



May 10, 2021

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

RE: Docket 5077: Tariff Advice to Amend Electric Tariff Entitled Standards for Connecting Distributed Generation

Dear Ms. Massaro:

The Rhode Island Office of Energy Resources (OER) supports the Northeast Clean Energy Council's (NECEC) request to establish an independent ombudsperson to help resolve interconnection disputes that may arise between Interconnecting Customers and National Grid. In such cases, an ombudsman could provide valuable, third-party perspectives to the disputing parties, the Commission, and other stakeholders.

OER appreciates the concerns previously expressed by the Commission and other parties regarding the role of an ombudsman and how it would be paid for, if authorized. We believe that an independent third-party focused on reviewing interconnection engineering, design, and costs may be beneficial to the process without binding any party or the Commission to adopt its analysis or conclusions. In particular, we note that the ombudsman would have no adjudicatory authority.

Should the Commission concur and find value in having access to an independent resource of this nature, OER is prepared to provide a reasonable level of funding and procurement support on a pilot basis (not to exceed two years). If approved, OER would work with Commission staff to draft a consensus scope of work. OER would then conduct a competitive procurement process pursuant to State Purchasing guidelines to identify and select a qualified individual or firm capable of providing defined services. While any contracted entity would report to OER on an administrative basis, the Commission and its staff would have all reasonable access to this resource. Also, the ombudsman would be made available for all appropriate regulatory proceedings to offer observations, insights, and recommendations to mitigate or avoid future complaints and disputes.

We note that OER's budget is dependent upon restricted receipts and the agency has no mechanism by which to recover its costs for this endeavor. OER would prefer that those agencies with reasonable means of cost recovery provide the funding needed to advance this proposal on a pilot basis. None the less, funding alone should not be the sole barrier to a good idea that might prove valuable during interconnection disputes. It is in this spirit that we offer our commitment to assist.



STATE OF RHODE ISLAND

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OER also supports NECEC's proposed fee schedule for simplified pre-applications. The proposed fee schedule would bring Rhode Island into alignment with a recently approved interconnection tariff in Massachusetts. It is reasonable to assume that the costs incurred would be similar across state lines because of similarities in renewable energy policies and service territory; therefore, it stands to reason that fee schedules should be consistent as well. Many small-scale installers actively working in Rhode Island also sell and install PV systems in Massachusetts, and market consistency may help ensure that customers in both states share proportionally in the increase of any new soft costs for renewable installations. Additionally, a graduated fee schedule that increases as system size increases is a common-sense approach to cost-allocation as size has a significant bearing on the overall economics of a distributed generation project.

Finally, OER commends the parties for supporting consensus language specific to microgrids (sheet 11), which will allow municipalities to work with National Grid on developing and installing resiliency projects utilizing these technologies.

Thank you for your consideration.

Sincerely,

Nicholas S. Ucci
Commissioner