

April 22, 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 Testimony

Dear Ms. Massaro:

On behalf of National Grid,¹ I have enclosed an electronic copy of the pre-filed testimony and Attachment 1 of Timothy R. Roughan 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.

**THE NARRAGANSETT ELECTRIC COMPANY
d/b/a NATIONAL GRID
RIPUC DOCKET NO. 5077
TARIFF ADVICE TO AMEND ELECTRIC TARIFF
ENTITLED STANDARDS FOR CONNECTING
DISTRIBUTED GENERATION, RIPUC NO. 2244
WITNESS: TIMOTHY R. ROUGHAN**

PRE-FILED DIRECT TESTIMONY

OF

TIMOTHY R. ROUGHAN

**THE NARRAGANSETT ELECTRIC COMPANY
d/b/a NATIONAL GRID
RIPUC DOCKET NO. 5077
TARIFF ADVICE TO AMEND ELECTRIC TARIFF
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1 **I. Introduction and Qualifications**

2 **Timothy R. Roughan**

3 **Q. Mr. Roughan, please state your name and business address.**

4 A. My name is Timothy R. Roughan. My business address is 40 Sylvan Road, Waltham, MA
5 02451.

6

7 **Q. Mr. Roughan, by whom are you employed and in what position?**

8 A. I am employed by National Grid Service Company, Inc. (Service Company) as the Director
9 of Regulatory Strategy for Rhode Island.

10

11 **Q. Mr. Roughan, please describe your educational background and professional
12 experience.**

13 A. I have a Bachelor of Science in Mechanical Engineering from Worcester Polytechnic
14 Institute. Since 1982, I have worked for the Service Company and its predecessor
15 companies in a variety of roles. Recently, I have worked extensively on matters relating to
16 distributed generation and non-wire alternatives.

17

18 **Q. Have you previously testified before the PUC?**

19 A. Yes, I have testified before the PUC in numerous dockets. I most recently testified before
20 the PUC in Docket Nos. 4770, 4780, and 5080.

21

1 **II. Purpose of Testimony**

2 **Q. What is the purpose of your testimony?**

3 A. The purpose of my testimony is to: (1) describe the consensus language the Company
4 reached with the Rhode Island Division of Public Utilities and Carriers (Division), the
5 Rhode Island Office of Energy Resources (OER) and the Northeast Clean Energy
6 Council (NECEC) (collectively, Parties) regarding revisions to the Company’s electric
7 tariff, entitled Standards for Connecting Distributed Generation, R.I.P.U.C. No. 2244
8 (Tariff) and (2) the two areas for which the Parties have not reached consensus. This
9 Tariff would supersede the Company’s Standards for Connecting Distributed Generation,
10 R.I.P.U.C. No. 2180.

11
12 As background, on October 22, 2020, the Company filed a tariff advice with the Rhode
13 Island Public Utilities Commission (PUC), which reflected consensus language upon
14 which OER, and NECEC agreed. On February 16, 2021, the PUC held a technical
15 session in this docket, during which the PUC discussed the tariff advice with the Parties,
16 followed by a procedural conference. On February 25, 2021, Chief of Legal Services for
17 the PUC circulated a Revised Procedural Schedule, which summarized the outstanding
18 issues identified during the procedural conference: (1) ombudsperson; (2) the proposed
19 new Section 5.4 language; and (3) the new objection the Division raised in its testimony
20 to the “acceleration” language in Section 5.4. The Revised Procedural Schedule also

21

1 noted that clarity around what is and is not appropriate for dispute resolution might be
2 desirable. The Chief of Legal Services subsequently provided dispute resolution
3 language for the Parties' consideration on March 5, 2021. Separately, on December 1,
4 2020 a public commenter submitted a letter to the Commission on behalf of various
5 organizations that proposed adding a simplified process size limit to the consensus tariff
6 advice that had been filed in October 2020. The Company, OER and NECEC agreed
7 among themselves to explore whether the solar community would support revisions to the
8 Simplified process based on previous discussions in RI and on work by the Company's
9 Massachusetts affiliate on a similar topic. On March 2, 2021, the Company presented
10 and discussed the proposed simplified process tariff revisions and related expedited
11 process tariff revisions with the solar community at a meeting hosted by OER and the
12 Renewable Energy Fund, which were well received. On April 6, 2021 the Company
13 requested and received a two-week extension to file revised proposed consensus tariff
14 revisions that include the proposed revisions to the simplified process and the related
15 proposed revisions to the expedited process. This testimony reflects the revised proposed
16 consensus tariff revisions following the above developments and the addition of the
17 Division as a party that has reached consensus.

18
19 **Q. Does this testimony include the Company's proposed revised tariff?**

20 A. No. The PUC has instructed the Company to file the tariff after the PUC reviews and
21 approves revised language.

1 **Q. Will the Company include formatting changes to the tariff when it files the tariff**
2 **with the PUC?**

3 A. Yes. The PUC requested that that the Company make formatting changes to the tariff
4 that may make the document easier to navigate. The Company will include such
5 formatting changes in its tariff compliance filing for the PUC's review.

6
7 **Q. Are you sponsoring any attachments with your testimony?**

8 A. Yes. I am sponsoring Attachment 1, which is a table that includes a summary and
9 rationale for the proposed consensus revisions to the Tariff and references to the
10 applicable sections of the Tariff.

11
12 **Q. You mentioned that the Company filed a tariff advice with the PUC on October 22,**
13 **2020. Why did the Company file the tariff advice?**

14 The Company filed the tariff advice on October 22, 2020 to address some of the ongoing
15 challenges related to the interconnection of distributed generation (DG) in Rhode Island.
16 The revisions included in the tariff advice dated October 22, 2020 were a product of the
17 Company's extensive collaboration with the OER, NECEC and other stakeholders over
18 the past year.

19
20 **Q. Please describe the areas on which the parties reached full consensus.**

21 A. Please see Attachment 1 for a table, which includes a summary and rationale for the

1 proposed consensus revisions to the Tariff and references to the applicable sections of the
2 Tariff. The Parties resolved the outstanding issues identified in the February 25, 2021
3 Revised Procedural Conference as follows:

- 4 • Ombudsperson: Please see below. The Parties did not reach full consensus on this
5 language.
- 6 • Redrafting of the new Section 5.4 language: The Parties reached consensus on
7 Section 5.4 by reverting to the language that was in the Company's original tariff in
8 Section 5.4 regarding acceleration of costs and deleting the language the Company
9 added in its October 22, 2020 filing.
- 10 • The new objection the Division raised in its testimony to the "acceleration" language
11 in Section 5.4: As noted above, the Parties reached consensus on Section 5.4 by
12 reverting to the language that was in the Company's original Tariff before it filed
13 changes on October 22, 2020.

14
15 **Q. You indicated that the parties reached partial consensus. Please explain the area(s)**
16 **on which the parties did not reach consensus.**

17 A. The Parties reached full consensus on all the revisions in Attachment 1 except for the
18 following areas: (1) Ombudsperson language; and (2) the Pre-Application report fee.

19

1 **Q. Please explain the Company's preference regarding the Ombudsperson language in**
2 **the Tariff.**

3 A. The Company and the Division did not agree with the addition of Ombudsperson
4 language in the Tariff. Therefore, the Company proposes to exclude any references to the
5 Ombudsperson role in the Tariff.

6 NECEC and the OER support the inclusion of the Ombudsperson role in the Tariff, and
7 the Company understands that NECEC and the OER will file testimony with the PUC
8 explaining their respective positions.

9

10 **Q. Why doesn't the Company agree with the addition of Ombudsperson language in**
11 **the tariff?**

12 A. The Company agrees with the construct of an Ombudsperson role as it provides a third-
13 party review of the interconnection tariff implementation in addition to internal elevation
14 of a complaint as per Section 9 of the tariff. In addition, the Company's affiliates in
15 Massachusetts and New York have regulator-assigned ombudsperson roles, which allows
16 the regulator to better understand the implementation challenges with interconnection.

17 However, as in Massachusetts and New York, where it is not in their respective
18 interconnection tariffs, the Company does not think it is appropriate to include this role in
19 the Tariff. The Company is willing to further collaborate with the Parties and continue
20 discussions regarding the Ombudsperson role once further clarity about a potential pilot
21 funded by the OER is determined.

1 **Q. Please explain the Company's preference regarding the fee for the Pre-Application**
2 **report in the Tariff.**

3 A. The Company and Division agreed with the fixed rate of \$750 for the Pre-Application
4 Report. NECEC did not agree with this amount for a fixed rate. The Company
5 understands that NECEC will file testimony with the PUC explaining its position
6 regarding the fixed rate for the pre-application report. The Company proposes that
7 Table 2 of the Tariff require a fixed fee of \$750 for the Pre-Application Report for
8 simplified, expedited and standard applications.

9
10 **Q. Please explain the Company's rationale for the \$750 Pre-Application Report fee and**
11 **how the Company developed this fixed fee amount.**

12 A. The Company's affiliate in NY instituted a similar pre-application report some time back
13 and agreed that a flat \$750 fee was appropriate. The NY-ISO charges \$1,000 for the same
14 information in its pre-application fee. In MA, the Company's affiliate estimated that the
15 new information required by the proposed pre-application report would take
16 approximately six to eight hours to assemble regardless of application process. This
17 amounts to approximately \$750 to \$1,000 to provide the new information proposed to be
18 included in a pre-application report. The amount of work is identical no matter how large
19 (or small) the project is, so in MA, the Company's affiliate proposed a flat \$1,000 fee.
20 The MA Department of Public Utilities approved a graduated fee, with lower fees for
21 smaller projects and capped the fee at \$750 for larger projects.

1 **Q. Why did the Company make the changes to the Tariff relating to the simplified**
2 **process?**

3 A. The Company proposed changes to the Simplified process for two main reasons: to
4 address the requests of developers made directly to the Company; and to simplify the
5 existing screening process. Changes made to the screening process also maintain
6 uniformity across service territories for the ease of developers, who work in both
7 Massachusetts and Rhode Island, as similar changes have been proposed in
8 Massachusetts and are pending approval.

9
10 One change to the Simplified process was the increase in the maximum power rating of a
11 single-phase system from 15 kW to 25 kW, to be uniform with systems on a three-phase
12 inverter. Developers have contacted the Company to request this change as recently as
13 December 2020.

14
15 The Company made additional changes related to the Simplified process to accommodate
16 larger and more complicated projects, including those that may need an upgraded service
17 transformer and updated Simplified screens and a process to manage upgrades. To ensure
18 continuity across process tracks, the Company also made clarifying changes to the
19 screening boundaries between Simplified and Expedited process, including directing spot
20 network applications to the Expedited process.

21

1 **Q. Did the Company receive feedback from developers regarding the proposed changes**
2 **relating to the simplified process?**

3 A. Yes, the Company received feedback on March 2, 2021 from developers in a live
4 webinar, which the OER hosted.

5

6 **Q. Did the Company receive feedback from developers regarding the other proposed**
7 **revisions to the Tariff?**

8 A. The Company received feedback from the Northeast Clean Energy Council (NECEC) on
9 all proposed revisions to the tariff. NECEC advocated on behalf of developers.

10

11 **Q. Does this conclude your testimony?**

12 A. Yes.

<p align="center">Proposed Consensus Tariff Revisions and Rationale</p>	<p align="center">Current Interconnection Tariff Reference</p>
<p>Revision: Change 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>Revision: Revise 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 1.2, Definitions, Affected System, Sheet 3</p>
<p>Revision: Insert “distribution” in definition of Company EPS.</p> <p>Rationale for change: To clarify the meaning of “EPS”.</p>	<p><u>See</u> Section 1.2, Definitions, Sheet 4</p>
<p>Revision: Add definitions of Energy Storage System, Export Capacity, Inadvertent Export, Limited Export, Nameplate Rating, NRTL, and Protective Function, and revised definition of Facility.</p> <p>Rationale for change: To provide terminology for new Section 4.3.1 concerning Export Capacity.</p>	<p><u>See</u> Section 1.2, Definitions, Sheet 4 through Sheet 7</p>
<p>Revision: Add 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 1.2, Definitions, Sheet 5</p>
<p>Revision: Add 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 1.2, Definitions, Sheet 5; Section 9.4, Interconnection Technical Standards Committee, Sheet 49</p>

<p align="center">Proposed Tariff Revisions and Rationale</p>	<p align="center">Current Interconnection Tariff Reference</p>
<p>Pre-Impact Study Review: Add 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 ISRDC 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 1.2, Definitions, Sheet 7; Section 1.3.5, Forms and Agreements, Sheet 9; Section 3.0, Process Overview, Sheet 10; Section 3.4, Standard Process, Sheets 16-19; Table 1, Sheet 26; Exhibit F – Pre-Impact Study Review Agreement, Sheet 75</p>
<p>Revision: Add reference to microgrids and delete 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>Revision: Revised description of Simplified process.</p> <p>Rationale for change: Reflects proposed changes to the Simplified process.</p>	<p><u>See</u> Section 3.0, Process Overview, Sheet 11</p>
<p>Revision: Add requirement for Company to advise Interconnecting Customer of materials missing from an interconnection application.</p> <p>Rationale for change: To provide the Interconnecting Customer with information about specific materials needed for the Company to accept application as complete and ready to proceed to next step.</p>	<p><u>See</u> Section 3.1.a.iii, Simplified Process, Sheet 12; Section 3.3.a.iii, Expedited Process, Sheet 15; Section 3.4.1.iii, Standard Process, Sheet 17</p>
<p>Revision: Revise Simplified process.</p> <p>Rationale for change: Revise Simplified process to keep more applicants in the Simplified process including by deleting the existing Simplified process screen and adding a new Simplified eligibility and screening process.</p>	<p><u>See</u> Section 3.1.b and 3.1.c and Figure 1 and Notes, Simplified Process, Sheets 12-13; Delete Figure 1 and Explanatory Notes and Figure 2 in current tariff, Sheets 21 through 25; Table 2, Note 4, Sheet 29</p>

Proposed Tariff Revisions and Rationale	Current Interconnection Tariff Reference
<p>Revision: Add 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.f and 3.1.g, Simplified Process, Sheet 13; Table 2, Notes 1 and 5 and deleted Note 8, Sheet 30</p>
<p>Revision: Add information to be provided in Pre-Application Reports, a fee, and time frames.</p> <p>Rationale for change: To require specific additional information in the Pre-Application Report and compensate the Company accordingly. Consensus was reached on the concept of charging a fee.</p>	<p><u>See</u> Section 3.2, Pre-Application Reports, Sheets 13-14; Table 2, Sheet 42; Exhibit B – Generating Facility Expedited/Standard Pre-Application Report Form, Sheet 62</p>
<p>Revision: Add specificity about the Expedited Process.</p> <p>Rationale for change: To provide more detail about the steps of the Expedited Process, including by adding a new Expedited eligibility and screening process.</p>	<p><u>See</u> Section 3.3, Expedited Process, Sheets 14-16</p>
<p>Revision: Add 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 16-19</p>
<p>Revision: Add 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, Sheet 18</p>
<p>Revision: Add 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 19; Section 5.3, System Modification Costs, Sheet 39; Section 5.4, Separation of Costs, Sheet 40; Section 5.5, Normal Payment Procedure, Sheets 40-41; Exhibit G – Detailed Study Agreement, Sheets 78-80</p>

<p>Revision: Clarify 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 Note 1 of Table 1, Sheet 29</u></p>
<p>Revision: Add new Section 4.3.1 concerning Export Capacity</p> <p>Rationale for change: Clarifies methods for limiting the total export capacity of a DG facility coupled with an Energy Storage System to enable the facility to qualify for the Simplified process.</p>	<p><u>Not in current tariff</u></p>

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

April 22, 2021
Date

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

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