



Memorandum

From: People's Power & Light,
represented by Karina Lutz, Advocacy Consultant
To: RI Public Utilities Commission
Cc: Larry Chretien, PP&L Executive Director
Date: Nov. 15, 2011
Re: Docket No. 4276, Distributed Generation Interconnection

The Commission has requested People's Power & Light to inform it of which of its comments on the Distributed Generation Interconnection Docket No. 4276 have not been resolved by National Grid's revisions to its proposed tariff revisions.

One that has not been addressed is the request for a standard for "good faith." The new law, in 39-26.3(2) and (4), uses the term (and the tariff already did, on sheet 4 and 5), in regards to the accuracy of the feasibility study and the impact study (ISRDG) estimates. It would be helpful if the tariff described or the Commission ruled what kind of evidence would prove "good faith" or lack thereof in these estimates.

On Sheet 6: The definition of net metering in the DG Interconnection tariff does not accord with that in the new net metering statute:

(from tariff)

Net Metering: Customers of the Company who, pursuant to the provisions of the Company's Net Metering Provision, R.I.P.U.C. No. 2075, as amended and superseded from time to time, are eligible to receive Renewable Generation Credits and Excess Renewable Generation Credits, as applicable, as defined in R.I.P.U.C. No. 2075, Section II.

(from statute 39-26.4-2(8) and (9))

(8) "Net metering" means using electricity generated by an eligible net metering system for the purpose of self-supplying power at the eligible net metering system site and thereby offsetting consumption at the eligible net metering system site through the netting process established in this chapter.

(9) "Net metering customer" means a customer of the electric distribution company receiving and being billed for distribution service whose distribution account(s) are being net metered.

Also on Sheet 6:

To clarify, we'd like to assume when the DG interconnect tariff refers to "the Company's Net Metering Provision," it means the net metering tariff (R.I.P.U.C. No. 2075, being revised in Docket 4268). However, since it is referred to as being "amended and superceded from time to time," and we would like to avoid expensive and chilling delays to smooth implementation of the new policies, it should be very clear that the Company may not unilaterally revise the provision (tariff) again.

Sheet 9 says, "The crossing of a public way by the Interconnecting Customer with any equipment is prohibited due to public safety reasons." This should cite the law banning private electrical lines crossing public right-of-ways vs. "public safety reasons." There should not be a presumption that crossing a public way is inherently unsafe. Not all public ways are equal in terms of presenting a concern for public safety.

That law may someday change, in certain circumstances, if safety can be provided, and if so, this tariff should not unduly restrict such interconnections.

Also on Sheet 9: we asked the Company to spell out the special requirements for 3MW+, and see no additional language.

Sheet 44: The new DG Standard Contracts statute and net metering revisions may not be clear on this, but it should be clear that customers have the option to choose net metering or distributed generation standard contracts, or, if possible, both (i.e., to contract for the net excess generation).