

February 2, 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
National Grid's Reply Comments to Division

Dear Ms. Massaro:

I have enclosed an electronic version of National Grid's¹ reply comments in response to the comments of Gregory L. Booth, LLC on behalf of the Rhode Island Division of Public Utilities and Carriers 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 781-472-0531.

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

February 2, 2021

Date

**Docket No. 5077– National Grid’s Standard for Distributed Generation Tariff Advice
Service List updated 11/9/2020**

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**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

The Narragansett Electric Company d/b/a National Grid)	
Standards for Connecting Distributed Generation,)	R.I.P.U.C. No. 5077
R.I.P.U.C. No. 2244, Tariff Advice Filing)	
)	

**THE NARRAGANSEET ELECTRIC COMPANY D/B/A NATIONAL GRID
REPLY COMMENTS TO DIVISION COMMENTS**

The Narragansett Electric Company, d/b/a National Grid (“National Grid” or “Company”), submits these reply comments in response to the comments of Gregory L. Booth, LLC on behalf of the Rhode Island Division of Public Utilities and Carriers (“Division”) in this docket. The Company has discussed this matter with the Rhode Island Office of Energy Resources (“OER”) and the Northeast Clean Energy Council (“NECEC”). The OER and NECEC support National Grid’s reply comments.

I. INTRODUCTION

On October 22, 2020, the Company submitted a tariff advice filing to request the Rhode Island Public Utilities Commission’s (“PUC”) approval of revisions to the Company’s electric tariff, entitled Standards for Connecting Distributed Generation, R.I.P.U.C. No. 2244 (“Tariff”). This Tariff would supersede the Company’s Standards for Connecting Distributed Generation, R.I.P.U.C. No. 2180. The Company filed this tariff advice to address some of the ongoing challenges related to the interconnection of distributed generation (“DG”) in Rhode Island. The proposed revisions are a product of the Company’s extensive collaboration with the Rhode Island OER, NECEC and other stakeholders over the past year, including a representative of the Division, from time to time. The Company, OER, and NECEC reached consensus on the proposed revisions

to the Tariff, as reflected in the OER and NECEC’s letters of support, which the Company attached to its October 22, 2020 tariff advice filing.

On January 19, 2021, Mr. Booth submitted comments on behalf of the Division, outlining his review of the materials in this docket, his observations and recommendations to the Division. (“Booth Comments”)

Mr. Booth expresses two concerns in his comments: 1) the overall impact of the proposed tariff revisions could result in higher electric rates; and 2) the proposed changes would transfer control away from the Electric Infrastructure, Safety and Reliability (“ISR”) Plan process and the Commission’s other ratemaking authority. Mr. Booth has provided no evidence that revising the Tariff to adapt the interconnection process to Rhode Island’s rapidly evolving DG landscape will affect electric rates. As the Company explained in responses to data requests from the Commission, the proposed tariff revisions would neither infringe on the Electric ISR process nor the Commission’s other ratemaking authority. Below, the Company has responded in more detail below to Mr. Booth’s specific comments.

II. REPLY COMMENTS

A. Addition of the Interconnection Technical Standards Committee (“ITSC”) (Sheets 6 and 55)

Open ITSC Meetings

The proposed tariff revisions would create an ITSC. Mr. Booth asserts that National Grid proposes to close these ITSC meetings to the public due to the “...potentially sensitive nature of meeting topics.” Booth Comments at p. 2. He further states that closing ITSC meetings would be contrary to the operation of technical working groups in other jurisdictions and that a better approach would be to have open meetings as a general rule. *Id.* The Company would like to clarify that it does not intend to close the ITSC meetings to the public.

Under the Company's proposed tariff revisions, there would be a technical working group that would primarily be intended to be attended by individuals with extensive knowledge of the technical aspects of the interconnection process. The Company's reference to the potentially sensitive nature of meeting topics was not meant to suggest that the public be precluded from attending the ITSC meetings. Rather, the Company was referring to the following concerns: 1) protecting the confidentiality of discussions about specific and potentially proprietary issues with specific DG projects and; 2) ensuring that ITSC meetings are constructive and focused on the technical aspects of interconnection. Having non-technical people asking questions relative to technical issues can be counterproductive. To be clear, the intent is not to limit the attendance of the general public, but rather to limit non-technical attendees from asking that non-technical topics be addressed at the meetings.

The Company's Massachusetts and New York affiliates are active participants in technical working groups in their respective jurisdictions, which members of the public may attend and observe. In both jurisdictions, technically savvy attendees have provided valuable insights to the Company's affiliates, which has allowed for consensus on technical changes in the interconnection process to occur. A primary function of these groups is to allow for discussion of technical challenges or concerns from the developer or distribution company perspective and to dive into the technical rationale. In certain instances, results have allowed for consensus toward changes in the Company's affiliates' technical approaches and/or have driven alignment of best practices between National Grid and neighboring utilities. However, these technical groups deal only with changes to the distribution companies' technical standards and purposefully steer conversations away from process elements wherever possible. In certain instances when group discussions involve tariff items, only those specific items are brought to the public utility regulator.

Adoption of Technical Standards

Mr. Booth notes that National Grid proposes that the ITSC would have the final say in adopting changes to interconnection standards. Mr. Booth proposes that it would make more sense for the Commission to make those decisions, with the ITSC making recommendations to the Commission, which Mr. Booth thinks would be more in line with the workings of technical standards working groups in other jurisdictions. The Company is not proposing for the ITSC to have final say in adopting changes to interconnection tariff. Reviewing and approving proposed changes to the Tariff would remain the responsibility of the Commission. With respect to Mr. Booth's understanding of how technical standards working groups in other jurisdictions operate, the technical working group in Massachusetts (the Technical Standards Review Group), focuses on technical issues and does not make recommendations on interconnection tariff revisions to the Massachusetts Department of Public Utilities, except in the rare instances described below.

As discussed above, technical working groups in National Grid's Massachusetts and New York jurisdictions make recommendations to the utility regulator in those jurisdictions only in limited specific instances in which an advance in technical standards might require an update to a process mandated by the applicable tariff.

The Tariff does not contain technical standards for interconnection. The Company's technical standards are memorialized in electrical service bulletins ("ESBs") for many aspects of new service connections, metering configurations, civil construction requirements for foundations, etc. ESB 756 is the specific bulletin covering the technical aspects of interconnection. The Tariff speaks primarily to the process of interconnection. These ESBs are common to all the distribution companies under the National Grid umbrella, with state-specific differences. The Rhode Island

specific ESB is known as ESB 756, Appendix D. The ESBs are reviewed periodically by internal engineering functions and modified if necessary.

The ESBs are technical documents for which the Company and its affiliates in Massachusetts and New York neither seek nor require regulatory approval. Due to this multi-state process, requiring any one regulator to approve any ESB would be challenging for National Grid and its customers, as it could result in different technical standards for identical technical challenges National Grid faces across its jurisdictions resulting from the huge increase in requests for interconnections. Moreover, the role of the regulators is to determine process fairness. The Tariff intentionally does not get into the technical requirements of interconnection, as that is the responsibility of the Company (and of its affiliates in their respective jurisdictions), which is the subject matter expert for its system.

Vice-Chair of ITSC

If an Ombudsperson role is created, as the Company has proposed, Mr. Booth does not agree with the proposal for the Ombudsperson to serve as the Vice Chair of the ITSC. Mr. Booth's concern is that the Ombudsperson should remain impartial.

The Company agrees that an Ombudsperson role should be as impartial as possible, but notes that the Ombudsperson should be versed in the technical interconnection issues and should attend meetings of the ITSC.

B. Addition of a Pre-Impact Study (Sheets 7, 9, 12, 19-20, 28, 79-80)

Mr. Booth proposes that the amendment to add a Pre-Impact Study should state that the agreed-upon fee should be adequate to cover the cost of the proposed Pre-Impact Study.

The Company agrees with these comments.

**C. Addition of an Ombudsperson (with non-binding decision authority on tariffs)
(Sheets 11, 51-52)**

Mr. Booth's opinion is that the creation of an Ombudsperson role would be administrative overreach for which National Grid has provided no justification. If an Ombudsperson position is established, Mr. Booth perceives a conflict between being a hearing officer and a process overseer. He contends that allowing for the Ombudsperson to make recommendations about how to mitigate future complaints or disputes is an attempt to transfer management responsibility for addressing interconnection problems to the Commission. Mr. Booth comments that the Company should be in the best position to approach the analysis and solutions for interconnection.

The Company worked closely with stakeholders, including the OER, NECEC, and, from time to time, Division staff, on the consensus tariff. Some parties, including the Company, OER and NECEC, agreed with the inclusion of an Ombudsperson position. In Massachusetts, the Department of Public Utilities has a DG Ombudsperson, who has been very helpful for both the Company's Massachusetts affiliate and interconnection customers by providing focused resolution on DG matters such as open dockets, programs, and projects. The Ombudsperson in Massachusetts has also participated in dispute resolutions beyond good faith negotiations under the Massachusetts DG interconnection tariff.¹

National Grid has an internal Ombudsperson in its New York and New England territories who serves as a single point of contact within the Company for DG developers on matters of dispute escalation or where clarification is needed on the Company's technical or process

¹ The Company notes that in Massachusetts, the Ombudsperson role was phased in, beginning with an interim appointment of an Ombudsperson, which was made permanent following positive experience with the interim appointment. After several years of effective assistance by the Ombudsperson in dispute resolutions under the Massachusetts DG interconnection tariff, the role of the Ombudsperson was expanded beyond assistance with dispute resolutions. The Company is proposing that the Ombudsperson role in Rhode Island be focused on assistance with dispute resolutions and mitigating the likelihood of future disputes. The Ombudsperson in Massachusetts is a Department of Public Utilities employee and impartiality has not been a concern.

requirements. In the New York and Massachusetts territories, National Grid’s internal Ombudsperson and the state regulatory Ombudspersons work collaboratively on matters of concern for the DG community and on dispute resolutions, which has proven to be a successful model in both territories.

D. Addition of a Pre-Application Form (Sheets 14-16, 66)

Mr. Booth supports this proposed change to the extent the amendment includes additional language to recover expenses from frivolous applications.

The Company agrees with these comments and does plan to suggest a fee for the pre-application process.

E. Other Concerns

Hearing Officer (Sheet 53)

Mr. Booth finds the term “hearing officer” unclear and asks whether it is intended to refer to the Ombudsperson. Although Mr. Booth notes that the term “hearing officer” currently is in the tariff, he asks for the statutory authority for the Commission to delegate its “hearing authority” to a “hearing officer.”

The Company has no comment on this suggestion but notes that the term “hearing officer” is already in the Company’s current tariff and is not part of the proposed consensus changes.

System Modifications and System Improvements (Sheet 44)

Mr. Booth states that the proposed revisions appear to allow the Company to socialize the cost of System Modifications the Company determines “would be considered used and useful by its customer base.” Booth Comments at p. 3. Mr. Booth considers the ISR Plan process to be a better forum for establishing what constitutes a System Modification and notes that the ISR Plan process already addresses certain capital projects that benefit DG and are appropriately socialized.

Mr. Booth misunderstands the Company's proposal as one that would transfer capital costs to customers outside of the ISR Plan and ratemaking processes. As noted in the Company's response to Data Request PUC 2-4, the Company would look to fund some portion of a System Modification through an upcoming ISR in the event that a portion of the System Modification benefited the Rhode Island customer base at large. The Company has no intention of circumventing or modifying the existing Electric ISR process, nor is the Company proposing to transfer capital costs to customers outside of the ratemaking process.

Public Notices (Sheet 54)

Mr. Booth objects to a public notice and to the timeframe for the Commission to issue an order.

The Company has no comment on Mr. Booth's objections. The Company notes that the table on sheet 54 is redlined because it was moved from the location where it currently appears in the Tariff (sheets 57-58). Other than relocating the table to a more logical position in the Tariff, the only change to the table is the substitution of "Ombudsperson" for "Commission."

III. CONCLUSION

National Grid appreciates the opportunity to submit reply comments in response to the Division's comments on the proposed tariff revisions.

Respectfully Submitted,
**The Narragansett Electric Company
d/b/a National Grid**



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