



Public Utilities Commission

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July 31, 2019

Dear Commissioners,

Thank you for considering implementing changes that we see impeding the progress of renewable energy installations and the associated job growth in Rhode Island.

Some of the interconnection problems we are experiencing in the RI residential solar industry include:

- **Transformer load limitations and upgrades** - Currently, if the addition of any PV system on a shared transformer puts the amount of connected DG over 20kW AC, that customer must pay for a new transformer and sometimes a new pole. Then any subsequent customers who wish to install a PV system must contribute to the original cost of the upgrade. How the costs are covered with more subsequent PV installations isn't clear. In all of these cases we've experienced, the extra cost has drastically hurt the economics of installing PV and has effectively stopped these customers from moving forward. These EPS upgrades should be shared by all ratepayers.
- **National Grid PV system sizing methodology** - National Grid applies a generic capacity factor to all PV system sizes to calculate PV production. This is not an accurate way of calculating electricity production and does not allow those with inefficient roofs their right by statute to produce or offset 100% of their electricity usage and conversely allows those with efficient roofs to produce more electricity than they use. Newport Solar has submitted to National Grid and the DG Board a simple, free sizing methodology utilizing the Federal Government's NREL PV Watts calculator that is much more accurate in estimating PV production and adds less than one minute to an application review.
- **Prohibition of batteries on REG systems** - National Grid currently does not allow owners of REG systems to install batteries to store and use the power generated from their PV system in the event of a power outage, or anytime. Customers have purchased and own this equipment and National Grid is "reaching behind the meter" to tell customers that they cannot utilize equipment that is behind their utility meter when National Grid cannot supply electricity. This arbitrary rule also bars REG system owners from participating in DR programs and the multitude of service opportunities a battery installation offers. National Grid's reasoning of ratepayers "gaming the system" is dismissed with the installation of an automatic transfer switch.

Some less critical, but also important rules that very much need changing include:

- **Electrical Engineer stamped 3-line diagrams for transformer sizing studies** - When a Simplified Interconnection Application shows that there will be more than 20 kW of PV on a shared transformer, the applicant must move to an Expedited Interconnection Application, which requires the customer to pay \$300 for transformer study and submit an electrical engineer stamped 3-line diagram. These electrical diagrams can cost anywhere from \$400-\$1,000 raising the cost of the installation up to \$1,300.00 without any guarantee of approval. A transformer load calculation is done using the system AC nameplate capacity, which is found on all interconnection applications and the 3-line diagram is not needed. This engineered 3-line diagram, and the extra expense of time and money, should not be required for any transformer load calculation.
- **3-phase Net meters** - Newport Solar recently installed a PV system on a commercial building with 3-phase power. National Grid informed us, upon submission of all close-out documents, that they had no 3-phase Net meters stocked and would have to custom-build one for our client. This delayed the interconnection of the PV system by over five weeks. National Grid should be required to keep a minimum of these meters in stock to avoid anymore of these unnecessary delays in interconnection.

Rhode Island has adopted the Power Sector Transformation as the roadmap to our changing electric grid and how ratepayers will interact with the grid. We have rules in place that have fostered the RE industry here in Rhode Island through “phase 1”. We are now beyond “phase 1” and need to re-write the rules to afford all ratepayers the equal right and opportunity to install and interconnect DG. The current rules governing the interconnection of DG are in direct conflict with the state’s goals of the Power Sector Transformation, GHG emission reductions, energy independence and local RE job growth. Now is the time to utilize all of the information the PUC has gleaned from the past several years of studies and meetings and enact the rule changes that the state has collectively decided it wants

Sincerely,
Newport Solar
Doug Sabetti- President