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**Date:** 1/15/2008 12:50:19 PM  
**Subject:** Net metering Implementation and Docket No. 3904

Luly, per the invitation to offer written comments on the new "net metering" law (H5566subB ) and it's implementation as discussed at the PUC hearing this past Tuesday (Jan.08,2008), attached are comments from the Portsmouth Sustainable Energy subcommittee. This specifically addresses the new law and RI GL section 39-26-6-g-1 interpretation of "net metering". If these comments should go to another place within the PUC please direct them to the right organization with a e-copy to me. Thanks for the opportunity to participate in this process.

Gary Gump  
Portsmouth PEDC Sustainable Energy subcommittee

**CC:** "Richard Talipsky" <rtalipsky@seacorp.com>

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION

IN RE: NATIONAL GRID - TARIFF :  
ADVICE FILING TO AMEND : DOCKET NO. 3904  
R.I.P.U.C. NO. 1078-A :

JANUARY 11, 2008

1) REQUEST FOR RI MUNICIPALITIES FOR CONSIDERATION OF "VIRTUAL"  
NET METERING TO APPLY TO THE TOTAL OF ALL THE VARIOUS  
MUNICIPAL LOADS THAT ARE SEPARATELY METERED (example: more than 20  
meter points spread across School and Town departments).

The Town of Portsmouth has secured some \$3M in zero interest and low interest funding to purchase and install a wind turbine with nameplate capacity of 1.5 megawatts to produce renewable energy at either the High school or the Middle school for municipal use. Proposals for this project have been received and are currently under review. It is expected that the successful bidder will deliver an operational system to the town late this year or first quarter 2009. The projected energy output of this generator is approx. 4+ million kilowatt hours annually and the town expects that it will comply with all the necessary requirements to apply for the "net-metering" rate. However with approximately 4.5 million kilowatt hours of annual municipal energy consumption and the largest single meter annual consumption being approx 1 million kilowatt hours (at either the High school or Middle school) the town is unable to benefit from the full annual net value of production of the Wind Generator.

Considering all the Town loads as one "virtual" meter (or aggregate meter) will allow the town to fully value the output of this Renewable energy resource. This would also allow any municipality to utilize its' best energy production site rather than restricting the location to the largest individual metered municipal load and to realize maximum value from any renewable energy process they may install.

Note: we understand that for Portsmouth the local utility company renewable energy "distribution" burden is limited to the physical distribution network in Portsmouth and the actual output of the generator not the nameplate capacity.

2) SUPPORT FOR "SEASONAL" ANNUAL NET - METERING

Portsmouth's largest annual loads are it's schools. Like the Portsmouth Abbey, we would also like to see the timing changed in the twelve-month calculation proposed. The late fall and winter months are peak production periods for wind generation. We suggest two schedules; the Vernal Equinox (March 21) for solar generation and the Autumnal Equinox (September 21) for wind turbines.

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