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January 5, 2021

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

Re: Docket 5077

Dear Ms. Massaro:

Enclosed please find an original and nine copies of the Northeast Clean Energy Council's comments in the above captioned docket. Please note that an electronic copy of this document has been provided to the service list.

Thank you for your attention to this matter.

Sincerely,



Joseph A. Keough, Jr.

JAK/kf

Enclosures

cc: Docket 5077 Service List (*via electronic mail*)

Via Electronic Filing

January 5, 2021

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

RE: RIPUC Docket 5077: Comments of the Northeast Clean Energy Council

Dear Ms. Massaro:

The Northeast Clean Energy Council (“NECEC”)¹ appreciates the opportunity to submit the following comments in Docket 5077 in support of the proposed changes to the Narragansett Electric Company Standards for Connecting Distributed Generation (the “DG Interconnection Tariff” or “DG Tariff”) offered by National Grid.

As Rhode Island moves towards a cleaner and more distributed electricity grid,² establishing successful interconnection procedures for DG resources will be key to its success. Today, renewable energy developers face significant challenges in connecting resources to the grid: both high costs and lengthy timelines have created strong headwinds for many of NECEC’s members and the clean energy industry in general. For these reasons, NECEC actively engaged with National Grid, the developer community, and the Office of Energy Resources (“OER”) for over a year to discuss ways in which to improve the current interconnection process. This process resulted in the proposed revisions filed before the Commission here.

As noted in its October 22nd letter that accompanied National Grid’s Tariff Advice Filing, NECEC supports the proposed updates to the DG Tariff and believes that they represent modest progress in establishing a set of interconnection procedures that are transparent, timely and affordable for DG developers (“Interconnecting Customers”).

¹ NECEC is a clean energy business, policy, and innovation organization whose mission is to create a world-class clean energy hub in the Northeast, delivering global impact with economic, energy and environmental solutions. NECEC is the only organization in the Northeast that covers all of the clean energy market segments, representing the business perspectives of investors and clean energy companies across every stage of development. NECEC members span the broad spectrum of the clean energy industry, including clean transportation, energy efficiency, wind, solar, energy storage, microgrids, fuel cells, and advanced and “smart” technologies.

² See Governor Gina Raimondo, “Advancing a 100% Renewable Energy Future for Rhode Island by 2030,” Executive Order 20-01, (January 17, 2020).

DISCUSSION

The proposed changes to the DG Tariff offer improvements in several areas that NECEC discusses below. Collectively, they represent meaningful changes and NECEC urges the Commission to approve all of the changes proposed by National Grid.

A. Creating an Independent Ombudsperson Role that Reports to the Commission

Establishing an independent ombudsperson will be invaluable to resolving interconnection disputes between Interconnecting Customers and National Grid in an efficient manner. Experience has shown that, despite commitments from all parties, disputes will arise as individual projects move through the interconnection process. National Grid, informed by NECEC and others, has taken care to develop a proposal that balances impact, objectivity and flexibility for the Commission. NECEC's goals in developing proposed tariff language were to establish a truly independent ombudsperson while providing the Commission flexibility in structuring the role, and the DG Tariff language (See Sheet 11, 51-52). NECEC agrees with National Grid that it is well within the Commission's purview to "determine: a) if there should be an ombudsperson, b) who that ombudsperson works for, and c) what the ultimate role of the ombudsperson would be." (See National Grid Response to PUC 1-3-a). Based on the disputes that have arisen in Rhode Island and its members' experience with the now-expanded ombudsperson function within the Massachusetts Department of Public Utilities, NECEC believes that it is prudent for the Commission to adopt a similar model for Rhode Island.

B. Establishing an Interconnection Technical Standards Committee

NECEC supports the National Grid proposal to establish an Interconnection Technical Standards Committee ("ITSC").³ As envisioned, the ITSC would function similarly to the Massachusetts Technical Standards Review Group which has proven helpful to NECEC member companies by creating a dedicated forum for communication and problem solving around technical and engineering issues.⁴ As the interconnection process gets more complex and technologies evolve, NECEC anticipates that the ITSC will become a valuable body, but only if structured and administered in a way that allows for proper stakeholder input. NECEC believes that, as proposed, the ITSC would achieve success because the tariff language prescribes a specific composition, including a chair and vice chair, process and meeting/reporting requirements that reflects the interests of developers, National Grid, and the state of Rhode Island.

C. Developing an Optional Pre-Impact Study Review

³ See Proposed Tariff Revisions: Section 1.1, Definitions, Sheet 6; Section 9.4, Interconnection Technical Standards Committee, Sheet 55

⁴ See <https://sites.google.com/site/massdgc/home/interconnection/technical-standards-review-group>

The proposed tariff changes include an optional Pre-Impact Study Review process under which an Interconnecting Customer can elect to request that National Grid perform a high-level engineering study before it engages in a full Impact Study.⁵ The purpose of this new process is to allow for an Interconnecting Customer to gain insight into the viability of a potential project more quickly with lower expense than if a full Impact Study was performed. The Pre-Impact Study Review includes technical and engineering assessments that go beyond a Pre-Application Report and, under certain circumstances, will provide enough information about a project to allow an Interconnecting Customer to make a sound decision about whether or not to proceed. Ultimately, this completely optional process offers efficiency gains for Interconnecting Customers and National Grid alike by giving both an earlier view of project viability and reducing the resources dedicated to pursuing projects that would ultimately face too many challenges to be built. For these reasons, NECEC urges the Commission to adopt the Pre-Impact Study Review provisions in the proposed DG Tariff.

D. Adding Flexibility to Interconnection Payment Timelines

Section 3.5 (“Time Frames”) of the Proposed Tariff contains a new paragraph that provides greater clarity on the time frames under which Interconnecting Customers must make interconnection installment payments. Specifically, the new provision would give an Interconnecting Customer up to 90 business days after the execution of an Interconnection Service Agreement (“ISA”) to make its initial payment and another 90 business days to make its final payment. Because project financing is often conditioned upon an ISA to release funding, this provision will provide greater flexibility. In addition, lengthy project permitting timelines can also cause challenges for Interconnecting Customers in making ISA payments. It is important to note that an Interconnecting Customer can make payments earlier thereby accelerating the National Grid’s construction obligations. Thus, this provision will allow greater flexibility in the design and construction process and NECEC recommends that this change take effect immediately and apply to projects currently in the application queue.

E. Improving Communication About Affected System Operator Studies

Affected System Operator (“ASO”) studies have become an increasingly common occurrence in the DG interconnection process. Although ASO studies are referenced in the current DG Tariff, recent experience has shown that additional clarity is required. As a result, National Grid has proposed a series of updates to the DG Tariff that increase the transparency, timely notifications, coordination and clarity around ASO studies. Because National Grid, as distribution utility, facilitates the communication between the Interconnecting Customer and ASO (e.g., the transmission provider), it is essential that National Grid have an explicit obligation to coordinate between the Interconnecting Customer and the ASOs (Sheet 20) and provide as much timely information as possible about ASO studies including in Pre-Application Reports

⁵ See Proposed Tariff Revisions: Section 1.1, Definitions, Sheet 7; Section 1.3.5, Forms and Agreements, Sheet 9; Section 3.0, Process Overview, Sheet 12; Section 3.4, Standard Process, Sheets 19 and 20; Table 1, Sheet 28; Exhibit F – Pre-Impact Study Review Agreement, Sheets 79-80.

(Sheet 16), upon completion of the Initial Review (Sheet 19), during the Impact Study/ISR DG process (Sheet 20). In addition, because both distribution level studies (Impact Study or ISR DG) and ASO studies can be time consuming, the Interconnecting Customer should have the discretion to choose that these studies occur concurrently (Sheet 20).

F. Future Treatment of Cost Allocation and Distribution Planning

As indicated in the Commission's Data Requests (PUC 1-4, 1-6, 2-1 through 2-4) and National Grid's responses, there is a general need to address the various issues related to how distribution (and transmission) costs get distributed among beneficiaries in ways that are equitable, efficient and transparent. While not the topic of this proceeding, given the increased importance of distributed renewable generation, NECEC encourages the Commission to prioritize cost allocation and distribution planning issues in the near future.

CONCLUSION

For the reasons articulated above, NECEC urges the Commission to approve the proposed changes to the DG Tariff.

Sincerely,



Jeremy McDiarmid
Vice President, Policy & Government Affairs

CERTIFICATION

I hereby certify that on January 5, 2021, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Luly Massaro, Commission Clerk, by electronic mail and regular mail.

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