

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

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| <p>The Narragansett Electric Co. d/b/a National Grid) - Proceeding to Establish a Pilot Metering) Program for Municipal-Owned Streetlights)</p> | Docket # 4513 |
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**MOTION TO REOPEN AND OBJECTION
BY PRISM STREETLIGHTS, INC. d/b/a PRISM
AND THE RI LEAGUE OF CITIES AND TOWNS**

By its attorneys, Prism Streetlights, Inc. (PRISM) and the Rhode Island League of Cities and Towns (collectively the “Municipalities”), moves to reopen this docket pursuant to Rule 1.26 and objects to National Grid’s November 20, 2017 filing determining that metering municipally owned streetlights is not cost effective.

To date PRISM has installed or has queued for installation some 34,829 metering controls for ten municipalities for a total investment exceeding \$4.7 million. This investment will produce energy savings exceeding 6.6 million kWh per year from the dimming controls alone.

The Municipalities object to flaws in the metering study and its conclusions. The study has many flaws, including improperly loading the metering chips and using an incorrect and inadequate methodology to compare their results to the current unmetered rate. The Municipalities have asked the metering controller manufacturers to help in preparing a detailed technical response. One issue that has prevented us from completing our work is that National Grid tested controllers manufactured by several companies but does not reveal which system produced which results. On November 29 PRISM asked John Walter at National Grid to link specific products to specific results. On November 30, Mr. Walter responded: “I wanted to let you know that the Company is in receipt of

your email request and will be getting back to you shortly regarding this matter.” To date, more than a month later, we have received no such response. Therefore, manufacturers cannot properly analyze or respond to the report.

Simply put, metering promises to give the Municipalities full control over the operation and cost of operating their streetlights. Utilizing these metering chips that are already in place will mean that National Grid does not have to be sent spreadsheets of light by light changes in operating parameters and then would not have to manually make changes to each and every light. The Municipalities know very well that they can achieve greater efficiency of operation through metering, where they are simply charged for the electricity consumed at their municipal streetlights. Metering is also the means by which Municipalities can justify the cost of implementing controls that provide much greater capacity for grid modernization and smart cities. The Municipalities have already realized substantial benefits from the installation of metered controls but cannot obtain all the potential cost savings from metering until metering is approved by the Commission. The Municipalities therefore respectfully ask the PUC to reopen this proceeding, take testimony needed to correct the investigation, and authorize metering for municipal streetlights.

Respectfully submitted,

PRISM STREETLIGHTS, INC. AND THE
RHODE ISLAND LEAGUE OF CITIES AND
TOWNS

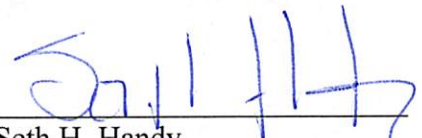
By their attorney,



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CERTIFICATE OF SERVICE

I hereby certify that on January 17, 2018, I sent a true copy of the document by electronic mail to the PUC and the service list and filed the original pleading and 9 photocopies with the PUC.


Seth H. Handy