Celia B. O'Brien
Assistant General Counsel and Director

March 13, 2015

VIA HAND DELIVERY AND ELECTRONIC MAIL

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

RE: Docket 4549 - Tariff Advice Filing to Amend RIPUC No. 2099, Net Metering Provision
Responses to PUC Data Requests – Set 2

Dear Ms. Massaro:

On behalf of National Grid[1], I enclose ten (10) copies of the Company's responses to the second set of data requests issued by the Rhode Island Public Utilities Commission (PUC) in the above-referenced docket.

Please be advised that counsel to the PUC has granted an extension of time until Monday, March 16 for the Company to file its response to Data Request PUC 2-1. Given that the Company's response to PUC 2-3, part b. refers to the Company's response to PUC 2-1, part c., the Company will endeavor to file its response to PUC 2-1 as soon as possible.

Thank you for your attention to this matter. If you have any questions regarding this filing, please contact me at 781-907-2153.

Very truly yours,

Celia B. O'Brien

Enclosures

cc: Docket 4549 Service List
Jon Hagopian, Esq.
Steve Scialabba, Division

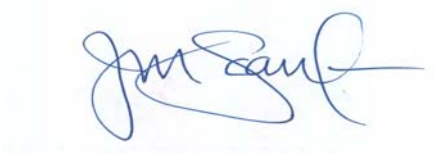
[1]The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

40 Sylvan Road, Waltham, MA 02451
T: 781-907-2153 ■ celia.obrien@nationalgrid.com ■ www.nationalgrid.com

Certificate of Service

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 the Rhode Island Division of Public Utilities and Carriers.



Joanne M. Scanlon

March 13, 2015
Date

Docket No. 4549 National Grid – Net Metering Tariff Advice
Service List updated 2/26/15

Name/Address	E-mail	Phone
Celia B. O'Brien, Esq. National Grid 280 Melrose Street Providence, RI 02907	Celia.obrien@nationalgrid.com Joanne.scanlon@nationalgrid.com Ian.springsteel@nationalgrid.com Jeanne.lloyd@nationalgrid.com	781-907-2153 781-907-2121
Jon Hagopian, Sr. Counsel Division of Public Utilities and Carriers 89 Jefferson Blvd. Warwick, RI 02888	Jhagopian@dpuc.ri.gov Sscialabba@dpuc.ri.gov Acontente@dpuc.ri.gov Jshilling@dpuc.ri.gov	401-784-4775
Karen Lyons, Esq. Dept. of Attorney General	Klyons@riag.ri.gov dmacrae@riag.ri.gov jmunoz@riag.ri.gov	401-351-1102 Ext. 2012
File an original & 9 copies w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov Cynthia.WilsonFrias@puc.ri.gov Alan.nault@puc.ri.gov Todd.bianco@puc.ri.gov Amy.Dalessandro@puc.ri.gov	401-780-2107
Nicholas Ucci, OER	Christopher.Kearns@energy.ri.gov Nicholas.ucci@energy.ri.gov	
Seth H. Handy, Esq. (Wind Energy Dev.) Handy Law, LLC	seth@handylawllc.com	401-626-4839
Jerry Elmer, Esq. Conservation Law Foundation	jelmer@clf.org	401-351-1102 Ext. 2012

PUC 2-2

Request:

The net metering statute at R.I. Gen. Laws § 39-26.4-2(13) states that the renewable net metering "credit shall be equal to the total kilowatt hours of electricity generated and consumed on-site during the billing period multiplied by the sum of the distribution company's."

a. Please explain how the Company is determining the total kilowatt hours of electricity generated and consumed on-site for a customer with a single bidirectional meter.

b. Please explain how the Company is capturing usage for purposes of the energy efficiency charge which is not part of the credit calculation where the customer has a single bidirectional meter.

Response:

a. The Company does not determine the total kilowatt-hours (kWhs) of electricity generated and consumed on-site for a customer with a single bidirectional meter.

To provide a cost-effective and efficient metering solution for net metering, the Company has, for many years, employed the use of a so-called "net" meter. This single meter is not capable of separately measuring the on-site usage and the amount of generation at a customer location at which a net metering eligible facility has been installed. This type of meter will "spin backwards" when there is more generation than load at any time during a billing month. A customer's netted usage is determined by taking the difference between the current month's meter reading and the prior month's meter reading. If, at the end of a month, there is more load than generation after this netting takes place, the Company bills the net kWhs at rates in effect during the billing month. If, at the end of a month, there is excess generation, which occurs when generation is more than load after this netting takes place, the Company multiplies this negative, or excess, kWh[1] by the (i) standard offer service kWh charge for the rate class applicable to the net metering customer; (ii) distribution kWh charge; (iii) transmission kWh charge; and (iv) transition kWh charge to calculate a net metering credit for that particular month.

As explained in the Company's response to PUC 1-4, for purposes of determining whether the customer's annual generation has exceeded on-site usage, the Company considers the "billing period" to be a 12-month period. Therefore, on an annual basis, the

[1] In this case, the current month's meter reading is less than the prior month's meter reading because the meter "spins backwards" and results in a net negative kWh amount.

Company reviews each account to ensure that no excess generation has occurred during the 12-month period. If there is excess generation at the end of the period, the Company will re-value the excess generation at the standard offer service rate, as required by the Net Metering Provision, and charge the customer for the difference between (1) the Renewable Net Metering Credit that had been credited to the customer's account over the 12 months and (2) the Standard Offer Service rate multiplied by the excess generation.

b. As the response to part a. above indicates, the Company does not capture usage except for that amount of usage that exceeds the amount of generation in a monthly billing period. Any net usage that is billed during the month would be assessed the Energy Efficiency Program charge.

PUC 2-3

Request:

For the customer identified in PUC-1-5, please clarify that the customer is receiving bills for the total usage for each of the 44 accounts.

a. Please explain how the value for the "total kilowatt hours of electricity generated and consumed at on-site" is determined for the customer identified in PUC-1-5.

b. Using one month of data, please show how the net metering credits are calculated for purposes of providing the check. (Please provide bills for that month and a calculation of the credit as it is done to issue the check).

Response:

The customer identified in the Company's response to PUC 1-5 is receiving bills for each of the 44 accounts.

a. The Company does not determine the total kilowatt hours (kWhs) of electricity generated and consumed on-site for a customer with a single, bi-directional meter. The project for the customer identified in the Company's response to PUC 1-5 involves a stand-alone wind turbine that has a net meter similar to the one described in the Company's response to PUC 2-2, the difference being that the customer's meter is an interval meter that reads two channels for kWhs. One channel reads the amount that is used on-site, and the other channel reads the amount that is exported. Each channel reads the net usage. That is, if the project is generating electricity, and the on-site use is more than the generated amount for any five-minute window, then the channel reading use on-site reads the net of the generated amount and the on-site use. If there is more electricity generated than used on-site, the net amount is recorded in the export channel.

   The Company then adds amounts from the two channels together to record usage for a monthly billing period. As there is minimal parasitic load for a stand-alone wind turbine, there is usually more electricity generated than used on-site. The Company calculates the credit for the excess generation using the (i) standard offer service kWh charge for the rate class applicable to the net metering customer; (ii) distribution kWh charge; (iii) transmission kWh charge; and (iv) transition kWh charge.

b. Please see the Company's response to PUC 2-1, part c.

Prepared by or under the supervision of: Timothy R. Roughan

PUC 2-4

Request:

Are customers who are receiving checks in lieu of bill credits receiving a lower credit than those who are receiving the bill credits where that customer has a behind-the-meter net metering system and a single bidirectional meter?

Response:

No. A credit is only issued to customers where the amount of generation exceeds the on-site use. The Company does not separately bill for the kilowatt-hours (kWhs) that were consumed on-site and apply a credit for those kWhs that the customer self-generated. For example, if a customer generates the same quantity of kWhs that they used on-site during a month, the meter would register no kWh usage, and, therefore, there would be no kWhs to bill. A customer on an energy-only rate (i.e., Rate A-16 or Rate C-06) would be billed only the monthly customer charge. There is inherent value in not being billed for any kWhs in a given month by the customer avoiding a cost through his/her electric bill, but no credits are calculated associated with that value. Credits are only calculated monthly for generation in excess of usage.

Prepared by or under the supervision of: Timothy R. Roughan

PUC 2-5

Request:

If the response to PUC 2-5 is in the affirmative, please indicate what steps the Company has taken to rectify this situation. If the response to PUC 2-5 is in the negative, please explain why not. Use examples, if necessary for clarity.

Response:

Please see the Company's response to PUC 2-4.