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November 8, 2011

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

RE: Supplement to Comments on Proposed Tariff Advice, PUC Docket No. 4268

Dear Ms. Massaro:

I would like to supplement my objection to the Proposed Tariff Advice with respect to Section III, which proposes to define "avoided cost" as equivalent to the Company's Standard Offer rate, as set forth below:

The proposed definition would violate Federal Law. National Grid seems to admit that because the excess power purchased would be transmitted through the interstate grid, under 16 U.S.C. § 2621, the compensation to the Qualifying Facility is limited to the utilities' "avoided cost". However, even were this to be interpreted as the "avoided cost of similar technologies", there is wind and solar power available in other states connected to the Rhode Island grid, such as Maine and Massachusetts. Therefore the price cannot be defined as proposed. It must be based on the daily ISO price for that power on the Northeast grid, not the Standard Offer rate.

Thank you.

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