

Schacht & McElroy

Michael R. McElroy
Robert M. Schacht (retired)

Members of Rhode Island
and Massachusetts Bars

Attorneys at Law

21 Dryden Lane
Post Office Box 6721
Providence, RI 02940-6721

(401) 351-4100
fax (401) 421-5696

www.McElroyLawOffice.com
Michael@McElroyLawOffice.com

October 10, 2014

Luly Massaro, Clerk
Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

Re: Block Island Power Company – Net Metering – Docket No. 4387

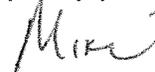
Dear Luly:

As you know, this office represents Block Island Power Company (BIPCo).

Enclosed are an original and nine copies of BIPCo's responses to the Commission's 1st set of data requests. Copies have been sent to the service list by electronic mail.

If you have any questions or you need any further information, please do not hesitate to call.

Very truly yours,



Michael R. McElroy

MRMc:tmg
cc: Service List
Albert R. Casazza, M.D.

Docket No. 4387 – Block Island Power Co. – Net Metering Policy
 Service List as of 9/20/14

Name/Address	Email	Phone
Michael McElroy, Esq. Schacht & McElroy PO Box 6721 Providence RI 02940-6721	Michael@McElroyLawOffice.com	401-351-4100
Dr. Alberto Casazza	casazzaa@gmail.com	
Cliff McGinnes	IFRTruck35@mac.com	
Nancy Dodge, Town Manager Town of New Shoreham	townmanager@new-shoreham.com	401-466-3219
Leo Wold, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	Lwold@riag.ri.gov	401-222-2424
	Jmunoz@riag.ri.gov	
	dmacrae@riag.ri.gov	
Jon Hagopian, Esq. Division of Public Utilities and Carriers	Jon.hagopian@dpuc.ri.gov	
	steve.scialabba@dpuc.ri.gov	
	John.bell@dpuc.ri.gov	
File an original & nine (9) copies w/ Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick RI 02888	Luly.massaro@puc.ri.gov	401-780-2107
	Cynthia.WilsonFrias@puc.ri.gov	
	Alan.nault@puc.ri.gov	
	Todd.bianco@puc.ri.gov	

Block Island Power Company

P.O. Box 518 – Block Island, RI 02807

(401) 466-5851 Fax (401) 466-5068

Reply to the Public Utilities Commission First Set of Data Requests re: Block Island Power Company's Net Metering Policy, Docket No. 4387:

1. Please provide BIPCo's most recent customer count by customer class.
*Customer count by class: Residential 1401, Commercial 429, Public Authority 33.
Total: 1863*
2. Please provide BIPCo's peak for FY 2014.
BIPCo's Peak load for FY 2014 was 4070 Kw
3. Did BIPCo exceed the FY 2014 peak during the summer of FY 2015? If so, what was the peak in the summer of FY 2015 and on what day did it occur?
BIPCo did not exceed the peak load for FY 2014 in the summer of FY 2015.
4. Please calculate the 3% net metering cap. Please show the historical cap based on the previous 2% limit as it applied before BIPCo's net metering policy was changed in CY 2014.
The current 3% net metering cap is 122Kw. The previous historical cap based upon 2% of peak was approximately 80Kw.
5. Please explain how removal of the three grandfathered windmills from the wattage cap affected the ability of new projects to net meter.
The removal of the three grandfathered windmills from the wattage cap allowed additional installations having a total of 30Kw to the net metering program.
6. Please indicate whether BIPCo has reached the cap and if so, when? If not, what percentage of the peak is currently net metered?
BIPCo has not reached the cap in its net metering program. The percentage of the peak used currently is 38.2%

7. How many installations included in the calculation of the 3% peak are currently being net metered? When were they installed and what are the sizes? *The number of net metering customers in the 3% cap is 17. The dates of installation are not known as the solar units were installed sporadically over a long period of time without consent or knowledge of the Company. In 2010, BIPCo began a policy of demanding that the installation solar units be certified by the Town Building Inspector as compliant with Town regulations. The dates listed below are the dates BIPCo received written certification by the Town. Solar installations were identified by BIPCo's meter readers. The sizes of the installations are included in the chart below.*

	Kilowatts		date of registration
1	0.9		8/11/13
2	1		6/22/13
3	2.5		6/1/13
4	5		6/1/13
5	2.5		4/2/13
6	2.3		5/1/13
7	0.5		4/2/13
8	2.5		4/2/13
9	1		4/2/13
10	1.9		4/2/13
11	1.3		1/1/12
12	2.1		10/26/11
13	2.5		4/2/13
14	2.5		1/1/13
15	2.5		1/1/13
16	12.5		3/21/13
17	3.1		3/1/13
	46.6	Total	

8. Has BIPCo had to deny any net metering installations in CY 2014 because they would exceed the cap? If so, what is the size of the facilities denied?
BIPCo has not denied any net metering installations in CY 2014 that would have exceeded the cap.

9. Has BIPCo had to deny any net metering installations in CY 2014 for reasons unrelated to the cap? If so, how many? If so, for each, please provide a copy of the denial together with the reasoning.
BIPCo has not denied an installation for net metering in CY2014 for any reason.

10. Please explain the circumstances under which BIPCo would disconnect a customer as set forth in number 10 of the net metering policy. Has BIPCo had to rely on this provision to disconnect any net metering customers? If so, please set forth the circumstances. *BIPCo would disconnect a net metering customer if data from the "smart meter" showed disturbance on the line. BIPCo has not had to do this.*

11. As part of BIPCo's review of net metering requests, does BIPCo include a determination that the installation is reasonably designed and sized to annually produce electricity in an amount that is equal to or less than the renewable self-generator's usage at the eligible net metering system site, measured by the three year average annual consumption of energy over the previous three years?
BIPCo has not evaluated each installation to see if it were reasonably designed and sized to produce electricity in an amount equal or less than the renewable self-generator's usage. Approximately 13 years ago, Mr. Michael Wagner, the then General Manager of BIPCo and Mr. Chris Warfel came to a decision that a 2% cap would be appropriate for the totality of the renewables. BIPCO divided that cap to limit each installation to 2.5KW to allow a larger number of participants. This policy has been agreed upon by the Town until 2014. In 2014, the individual size limit was abandoned in favor of an overall cap on the totality of the installations to accommodate the wishes of customers who had installed units larger than the previous limit. The Town has not formally approved this new policy.

12. In the cover letter to Mr. Spirito, Dr. Casazza stated that the policy "reimburse[es] all net metering customers for some of the excess electricity that is delivered to [BIPCo's] system." Please explain what electricity delivered to the system is not being reimbursed.
BIPCo has installed "smart meters" on each of the homes having net metering installations. These meters measure the amount of electricity used from our grid and the

amount delivered by the customer to our grid. BIPCo gives credit for 125% of the amount of electricity used from our grid. BIPCo does not reimburse or give credit for the surplus amount of electricity that is greater than the amount that is 125% of electricity used from our grid.

13. Please set forth the basis for the statement in the cover letter to Mr. Spirito that "I think this policy does not hurt the ratepayers who are not net metering nor does it pose a significant financial problem to BIPCo," including any analysis performed by BIPCo.
There has been no financial analysis of the impact of the net metering program. BIPCo has had this policy for many years and we believe that the amount of financial impact to the company and the rate payers has been minimal and offset by the capture of excess electricity at no charge.

14. Has the increase in the net metering cap from 2% to 3% caused any engineering or reliability concerns for BIPCo's system? If yes, please explain.
Expanding the cap from 2% to 3% has not caused any engineering or reliability problems as the 2% cap has not been exceeded as yet.

15. Absent the statutory cap, are there any studies or analysis performed by BIPCo, or any consultant, regarding the system's ability to handle net metering on any or all of its feeders above the 3% cap? If so, please provide a copy.
There have been no studies nor analyses performed regarding the system's ability to handle net metering on any or all of its feeders above the 3% cap.

Responses prepared by Albert Casazza, President