

October 9, 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 9**

Dear Ms. Massaro:

On behalf of National Grid¹, I have enclosed responses to the Rhode Island Public Utilities Commission's ninth set of data requests in the above-referenced matter.

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

Very truly yours,



Raquel J. Webster

Enclosures

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

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

Certificate of Service

I hereby certify that a copy of the cover letter and/or any materials accompanying this certificate was electronically transmitted to the individuals listed below. Copies of this filing will be hand delivered to the RI Public Utilities Commission and to the RI Division of Public Utilities and Carriers.

October 9, 2015

Raquel J. Webster

**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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The Narragansett Electric Company
d/b/a National Grid
R.I.P.U.C. Docket No. 4483
In Re: Distributed Generation Interconnection Dispute between
Wind Energy Development, LLC, ACP Land, LLC and
The Narragansett Electric Company
Responses to Commission's Ninth Set of Data Requests
Issued on October 7, 2015

COMM 9-1

Request:

Does National Grid currently compare system upgrades required for a generator interconnection against the Company's current area construction work plans to determine if there are common modifications that can reduce the cost to the generator customer? This was recommended on p. 13 of Greg Booth's Report.

Response:

Yes. During the course of the study process the Company conducts, it reviews proposed work in the area to determine which components of the new construction will be charged to the customer versus what the Company expects to include in rates as system improvements, which is work that the Company concludes is a benefit to all customers.

The Narragansett Electric Company
d/b/a National Grid
R.I.P.U.C. Docket No. 4483
In Re: Distributed Generation Interconnection Dispute between
Wind Energy Development, LLC, ACP Land, LLC and
The Narragansett Electric Company
Responses to Commission's Ninth Set of Data Requests
Issued on October 7, 2015

COMM 9-2

Request:

Is the website for the REG program up and running as of right now, and if so, is the accepted projects conference mentioned on the website? This is referenced in the response to COMM 6-26 and COMM ~~6-27~~ 7-3.

Response:

Yes. The RE Growth Program website is up and running, and the Company references the accepted bidders conference on the website.

The Narragansett Electric Company
d/b/a National Grid
R.I.P.U.C. Docket No. 4483

In Re: Distributed Generation Interconnection Dispute between
Wind Energy Development, LLC, ACP Land, LLC and
The Narragansett Electric Company
Responses to Commission's Ninth Set of Data Requests
Issued on October 7, 2015

COMM 9-3

Request:

This question relates to the Chart provided in COMM 7-6 (Page 2 of 2). Referring to this chart, please compare the number of applications to interconnect to projects that have interconnected. Upon review of this comparison, can the Company verify that, with the exception of Simple Solar Applications (which is 60%), there is an interconnection rate of 50% or less, meaning that only half of the projects that applied, actually interconnected. If this is correct, do these numbers signify a problem with the interconnection process?

Response:

It is correct that there is an interconnection rate of 50% or less for interconnection projects not including simple solar applications. These numbers do not, however, signify a problem with the interconnection process for several reasons. Some of the key reasons are as follows:

1. Many projects are not financially viable. Once a project is studied, the customer then makes a determination regarding whether it wants to move forward with the project. This usually requires determining whether the project is financially viable (i.e., can the project be financed or not?). If it cannot be financed, then the project does not complete the interconnection process.
2. The Company does not allow stale projects to stay in the interconnection process. One purpose of the interconnection process is to minimize 'stale' projects. These are projects that are not moving forward for a variety of reasons. If the Company allows 'stale' projects to stay in the interconnection process, it will greatly complicate studies for projects in the same area, and developers of future projects would have to pay more for interconnections if stale projects remain in the queue.
3. The Company routinely cancels projects when customers do not meet the required deadlines. This allows viable projects to move forward faster.

The Narragansett Electric Company
d/b/a National Grid
R.I.P.U.C. Docket No. 4483
In Re: Distributed Generation Interconnection Dispute between
Wind Energy Development, LLC, ACP Land, LLC and
The Narragansett Electric Company
Responses to Commission's Ninth Set of Data Requests
Issued on October 7, 2015

COMM 9-4

Request:

This question relates to Sec. ~~2.2~~ 2.0 of the Redlined Tariff, Sheet 9. The edit shows that a reference to "Detailed Study" was removed. The explanation given for that edit (Raquel Webster cover letter, p.2) was that this reference was best explained in Sec.3.3 ("Feasibility Study"). There appears to be no reference to Detailed Study in Sec. 3.3. Since it is not explained in Sec. 3.3, what then was the purpose of deleting the reference to Detailed Study.

Response:

The reference to a Detailed Study is in section 3.4 (3)(e) of the Tariff. The Company deleted the reference to "Detailed Study" in section 2.0 of the Tariff because this section relates to the basic understandings of the tariff, and the Company did not intend to include any references to a Detailed Study in this section.

The Narragansett Electric Company
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R.I.P.U.C. Docket No. 4483
In Re: Distributed Generation Interconnection Dispute between
Wind Energy Development, LLC, ACP Land, LLC and
The Narragansett Electric Company
Responses to Commission's Ninth Set of Data Requests
Issued on October 7, 2015

COMM 9-5

Request:

This question relates to Sec. 3.0 ("Process Overview"). Explain the reason for this edit in the opening paragraph. Raquel Webster's cover letter merely says that it "clarifies the applicability of time frames" in Tables 1 and 2.

Response:

Based on the Company's experience, the Company made this edit to further clarify that the timelines apply only to the interconnection process up to the delivery of an executable interconnection service agreement and not to the entire interconnection process.

The Narragansett Electric Company
d/b/a National Grid
R.I.P.U.C. Docket No. 4483

In Re: Distributed Generation Interconnection Dispute between
Wind Energy Development, LLC, ACP Land, LLC and
The Narragansett Electric Company
Responses to Commission's Ninth Set of Data Requests
Issued on October 7, 2015

COMM 9-6

Request:

Do the edits contained in the following sections change the Company's existing practice with respect to interconnection, or do they merely clarify existing practice?

Sec. 3.0 ("Process Overview"), second paragraph, following the 4 numbered paragraphs.

Sec. 4.2.1 ("General Requirement"), Sheet 29.

Sec.8.1 ("Metering, Related Equipment and Billing Options"), Sheet 42. Specifically, is the following language a substantive change or clarification of existing practice: "Any existing Company meter on the Interconnecting Customer's premise will be changed to an interval meter and will require remote access as outlined below."

Response:

- a. Sec 3.0 – The Company's revision to the *Process Overview* provision in section 3.0 of the Tariff solely clarifies the existing process. Specifically, a customer can either pay an application fee or the Feasibility Study fee if they elect to have the Company perform a Feasibility Study.
- b. Sec 4.2.1 – The Company's revision to the *General Requirements* provision in section 4.2.1 of the Tariff solely clarifies the existing process. The Company has a system-wide Electric Service Bulletin (ESB) # 756, which is modified for each state in which the Company does business. ESB 756-D is the Rhode Island version of the standard. Since the IEEE and UL standards referenced in section 4.2.1 are voluntary, the Company reserves the right to use its own standards (specifically, ESB # 756), which have been developed over many years.
Sec 8.1 – The Company's revision to the *Metering, Related Equipment, and Billing Options* provision in section 8.1 of the Tariff reflects a change to the Company's existing practice. The Company made this revision to comply with the requirements of the Renewable Energy Growth Law, R.I. Gen. Laws § 39-26.6-1 et seq. This section relating to meters applies where a parallel meter is required for the generation output. Because the generator meter requires remote access to allow for reporting of renewable energy

The Narragansett Electric Company
d/b/a National Grid
R.I.P.U.C. Docket No. 4483
In Re: Distributed Generation Interconnection Dispute between
Wind Energy Development, LLC, ACP Land, LLC and
The Narragansett Electric Company
Responses to Commission's Ninth Set of Data Requests
Issued on October 7, 2015

COMM 9-6, page 2

Certificates to the NEPOOL GIS and to the generation asset at the ISO, the Company elected to require all meters on the site to have remote access.

The Narragansett Electric Company
d/b/a National Grid
R.I.P.U.C. Docket No. 4483
In Re: Distributed Generation Interconnection Dispute between
Wind Energy Development, LLC, ACP Land, LLC and
The Narragansett Electric Company
Responses to Commission's Ninth Set of Data Requests
Issued on October 7, 2015

COMM 9-7

Request:

Does the Company believe the phrase “operate in parallel” is readily understandable to all prospective interconnection customers? If not, is the Company willing to include a definition of “operate in parallel” in Sec.1.2?

Response:

The phrase “operate in parallel “ is a standard industry term relating to interconnections and which is also used in the IEEE 1547 standard. The Company is willing to further revise the Tariff to include the following definition of *Operate in Parallel*:

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. Note that this is consistent with the definition the Company provided in its response to PUC data request 6-12 in this docket.

The Narragansett Electric Company
d/b/a National Grid
R.I.P.U.C. Docket No. 4483
In Re: Distributed Generation Interconnection Dispute between
Wind Energy Development, LLC, ACP Land, LLC and
The Narragansett Electric Company
Responses to Commission's Ninth Set of Data Requests
Issued on October 7, 2015

COMM 9-8

Request:

This question relates to Sec.3.4, Sheet 17, Paragraph (h). Does this edit mean that if a customer does not request an ISA, it will not receive one regardless of the fact that it has completed all necessary studies? If yes, is this a substantive change to the Company's existing practice or merely a clarification of existing practice?

Response:

Yes. The Company's revision to Section 3.4, Sheet 17, Paragraph (h) means that if a customer does not request an ISA, then it will not receive one even if the customer has completed all necessary studies. This revision is a clarification of the Company's existing practice. There are many occasions where the expected cost of the DG project and/or the costs to interconnect make the project not financially viable. In addition, local zoning or permitting issues may stop a project from moving forward. Since it is a time-consuming process for the Company to prepare ISAs, the Company is merely asking the customer to confirm that they plan to move forward with the project before the Company begins the process of preparing an ISA.

The Narragansett Electric Company
d/b/a National Grid
R.I.P.U.C. Docket No. 4483
In Re: Distributed Generation Interconnection Dispute between
Wind Energy Development, LLC, ACP Land, LLC and
The Narragansett Electric Company
Responses to Commission's Ninth Set of Data Requests
Issued on October 7, 2015

COMM 9-9

Request:

This question relates to Sec. 5.2 ("Interconnection Equipment Costs"). Explain the meaning and effect of this edit, including its reference to the new definition of System Improvement on Sheet 7, and exactly how it will change the current interconnection process.

Response:

The Company's edit to the Interconnection Equipment Costs provision in section 5.2 of the Tariff is a clarification of the Company's existing practice of charging customers only for costs to interconnect the DG. If the Company either has other planned work, or, during the course of the study, determines that some equipment needs to be replaced in the area where work is to be performed (i.e., a pole is past its useful life), the Company would replace or upgrade these pieces of equipment and not charge the customer for this other work.

The Narragansett Electric Company
d/b/a National Grid
R.I.P.U.C. Docket No. 4483
In Re: Distributed Generation Interconnection Dispute between
Wind Energy Development, LLC, ACP Land, LLC and
The Narragansett Electric Company
Responses to Commission's Ninth Set of Data Requests
Issued on October 7, 2015

COMM 9-10

Request:

What does National Grid perceive to be the 3 most important tariff revisions in this filing and why?

Response:

The Company perceives the following as the three most important Tariff revisions:

1. *Expanding the simplified process, which will allow projects of up to 15 kW single phase to be reviewed and approved instead of having to go through the expedited process.* This revision is customer-friendly, assists customers with moving through the interconnection process quickly, and, in turn, results in more renewable energy projects in Rhode Island.
2. *Expanding the penetration screen from 7.5% to 15% to allow more projects to be reviewed without an impact study.* This is another example of a change that will further simplify the interconnection process for customers and, in turn, encourage more renewable energy projects in Rhode Island.
3. *Clarifying a number of items in the Tariff based on customer feedback during the working group process and issues raised by customers who have worked with the previous version of the Tariff.* As reflected in the proposed revised Tariff, the Company made several clarifying edits to the Tariff. It was important for the Company to incorporate as much feedback as possible from stakeholders during the Tariff workshops and DG seminars, and the Company believes that the proposed Tariff reflects this feedback.