

June 10, 2021

BY ELECTRONIC MAIL

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

RE: Docket 5077 - Standards for Connecting Distributed Generation, R.I.P.U.C. No. 2244 Responses to PUC's Joint Data Requests and Request for Comments

Dear Ms. Massaro:

I have enclosed an electronic version of National Grid's¹ responses to the Public Utilities Commission's Joint Data Requests and Request for Comments issued to all parties in the above-referenced docket.²

Thank you for your attention to this filing. If you have any questions concerning this matter, please contact me at 781-907-2121.

Very truly yours,



Raquel J. Webster

Enclosures

cc: Docket 5077 Service List
Jon Hagopian, Esq., Division
John Bell, Division

¹ The Narragansett Electric Company d/b/a National Grid (National Grid or Company).

² Per Commission counsel's update on October 2, 2020, concerning the COVID-19 emergency period, the Company is submitting an electronic version of this filing. The Company will provide the Commission Clerk with five (5) hard copies and, if needed, additional hard copies of the enclosures upon request.

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.

Joanne M. Scanlon

June 10, 2021
Date

**Docket No. 5077– National Grid’s Standard for Distributed Generation Tariff Advice
Service List updated 2/10/2021**

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The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 5077
In Re: Tariff Advice to Amend Standards for Connecting
Distributed Generation RIPUC No. 2244
National Grid's Responses to the Commission's Joint Data Requests and
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Issued to all Parties on June 3, 2021

National Grid
PUC 1-1

Request:

This request is directed to National Grid, NECEC, the Division, and OER:

By way of background, it appears there has been some confusion caused in the operation of the Standards for Connecting Distributed Generation, particularly in the area of Affected System due to the fact that The Narragansett Electric Company owns both the transmission and distribution assets in Rhode Island. While New England Power operates those assets as an Affected System Operator under an Integrated Facilities Agreement, the ownership/operation is not intuitive. The following attempts to provide clarity without changing the substantive aspects of the operation of the tariff.

The anticipated final hearing in this matter is scheduled for June 14, 2021. Please provide responses and/or comments as appropriate on the following no later than June 10, 2021. The underlined changes proposed by the Company are in black. The proposed changes are in red.

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?

Response:

Yes, but the Company would prefer that the deleted language is kept in the tariff because it is needed to conform the Company's tariff to the industry agreed-upon term of EPS in the Institute of Electrical and Electronics Engineers (IEEE) Standard for Interconnecting Distributed Resources with Electric Power Systems 1547-2003.

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 5077

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National Grid
PUC 1-2

Request:

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:

Please see the Company's response to PUC 1-1 regarding the Company's thoughts on changing the term EPS to EDS. The deletion of 'neighboring' and the addition of the last sentence will provide clarity in the definition, with the addition of the following words "...but operated on its behalf by the New England Power Company (NEP)" so that the last sentence reads: "Affected System includes the transmission system in Rhode Island that is owned by The Narragansett Electric Company but operated on its behalf by the New England Power Company (NEP)."

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National Grid
PUC 1-3

Request:

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:

The proposed tariff revisions do not suggest the change highlighted above. The proposed tariff revisions keep the term 'Company EPS' but then simply defines it as the distribution company assets. The suggested change in the tariff is only the addition of the word 'distribution'. The Company recommends keeping the abbreviation 'EPS' in the tariff and not substituting or adding the proposed abbreviation 'EDS' for the reasons stated in the Company's response to PUC 1-1.

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National Grid
PUC 1-4

Request:

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:

Please see the response to PUC 1-1 on the change of EPS to EDS; the Company does not support this change. The Company would suggest the following change in this sentence, "This term is used in the Institute of Electrical and Electronics Engineers (IEEE) Standard 1547-2003, "IEEE Standard for Interconnecting Distributed Resources with Electric Power Systems" ("IEEE Standard 1547-2003")", to: "This term is used in the Institute of Electrical and Electronics Engineers (IEEE) Standard 1547-2003, "IEEE Standard for Interconnecting Distributed Resources with Electric Power Systems" ("IEEE Standard 1547-2003"), and is meant to refer to the latest IEEE 1547 standard as it is updated from time to time."

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National Grid
PUC 1-5

Request:

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:

No. The Company references IEEE 1547 in the tariff and in the Company's accompanying electric service bulletin (ESB) 756 that covers interconnection, both of which include projects within a microgrid where the customer owns their own electric distribution system (known as the local EPS) that connects to the Company EPS. In any future microgrid proposal, the Company would expect to use the term Local EPS in its studies and accompanying interconnection service agreement (ISA).