

MEMORANDUM

To: Docket No. 4994 Service List (Tech Session Participants)
Cc: Laura Bickel, Esq.
From: Commission Staff
Date: February 8, 2021
Re: Advance Questions for 2-11-21 Technical Session

To allow participants to prepare for the February 11, 2021 Technical Session, PUC Staff is providing the following bullet points after having reviewed Providence Water's Renewable Energy Study ([http://www.ripuc.ri.gov/eventsactions/docket/4994-ProvWater-REStudy\(12-9-20\).pdf](http://www.ripuc.ri.gov/eventsactions/docket/4994-ProvWater-REStudy(12-9-20).pdf)); National Grid's Response to PUC 7-1 in Docket No. 5010 (<http://www.ripuc.ri.gov/eventsactions/docket/5010-NGrid-DR-PUC7%2012-14-20.pdf>); and the Pine Hill Solar Facility RES Eligibility filing in Docket No. 4984 (<http://www.ripuc.ri.gov/eventsactions/docket/4984page.html>).

We expect to spend significant time on the sizing and expected output of the facility. This is one critical component to calculating the correct electric rate to be included in Providence Water's rate case. National Grid and Providence Water's participants will need to provide a clear explanation on how they understand (or evaluate) the sizing of the facility. It will be important for Providence Water to have someone who is familiar with the actual equipment installed and what is on the interconnection application provided in 7-1 in 5010 (e.g., FS2000K and FS3000K inverters and the DC rating). Providence Water will also need someone to explain what is listed in the application for RES eligibility and the DC nameplate provided to NEPOOL GIS for the facility.

- Sizing of the facility
 - We have questions about the choice of inverter AC nameplate and the DC nameplate capacity used for the system.
 - We want to know what PWSB believes will be generated and how that compares to what NG believes will be generated.
 - We will get into assumptions about the capacity factor, DC to AC derate and why those are reliable assumptions
- Excess products (credits and RECs)
 - Given the discussion above on the facility size
 - we'll want to discuss how much excess product PWSB believes it will have to purchase per the contract
 - Or remaining product PWSB believes it will need to purchase to meet its goals
- Alternative analysis
 - Why didn't the study examine a case in which you bought the NEM credits at a discounted price and then purchase RECs on the market for your load?
- Goals and Definitions
 - What is PWSB's "Renewable Energy Policy" approved by vote at the June 26, 2019 meeting
 - We have the meeting minutes. Is there a written document, or is the only formal recording of the policy what is recorded in the meeting minutes?
 - How was it developed
 - What definitions are being used

- Did the Board review/consider/understand existing state goals and definitions?
 - Why is it important to PWSB where RECs come from at the project level?
 - Why isn't, for example, timing of peak load a consideration, assuming goals include reduction of carbon emissions?
 - Number of RECs – why does it matter for “renewableness” where the facility is located?
- Getting back to link between NEM and 100% renewable
 - Was the Board made aware of the how remote NEM works?
 - Was this a factor discussed in meeting goals?
- How will the RECs be retired to meet PWSB goals and how will it be transparent to all?
 - We understand that the AlsoEnergy is the independent verifier; why isn't PWSB relying on the output of National Grid's MSS asset?
 - It also appears the RECs will go into PWSB's NEPOOL GIS account. Will the RECs be tracked against usage? Will staff report to the Board confirmation that the RECs were retired voluntarily (in a reserve account, e.g.)?
 - What will PWSB do during years in which generation does not match use (over or under)?