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June 10, 2021

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

RE: RIPUC Docket 5077: NECEC Responses to June 3, 2021 Data Requests

Dear Ms. Massaro:

The Northeast Clean Energy Council (“NECEC”)¹ appreciates the opportunity to submit the following responses in the Rhode Island Public Utilities Commission’s (the “Commission”) Docket 5077 related to the Data Requests to all Parties and Request for Comments issued by the Commission on June 3, 2021 in the above referenced docket.

NECEC has been an active stakeholder in the discussions that preceded the commencement of this proceeding and has worked collaboratively with the Office of Energy Resources (“OER”), National Grid and the Division of Public Utilities and Carriers (the “Division”) (collectively, the “Parties”). Below please find NECEC’s responses and comments to the Data Requests.

Request 1.

Sheet 3, paragraph 1: This document (“Interconnection Tariff”) describes the process and requirements for an Interconnecting Customer to connect a power-generating facility to the Company’s electric distribution system, ~~referred to as the Electric Power System (“Company EPS”)~~, including discussion of technical and operating requirements, metering and billing options, and other matters.

Is the proposed change consistent with the party’s respective understanding of the Applicability of the tariff?

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.

Response 1.

It is NECEC's understanding that the RIPUC No.2244 (the "Tariff"), applies to National Grid's electric distribution system regulated by the Commission. The proposed change is consistent with NECEC's understanding of the Tariff's applicability; however, "Electric Power System" or "EPS" is a term that is widely used in the utility industry, and we note that "Company EPS" is a defined term in the current DG interconnection tariffs in Massachusetts where NECEC members are also active in developing distributed energy resources.

Request 2.

Sheet 3, Section 1.2: Affected System: Any ~~neighboring~~ transmission or distribution electric power system, other than EPS not under the control of the Company EPS EDS, for (e.g., a municipal utility, or other regulated distribution or transmission utility, which the stability, reliability or operating characteristics may be significantly affected by the proposed Facility. include Affiliates, or ISO-NE, as defined herein). Affected System includes the transmission system in Rhode Island that is owned by The Narragansett Electric Company.

Do the proposed changes provide clarity without changing the meaning and/or applicability of the definition?

Response 2.

NECEC notes that the proposed changes narrow the definition of Affected System to only those non-Company systems for which "the stability, reliability or operating characteristics may be significantly affected by the proposed Facility." NECEC also notes that the proposed, consensus definition of Affected System mirrors a similar consensus effort in Massachusetts. NECEC agrees that the transmission system in Rhode Island, owned by the Narragansett Electricity Company, is an Affected System under the Tariff.

Request 3.

Sheet 5, Section 1.2: Company ~~EPS~~ EDS: The electric distribution power system owned, controlled or operated by the Company used to provide distribution service to its Customers.

Does the proposed change provide clarity without changing the meaning or applicability of the definition?

If the change makes sense, each time the term "Company EPS" occurs in the tariff, we would then need to change it to "Company EDS." Would it change the meaning or applicability of any other portion of the tariff where the current terms is "Company EPS"?

Also, the term "EPS" is self-standing in many instances. It may need to be replaced with "EDS", and the term "EDS" would need to be defined as "electric distribution power system" in the definition section. Is this accurate?

Alternatively, if the term "EPS" has its own meaning separate and apart from distribution, then it would need to be defined separately as well.

Response 3.

NECEC does not believe that changing “EPS” to “EDS” will change the meaning or applicability of the term in the Tariff.

Request 4.

Sheet 4, Section 1.2: Area EPS would be changed to Area EDS. Should the IEEE Standard be changed to 1547-2018?

Does the proposed change provide clarity without changing the meaning or applicability of the definition? Would it change the meaning or applicability of any other portion of the tariff where the current terms is “Area EPS”?

Response 4.

NECEC does not take a position on this Data Request.

Request 5.

Sheet 5, Section 1.2: Local EPS: The customer premises within which are contained the Facility. This term is used in the IEEE Standard 1547-2003.

This term is only used in the definitions section and never shows up again in the tariff. Can it be deleted?

Response 5.

NECEC does not take a position on this Data Request.

NECEC appreciates the opportunity to offer the foregoing responses. Should you have any questions, please do not hesitate to contact me.

Sincerely,



Jeremy McDiarmid
Vice President, Policy & Government Affairs

cc: Docket 5077 Service List (via email)