

November 18, 2020

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 Data Requests – Set 1

Dear Ms. Massaro:

I have enclosed an electronic version of National Grid's¹ responses to the Public Utilities Commission's First Set of Data Requests 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

November 18, 2020
Date

**Docket No. 5077– National Grid’s Standard for Distributed Generation Tariff Advice
Service List updated 10/27/2020**

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PUC 1-1

Request:

For each of the proposed tariff amendments listed in Attachment 2 to the filing, please indicate whether the amendment is (a) clarifying current practice; (b) adding a new procedure or process; (c) removing an existing procedure or practice; or (d) adding a new substantive component.

Response:

Please see the table below, where each amendment to the Interconnection Tariff has been characterized in the right-most column.

Proposed Tariff Revisions and Rationale	Interconnection Tariff Reference (Per Redlined Tariff as Filed)	Amendment Characterization
<p>Revision: Changed threshold for generating facilities that likely will require review by New England Power Company (“NEP”) in accordance with ISO-NE rules.</p> <p>Rationale for change: To reflect ISO-NE current process requiring NEP to provide additional analysis of generating facilities between 1 MW and 5 MW.</p>	<p><u>See</u> Section 1.1, Applicability, Sheet 3</p>	<p>(a) Clarifying current practice</p>

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Proposed Tariff Revisions and Rationale	Interconnection Tariff Reference (Per Redlined Tariff as Filed)	Amendment Characterization
<p>Revision: Revised definition of “Affected System” and added definitions for “Affected System Operator”, “Affected System Owner” and “Affected System Operator Study”.</p> <p>Rationale for change: To clarify the definition of Affected Systems and add definitions of related terms used in the tariff.</p>	<p><u>See</u> Section 1.1, Definitions, Affected System, Sheet 3</p>	<p>(a) Clarifying current practice</p>
<p>Revision: Inserted “distribution” in definition of Company EPS.</p> <p>Rationale for change: To clarify the meaning of “EPS”.</p>	<p><u>See</u> Section 1.1, Definitions, Sheet 4</p>	<p>(a) Clarifying current practice</p>
<p>Revision: Added definition of Initial Review.</p> <p>Rationale for change: To add the definition of Initial Review because, although this term is used in the tariff, the term is not a defined term in the tariff.</p>	<p><u>See</u> Section 1.1, Definitions, Sheet 5</p>	<p>(a) Clarifying current practice</p>

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Proposed Tariff Revisions and Rationale	Interconnection Tariff Reference (Per Redlined Tariff as Filed)	Amendment Characterization
<p>Revision: Added a new tariff provision to provide for the creation of an Interconnection Technical Standards Committee (“ITSC”).</p> <p>Rationale for change: The ITSC will facilitate the timely flow of technical information and information regarding potential changes to the technical requirements of interconnection.</p>	<p><u>See</u> Section 1.1, Definitions, Sheet 6; Section 9.4, Interconnection Technical Standards Committee, Sheet 55</p>	<p>(b) Adding a new procedure or process; (d) Adding a new substantive component</p>
<p>Revision: Pre-Impact Study Review: Added a new tariff provision to provide for a Pre-Impact Study Review.</p> <p>Rationale for change: The Pre-Impact Study Review will provide an optional high-level engineering review before an Impact Study or ISRDG is carried out to determine the scope of modifications to the EPS at an early stage of the interconnection process. The proposed Pre-Impact Study Review Agreement will be Exhibit F, and current Exhibits F through I will be re-lettered accordingly.</p>	<p><u>See</u> 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</p>	<p>(b) Adding a new procedure or process</p>

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Proposed Tariff Revisions and Rationale	Interconnection Tariff Reference (Per Redlined Tariff as Filed)	Amendment Characterization
<p>Revision: Added reference to microgrids and deleted outdated paragraph contemplating special interconnection requirements for facilities over 3 MW.</p> <p>Rationale for change: To acknowledge that the Company will work with local jurisdictions and Interconnecting Customers who are considering microgrids.</p>	<p><u>See</u> Section 2.0, Basic Understandings, Sheet 10</p>	<p>(a) Clarifying current practice; (c) Removing an existing procedure or practice;</p>
<p>Revision: Created an Ombudsperson role.</p> <p>Rationale for change: To designate an individual from the PUC or retained by the PUC to have responsibility for overseeing the Company's administration of disputes.</p>	<p><u>See</u> Section 2.0, Basic Understandings, Sheet 11; Section 9.2, Mediation/Non-binding Arbitration, Sheets 51-52; Table 3, Sheet 54</p>	<p>(d) Adding a new substantive component</p>

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Proposed Tariff Revisions and Rationale	Interconnection Tariff Reference (Per Redlined Tariff as Filed)	Amendment Characterization
<p>Revision: Added requirement to the Simplified Process that the Company must have completed any required System Modifications before interconnection is authorized.</p> <p>Rationale for change: To clarify that under the Simplified Process (as is the case under the Expedited and Standard Processes), interconnection cannot be authorized until System Modifications have been completed.</p>	<p><u>See</u> Section 3.1.g, Simplified Process, Sheet 14</p>	<p>(a) Clarifying current practice</p>
<p>Revision: Added additional information to Pre-Application Reports, a fee for both mandatory and optional Pre-Application Reports, and time frames.</p> <p>Rationale for change: To compensate the Company for the additional information required in the Pre-Application Report. Consensus was reached on the concept of charging a fee; determination of the fee amount was deferred.</p>	<p><u>See</u> Section 3.2, Pre-Application Reports, Sheets 14-16; Exhibit B – Generating Facility Expedited/Standard Pre-Application Report Form, Sheet 66</p>	<p>(b) Adding a new procedure or process</p>

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Proposed Tariff Revisions and Rationale	Interconnection Tariff Reference (Per Redlined Tariff as Filed)	Amendment Characterization
<p>Revision: Added specificity about the Standard Process.</p> <p>Rationale for change: To provide more detail about the steps of the Standard Process.</p>	<p><u>See</u> Section 3.4, Standard Process, Sheets 19-20</p>	<p>(a) Clarifying current practice</p>
<p>Revision: Added more information about ASO Studies and the Standard Process.</p> <p>Rationale for change: To provide more information about how an ASO Study can affect the Standard Process.</p>	<p><u>See</u> Section 3.4.f and h, Standard Process, Sheets 20-21</p>	<p>(a) Clarifying current practice</p>
<p>Revision: Added specificity about System Modification payment obligations.</p> <p>Rationale for change: To clarify Interconnecting Customer System Modification payment obligations.</p>	<p><u>See</u> Section 3.5, Time Frames, Sheet 23; Section 5.3 System Modification Costs, Sheet 43; Section 5.4 Separation of Costs, Sheet 44; Section 5.5, Normal Payment Procedure, Sheet 45; Exhibit H – Detailed Study Agreement, Sheet 85</p>	<p>(a) Clarifying current practice</p>

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Proposed Tariff Revisions and Rationale	Interconnection Tariff Reference (Per Redlined Tariff as Filed)	Amendment Characterization
<p>Revision: Clarified that Table 1 Time Frames will be affected by a “transmission” level system impact study.</p> <p>Rationale for change: To clarify that this provision refers to a transmission, and not a distribution, system impact study.</p>	<p><u>See</u> Note 1 of Table 1, Sheet 31</p>	<p>(a) Clarifying current practice</p>

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PUC 1-2

Request:

For each of the proposed tariff amendments that is not simply to clarify a current practice, please indicate whether there is any shift of risk or cost from the current tariff provision (for example, but not limited to, a cost shift between a Customer subject to the tariff and the general body of ratepayers; a shifting of risk between the Company and a Customer subject to the tariff).

Response:

Please see the table below.

Proposed Tariff Revisions and Rationale	Interconnection Tariff Reference (Per Redlined Tariff as Filed)	Amendment Characterization	Shift of Risk or Cost?
<p>Revision: Revised definition of “Affected System” and added definitions for “Affected System Operator”, “Affected System Owner” and “Affected System Operator Study”.</p> <p>Rationale for change: To clarify the definition of Affected Systems and add definitions of related terms used in the tariff.</p>	<p>See Section 1.1, Definitions, Affected System, Sheet 3</p>	<p>(a) Clarifying current practice</p>	<p>No</p>
<p>Revision: Added a new tariff provision to provide for the creation of an Interconnection Technical Standards Committee (“ITSC”).</p> <p>Rationale for change: The ITSC will facilitate the timely flow of technical information and information regarding potential changes to the technical requirements of interconnection.</p>	<p>See Section 1.1, Definitions, Sheet 6; Section 9.4, Interconnection Technical Standards Committee, Sheet 55</p>	<p>(b) Adding a new procedure or process; (d) Adding a new substantive component</p>	<p>No</p>

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Proposed Tariff Revisions and Rationale	Interconnection Tariff Reference (Per Redlined Tariff as Filed)	Amendment Characterization	Shift of Risk or Cost?
<p>Revision: Pre-Impact Study Review: Added a new tariff provision to provide for a Pre-Impact Study Review.</p> <p>Rationale for change: The Pre-Impact Study Review will provide an optional high-level engineering review before an Impact Study or ISRDG is carried out to determine the scope of modifications to the EPS at an early stage of the interconnection process. The proposed Pre-Impact Study Review Agreement will be Exhibit F, and current Exhibits F through I will be re-lettered accordingly.</p>	<p><u>See</u> 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</p>	<p>(b) Adding a new procedure or process</p>	<p>No.</p>
<p>Revision: Added reference to microgrids and deleted outdated paragraph contemplating special interconnection requirements for facilities over 3 MW.</p> <p>Rationale for change: To acknowledge that the Company will work with local jurisdictions and Interconnecting Customers who are considering microgrids.</p>	<p><u>See</u> Section 2.0, Basic Understandings, Sheet 10</p>	<p>a) Clarifying current practice; c) Removing an existing procedure or practice</p>	<p>No.</p>

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Proposed Tariff Revisions and Rationale	Interconnection Tariff Reference (Per Redlined Tariff as Filed)	Amendment Characterization	Shift of Risk or Cost?
<p>Revision: Created an Ombudsperson role.</p> <p>Rationale for change: To designate an individual from the PUC or retained by the PUC to have responsibility for overseeing the Company's administration of disputes.</p>	<p>See Section 2.0, Basic Understandings, Sheet 11; Section 9.2, Mediation/Non-binding Arbitration, Sheets 51-52; Table 3, Sheet 54</p>	<p>(d) Adding a new substantive component</p>	<p>No.</p>
<p>Revision: Added additional information to Pre-Application Reports, a fee for both mandatory and optional Pre-Application Reports, and time frames.</p> <p>Rationale for change: To compensate the Company for the additional information required in the Pre-Application Report. Consensus was reached on the concept of charging a fee; determination of the fee amount was deferred.</p>	<p>See Section 3.2, Pre-Application Reports, Sheets 14-16; Exhibit B – Generating Facility Expedited/Standard Pre-Application Report Form, Sheet 66</p>	<p>((b) Adding a new procedure or process</p>	<p>No.</p>

PUC 1-3¹

Request:

Sheet 11 includes the following language:

The Commission, in consultation with the Division of Public Utility Carriers and the Rhode Island Office of Energy Resources, shall appoint 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. At the discretion of the Commission, the appointed ombudsperson shall be either an employee of the Commission or an independent third party contracted with and reporting to the Commission. The ombudsperson will hear 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 appointed ombudsperson will oversee any and all elements of the interconnection process and will, where confidentiality is not compromised, offer recommendations to the Company, the Office of Energy Resources, the Division of Public Utilities and Carriers, 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.

- a. Is it the intention of National Grid to have its tariff bind the Commission indefinitely to either allocate personnel to the specific role of ombudsperson or hire a third-party contractor for such a role?

Is the Company aware of other jurisdictions in which National Grid has proposed a tariff for a similar purpose in other contexts? If so, please identify.

Why does the Company believe it is appropriate for a utility-proposed tariff to be the regulatory vehicle through which the Commission makes a decision that could have the force and effect of regulations and are binding on the Commission's processes and resources?

- b. The Massachusetts DPU has had an Ombudsperson for an extended period of time. The initial roles were as follows: "The interconnection ombudsperson hears the complaints of parties that reach the end of § 9.1, "good faith negotiation," of the DG Interconnection Tariff without resolution. DG Interconnection Tariff at § 9.1. The

¹ The Company's response begins on page 2.

PUC 1-3, page 2

interconnection ombudsperson role is to (1) be easily accessible; (2) review written documentation from the good faith negotiation process; (3) conduct independent interviews and investigations as she deems necessary; and (4) offer independent problem-solving assistance.” To the extent the Company has experience with the Ombudsperson and her duties, please indicate:

1. The number of other DPU personnel with whom the Company has interacted when participating in dispute resolution or other work done by the DPU Ombudsperson.
 2. The types of personnel with whom the Company has interacted when participating in dispute resolution or other work done by the DPU Ombudsperson (engineer, attorney, accountant, etc.).
- c. Please provide a list of all duties of the Ombudsperson that are included in “the appointed ombudsperson will oversee any and all elements of the interconnection process.”
1. If the Company were posting the job specifications of ombudsperson, what qualifications would the Company be seeking?
- d. If the Commission were to allocate a portion of an existing full time equivalent at the Commission, how many hours per month does the Company anticipate the Commission allocating toward the Ombudsperson role?
- e. How does the Company propose the Commission fund the Ombudsperson position (whether an FTE or third-party contractor)?
- f. What is the jurisdiction of the ombudsperson to resolve disputes that affect rates/tolls/other tariffs (reference can be made to the Dispute Resolution section of the tariff)? Is it different in Rhode Island than in Massachusetts?

Response:

- a. No, it is not the Company's intention to have its tariff bind the Commission indefinitely to either allocate personnel to the specific role of ombudsperson or hire a third-party contractor for such a role. It is entirely in 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.

PUC 1-3, page 3

The Company is not aware of other jurisdictions in which National Grid has proposed a tariff for a similar purpose in other contexts.

As the Commission noted, the Massachusetts DPU has had an ombudsperson for an extended period of time and that role is described in part in the DG interconnection tariffs of the three Massachusetts electric distribution companies, which is why the Company thinks it is appropriate for a utility-proposed tariff to provide for an Ombudsperson. As the Company stated above, it is entirely in the Commission's purview to determine if there should be an ombudsperson in Rhode Island. The Company respectfully points out that the current tariff, in Section 9.2, sets out the role of the Commission in dispute resolutions and the proposed revisions in Section 9.2 and Table 3 simply identify the designated individual, i.e., the Ombudsperson, who would fill that role on behalf of the Commission.

- b. The Company's affiliate interacts with the ombudsperson at the Massachusetts DPU when participating in dispute resolution. At times, the Company's affiliate has interacted with another DPU lawyer to attempt to resolve customer concerns before they reach the dispute resolution stage. In April 2020, the DPU expanded the ombudsperson's role to include overseeing dockets. In the context of stakeholder meetings in a docket, the Company's affiliate occasionally has interacted with other DPU personnel, including one who has an engineering background and one familiar with rate making.
- c. The list of duties would include:
 - i. Responding to any issue a DG customer may have with the Company's interpretation of the tariff
 - ii. Participating in alternative dispute resolutions that progress beyond Good Faith Negotiations by reviewing the written documentation from the Good Faith Negotiations process; conducting independent interviews and investigations as the ombudsperson deems necessary; and offering independent problem-solving assistance.
 - 1. If the Company were posting the job specifications of ombudsperson, the Company would be seeking the following qualifications. The ombudsperson should be impartial and knowledgeable about the interconnection process. They should have a developer perspective, and also understand the role of a regulated electric utility. The ombudsperson should be a problem solver and have good communication skills.

PUC 1-3, page 4

- d. The time allocation for the role may vary depending on the level of DG disputes at any given time. The role overall is expected to be part time, 5-10 hours per week, considering the responsibilities proposed in item C above, and the amount of DG interconnection activity in the state.
- e. The Company did not discuss funding for the Ombudsperson position with the parties and would have to further discuss this subject with the parties and further analyze this subject internally.
- f. The Ombudsperson would only have jurisdiction to provide dispute resolution assistance within Section 9 of the tariff and to make recommendations to mitigate or avoid future disputes as specified in the provision quoted above. The consensus language also provides that the ombudsperson would oversee the interconnection process under the tariff. The ombudsperson would not have jurisdiction to resolve disputes that affect rates/tolls/other tariffs. This is consistent with the original role of the ombudsperson in Massachusetts as the interconnection ombudsperson. As noted above, in April 2020 the Massachusetts DPU expanded the ombudsperson's role in Massachusetts; the consensus language does not propose a similar expanded role for the ombudsperson in Rhode Island.

PUC 1-4¹

Request:

Sheet 44 includes the following language:

If System Modifications are required to interconnect a proposed Facility and the Company determines that those System Modifications (in full or in part) may provide an obvious future benefit to the Company EPS that would be considered used and useful by the Company's customer base, the Interconnecting Customer shall only be responsible for the incremental cost of such System Modifications that would not otherwise be considered used and useful.

- a. How do the System Modifications in this paragraph differ from System Improvements?
- b. Please provide a listing of the specific criteria the Company would use in making its determination of whether the "System Modifications (in full or in part) may provide an obvious future benefit to the Company EPS that would be considered used and useful by the Company's customer base."
- c. Please review the past four years of experience of DG projects under evaluation or actually interconnected and identify the instances where all or a portion of any system modifications would have qualified for socialization under the new rule if they had been in effect at the time of interconnection.
- d. In measuring whether there is an "obvious future benefit," please define the length of time into the future that would be considered in order to qualify as a future benefit.
- e. Has the Company assessed whether the use of the word "may" instead of "will" might result in additional disputes between the Customer and Company? Please explain.
- f. When must the investment become used and useful to qualify for this paragraph?
- g. How does this modify current practice?
- h. How does this paragraph differ from the preceding two paragraphs on accelerated modifications (per R.I. Gen. Laws § 39-26.3-4.1(b))?
- i. How will this paragraph work with the preceding two paragraphs on accelerated modifications (per R.I. Gen. Laws § 39-26.3-4.1(b))?

¹ The Company's response begins on page 2.

PUC 1-4, page 2

How will this paragraph work with the last two paragraphs on Sheet 43 that relate to subsequent customer contributions to a System Modification (per R.I. Gen. Laws § 39-26.3-4.1(c))?

Response:

- a. The System Modifications in the quoted paragraph from Sheet 44 differ from System Improvements in that System Modifications are caused by and benefit one or more DG customers, and System Improvements are capital investments planned by the Company and are economically justified and benefit all customers, as both terms are defined in the tariff. This paragraph was included as compromise language even though Section 5.3 System Modifications already states that “The Interconnecting Customer shall only pay for that portion of the interconnection costs resulting solely from the System Modifications required to allow for safe, reliable parallel operation of the Facility with the Company EPS; provided, however, the Company may only charge an Interconnecting Customer for System Modifications specifically necessary for and directly related to the interconnection.”

The thinking was that, over time, and higher and higher DG saturation, a System Modification that originally was only used to interconnect a DG project could be used to serve other, non-DG, customers as a redundant service, as described in more detail in paragraph b. In that event, that portion of the System Modification would be then classified as a System Improvement.

- b. The criteria used would vary, but essentially, any portion, that serves other non-DG customers in the future, either directly, or indirectly as a redundant service in the event of outages, would be used.
- c. Since Section 5.3 has been in effect for many years, the Company does not have any specific System Modifications that would have been changed from that classification to System Improvement, but as DG saturation continues to increase, the chance of a system modification providing value to other customers will continue to grow as more system modifications are constructed to connect DG projects.
- d. The “obvious future benefit” is intended to refer to an enhancement to system reliability, safety, and/or hosting capacity enablement for the life of the associated system assets. Asset life expectancy varies, ranging as high as 20+ years.

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- e. The use of 'may' versus 'will' is likely to cause future disputes, but as the determination of changing a System Modification to a System Improvement requires the Company to then also prove it in a future ISR hearing, the burden of proof is on the Company, so it is the final determination of the Company to make this decision.
- f. Once a System Modification is used for other customers, it will be considered used and useful.
- g. It actually does not differ from current practice. In the third paragraph of Section 5.3, "Effective for Renewable Interconnecting Customer Applications filed on or after July 1, 2017, if a Renewable Interconnecting Customer is required to pay for system modifications and a subsequent renewable energy or commercial customer relies on those modifications to connect to the distribution system within ten (10) years of the earlier Renewable Interconnecting Customer's payment, the Company will require that the subsequent customer make a prorated contribution toward the cost of the system modifications and will credit such amount to the earlier Renewable Interconnecting Customer as determined by the Commission," the tariff already provides for this to occur.
- h. This paragraph differs from the preceding two paragraphs on accelerated modifications in that the paragraph referenced is looking at a future project the Company has already determined to be part of its five-year plan on future investments. This language on Sheet 44 is looking at an investment the Company made solely on the behalf of a DG customer and which was not in the Company's long term investment plan.
- i. The paragraphs referenced in this question will be a separate process since those paragraphs simply identify a future investment in the Company's five-year plan, whereas, the language on Sheet 44 is for an investment not in that plan.

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PUC 1-5

Request:

Referencing the language from Sheet 44 included in PUC 1-4, please indicate where the investments will show up in other dockets.

- a. From what source of funds (docket) will the Company seek cost recovery for the cost of any investment that is not included in the incremental cost under the language from Sheet 44 referenced in PUC 1-4. When will review of those costs be conducted by the Commission? When would the Company seek to recover the costs in rate base (e.g., the ISR, the next rate case, or another process)?

Response:

- a. If a System Modification were converted to a System Improvement, the Company would look to recover the funds through the discretionary section of a future annual ISR Plan filing, since this would be the funding pathway for such investments as system improvements benefit all customers. The PUC would review such costs during its review of the ISR Plan as it does for all ISR Plan investments.

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PUC 1-6

Request:

How does the cited language from Sheet 44 change the current cost causation principles followed in RIPUC No. 2180, if at all? Please provide a full explanation of the response.

Response

The Company does not believe that the language from Sheet 44 would change current cost causation principles. If some portion of an investment that was installed solely for the use of a DG project later is used to serve other customers, the rationale of cost causation solely to the DG project will have changed. Therefore, the concept is maintained that once all customers benefit from an investment, its cost should be recovered from all customers.

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Request:

Although not new language, Section 9.2.c contemplates a PUC-developed list of qualified neutrals. The list originally developed by the PUC is no longer current and was never requested by parties to dispute resolution. From where does the Massachusetts DPU develop a list of qualified neutrals? What are the qualifications? Does the Company know how often the list is refreshed? If so, please indicate the timeframe. What process does the Company suggest the Commission use to develop a list?

Response:

The Company does not know the answers to the Commission's questions regarding the Massachusetts DPU's list of qualified neutrals. However, the Commission might find the following MA resources for qualified neutrals helpful:

- DPU Dispute Resolution Guidance
 - <https://www.mass.gov/info-details/interconnection-dispute-resolution-guidance>
 - States "*The DPU has a list of qualified mediation neutrals, but you can use any neutral*"
- Mass.gov Qualifications and Standards for Neutrals
 - <https://www.mass.gov/supreme-judicial-court-rules/uniform-dispute-resolution-rule-8-qualifications-standards-for-a-purpose-and-applicability>
 - PDF: <https://www.mass.gov/doc/rule-8-of-the-uniform-rules-on-dispute-resolution/download>

The Company thinks it may be more efficient to use the same criteria as the Massachusetts DPU for qualifying neutrals since the interconnection tariffs and processes are almost identical for Massachusetts and Rhode Island.