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April 29, 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 related to certain consensus and non-consensus changes proposed to the Narragansett Electric Company Standards for Connecting Distributed Generation offered by National Grid. 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**

April 29, 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”)<sup>1</sup> appreciates the opportunity to submit the following comments in the Rhode Island Public Utilities Commission’s (the “Commission”) Docket 5077 related to certain consensus and non-consensus changes proposed to the Narragansett Electric Company Standards for Connecting Distributed Generation (the “DG Interconnection Tariff” or “DG Tariff”) offered by National Grid.

At the outset, NECEC notes its appreciation for the ongoing participation of the Office of Energy Resources (“OER”), National Grid and the Division of Public Utilities and Carriers (the “Division”) (collectively, the “Parties”). The proposed consensus changes to the DG Tariff, while modest, would represent important changes to the interconnection process in Rhode Island. Below, pursuant to the Commission staff’s email memorandum from April 21, 2021, NECEC discusses both the consensus and non-consensus elements of the DG Tariff.

**Consensus Changes**

Based on the April 22, 2021 filing of National Grid<sup>2</sup> and the discussions among stakeholders, NECEC believes that most of the DG Tariff changes proposed by National Grid in its original October 22, 2020 filing in this docket are consensus among the Parties. NECEC’s

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<sup>1</sup> 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.

<sup>2</sup> See Pre-Filed Direct Testimony of Timothy Roughan, April 22, 2021.

support for these changes remains consistent with its previous filings in this docket.<sup>3</sup> As noted in its October 22<sup>nd</sup> 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").

In addition, NECEC is pleased to support the proposed changes identified in National Grid's April 22, 2021 filing that would increase the capacity of distributed energy project eligible to apply for interconnection under the Simplified Process.<sup>4</sup> NECEC urges the Commission to adopt this set of changes to the DG Tariff because they will allow for a more efficient and streamlined process for residential and small commercial projects that incorporate systems large enough to facilitate the electrification of transportation (i.e., electric vehicle charging equipment) and/or electric thermal applications (e.g., air-source heat pumps).

### Non-Consensus Changes

#### *A. Creating an Independent Ombudsperson Role*

NECEC continues to believe that establishing an independent ombudsperson will be invaluable to resolving interconnection disputes between Interconnecting Customers and National Grid in an efficient manner. In its original October 22, 2020 filing, National Grid, informed by NECEC and others, submitted an Ombudsperson proposal that balances impact, objectivity, and flexibility for the Commission. NECEC's goals in working to develop and support the 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). In discovery in this Docket, National Grid contended that it was 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."<sup>5</sup>

NECEC understands that there are concerns about how an Ombudsperson function would be funded. Based on the discussion at the February 16, 2021 technical conference in this docket and subsequent discussions with the Parties, NECEC would support, as an alternative to the Ombudsperson provisions filed by National Grid in October, a two-year pilot program, funded by OER. Attached as Exhibit A is a draft of language that NECEC proposes to include in the DG Tariff as a compromise. If the Commission is not inclined to adopt a permanent Ombudsperson function at this time, providing a two-year period to test whether an Ombudsperson role delivers benefits to DG stakeholders and increases the efficiency of the interconnection process would establish a basis for deciding whether a permanent Ombudsperson role is merited in the future.

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<sup>3</sup> See NECEC Comment Letters in Docket 5077 dated January 5, 2021 and October 22, 2020.

<sup>4</sup> See Pre-Filed Direct Testimony of Timothy Roughan *supra* n.2, at 8-9.

<sup>5</sup> See National Grid Response to PUC 1-3-a. (November 18, 2020); see also id. at 6 (testifying that National Grid no longer supports including a reference to the Ombudsperson in the tariff).

*B. Graduated Pre-Application Fee Schedule*

As indicated in its earlier filings in this Docket, NECEC supports the proposed DG Tariff enhancements to the Pre-Application Reports in Section 3.2 of the DG Tariff.<sup>6</sup> In addition, NECEC acknowledged that some sort of Pre-Application fee would be appropriate to include in the Tariff. However, at the time of the October 22, 2020 filing, National Grid did not propose specific fee levels. In its April 22, 2021 Pre-Filed Testimony, National Grid proposes a fixed \$750 fee for all Pre-Application reports regardless of whether the proposed project for which the Report is requested is one kW or ten MW. Given that the size of a project has a significant bearing on the economics of a DG project, NECEC contends that the Commission should set a graduated fee schedule for Pre-Apps to avoid disproportionately impacting developers of smaller projects. Specifically, NECEC suggests the following:

<b>Project Size</b>	<b>Pre-Application Report Fee</b>
< 250 kW	\$100
250 kW – 500 kW	\$250
> 500 kW	\$750

In addition to providing a more equitable solution, this fee schedule has already been adopted by the Massachusetts Department of Public Utilities.<sup>7</sup> The Commission should adopt this graduated fee schedule to create consistency between Massachusetts and Rhode Island for DG developers who, like National Grid, serve both jurisdictions.

CONCLUSION

NECEC appreciates the opportunity to offer the foregoing comments. The Commission should (a) adopt the consensus changes referenced in National Grid's April 22<sup>nd</sup> Pre-Filed Testimony as reflected in National Grid's October 22, 2020 filing and (b) direct National Grid to amend the DG Tariff in a manner that is consistent with NECEC's comments contained herein.

Sincerely,



Jeremy McDiarmid  
Vice President, Policy & Government Affairs

cc: Docket 5077 Service List (via email)

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<sup>6</sup> See NECEC Letter of Support, October 22, 2020, Filed with National Grid's Tariff Advice Filing, Attachment 3 at 3.

<sup>7</sup> See Massachusetts Department of Public Utilities, Order DPU 19-55-D (September 16, 2020) at 16-17.

**Exhibit A**

**NECEC's Proposed Ombudsperson Pilot Language**

For a two-year pilot period, the Rhode Island Office of Energy Resources, in consultation with the Commission, shall seek competitive proposals for the services of an ombudsperson to oversee the Company's administration of interconnection and help ensure that the interconnection process works efficiently to serve the purposes of Rhode Island's energy plan and policy goals. The appointed ombudsperson shall be an independent third party contracted with and reporting to the Office of Energy Resources. The Office of Energy Resources will provide the Commission with reasonable access to the ombudsman, and will meet all regulatory obligations. The ombudsperson shall not have any adjudicatory authority, but will mediate complaints about the interconnection process from both the Interconnecting Customer and the Company when such complaints cannot be resolved before or during good-faith negotiations as outlined in Section 9.1. The ombudsperson will oversee any and all elements of the interconnection process and will, where confidentiality is not compromised, offer recommendations to the Company and the Commission about opportunities to mitigate or avoid future complaints and disputes. See Section 9 for the formal process to review disputes with the Company about any aspect of the interconnection process. At the conclusion of the two-year pilot period, the Commission shall evaluate the effectiveness of the ombudsperson in resolving disputes efficiently and improving the interconnection process, and shall determine whether to establish and fund a permanent ombudsperson function.

**CERTIFICATION**

I hereby certify that on April 29, 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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