

Rhode Island Office of Energy Resources
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STATE OF RHODE ISLAND
**OFFICE OF
ENERGY RESOURCES**
Commissioner Nicholas Ucci

October 22, 2020

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

RE: Docket 5077 - Standards for Connecting Distributed Generation

Dear Ms. Massaro,

Thank you for the opportunity to submit this letter of support for the proposed updates to the Standards for Connecting Distributed Generation (Interconnection Tariff). National Grid's proposal was developed in collaboration with the Office of Energy Resources (OER) and the Northeast Clean Energy Council. The proposed changes to the Interconnection Tariff were also discussed with the Division of Public Utilities and Carriers. OER respectfully requests that the Public Utilities Commission (Commission) approve the proposed changes to the Interconnection Tariff.

The proposed changes to the Interconnection Tariff would improve the interconnection application process and communications between renewable developers and National Grid, including the following:

- Gives flexibility to National Grid and renewable developers on payment timelines with Interconnection Service Agreements resulting from issues that may arise with permitting and financing projects.
- Establishes a Technical Services Review Committee to discuss and, potentially, resolve technical and engineering matters impacting renewable project development. This entity will provide a forum to potentially resolve or improve the interconnection process between the parties.
- Creates an option for renewable developers to receive a Pre-Impact Study as they begin interconnection studies with National Grid. Having the option of a Pre-Impact Study will improve communication and transparency on application matters, including greater discussion of potential Affected System Operator studies. In particular, a Pre-Impact Study may help new market entrants better understand National Grid requirements and processes when developing interconnection applications for the first time.

The proposed changes to the Interconnection Tariff reflect a collaborative effort to improve communications and process outcomes between the utility and renewable developers, thereby creating efficiencies across Rhode Island's clean energy marketplace.

OER appreciates the Commission's attention to this matter and looks forward to further discussion.

Sincerely,

Chris Kearns
Interdepartmental Project Manager