



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Administration
DIVISION OF LEGAL SERVICES
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February 26, 2015

VIA FIRST CLASS MAIL AND ELECTRONIC MAIL:

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

RE: National Grid Tariff Advice Filing for Renewable Energy Growth Program
[RE Growth Program] and Solicitation & Enrollment Process Rules
(Docket No. 4536A)

Dear Ms. Massaro:

Enclosed for filing on behalf of Rhode Island Distributed Generation Board ("Board") and the Office of Energy Resources ("OER"), is an original and ten (10) copies pertaining to the above mentioned matter.

Sincerely,

Daniel W. Majcher, Esq.

DWM/njr

Enclosure

c. Docket 4536A Service List



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February 26, 2014

SENT VIA FIRST CLASS MAIL AND ELECTRONIC MAIL:

Amy D'Alessandro, Esq.
Public Utilities Commission
89 Jefferson Blvd.
Warwick, Rhode Island 02888

RE: National Grid Tariff Advice Filing for Renewable Energy Growth Program (RE Growth Program) and Solicitation & Enrollment Process Rules (Docket No. 4536A)

Dear Ms. Massaro:

On behalf of the Rhode Island Distributed Generation Board ("Board") and the Office of Energy Resources ("OER"), please accept the following comments in regards to the above mentioned docket:

Overall, the Board and OER found the discussion on the various issues between the parties on Thursday, February 12, 2015, beneficial. These discussions provided clarity and narrowed the issues for determination related to the Renewable Energy Growth ("REG") tariff enrollment and rules and regulation documents. The two matters that the OER raised to the parties during these discussions included:

1. Clarifying the REG project extension language options within the rules and regulations, which would protect the utility, the renewable energy developer and the property owner in the event of an unexpected delay not related to interconnection.
2. The DG Board respectfully disagrees with the request of Wind Energy Development ("WED") that a "Zonal Incentive" be established in the 2015 REG program. The Zonal Incentive matter was discussed by the OER, National Grid and the DG Board this past summer at the start of the development of the 2015 program and associated ceiling prices. It was determined that because of tight timeframes for implementation of the 2015 program, National Grid would examine the inclusion of Zonal Incentives for the 2016 program.

We respectfully request that the Rhode Island Public Utilities Commission consider these comments.

Sincerely,

Daniel W. Majcher, Esq.

DWM/njr

c. Kenneth Payne
Christopher Kearns
Service List 4536A