

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

IN RE:

DOCKET NO. 4288/4277

**R. I. OFFICE OF ENERGY RESOURCES'
REPORT AND RECOMMENDATIONS
REGARDING DISTRIBUTED GENERATION
CLASSES AND CEILING PRICES; R. I.
OFFICE OF ENERGY RESOURCES' PROPOSED
STANDARD CONTRACT; NARRAGANSETT
ELECTRIC COMPANY d/b/a NATIONAL GRID'S
PROPOSED DISTRIBUTED GENERATION
ENROLLMENT APPLICATION AND PROCESS RULES**

OFFICE OF ENERGY RESOURCES' MOTION FOR RELIEF FROM ORDER

The Rhode Island Office of Energy Resources ("OER"), by its attorneys, pursuant to PUC Rule of Practice and Procedure 1.28 (b) (6) moves for relief from Paragraph 6 (pg. 50) of Order No. 20676 which approved the target levels for distributed generation in 2012. Paragraph 6 provided as follows:

6. The Distributed Generation Classes and Targets proposed by OER on September 27, 2011 are approved, as filed and set forth in Appendix A, for 2011 and 2012. The approved Classes and Targets set forth in Appendix A shall remain in effect until new classes and targets are proposed by OER and approved by the Commission.

OER requests that the PUC amend Order No. 20676 so as to permit OER to reallocate the remaining 5 megawatts from the 2012 allocation plan into the 2013 program. As grounds therefore, OER states that the requested reallocation will allow the ceiling prices to be reduced for the eligible technologies, thereby reducing adverse impacts upon ratepayers. This would result in a delay of the next 5 megawatt allocation by 2 to 3 months. The reallocation will also provide greater flexibility by providing additional megawatts in the 3 planned megawatt allocations in 2013, which will increase the eligible technologies and project sizes participating in the program.

R. I. Office of Energy Resources,
by its attorneys,



Michael D. Mitchell, Esquire (RIBA #3473)

Chief of Legal Services
Division of Legal Services
Department of Administration
One Capitol Hill, 4th Floor
Providence, RI 02908
401/222-8339
401/222-8244 (FAX)
michael.mitchell@doa.ri.gov

9/20/12

Notice of Hearing

The above captioned matter shall be scheduled for public hearing on October 4, 2012, at 1:00 p.m., at the offices of the Public Utilities Commission, 89 Jefferson Blvd., Warwick, RI 02888.

Michael S. Mitchell

CERTIFICATION

I hereby certify that a copy of the within was forwarded to all parties identified on the attached service list via electronic mail on September 20, 2012.

Michael S. Mitchell

Docket No. 4288 – Office of Energy Resources Filings: 1) Proposed Distributed Generation (DG) Standard Contract Act Classes and Ceiling Prices for 2011; and 2) Proposed DG Standard Contract; and

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

Service Lists updated 9/20/12

Name/Address of Parties in Docket	E-mail Address	Phone
Peter Lacouture, Esq. Robinson & Cole LLP One Financial Plaza, Suite 1430 Providence, RI 02903-2485	placouture@rc.com	401-709-3314
Marion S. Gold, Administrator RI Office of Energy Resources One Capitol Hill Providence, RI 02908-5850	Marion.Gold@energy.ri.gov Joyce.discuillo@energy.ri.gov	401-574-9119
Christopher Kearns, Program Service Officer RI Office of Energy Resources	Christopher.Kearns@energy.ri.gov	
Thomas R. Teehan, Esq. National Grid 280 Melrose St. Providence, RI 02907	Thomas.teehan@us.ngrid.com Joanne.scanlon@us.ngrid.com madison.milhousjr@us.ngrid.com corinne.abrams@us.ngrid.com	401-784-7667
Leo Wold, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	Lwold@riag.ri.gov dmacrae@riag.ri.gov Sscialabba@ripuc.state.ri.us Dstearns@ripuc.state.ri.us Acontente@ripuc.state.ri.us Jmunoz@riag.ri.gov	401-222-2424
Jerry Elmer, Esq. Conservation Law Foundation 55 Dorrance Street Providence, RI 02903	jelmer@clf.org akullenberg@clf.org	401-351-1102 Ext. 12
Richard Hahn Lacapra Associates 1 Washington Mall, 9th floor Boston, MA 02108	rhahn@lacapra.com apereira@lacapra.com	
Alan M Shoer, Esq. Adler Pollock & Sheehan P.C. One Citizens Plaza, 8th Floor Providence, RI 02903	ashoer@apslaw.com	
Seth H. Handy, Esq. Handy Law, LLC 42 Weybosset St. Providence, RI 02903	seth@handylawllc.com	401-626-4839

CERTIFICATION

I hereby certify that a copy of the within was forwarded to all parties identified on the attached service list via electronic mail on September 20, 2012.

Michael S. Antcheff

Docket No. 4288 – Office of Energy Resources Filings: 1) Proposed Distributed Generation (DG) Standard Contract Act Classes and Ceiling Prices for 2011; and 2) Proposed DG Standard Contract; and

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

Service Lists updated 9/20/12

Name/Address of Parties in Docket	E-mail Address	Phone
Peter Lacouture, Esq. Robinson & Cole LLP One Financial Plaza, Suite 1430 Providence, RI 02903-2485	placouture@rc.com	401-709-3314
Marion S. Gold, Administrator RI Office of Energy Resources One Capitol Hill Providence, RI 02908-5850	Marion.Gold@energy.ri.gov Joyce.discuillo@energy.ri.gov	401-574-9119
Christopher Kearns, Program Service Officer RI Office of Energy Resources	Christopher.Kearns@energy.ri.gov	
Thomas R. Teehan, Esq. National Grid 280 Melrose St. Providence, RI 02907	Thomas.teehan@us.ngrid.com Joanne.scanlon@us.ngrid.com madison.milhousjr@us.ngrid.com corinne.abrams@us.ngrid.com	401-784-7667
Leo Wold, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	Lwold@riag.ri.gov dmacrae@riag.ri.gov Sscialabba@ripuc.state.ri.us Dstearns@ripuc.state.ri.us Acontente@ripuc.state.ri.us Jmunoz@riag.ri.gov	401-222-2424
Jerry Elmer, Esq. Conservation Law Foundation 55 Dorrance Street Providence, RI 02903	jelmer@clf.org akullenberg@clf.org	401-351-1102 Ext. 12
Richard Hahn Lacapra Associates 1 Washington Mall, 9th floor Boston, MA 02108	rhahn@lacapra.com apereira@lacapra.com	
Alan M Shoer, Esq. Adler Pollock & Sheehan P.C. One Citizens Plaza, 8th Floor Providence, RI 02903	ashoer@apslaw.com	
Seth H. Handy, Esq. Handy Law, LLC 42 Weybosset St. Providence, RI 02903	seth@handylawllc.com	401-626-4839

Jeff Broadhead, Executive Director WCRPC	jb@wcrpc.org	
Mike McElroy, Esq. Schacht & McElroy PO Box 6721 Providence, RI 02940-6721	Michael@McElroyLawOffice.com	401-351-4100
Joseph E. Donovan, Esq. Constellation Energy Resources, LLC	Joseph.donovan@constellation.com	410-470-3582
Bryan S. Miller, VP Energy Policy Constellation Energy	Bryan.Miller@constellation.com	410-470-3266
Jeffrey W. Garrison, Regulatory Associate Constellation Energy	Jeffrey.Garrison@constellation.com	410-470-3160
Daniel Allegretti, VP Energy Policy Constellation Energy Commodities	Daniel.W.Allegretti@constellation.com	603-224-9653
File an original & 10 copies w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Lmassaro@puc.state.ri.us Adalessandro@puc.state.ri.us Anault@puc.state.ri.us Dshah@puc.state.ri.us Nucci@puc.state.ri.us	401-780-2107
Interested Parties		
Kelly Mahoney, Governor's Office Policy Dir.	Kelly.Mahoney@governor.ri.gov	401-222-8135
Andy Kern, RGS Energy	akern@alterisinc.com	
Brian Dunphey	bdunpheygcts@gmail.com	
Dan Richardson	Dan.richardson@rterra.com	401-619-5297
Fred Unger, Hartwood Group	unger@hrtwd.com	
Hannah Morini, RIEDC	hmorini@riedc.com	
James Schwartz, Independence Solar	jschwartz@independencesolar.com	
Jim Christo, RGS Energy	jchristo@alterisinc.com	
Julian Dash, RIEDC	jdash@riedc.com	
Karina Lutz	karina@ripower.org	401-497-5968
Karl Munzel	kmunzel@alterisinc.com	
Kevin Stacom	Kevin.stacom@gmail.com	
Kirt Mayland	dkm@soltasenergy.com	
Kristie Caltabiano, Tecta Solar	kcaltabiano@tectaaamerica.com	
Laurence W. Ehrhardt	LARRY4REP@aol.com	
Mark Luders	mluders@vanguardenergypartners.com	
Michelle Mulcahy, Alteris, Inc.	mmulcahy@alterisinc.com	
Omay Elphick, Alteris, Inc.	omayelphick@gmail.com	
Palmer Moore, Nexamp	pmoore@nexamp.com	
Paul Raducha	praducha@providenceeg.com	
Robert J. Tomey, Conanicut Energy LLC	conanicutenergy@cox.net	
Stephan Wollenberg	stephan@ripower.org	617-524-3950
Ted Vansant, RGS Energy	tvansant@alterisinc.com	
Lyle Trued, Fonroche USA	l.trued@fonrochegroup.com	646-535-8783
Michelle Mulcahy, Smart Energy Capital	MMulcahy@smartenergycapital.com	914-236-4284