adder to the Large and Commercial Solar classes. I discussed the merits of this adder in my memo regarding the proposed ceiling prices for 2020. The addition of the adder has required changes to the Renewable Energy Growth Program Solicitation and Enrollment Process Rules for Solar (greater than 25 kW), Wind, Hydro, and Anaerobic Digester Projects and to RIPUC No. 2152-G, Renewable Energy Growth Program for Non-Residential Customers.

The changes to these documents appear to be made correctly.

CUSTOMER DISCLOSURE REQUIREMENT

The Renewable Energy Growth Program Solicitation and Enrollment Process Rules for Small-Scale Solar have been modified to include the requirement for a customer disclosure form. The form will be available on the National Grid website.