Raquel W. Webster
Senior Counsel

April 30, 2015

BY HAND DELIVERY AND ELECTRONIC MAIL

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

RE: Docket 4483 – In Re: Petition of Wind Energy Development, LLC and ACP Land, LLC Relating to Interconnection
Responses to PUC Data Requests – Set 6

Dear Ms. Massaro:

On behalf of National Grid[1], I have enclosed responses to the PUC's sixth set of data requests in the above-referenced matter.

Please note that the Company's response to COMM 6-3 is pending.

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

Sincerely,

Raquel J. Webster

Enclosures

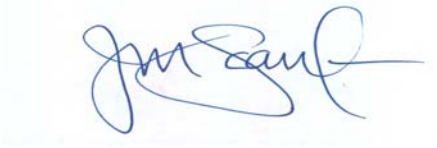
cc: Docket 4483 Service List
Leo Wold, Esq.
Steve Scialabba, Division

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

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

Paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



Joanne M. Scanlon

April 30, 2015
Date

Docket No. 4483 – Wind Energy Development LLC & ACP Land, LLC – Petition for Dispute Resolution Relating to Interconnection
Service List updated 4/10/15

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COMM 6-1

Request:

Explain more fully the reasons why the revision in Section 1.2 (Impact Study) is necessary, *other than* consistency with Company policy. Please do not repeat the explanation on page 2 of the cover letter.

Response:

The Company is proposing to revise the definition of "Impact Study" to clearly state the amount of time during which any system modification cost estimates included in the study will be valid. There have been circumstances where customers have not acted expeditiously when presented with an estimate for system modifications. In some cases, such customers may have needed to secure financing and/or other required permits for construction of their DG projects, or they may have been waiting for the next round of solicitations for the existing DG contract program. This effect, coupled with the fact that, in some cases, estimates for system modifications can amount to tens or hundreds of thousands of dollars (and in once recent case, millions), results in system modification estimates becoming stale. Without the ability to re-estimate the costs of projects with material or equipment costs that may vary significantly from month to month (e.g., the costs of copper and aluminum), the Company runs the risk of significant over- or under-recovery of the actual costs necessary to construct the project. Accordingly, the Company revised the definition of "system impact study" simply to allow the Company to re-estimate system modification costs when the customer has not acted within 60 business days from delivery of the study to continue with their project. The 60-business-day period is consistent with time the Company allows for customers to agree with estimates for other customer-driven work, such as the installation of a new service, or the relocation of Company equipment.

COMM 6-2

Request:

Footnote 3, Page 2 of Cover Letter. Has the Company chosen not to propose revisions to R.I.P.U.C. No. 2078 that would improve the interconnection process simply because it wants to see whether such provisions are approved in MA?

Response:

In part, yes. There have been a number of revisions proposed to the Company's Massachusetts (MA) Standards for Interconnection of Distributed Generation tariff (MDPU No. 1219) within the last three years, as filed with the Department of Public Utilities (DPU) in Docket D.P.U. 11-75 (MA Tariff Revisions). Since the MA tariff is still pending approval at the MDPU (approval could occur in the next month or so), the Company elected to wait for final approval of other clarifying edits prior to considering to offer them in RI. The tariff revisions proposed in RIPUC No. 2078 (RI Proposed Tariff) include some of the MA Tariff Revisions (the same or substantially similar language) or concepts addressed by the MA Tariff Revisions. These revisions include: pre-application report requirements (Section 3.2); increase to the simplified process project threshold to 15 kW and feeder capacity threshold to 15% (Section 3.1); language addressing ISO OP-14 requirements; cost sharing and refunding language (Section 5.3); final accounting provisions in the Impact Study or ISRDG Agreement and Detailed Study Agreement; and non-substantive clean-up edits.

The Company did not propose to make all of the MA Tariff Revisions (including the revisions currently pending approval before the DPU) for a number of reasons:

(1) Not all of the MA Tariff Revisions are applicable because of differences in state law and/or differences in the two states' tariffs that have developed over time, such as the changes made to the MA tariff to update information pertaining to Class I, Class II, and Class III net metering facilities.

(2) Some revisions made to the MA tariff pertaining to group studies were included as part of a pilot program subject to further review by the DPU, the Company, and interested stakeholders. It is premature to include these revisions in the Rhode Island (RI) tariff

because whether the changes will result in a process improvement has yet to be determined. In fact, the Company has already identified a number of areas in which the group study process, as set forth in the MA Tariff Revisions, could be further clarified or improved.

(3) In the Company's opinion, based on experience implementing these provisions, some of the MA Tariff Revisions complicate rather than improve the process for the Company and/or its customers. For instance, some of the revisions pertaining to time-frames and extensions make it difficult to process applications in a "queue". As such, the Company would not seek to include these revisions in the RI tariff.

The Company would consider including any MA Tariff Revisions as proposed revisions to the RI tariff to the extent such revisions are applicable to RI, to the extent that such revisions would, in the Company's opinion, result in a clarification of existing requirements or a process improvement.

COMM 6-4

Request:

Section 2.0. Basic Understandings. Sheet 9. Since 2011, identify the number, type and size of projects which have been subject to special interconnection requirements that require studies to be performed according to mutually agreed upon timelines, rather than the timelines identified in Section 3.

Response:

To date, the Company has not had a project that has been subject to special interconnection requirements that require studies to be performed according to mutually agreed upon timelines, rather than the timelines identified in Section 3. The majority of projects interconnected have been less than 3 megawatts (MWs).

Based on the experience of the Company's Massachusetts affiliate, there are occasions when an application requires additional processing time, particularly when the proposed project is greater than 3MWs or requires substation modifications. The Company expects, given the new Renewable Energy Growth Program, that this will also be the case in Rhode Island. As such, the Company has included the language permitting mutually agreed upon timelines in these instances in order to provide sufficient notice to customers that such additional processing time may be needed.

COMM 6-5

Request:

Section 3.1 Simplified Process, Sheet 11. Define in plain English the terms "secondary" and "single-phase," as used in this paragraph.

Response:

The term "secondary" is used to reference the low or "secondary" voltage side of a Company distribution transformer, which is typically 600 volts or below. The high or "primary" voltage side of a distribution transformer is typically over 600 volts.

The term "single-phase" is used to reference a characteristic of electrical service. Utilities in the U.S. distribute electricity using three-phase service (or three wires, a neutral, and a ground). Utilities will use one wire (or a single-phase) to serve customers that do not need a three-phase service. Customers with large electrical loads (i.e., retail box stores, larger restaurants) require a three-phase service; residential customers only require a single-phase service.

COMM 6-6

Request:

Section 3.1 Simplified Process. Sheet 11. Why did the Company choose 15 kW, as opposed to 20/25 kW, as the limit for qualification for the simplified interconnection process?

Response:

The Company chose the limit of 15kW for qualification of an application for the Simplified Process based on the Company's determination that projects of this threshold or less could be reviewed quickly through the Company's screening tools, and would likely not cause a voltage problem on a typical 50 kVA distribution transformer.

COMM 6-7

Request:

Section 3.2 Pre-Application Reports. Sheet 13. Why does the Company require the customer to apply for interconnection after receiving a pre-application report that may very well inform the customer that the proposed project is no longer feasible from an engineering or economic standpoint, or for any other reason relating to the customer's specific circumstances?

Response:

The Company never requires a customer to apply for interconnection service unless they have indicated they are installing a new DG unit or replacing an existing DG unit with a different unit that has not been previously studied by the Company. The Company's proposal to require a Pre-Application Report for customers intending to submit an application through either the Expedited Process or Standard Process is to facilitate the review of such an application, by allowing the Company to identify any potential issues with interconnection prior to the submission of an application. For these customers, interconnection applications are required to be submitted only if the customer has reviewed their Pre-Application Report and decided in their discretion to move forward with their proposed project. If the Pre-Application Report indicates potential issues associated with interconnection, and the customer chooses not to move forward, the Company does not require the customer to submit an interconnection application.

COMM 6-8

Request:

Section 3.2 Pre-Application Reports. Sheet 13. Define the following terms in plain English, as they are used in this section: a) three phase, b) area network c) spot network, and d) radial system.

Response:

a) Three-phase: The Company distributes electricity using a three-phase, four-wire electric distribution system as described in the Company's response to COMM 6-5. Similar to large, electric loads that require this type of service, larger distributed generation (DG) projects (>15 kWs) are required to connect to a three-phase system to prevent load and voltage imbalances. Therefore, if a customer is proposing a 100 kW project, the Company must have three-phase service available to interconnect that customer's project to the Company's distribution system.

b) Area network: Area network is a term used to describe an underground distribution system that provides highly reliable electric service to customers located in urban, high-load density areas. The system is designed with redundancy in its operation so that the Company can make new connections or repairs without interrupting many customers. Operation of an area network assumes that any power flow back into it is caused by a fault on the system and automatically opens up a breaker to not allow this reverse power flow. Because of this design feature, it cannot accept any power flow from DG in the area. An area network has highly specialized interconnection requirements. Parts of Providence are served with area networks.

c) Spot network: A spot network operates in the same way as an area network, but serves only one building and has the same characteristics and highly specialized interconnection requirements. The larger buildings in downtown Providence are served with spot networks.

d) Radial system: A radial distribution system serves the majority of customers in Rhode Island. This is the typical electric distribution system where power flows outward from substations to customer loads on the system. A radial system can accept reverse power flow.

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COMM 6-9

Request:

Section 3.2 Pre-Application Reports. Sheet 13. Does the term single phase refer to distribution or transmission service, and why is it important to inform the customer in the pre-application report whether a single or three phase is available near the proposed site?

Response:

The term "single-phase" refers to distribution service. Please see the Company's response to COMM 6-5 for a further explanation. As discussed in the Company's response to COMM 6-8, if a customer is proposing a 100 kW project in an area that is not served with three phase service, then the customer would have to pay for the system modifications needed to convert the area to three phase service. By providing this information in the Pre-Application Report, customers can be guided to locations that may require fewer system modifications and potentially less cost than others.

COMM 6-10

Request:

Sections 1.2. Definitions. Sheets 4 and 5. In one sentence, explain the difference between an impact study and an impact study for renewable DG (ISRDG). Please do not repeat the definitions shown on Sheets 4 and 5. If it is not possible to fully explain the difference in one sentence, identify the one, single fact that distinguishes these 2 terms the most.

Response:

ISRDGs are strictly for a renewable distributed generation project for which the amount of the study fees is limited by statute as compared to Impact Studies, which are for any distributed generation project for which the study fees are based on an estimate of actual cost.

COMM 6-11

Request:

Section 3.3 Expedited Process. Sheet 14. Why are there two duplicate sentences in Paragraph a (iv).

Response:

The second sentence was inserted in error and will be removed by the Company.

COMM 6-12

Request:

Section 3.3. Expedited Process. Sheet 15. What does it mean to "operate in parallel"?

Response:

Operating in parallel is a utility term that means the distributed generation (DG) is allowed to operate while connected to the Company's electric distribution system. This is in contrast to DG that operates in an islanded condition (e.g., an emergency generator that operates when there is an outage on the electric distribution system is operating in an islanded mode). It is critical that all requirements are fully met for DG to operate in parallel.

COMM 6-13

Request:

Section 3.3. Expedited Process. Sheet 15. Since 2011, has the Company ever encountered a customer that attempted to operate in parallel? If so, describe the number, type and size of the project(s) which have attempted to operate in parallel.

Response:

Yes. The intent of every distributed generation (DG) applicant is to operate their DG system in parallel with the Company's Electric Power System (EPS). Consequently, all DG projects that have received an Authorization to Interconnect are allowed to operate in parallel with the Company's EPS. To further clarify this, the Company would propose to change item k on sheet 15 to read:

The Interconnecting Customer cannot operate in parallel with the Company's Electric Power System until it has received the Authorization to Interconnect.

COMM 6-14

Request:

Section 3.4. Standard Process. Paragraph C. Sheet 17. Given the 5MW prescribed in R.I. Gen. Laws 39-26.6, is it reasonable to anticipate that a project greater than 5MW would apply for interconnection? If not, what is the purpose of the 5MW threshold contained in this section and Section 8.1. Metering, Related Equipment and Billing Option (Sheet 43).

Response:

The Tariff governs the interconnection of any Facility (as defined therein), which includes, but is not limited to, a "Distributed generation facility" as defined in R.I. Gen. Laws § 39-26.6. As such, it is reasonable to anticipate that projects greater than 5 MW will apply for interconnection. In fact, a customer in North Kingstown, Rhode Island recently installed a 12.5 MW combined heat and power project.

COMM 6-15

Request:

Provide a chart that identifies the number, type and size of all projects which have successfully completed the DG interconnection process outlined in R.I.P.U.C. No. 2078 for the period 2011 to the present. The chart should also reveal the following information:

a) total number of projects that have applied for interconnection in the requested time period, as well as all projects which have applied for interconnection, but for whatever reason, did not receive interconnection approval.
b) the specific reasons why projects were denied interconnection approval.
c) Any and all projects which have been notified that their application was subject to FERC approval and directed to submit an application to ISO-NE.

Response:

a) There were no projects that followed through with executing an interconnection service agreement and did not receive interconnection approval. There were 87 projects (totaling 37 MWs) that were cancelled. The chart below details the number of applications and connected kWs for all projects since RIPUC 2078 went into effect on November 30, 2011:

Applications received					
Type of Review	**CHP**	**Other**	**Solar**	**Wind**	**Grand Total**
Expedited	2	2	36	2	42
Simple			211		211
Standard	1	1	10	4	16
Grand Total	**3**	**3**	**257**	**6**	**269**

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kWs interconnected					
Type of Review	**CHP**	**Other**	**Solar**	**Wind**	**Grand Total**
Expedited	102	300	4,695	60	5,157
Simple			1,046		1,046
Standard	12,500	2,000	11,532	6,500	32,532
Grand Total	**12,602**	**2,300**	**17,273**	**6,560**	**38,735**

In addition to the projects detailed above, other classes of projects include a 225 kW hydro project, a 75 kW diesel project, and a 2 MW anaerobic digester project.

b) See response to a) above.

c) No projects have been subject to FERC approval.

COMM 6-16

Request:

Section 5.3 System Modification Costs. Sheet 36. In order for the refund contemplated in this section to occur, would it have to be initiated by the previously interconnecting customer, or would the Company voluntarily, or unilaterally, refund costs collected from a subsequent interconnection customer to a previously interconnection customer? Also, explain the reason for the 5 year cut-off.

Response:

As proposed in Section 5.3, "As appropriate, to the extent that subsequent Interconnecting Customers benefit from System Modifications that were paid for by an earlier Interconnecting Customer, the Company may assess a portion of the costs to such subsequent Interconnecting Customers, which will be refunded to the earlier Interconnecting Customer if actually collected." If the Company assesses and collects such costs,, the Company would voluntarily refund such amounts to the earlier Interconnecting Customer who paid for the System Modification(s). If the original customer has assigned the Interconnection Service Agreement for a distributed generation project to a subsequent customer in accordance with Section 9 of the agreement, refunds may be paid to the assignee. The five-year cutoff is consistent with the Company's prorated contribution period under its residential line extension policy.

COMM 6-17

Request:

Section 9.2 Mediation/Non-binding Arbitration. Sheets 43 through 45. Section 9.2 outlines a process whereby the parties can attempt to resolve differences through meetings with Commission staff and, if that process is not successful, attempt to resolve differences through third-party mediation/arbitration, chosen from a list of "pre-qualified neutrals maintained at the Commission." (Section 9.2(c)) If the mediation is not successful, the matter proceeds to a Commission hearing. The tariff, as currently drafted, contemplates arbitration by a third party, unaffiliated with the Commission, as evident from multiple provisions, including section 9.2(c) which states, "The Commission will use a list of pre-qualified neutrals maintained at the Commission…" and 9.2(f) which states, "The parties will contract with neutrals for services, splitting the fees 50/50." If the Company intends for future arbitrations to occur within the Commission, the tariff should appropriately reflect this. Please verify whether this is the Company's intention, and if so, provide tariff revisions which appropriately reflect this intention.

Response:

The Company's proposed revisions to Section 9.2 of the DG Tariff are based in substantial part on the Mediation/Non-Binding Arbitration Summary and Recommendations issued by Senior Legal Counsel to the Rhode Island Public Utilities Commission in this docket on April 30, 2014. See April 30, 2014 Mediation/Non-Binding Arbitration Summary and Recommendations (Recommendations), Docket 4483, at page 15.

In Section 9.2.b of the Recommendations, Senior Legal Counsel recommended in relevant part as follows:

> The parties will meet with a Commission staff person within 17 days of the submission of a petition to convene the Dispute Resolution Process. During that meeting, the Commission staff person may assist the parties in attempting to resolve outstanding differences, or shall provide two options to the parties: (1) to engage with the Commission staff person to attempt to resolve the dispute or make recommendations to the Commission or (2) to proceed with formal mediation/arbitration as set forth in 9.2.c-1.

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COMM 6-17, page 2

> In the event the parties choose to engage the assistance of the Commission staff member, the Commission staff member will set a reasonable schedule for the submission of any discover issued by the Commission staff member and any party may request to move to the formal third-party mediation/arbitration set forth in 9.2.c-1 prior to the final meeting conducted by the Commission staff member. Any information obtained by the Commission staff member, maintained by the Commission Clerk, shall be made available to the third-party mediator/arbitrator. Within ninety (90) days of the convening of the Dispute Resolution Process, the Commission staff member shall submit a summary of the dispute resolution process with the resolution, if one was agreed to, or recommendations to the Commission for its review under Rule 9.3.

The Company's proposed revisions to the DG Tariff in Section 9.2.b closely align with the language recommended by Senior Legal Counsel. In summary, once a petition to convene the Dispute Resolution Process has been filed (i.e. within 17 business days), the Parties would meet with a Commission staff member, and the staff member would either attempt to resolve the outstanding differences (presumably through dialogue), or provide options to the parties to either: (1) engage with Commission staff to attempt to resolve the dispute on his/her own, or make recommendations to the Commission to resolve the dispute, or (2) proceed for formal mediation/arbitration.

Accordingly, the Company's proposed language allows for future arbitrations to occur either within the Commission, or through a third-party arbitrator/mediator, consistent with Senior Legal Counsel's recommended tariff language.

COMM 6-18

Request:

Exhibit C-Expedited/Standard Process Interconnection Application. Purpose of Generating Facility. Sheet 60. For purposes of this question, the term "customer" means an interconnection customer intending to export electricity to the grid. Explain in both in numerical and non-numerical terms how a customer is impacted depending on the customer's choice to export electricity under the net metering tariff versus the REG tariff.

Response:

The purpose of this section is to determine whether the interconnection could be considered a FERC jurisdictional interconnection. This would occur when the customer is selling its energy output to a third party instead of selling the output to the Company either through net metering, the Renewable Energy Growth Program tariff, or as a Qualifying Facility under the Public Utility Regulatory Policies Act, 16 U.S.C. Section 2601 et seq.

The only impact a customer would see is the difference in compensation from either the net metering tariff or the Renewable Energy Growth Program tariff.

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COMM 6-19

Request:

Exhibit C-Expedited/Standard Process Interconnection Application. Purpose of Generating Facility. Sheet 60. Is Schedule B, referenced in Question 1 (Sheet 60), included in R.I.P.U.C. No. 2078. If so, where?

Response:

No. Schedule B is part of the Company's Net Metering Provision, RIPUC 2150.

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COMM 6-20

Request:

Exhibit C-Expedited/Standard Process Interconnection Application. Purpose of Generating Facility. Sheet 62. Define voltage flicker data, and explain why it is requested for wind, as opposed to other resource types.

Response:

Voltage flicker data is information from a proposed distributed generation (DG) unit that identifies the impact on the voltage in the area surrounding the location of the proposed DG unit as a result of the operation of the DG unit going from minimum output to maximum output. Any generation in an area affects the area's voltage. During periods of low output, the area voltage can drop, and during periods of high output, the area voltage can rise. If these conditions occur within a short period of time (low-to-high output, followed by high-to-low output), the rapid changes in output can cause rapid changes in voltage. If the change in voltage is rapid enough, neighboring customers will experience the result of the change in the area's voltage, which can become noticeable (e.g., lights shimmering or flickering, etc.).

The reason the Company would like to require this information for wind DG is that wind turbines protect themselves from over-speed conditions (a high-wind event) by tripping the unit off-line, thus, stopping all generation. Once the wind speed decreases enough, the wind turbine will begin to operate again and start to generate again. This process can continue throughout a storm with high winds. This repeated action can cause the rapid changes in voltage as described above. Because solar can rarely be installed with the same density (e.g., amount of generation per acre), the Company does not routinely require voltage flicker data from solar projects; however, if the amount of solar proposed in an area was enough that flicker could occur from its operation, the Company could also request the data for solar.

COMM 6-21

Request:

Is the DG interconnection process capable of being depicted through chronological images, similar to the way of construction project can be depicted through photographs taken at various stages of construction? Does the Company possess and/or maintain this type or record for any interconnection projects and if so, would it be willing to provide the same to the Commission?

Response:

The Company cannot depict the steps involved in the distributed generation (DG) interconnection process through chronological images because these steps vary according to Table 1 on Sheet 24 of the tariff. Depending on which process is used (Simplified, Expedited, or Standard), the steps vary as to the timelines within the interconnection process beginning with the submission of an interconnection application and ending when the Company provides an executable interconnection service agreement to the customer. To provide efficient interconnection service, there are multiple paths for different size DG projects as outlined in Section 3 starting on Sheet 10 of the tariff.

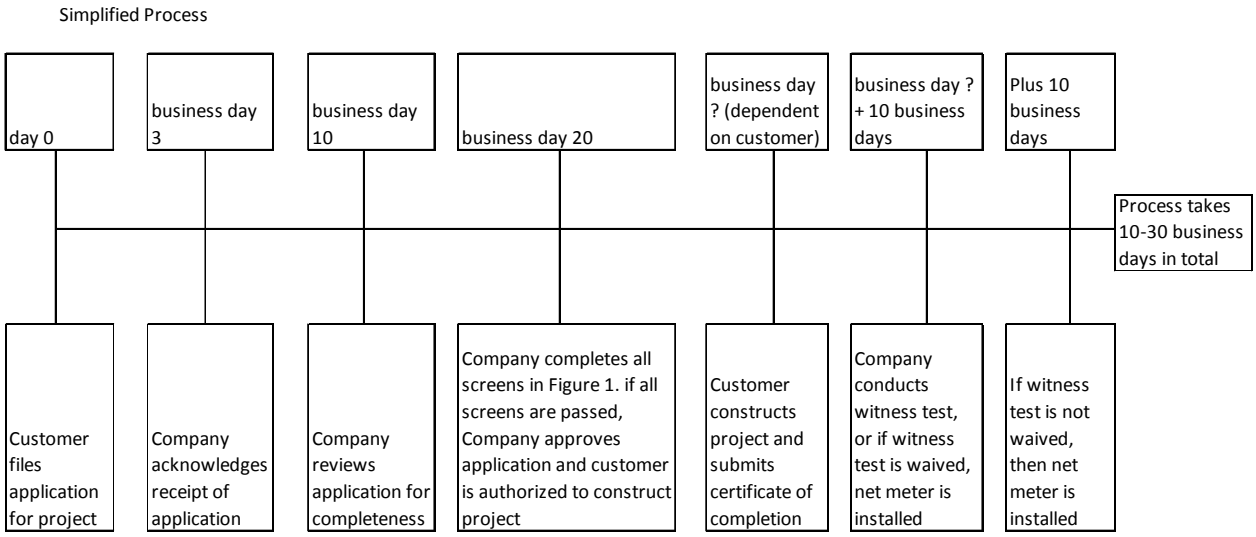
For example, the Simplified process works as follows:

1) A customer submits an application for interconnection to the Company. Within three business days after receipt of the application, the Company acknowledges that it has received the application.

2) Within 10 business days after receipt of the application, the Company informs the customer regarding whether the application is complete. If the application is not complete, the Company informs the customer why it is not complete.

3) The Company then reviews the screens in Figure 1, Sheet 19 of the tariff within an additional 10 business-day period. If the project passes all of the screens, the Company approves the application and the project follows the steps according to Section 3.1(c) through Section 3.1(h) of the tariff. This timeline is dependent on the customer completing construction of the proposed project. Please see the timeline for the Simplified process below:

COMM 6-21, page 2



The other processes (Expedited, Standard, Simplified Spot Network) are similar, but have other reviews or studies (Impact, Detailed) as shown in the timelines as seen in Table 1, Sheet 24 of the tariff. The total maximum days for the other projects are shown in the "Total Maximum Days" line.

COMM 6-22

Request:

Exhibit C-Expedited/Standard Process Interconnection Application. Purpose of Generating Facility. Sheet 63. Define "grounding bank."

Response:

A grounding bank is typically used to provide a neutral point for ungrounded electric distribution systems and is essentially a type of connection from a point on the electric system to the earth for safety purposes.

For distributed generation (DG), a grounding bank provides a means to "effectively ground" DG sites, which assists with mitigating transient over-voltages during single, line-to-ground faults, or when the Company's electric distribution system ground is removed due to a fault. A "fault" on the distribution system is an event that adversely affects the system, such as a short circuit (animal or vegetation contact, car accident, etc.).

During the impact study process for DG installations, the Company reviews whether it will require the customer to effectively ground the DG site.

COMM 6-23

Request:

Exhibit H-Interconnection Service Agreement. Section 5.2. Final Accounting. Sheet 77. Describe any and all circumstances in which Company work orders would be "closed" beyond 90 business days after completion of construction and installation of system modifications. Also, define "closed" as it is used in this section.

Response:

Work orders for construction work are kept open to account for any additional charges to the project after the physical work in the field has been completed. Some examples include creating drawings of the modified equipment for proper record keeping, coordination and execution of the witness test, installation of the meter, review of compliance documentation, granting of Authority to Interconnect, and, if contractors are involved in performing some of the work, receiving and processing contractor invoices for services rendered. The Company works diligently to assure that all charges are processed within the 90-day period, but occasionally some are not. In the event that some of these activities are not completed until after the work in the field has been completed, there can be occasions where final charges are not charged to a work order until after the 90-day period has ended.

A work order is "closed" after all charges to the project have been properly charged to the work order. Once a work order is closed, the Company can complete its recording of the capital-related work as plant in-service.

See the Company's response to COMM 6-24 for additional details regarding the closing of work orders.

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COMM 6-24

Request:

Exhibit H-Interconnection Service Agreement, Section 5.2. Final Accounting, Sheet 77. Have the closing of work orders ever been the cause of the Company not meeting the 90 day deadline for final accounting? If yes, how many times has this happened since 2011?

Response:

The closing of work orders has contributed to the Company not meeting the 90-day deadline for final accounting. The processing of DG projects involves numerous internal groups (e.g. Technical Sales and Service, Retail Connections Engineering, Design Engineering, Overhead Lines, Underground, Substation Maintenance, Meter Engineering, Telecom, etc.), as well as third-party contractors (collectively "Required DG Project Processors") each with their own assigned task(s). Work orders for a project cannot be closed out until all Required DG Project Processors have completed their task(s) and posted their charges to the work order(s).

Importantly, there are Company tasks required to process the DG project that occur after the construction and installation of the System Modifications (e.g., coordination and execution of the witness test, installation of the meter, review of compliance documentation, and granting of Authority to Interconnect). In addition, when third-party contractors are involved, there may be delays in the posting of charges pending the receipt of invoices from such contractors. As such, under the current Section 5.2 Final Accounting provisions, there is a gap of time between when the 90-day final accounting period commences (i.e., after completion of the System Modifications) and when the Company is actually able to commence the reconciliation (i.e., after all charges have been posted by the Required DG Project Processors and the work order(s) are closed), which contributes to the need for additional time to reconcile DG project costs in some cases.

Because there are complicated reconciliation steps beyond the closing of the work orders, it is difficult to identify how many times in 2011 the closing of work orders was the sole factor (as opposed to a contributing factor) for the Company not meeting the 90-day deadline. For example, final accounting requires the Company to reconcile multiple charges within multiple accounting and work management systems, which is a significant and time-consuming undertaking given the number of Required DG Project Processors. The Company's proposed language in Section 5.2, is intended to resolve the gap (which is lost processing time for the

Company) between when the period for final accounting commences and when the Company is actually able to begin the cost reconciliation.[1]

[1] For reference only, the Company notes that Massachusetts Electric Company and Nantucket Electric Company, d/b/a National Grid, have also addressed the need for additional time to perform reconciliations. Specifically, the companies proposed a revision to the Massachusetts interconnection tariff that allows for a 120 business day time frame for final accounting, as opposed to 90 business days. Such revision is currently pending approval before the Department of Public Utilities in Docket D.P.U. 11-75.

COMM 6-25

Request:

Letter of Raquel Webster. Page 4. Section 3.6. Fee Schedules. Bullet 2. Sheet 22 contains no reference to Note 2. Please clarify.

Response:

In the Company's filing, it inadvertently listed note 3 ahead of note 2 in Figure 1. Note 2 refers to screen 5, and note 3 refers to screen 3. The Company will correct the order of notes 2 and 3 when it files a compliance tariff.

Prepared by or under the supervision of: Timothy R. Roughan

COMM 6-26

Request:

The Company agreed in this docket to conduct an accepted projects conference following each distributed generation enrollment. (Summary of Interim Orders, November 12, 2014). Identify the tariff provision or rule where this requirement can be found.

Response:

The Company's agreement to conduct an accepted projects conference following each distributed generation (DG) enrollment is not contained in either the Company's tariff or its DG standard contract enrollment rules. In response to the April 30, 2014 Mediation/Nonbinding Arbitration Summary and Recommendations in this docket, the Company indicated in its letter dated May 14, 2014 that it agreed with the recommendation to conduct an accepted projects conference following each DG standard contract enrollment and that it would notify customers of the accepted projects conference upon transmittal of the executed DG standard contract. On October 8, 2014, the Company conducted an accepted projects conference (referred to as a DG Standard Contract Project Milestone Conference Call) for its second 2014 DG standard contract open enrollment awardees. On January 13, 2015, the Company conducted an accepted projects conference for the third 2014 DG standard contract open enrollment awardees. Under its Renewable Energy Growth Program, the Company will also conduct an accepted projects conference for customers that successfully enroll in this new program. There is no specific tariff provision pertaining to this conference, but the Company has agreed to conduct these conferences going forward.

COMM 6-27

Request:

The Company agreed in this docket to conduct a routine scoping meeting with all distributed generation enrollees. (Summary of Interim Orders, November 12, 2014). Identify the tariff provision or rule where this requirement can be found.

Response:

Section 3.4 of the tariff (Sheet 16) contains the provision regarding the Company's agreement to conduct a scoping meeting/discussion.

Prepared by or under the supervision of: Timothy R. Roughan

COMM 6-28

Request:

The Company agreed in this docket to provide an itemization of impact study costs whenever it attempts to collect costs in excess of the statutory fee. (Summary of Interim Orders, November 12, 2014). Identify the tariff provision or rule where this requirement can be found.

Response:

In Exhibit F, paragraph 7, Final Accounting, the Company will provide an accounting of all costs for the impact study. This can be found on Sheet 71, item F of the tariff, which is part of the "Impact Study or ISRDG Agreement" that begins on Sheet 70 of the tariff.

COMM 6-29

Request:

The Company agreed in this docket to inform customers of their right to request a final accounting on the billing invoice and interconnection service agreement. (National Grid's Letter to Commission, page 2, Section III (4). August 6, 2014). The purpose of the agreed upon revision was to ensure that customers would receive a final accounting in all circumstances, and not just when interconnection costs exceeded estimates. Explain how the proposed revision to Section 5.2 of the Interconnection Service Agreement (Sheet 77) achieves this purpose. Also, verify compliance with this agreement by producing a written document which clearly shows that the Company is in fact notifying customers of their right to request a final accounting in the billing invoice.

Response:

National Grid removed "Upon request by the Interconnecting Customer" from the beginning of Section 5.2. For all Interconnection Service Agreements (ISAs), which include System Modifications, the customer will receive a Final Accounting Report as described in Section 5.2.

National Grid has informed three out of the five customers that had advanced to a fully executed ISA since August 6, 2014 of their right to request a final accounting by adding an attachment to the ISA (see below example). National Grid did not include the same information on invoices to these customers. The Company understands that it must provide this additional notice to Interconnecting Customers until the revised tariff is approved.

Additional training was provided to ensure that no other omissions of additional attachment to ISA's will occur.

Please see the following final accounting language from an ISA that the Company issued recently:

Attachment 6: Section 5.2 Final Accounting
Within Section 5.2 of this document the process to request a final accounting report of the completed project is detailed and made available to the Interconnecting Customer. The request must be made to the Company within 90 days after completion of the construction and installation of the System Modifications to the Company's Electric Power System(EPS).

Prepared by or under the supervision of: Timothy R. Roughan