

March 2, 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 4536-A - Tariff Advice Filing for Renewable Energy Growth Program and Solicitation and Enrollment Process Rules
Response to PUC Data Requests – Set 3

Dear Ms. Massaro:

On behalf of National Grid¹, I am enclosing the Company's response to the third set of data requests issued by the Rhode Island Public Utilities Commission in the above-referenced proceeding.

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

Very truly yours,



Raquel J. Webster

Enclosures

cc: Docket 4536-A Service List
Steve Scialabba, Division
Leo Wold, Esq., Division

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

Service List

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

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

March 2, 2015

Date

Docket No. 4536-A National Grid Tariff Advice Filing for Renewable Energy Growth Program (RE Growth Program) and Solicitation & Enrollment Process Rules for 2015

Docket No. 4536-B RI Distributed Generation Board (DG Board) Report and Recommendation Regarding 2015 Renewable Energy Growth Classes, Ceiling Prices and Targets

Service List updated 1/9/15

Parties' Name/Address	E-mail	Phone
Celia B. O'Brien, Esq. Raquel J. Webster, Esq. National Grid 280 Melrose Street Providence, RI 02907	Celia.obrien@nationalgrid.com	781-907-2153
	Raquel.webster@nationalgrid.com	781-907-2121
	Joanne.scanlon@nationalgrid.com	
	Amy.tabor@nationalgrid.com	
	Jeanne.lloyd@nationalgrid.com	
Daniel W. Majcher, Esq. (for DB Board) Dept. of Administration Division of Legal Services One Capitol Hill, 4 th Floor Providence, RI 02908	Daniel.majcher@doa.ri.gov	401-222-8880
	Marion.Gold@energy.ri.gov	
	Christopher.Kearns@energy.ri.gov	
	Nicholas.ucci@energy.ri.gov	
Jon Hagopian, Sr. Counsel Division of Public Utilities and Carriers 89 Jefferson Blvd. Warwick, RI 02888	Jhagopian@dpuc.ri.gov	401-784-4775
	Sscialabba@dpuc.ri.gov	
	Acontente@dpuc.ri.gov	
	Jshilling@dpuc.ri.gov	
Richard Hahn Lacapra Associates 1 Washington Mall, 9th floor Boston, MA 02108	rhahn@lacapra.com	
	apereira@lacapra.com	
Karen Lyons, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	Klyons@riag.ri.gov	401-222-2424
	dmacrae@riag.ri.gov	
	jmunoz@riag.ri.gov	
Seth H. Handy, Esq. (Wind Energy Dev.) Handy Law, LLC 42 Weybosset St. Providence, RI 02903	seth@handylawllc.com	401-626-4839

COMM 3-1

Request:

Please see National Grid's First¹ and Second² 2013 DG Open Enrollment Reports, and the Renewable Energy Resources eligibility applications for the following projects enrolled in the DG program during those solicitation periods:

All American Foods³
T.E.A.M. Inc. Solar⁴
Steere Electric⁵

Note that the location of these projects changed from the time of their enrollment to the time they applied for qualification with the PUC.

- a. Is the Company aware of what caused the projects' addresses to change?
- b. In any of these cases, was the contract amended because of the change of address?
- c. Can a Certificate of Eligibility, as proposed in the RE Growth Program, be amended for reasonable changes project siting?
- d. How will the anti-segmentation rules and the Certificate of Eligibility proposed in the RE Growth Program allow for reasonable changes in siting a project while protecting against segmentation abuse?

Response:

- a. The source of the addresses provided in National Grid's Enrollment Reports are the Standard Contracts executed by the Company with the respective counterparties. The counterparties provide project information in their enrollment applications, which ultimately is reflected in the final contract executed by the parties.

The Company has contacted the counterparties for the projects referenced above and the cause for each address change is described below. The physical locations of the three referenced projects have not changed.

¹[http://www.ripuc.org/eventsactions/docket/4277-NGrid-DG-Mar2013-Enrollment\(4-25-13\).pdf](http://www.ripuc.org/eventsactions/docket/4277-NGrid-DG-Mar2013-Enrollment(4-25-13).pdf)

²[http://www.ripuc.org/eventsactions/docket/4277-NGrid-2ndEnrollment\(10-24-13\).pdf](http://www.ripuc.org/eventsactions/docket/4277-NGrid-2ndEnrollment(10-24-13).pdf)

³ http://www.ripuc.org/eventsactions/docket/4508-All_American_Solar_App_6-12-14.pdf

⁴ http://www.ripuc.org/eventsactions/docket/4510-TEAM-Application_6-25-14.pdf

⁵ [http://www.ripuc.org/eventsactions/docket/4519-Steere-RES-App\(8-25-14\).pdf](http://www.ripuc.org/eventsactions/docket/4519-Steere-RES-App(8-25-14).pdf)

COMM 3-1, page 2

All American Foods

The Standard Contract lists the project address at 65 All American Way. Leon Panteleos, President/Manager, All American Foods indicated that the address is "65 All American Way". All American Foods listed the address as "One All American Way" on the Renewable Energy Resource eligibility application since that facility is the only one that exists on that road.

T.E.A.M. Inc. Solar

The Standard Contract lists the project address at 811 Park East Drive. T.E.A.M. Inc. notified the Company that the address should be corrected to "841 Park East Drive" during the interconnection process. The Company has noted the address change to file.

Steere Electric

The Standard Contract lists the project address at 100 John Steere Road. Scott Milnes, Developer/Engineering Procurement & Construction (EPC) Manager of the Steere Electric project indicated that the project is located at "100 John Steere Rd". The Point of Interconnection (POI) to the utility pole is located at "77 Victory Highway" as referenced in the Renewable Energy Resource eligibility application.

- b. The addresses reflected in the Standard Contracts for All American Food and Steere Electric are correct. The T.E.A.M. Inc. project has already achieved commercial operation, established in the Company financial systems, and is receiving monthly payments for its monthly generation. The Company has noted the address change in its files and an amendment to the contract is not necessary.
- c. Yes. The Certificate of Eligibility can be corrected and updated for reasonable changes.
- d. The Certificate of Eligibility can be corrected and updated for reasonable changes. Under no circumstance can a Certificate of Eligibility be amended for an address change if such change results in violation of the segmentation rules or any other requirements under the tariff. Projects were screened for eligibility under the anti-segmentation rules of the DG Standard Contracts program, and will continue to be screened for eligibility under the anti-segmentation rules of the RE Growth Program enrollment process rules and tariffs.