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July 1, 2021

BY HAND DELIVERY AND ELECTRONIC MAIL

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

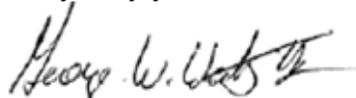
RE: Docket No. 5151 - Revolution Wind Advisory Opinion

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a National Grid (“Company”), enclosed please find five copies the Company’s responses to the First Set of Data Requests issued by the Public Utilities Commission in the above-referenced matter.

Thank you for your attention to this filing. If you have any questions, please contact me at 401-709-3351.

Very truly yours,



George W. Watson III

Enclosures

cc: 5151 Service List

CERTIFICATE OF SERVICE

I here by certify that on July 1, 2021, I delivered a true copy of the foregoing document to the Service List by electronic mail.



Heidi J. Seddon

Docket No. 5151 – Needs Advisory Opinion to EFSB regarding Revolution Wind, LLC Service List update 5/12/2021

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PUC 1-10

Request:

Please explain if any costs associated with the operations and maintenance (O&M) of the Delivery Facility would be passed on to Rhode Island or regional ratepayers through Local or Regional Network Service.

Response:

Article 10.2 of the ISO-NE *pro forma* Large Generator Interconnection Agreement (LGIA) requires that “Interconnection Customer shall be responsible for all reasonable expenses including overheads, associated with: (1) owning, operating, maintaining, repairing, and replacing Interconnection Customer’s Interconnection Facilities; and (2) operation, maintenance, repair and replacement of Interconnecting Transmission Owner’s Interconnection Facilities, Stand Alone Network Upgrades and Distribution Upgrades.” As the Interconnection Customer in this instance is the owner of the Delivery Facility, said owner will be responsible for such O&M costs, and these would not be passed on to Rhode Island or regional ratepayers through Local or Regional Network Service.

PUC 1-11

Request:

Please explain what entities would pay the cost of any Distribution Upgrades, Stand-Alone Network Upgrades, Network Upgrades, or any other upgrade costs considered in the Schedules of Section II of the ISO New England Inc. (ISO-NE) Transmission Markets, and Services Tariff (Open Access Transmission Tariff or OATT)? Please explain if these entities would bear incremental O&M costs associated with those upgrades.

Response:

Please see the response to PUC 1-9. Incremental O&M costs associated with such upgrades are assigned by the ISO-NE Tariff to the Generation Owner (in this case DWW), unless such upgrades are identified as Regional Benefit Upgrades in the ISO-NE regional plan. ISO-NE OATT, Schedule 11, Sec. 5. National Grid does not anticipate that any upgrades needed to accommodate the offshore wind project will be identified as Regional Benefit Upgrades in the ISO-NE regional plan.

