



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Rhode Island Division of  
Public Utilities and Carriers  
89 Jefferson Blvd.  
Warwick RI 02888  
(401) 941-4500

July 17, 2015

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

**RE: Docket 4536-A – Renewable Energy (RE) Growth Program  
Certifying the Rhode Island RE Growth Small-Scale Solar Aggregation as an  
Eligible Renewable Energy Resource**

Dear Luly,

The Division of Public Utilities and Carriers, (the “Division”) submits the attached comments for consideration by the Commission in its review of the proposal of National Grid in the above captioned docket.

On June 26, 2015, National Grid<sup>1</sup> made a filing seeking to comply with Renewable Energy Standard (RES), by proposing to simplify the process of certifying small-scale solar distributed generation projects that enroll in the Renewable Energy Growth Program. The Company has established a single New England Power Pool Generation System (NEGIS) asset number. In the event the PUC approves the instant filing, the Company will act as the Aggregator Owner and Verifier, for purposes of certifying an aggregation of small-scale solar projects enrolled in the RE Growth Program as Eligible Renewable Energy Resources pursuant to a single Rhode Island Certification number.

R.I. Gen. Laws § 39-26.6-12 (c) of the RE Growth Statute mandates that in the first four years of the program that a minimum of 3MW of nameplate capacity be carved out for small-scale solar projects which could potentially create an enormous number of applications seeking certification by the PUC as a Eligible Renewable Energy Resources.

It is the Division’s opinion that the concept of aggregating a large number of small-scale projects as Eligible Renewable Energy Resources under a single certification number is an efficient way to deal with this matter. Similarly, the procedure of aggregating should reduce the burden and costs to solar owners and eventually to ratepayers. Further, the Division approves of

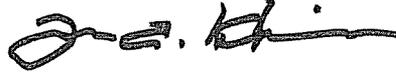
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<sup>1</sup> The Narragansett Electric Company d/b/a National Grid.

the quarterly reporting proposed to be made by the Company to the PUC relating to those projects which have been added or removed from the certified aggregation and that have reached commercial operation. Finally, the Division has no objection to the remaining recommendations set forth in the summary section on page 2 of the Company's filing letter dated June 26, 2015.

I appreciate your attention in this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jon G. Hagopian". The signature is fluid and cursive, with a prominent initial "J" and "H".

Jon G. Hagopian  
Senior Legal Counsel

cc: Thomas F. Ahern, Administrator  
Stephen Scialabba, Chief Accountant