Raquel J. Webster
Senior Counsel

March 27, 2014

BY HAND DELIVERY & ELECTRONIC MAIL

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

RE: Docket 4277 – Enrollment Application and Enrollment Process Rules

Dear Ms. Massaro:

On behalf of National Grid [1], I have enclosed a revised Enrollment Application and Enrollment Process Rules ("Enrollment Rules") for use in the 2014 DG Standard Contracts program in the above-referenced docket.

The Company is submitting these Enrollment Rules to make a correction in Schedule 2 of the Enrollment Rules, which has been redlined for clarity. The Company respectfully requests that the Rhode Island Public Utilities Commission replace the prior (approved) version of the Enrollment Rules with the enclosed version.

Thank you for your attention to this transmittal. If you have any questions, please contact me at (781) 907-2121.

Very truly yours,

Raquel J. Webster

Enclosures

cc: Docket 4277 and 4288 Service Lists
Steve Scialabba
Leo Wold, Esq.

[1] The Narragansett Electric Company d/b/a National Grid (the "Company").

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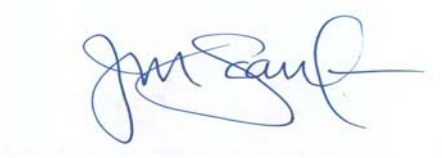
Certificate of Service

I hereby certify that a copy of the cover letter and/or any materials accompanying this certificate were electronically transmitted and sent via U.S. Mail to the individuals listed below. Copies of this filing were hand delivered to the RI Public Utilities Commission and to the RI Division of Public Utilities and Carriers.



Joanne M. Scanlon

March 27, 2014
Date

Docket No. 4288 – Office of Energy Resources Filings: 1) Proposed Distributed Generation (DG) Standard Contract Act Classes and Ceiling Prices; and 2) Proposed DG Standard Contract; and

Docket No. 4277 – National Grid National Grid – Distributed Generation Enrollment Application & Enrollment Process Rules

Service Lists updated 1/16/14

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Rhode Island Renewable Distributed Generation Standard Contract Enrollment Application and Enrollment Process Rules

I. Introduction and Overview

1.1 Purpose of the Enrollment

The Narragansett Electric Company d/b/a National Grid ("National Grid") or the "Company"), is seeking applications to enter into standard contracts for the supply of electric capacity and energy and Renewable Energy Certificates and related attributes (including Certificates issued in the New England Power Pool Generation Information System) (collectively, "RECs") from eligible Distributed Generation projects pursuant to Chapter 26.2 of Title 39 of the Rhode Island General Laws, entitled Distributed Generation Standard Contracts Act (the "Act"), and the solicitation and enrollment process rules promulgated under the Act. In addition, National Grid is conducting this enrollment in accordance with the Rules and Regulations Governing Long-Term Contracting Standards for Renewable Energy (the "Regulations") promulgated under Chapter 26.1 by the Rhode Island Public Utilities Commission ("Commission"), which became effective January 28, 2010. [1] In the enrollment periods for the current program year, National Grid is soliciting capacity, energy, RECs, and all other environmental attributes and market products that are available or may become available from Distributed Generation facilities pursuant to standard contracts for fifteen (15)-year terms.

1.2 Statutory Framework

Pursuant to the provisions of the Act, National Grid is required to procure 10% of the minimum long-term contract capacity under the long-term contracting standard for renewable energy in section 39-26.1-2, or 9 MW, based on annual class targets set by the Board [2] and approved by the Rhode Island Public Utilities Commission ("Commission"). National Grid shall enter standard contracts for an aggregate nameplate capacity of at least 40 MW of Distributed Generation projects by the end of 2014, as set forth in the following four (4) year schedule:

- By December 31, 2011: a minimum of five megawatts (5 MW) nameplate capacity
- By December 31, 2012: a minimum aggregate of twenty megawatts (20 MW) nameplate capacity

[1] Except as expressly differentiated in the Act, the standard contracts entered into shall be treated for all purposes as long-term contracts entered into under the provisions of the long-term contracting standards for renewable energy found in chapter 26.1 of Title 39 of the Rhode Island General Laws, and all such provisions shall apply to such contracts. R.I.G.L.. § 39-26.2-9.

[2] The Distributed Generation Standard Contract Board, or if not yet constituted, the Rhode Island Office of Energy Resources.

- By December 31, 2013: a minimum aggregate of thirty megawatts (30 MW) nameplate capacity
- By December 31, 2014: a minimum aggregate of forty megawatts (40 MW) nameplate capacity

Thus, under a single enrollment in 2011, the initial program year, National Grid entered standard contracts for a minimum of 5 MW nameplate capacity. Thereafter, the Company must conduct three enrollments annually. Each enrollment will be open for a two-week period. National Grid is not required to enter into more than one-third of the annual target per enrollment, with the exception of the 2011 program year. The attached Schedule 1 sets out a schedule of anticipated dates for the 2014 Enrollment process. The classes and annual targets for the 2014 program year are listed in Schedule 2 of this application.

1.2.1 Applications

Applicants are required to complete and submit a short-form application ("Application") which Application shall require the applicant to provide the project owner's identity and the project's proposed location, nameplate capacity, and renewable energy class and, as described in Section II below, allows for additional information including information relative to the permitting, financial feasibility, ability to build, and timing for deployment of the proposed projects. In addition, all applicants are required to bid a fixed bundled price, not to exceed the applicable standard contract ceiling price, for the sale of the energy, capacity, renewable energy certificates, and all other environmental attributes and market products that are available or may become available from the distributed generation facility on a fixed per kilowatt-hour basis for the output of the project. The Application to be used by facilities with a nameplate capacity greater than 500 kW is attached as Attachment A1. The Application to be used by facilities with a nameplate capacity of 500 kW or less is attached as Attachment A2.

Successful applicants will be selected in accordance with the process set forth in this application, which encompasses the solicitation and enrollment process rules. Standard contracts will be finalized between National Grid and successful applicants, based on bid prices and annual targets for each renewable energy technology class set by the Board and approved by the Commission. A blank Standard Contract, which has been approved by the Commission, is included in this application as Appendix B. The Standard Contract to be used by facilities with a nameplate capacity greater than 500 kW is attached as Attachment B1. The Standard Contract to be used by facilities with a nameplate capacity of 500 kW or less is attached as Attachment B2. Applicants are responsible for reading and understanding the Standard Contract to the extent necessary to submit an application, and to promptly execute this contract if selected in the enrollment. There will be no exceptions to the Standard Contract.

1.2.2 Eligibility Requirements

To be eligible under this enrollment, a distributed generation facility must be a "newly developed renewable energy resource" under the Long-Term Contracting Standard and the Regulations. A "newly developed renewable energy resource" is defined as an electric generation unit that uses exclusively an eligible renewable energy resource (as defined under R.I.G.L. § 39-26-5 and Section 5 of the Rules and Regulations governing the Implementation of a Renewable Energy Standard, effective July 25, 2007), that has neither begun operation, nor have the developers completed financing for construction.[3] The eligible technologies include biogas generated as a result of anaerobic digestion, but specifically exclude all other listed biomass fuels. Further, the unit must be located in the Narragansett Electric Company ISO-NE load zone, with a nameplate capacity no greater than three (3) MW, and be connected to the electric distribution company's power system.

a. Small Distributed Generation Projects

Small Distributed Generation projects must bid a fixed bundled price for the sale of energy, capacity, and renewable energy certificates ("RECs") and all other environmental attributes and market products that are available or may become available from the distributed generation facility on a per kilowatt-hour basis for the output of the project for a contract term of fifteen (15) years. If there are more projects than what is specified for a class target at the same price, the electric distribution company shall review the applications submitted and select first those projects that appear to be the furthest along in development and likely to be deployed in consultation with the Office of Energy Resources. Selection will be based on the lowest price received and on competitive non-price scoring, but not to exceed the applicable ceiling price, provided the applicants meet the minimum threshold requirements set forth in this application. Small Distributed Generation Projects must have a nameplate capacity within the following: Solar: fifty kilowatts (50 KW) to five hundred kilowatts (500 KW); Wind: fifty kilowatts (50 KW) to one and one-half megawatts (1.5 MW); Hydropower: fifty kilowatts (50 KW) to five hundred kilowatts (500 KW); Anaerobic Digestion: fifty kilowatts (50 KW) to five hundred kilowatts (500 KW); and Other Technologies: 1 MW. The applicant must submit an affidavit confirming that the project is not a segment of a larger project.

b. Large Distributed Generation Projects

Large Distributed Generation projects must bid a fixed bundled price for the sale of energy, capacity, and renewable energy certificates ("RECs") and all other environmental attributes and market products that are available or may become available from the distributed generation facility on a per kilowatt-hour basis for the output of the project for a contract term of fifteen (15) years. Alternative Pricing is allowed for a contract term different than fifteen (15) years, but the Applicant must

[3] Under Section 3.16 of the Regulations, projects located within the State of Rhode Island which obtained financing on or after January 1, 2009, which have not begun operation, would also be considered a "newly developed renewable energy resource."

demonstrate why the alternative term is appropriate, and if the Company agrees to the different term, it must be approved by the Commission. Selection will be based on the lowest price received and on competitive non-price scoring, but not to exceed the applicable ceiling price, provided the applicants meet the minimum threshold requirements set forth in this application. Large Distributed Generation Projects are larger than the Small Distributed Generation Project sizes set forth above, but are no greater than 3 MW.

II. Bid Evaluation and Selection Criteria and Process

2.1 Overview of Bid Evaluation and Selection Process

Applications received by National Grid will be subject to a consistent and defined review, evaluation, and selection process. All projects will be evaluated only against other projects submitted in the same approved class for that current enrollment. The first stage consists of a review of whether the bids satisfy specified eligibility and minimum threshold requirements. National Grid will conduct any additional evaluation as required, consistent with the requirements set forth above and select applicants for execution of Standard Contracts. Consultation with the Rhode Island Office of Energy Resources and/or the Rhode Island Division of Public Utilities and Carriers may also be utilized in this further assessment. Applicants selected by National Grid will be required to indicate in writing whether they intend to proceed with their proposals within five business days of being notified, and to execute contracts within two business days thereafter. Thus, the selected Applicant must pay the performance guarantee deposit and sign the contract within seven (7) business days after a contract offer has been made.

2.2 Interconnection Progress Prior to Enrollment

The Act requires that the distributed generation facility owner be liable for the cost of interconnection, and sufficient progress in the interconnection process must be made prior to the enrollment. Project owners must have submitted an Interconnection Application and have a completed Feasibility study as defined in the Rhode Island Distributed Generation Interconnection Act and The Narragansett Electric Company Standards for Connecting Distributed Generation. Project owners must provide copies of their Interconnection application and Feasibility Study with this application for enrollment. If the project has a completed Impact study, this would also be acceptable, since it is a more comprehensive study.

Information regarding Interconnection of Generators in Rhode Island can be found at the following link:

https://www.nationalgridus.com/narragansett/business/energyeff/4_standard_interconnection.asp

2.3 Minimum Threshold Requirements

The Distributed Generation Standard Contracts Act requires that Standard Contracts include a requirement that distributed generation facility owners make a performance guarantee deposit to National Grid[4] paid at the time of contract execution. The performance guarantee deposit can be as little as $500 or as much as $75,000 depending on the output of the project (i.e., projected annual energy output). The deposit must be received and confirmed by National Grid within seven (7) business days after a project is awarded a contract. There are no exceptions to this requirement. Applicants should be prepared to make a deposit when submitting applications into any enrollment. If payment of the required performance guarantee deposit is not received by the date required, the Company will withdraw the offer and not proceed with a Standard Contract with the Applicant in that enrollment. See Schedule 1 for the anticipated dates associated with this upcoming enrollment.

As a second threshold requirement, should the distributed generation facility not produce ninety percent (90%) of the output proposed in its enrollment application within eighteen (18) months of contract execution, the contract is automatically voided, and the performance guarantee deposit is forfeited (note: the same conditions apply to an eligible small-scale hydropower distributed generation facility that has not generated ninety percent (90%) of the output proposed in its enrollment application within forty-eight (48) months after contract execution). It is a threshold requirement, therefore, that the construction schedule for a project lead to accomplishment of this critical milestone within eighteen months of contract execution. The Proposed Hourly Output, [5] which is the maximum amount of energy and related products available for Delivery to National Grid at the Point of Delivery (kWh AC per hour)[6], must be demonstrated for at least four complete hours (which do not need to be four consecutive hours), which amount shall be adjusted to the extent required to reflect a lack of availability of energy (such as lower than expected wind speed or seasonally reduced insolation), and other factors, as proposed by the Applicant's engineer and accepted by National Grid in its reasonable discretion (the "Output Demonstration").

As a third threshold requirement, project developers submitting applications must have also submitted applications for interconnection and received a Feasibility study, or an Impact study, which should be submitted as part of the application.

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[4] The performance guarantee deposit is fifteen dollars ($15.00) for small distributed generation projects and twenty-five dollars ($25.00) for large distributed generation projects for every renewable energy certificate (REC) estimated to be generated per year under the contract, but at least five hundred dollars ($500) and not more than seventy-five thousand dollars ($75,000), paid at the time of contract execution. Should this milestone be achieved, the deposit shall be refunded, without interest, on a prorated basis of renewable energy actually delivered over the course of the first year of the project's operation.

[5] The Proposed Hourly Output is the maximum amount of energy and related products available for delivery to National Grid at the Point of Delivery (kWh AC per hour). See page 3 of Appendix A.

[6] If net metering, distinguish between total project generation and deliveries to the electric distribution system.

Applications that meet all the eligibility requirements and the above minimum threshold requirements will be further evaluated to determine compliance with a broader set of requirements, which have been designed to screen out proposals that are insufficiently mature from a project development perspective; lack technical viability; or fail to satisfy minimum standards for bidder experience and ability to finance the proposed project. The categories of information necessary to complete this further evaluation are set forth below.

- Energy Resource Plan
- Financial/Legal Capability
- Site Control
- Permit Acquisition Plan
- Interconnection
- Technical/Engineering
- Project Schedule
- Project Management and Experience
- Economic Benefit to Rhode Island

National Grid is interested in projects that can demonstrate the ability to develop, permit, finance, and construct the proposed project within the required eighteen-month schedule.

Applicants must use this application to provide responses. Applicants are requested to provide all reasonably available information in each section of the application. If any of the information requested is inconsistent with the type of technology or product proposed, or otherwise unavailable, the Applicant should include "N/A" and describe the basis for this designation. It is anticipated that larger projects may provide a higher level of detail in the responses than smaller projects. It is emphasized, however, that Applicants who do not provide complete and credible information in any of the above categories will be scored accordingly in the Scoring Process. The forms are included in this Application in MS Word format as Appendix A.

2.4 Project Scoring

In conducting evaluations of each project, National Grid will employ the scoring methodology described in Schedule 3. The non-price evaluation criteria are designed to assess the likelihood of a project coming to fruition based on various factors critical to successful project development. The objectives of the criteria are to provide an indication of the feasibility and viability of each project and the likelihood of meeting the proposed commercial operation date. Applications that can demonstrate, based on the current status of project development and past experience, that the project will likely be successfully developed and operated as proposed will have a higher likelihood of success.

For all Distributed Generation projects, price is weighted at eighty percent (80%) and non-price factors at twenty percent (20%).

National Grid reserves the right to reject any project not receiving a minimum score in the non-price evaluation, regardless of the completion date or pricing.

If the situation arises where multiple projects share the same interconnection facilities, and in the event that such projects receive equivalent scores in the evaluation, the project with the earliest interconnection application will be taken first. In addition, National Grid will reject any application for which interconnection is not technically feasible.

2.5 Projects at Customer Sites Involving Net Metering

A distributed generation project that is also being employed by a customer for net metering purposes may submit an application to sell the excess output from the project.[7] In this case, the applicant must be the project owner. The class in which the project is submitted is determined by the total project size, and not by the excess output offered for sale under a Standard Contract. The application forms in Appendix A require that both the project size and the excess output being offered for sale be specified.

2.6 Coordination with Annual Solicitations under the Long-Term Contacting Standard

The DG Enrollment process is separate and distinct from the annual competitive solicitations conducted under the Long-Term Contracting Standards. National Grid will provide reports to the Commission on both the solicitation and the annual enrollment process in order to track compliance with the Long-Term Contracting Standard. Projects submitted, but not yet selected, in an annual solicitation under the Long-Term Contracting Standard, may be submitted in a Distributed Generation enrollment. In this case, should the submitted pricing in one of the large DG classes be higher than that submitted in the competitive solicitation, a fully documented explanation must be provided. Additionally, the Applicant agrees that entering into a DG Standard Contract will automatically rescind the Applicant's bid relative to that project in the annual solicitation under the Long-Term Contracting Standard.

2.7 Delivery of Energy into ISO-NE Market

Energy will be delivered to National Grid in the Narragansett Electric Company ISO–NE load zone at the delivery node associated with the distributed generator. This will be accomplished through registration of the generator as a generation asset and assignment of the energy to National Grid.

[7] In such case, at the election of the self-generator, all the renewable energy certificates pertaining to the energy consumed on site may be sold on a month-to-month basis outside of the terms of the standard contract.

2.8 Participation in ISO-NE Forward Capacity Market (FCM)

National Grid shall be the "Project Sponsor" for all Large Distributed Generation Facilities and may qualify the Facility as an Existing Capacity Resource in the Forward Capacity Market (FCM) after the Commercial Operation Date and participate in every Capacity Commitment Period in the FCM with respect to the Facility. National Grid also reserves the right to be the "Project Sponsor" for Small DG Facilities, after consultation with the Division and the Board. If and when National Grid participates as "Project Sponsor" on behalf of any Facility, that Facility must support National Grid, as required, to qualify the Facility as an Existing Capacity Resource in the Forward Capacity Market. Generation owners are required to take commercially reasonable actions to maximize performance against any FCM Capacity Supply Obligations.

2.9 RPS Qualification and NEPOOL Generation Information System ("GIS") Certificates

The Distributed Generation projects must obtain qualification as a renewable resource pursuant to the Rhode Island Renewable Energy Standard ("RES"), and it must register as a Participant Account Holder with the NEPOOL-GIS. Once qualified, National Grid must be designated to receive all of the RECs produced by the project and tracked in the NEPOOL-GIS[8] under the operating rules found at http://www.iso-ne.com/committees/comm_wkgrps/mrkts_comm/geninfo_sys/operating/index.html

2.10 Official Contact for the Enrollment

Any questions on the Enrollment should be directed to the attention of the Official Contact for National Grid at the address listed below:

Jim Calandra
Environmental Transactions

Questions may be submitted to the Official Contact at following email address:
renewablecontracts@nationalgrid.com

[8] The Rhode Island Distributed Generation Standard Contract Act requires that an electric meter that conforms with standard industry norms be installed to measure the electrical energy output of the distributed generation facility, and require a system or procedure by which the distributed generation facility owner shall demonstrate creation of renewable energy credits, in a manner recognized and accounted for by the GIS; such demonstration of renewable energy credit creation to be at the distributed generation facility owner's expense.

2.11 Submittal of Enrollment Applications

The Standard Contract Enrollment Application and Appendices are posted on the National Grid Rhode Island Distributed Generation Standard Contracts website.

https://www.nationalgridus.com/narragansett/business/energyeff/4_dist_gen.asp

Completed applications should be submitted electronically to renewablecontracts@nationalgrid.com, following the instructions on the site for the Rhode Island Standard Contract Enrollment for renewable energy. Electronic submittal will assure that the time of submittal is documented.

2.12 Modification or Cancellation of the Open Enrollment

Following the submission of applications, National Grid may request additional information from Applicants at any time during the process. Applicants that are not responsive to such information requests may be eliminated from further consideration. National Grid may, at any time up to execution of Standard Contracts, postpone, withdraw and/or cancel this enrollment; alter, extend or cancel any due date; and/or, alter, amend, withdraw and/or cancel any requirement, term or condition of this enrollment, any and all of which shall be without any liability to National Grid. By submitting an Application, an Applicant agrees that the sole recourse that it may have with respect to the conduct of this enrollment is by submission of a complaint or similar filing to the Commission in a relevant docket pertaining to this Open Enrollment.

Schedule 1

Event	Anticipated Dates
Enrollment begins	April 21, 2014 – 9am EPT
Due Date for Submission of Applications	May 2, 2014 – 5pm EPT
Execute Contracts	May 16, 2014
File Contracts with the Commission	May 30, 2014

Note: Schedule 1 to be updated as required for each enrollment period.

Schedule 2
Classes and Targets Applicable to Current Enrollment Period

All Applicants are required to complete the Certificate of Tax Credit Eligibility included in Appendix A. All Applicants are required to bid a price, not to exceed the applicable ceiling prices.

Deleted: below

Class Nameplate (Eligible Project Size)	Target Nameplate	Ceiling Price w/ PTC/ITC & Bonus Depreciation (cents/kWh)	Ceiling Price w/ PTC/ITC, No Bonus Depreciation (cents/kWh)	Ceiling Price No PTC/ITC, No Bonus Depreciation (cents/kWh)
Wind (50 kW – 1500 kW) 50-999 kW 1,000-1,500 kW	1,500 kW In Total	 15.55 16.35	 16.20 17.50	 19.95 20.55
Small Scale Hydropower (50 – 500 kW)	500 kW	17.25	17.90	18.85
Small Solar-PV[9] (50 – 200 kW DC)	500 kW	25.75	27.10	N/A
Medium Solar-PV (201 – 500 kW DC)	1,400 kW	25.90	27.30	N/A
Anaerobic Digestion (50 – 500 kW)	500 kW	17.70	18.55	19.55
Large Solar PV (501 kW – 3,000 kW)	1,250 kW	22.25	23.50	N/A

Note: Schedule 2 to be updated as required for each enrollment period. Currently, there is a total of 16 MW[10] of nameplate capacity available for the 2014 program year. Each enrollment will be determined by the Board and posted prior to the opening of each enrollment period.

[9] The small solar class has the option of applying in either the small or the medium scale class, but not both. The applicant must indicate on the application the class under which the proposed project is applying and the proposed price must be below the applicable ceiling price.

[10] Any remaining allocation from the 2013 program year is carried over to the 2014 program year, as well as any capacity as a result of projects that have failed to reach their output within 18 months.

Schedule 3
Project Evaluation and Scoring Methodology

Non-Price Scoring for All Projects (20 points)

Non-price scoring is the same methodology employed National Grid in the initial competitive solicitation, and documented in the report on that solicitation, filed with the RI PUC on April 11, 2011. The scoring methodology is summarized as follows, and is based on the responses in Appendix A.

Evaluation Factors	Max Points	Criteria Considered in Each Factor
A. Siting and Permitting	4.0	• Extent to which site control has been achieved and acquisition of any necessary real property rights, including right of ways (1.5 points) • Identification of required permits and approvals and status of plan to obtain permits and approvals (1.5 points) • Community relations/support (1.0 points)
B. Project Development Status and Operational Viability	6.0	• Reasonableness of critical path schedule and demonstrated ability to meet major milestones (1.5 points) • Credibility of energy resource plan (1.5 points) • Commercial access to and reliability of the proposed technology (1.0 points) • Progress in interconnection process (2.0 points)
C. Experience and Capability of Bidder and Project Team	3.0	• Project development experience (1.0 points) • Project financing experience (1.0 points) • Operations and maintenance experience (1.0 points)
D. Financing	4.0	• Credibility of the financing plan (2.0 points) • Financial strength of the bidder (2.0 points)
E. Economic Benefit	3.0	• Project provides direct employment benefits (1.0 points) • Project provides indirect employment benefits (1.0 points) • Project provides tax revenues or other similar revenues (1.0 points)
Total	**20.0**	

Score on Submitted Price for all Projects (80 points)

For each class, the project with the lowest price relative to the ceiling price will receive 80 points. For other projects, one point will be deducted for each $MWh higher than the lowest submitted price.

Total Scoring

All Projects	
Price Scoring	80
Non-Price Scoring	20
Total	100

The scoring methodology is intended to discriminate between a project with competitive pricing and a "credible" project with competitive pricing that is most likely to be successfully deployed.

National Grid reserves the right to reject any project not receiving a minimum score in the non-price evaluation, regardless of the completion date or pricing.[11]

[11] There is the possibility that projects might meet (or even exceed) the threshold requirements, yet not make a credible demonstration that the project is likely to be completed and operated as proposed. It is not feasible to establish such a score in advance, as non-price scoring as a general matter is often driven by how projects compare on a relative basis. It would be expected, however, that some projects may clearly rank well below others in the same or similar classes.