BCR

Benjamin C. Riggs, Jr. 15D Harrington Street Newport, RI 02840 Tel. 401/846-2540 Fax. 846-1032

rmcriggs@earthlink.net

RE: Comment on P.U.C. Data Request of Nov. 16, 2011, PUC Docket No. 4268

1.

- a. No.
- b. n/a
- c. The definition under R.I. Gen. Laws § 39-26.2-3(6) states: õDistributed generation projectö means a distinct installation of a distributed generation facility. An installation will be considered distinct if it is installed in a different geographical location and at a different time, or if it involves a different type of renewable energy class.ö Consequently, a project cannot be both a net metering facility and a distributed generation project. Further, to comply with PURPA, excess generation can only be purchased at the avoided cost, which in this case is the ISO-NE price.

Benjamin C. Riggs, Jr. Newport