

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: Review of the Narragansett
Electric Co. d/b/a National Grid
Rate Design Pursuant to RIGL § 39-26.6-24

Docket No. 4568

**CONSERVATION LAW FOUNDATION'S
DATA REQUESTS (SECOND SET) DIRECTED TO
NARRAGANSETT ELECTRIC COMPANY D/B/A NATIONAL GRID**

Issued August 17, 2015

Definitions

CLF incorporates by reference the definitions included in its Data Requests (First Set), dated August 13, 2015.

“REC” (or “RECs”) means Renewable Energy Certificate(s) described in Rhode Island’s Renewable Energy Standard, R. I. Gen. Laws §39-26-2(13).

Data Requests

2-1. National Grid’s Schedule NG-2 [National Grid’s July 31, 2015 filing, page 78] is a bar graph that depicts “Growth in Use of Solar PV in Massachusetts” for each year 2009 to 2016 (with the figures for 2015 and 2016 being designated as “Forecast”). For each year depicted in this exhibit, please state the respective incentive price paid to PV owners in Massachusetts and Rhode Island under applicable state incentive programs.

2-2. National Grid’s Schedule NG-4 [National Grid’s July 31, 2015 filing, page 125] is a bar graph that compares the growth of solar PV in Germany (depicted in red bars) with the growth of solar PV in the United States (depicted in blue bars) for the years 2003 through 2012. For each year depicted in this exhibit, please state the respective incentive price paid to PV owners in Rhode Island under the applicable state incentive program(s) and the price paid that same year in Germany under that country’s incentive program(s).

2-3. National Grid’s Schedule NG-6 [National Grid’s July 31, 2015 filing, page 127] is a bar graph that depicts “Estimated Amount of Distribution [sic] Generation Installed in Rhode Island Through 2020.” Blue bars depict growth by year; red bars depict cumulative installed capacity.

Please state all assumptions that went into creating these estimates including, but not limited to, whether the Renewable Energy Growth Program would be fully subscribed every year and what the time lag would be between a project's enrollment and when that project would be operational.

2-4. Witnesses Zschokke and Lloyd state: "Advocates for the use of storage technologies argue in favor of demand rates because the rates provide economic value to the system and provide an economic opportunity to customers to consider use of storage technology." [National Grid's July 31, 2015 filing, page 21, lines 7-9.] Please direct us to the articles, books, statements or documents to which the witnesses are referring.

2.5. Witnesses Zschokke and Lloyd state: "Given this modest shift, transitioning more recovery of revenue requirement through the customer and demand charges would occur over several years." [National Grid's July 31, 2015 filing, page 23, lines 8-10.] Please amplify this statement. Specifically what future shifts does National Grid contemplate (in Rhode Island electricity distribution rates) toward customer and demand charges?

2.6. Witnesses Zschokke and Lloyd state [at National Grid's July 31, 2015 filing, at page 36, lines 12-13] "Page 2 of Schedule NG-9 [referring to page 137] shows savings realized by the same customer who reduces monthly use to 500 kWh from 1,000 kWh . . ." This hypothetical customer would be moving from National Grid's proposed Tier 3 to Proposed Tier 2. Please provide similar illustrative examples of the bill-impact results for customers who reduce monthly use but stay within the same proposed tier:

Customer A reduces from 1100 kWh/mo. to 900 kWh/mo.
Customer B reduces from 700 kWh/mo. to 500 kWh/mo.

2.7. This question addresses the proposed "Access Fee applicable to stand-alone generators" that is described in National Grid's July 31, 2015 filing, beginning at page 59, line 17. The question accepts the definition used by National Grid that stand-alone generators are "DG facilities that are directly connected to the distribution system and have no associated on-site load . . ." [*Id.*, at lines 18-19.]

(a) On July 31, 2015, how many stand-alone Qualifying Facilities were located in Rhode Island; and for each one, state the type of renewable technology it used, its nameplate capacity, and how much National Grid paid to the owner for energy, capacity and RECs during the preceding 12 consecutive months.

(b) On July 31, 2015, how many stand-alone net metered facilities were located in Rhode Island; and for each one, state the type of renewable technology it used, its nameplate capacity,

and how much National Grid paid to the owner for energy, capacity and RECs during the preceding 12 consecutive months.

(c) On July 31, 2015, how many stand-alone DG Standard Contract projects were located in Rhode Island; and for each one, state the type of renewable technology it used, its nameplate capacity, and how much National Grid paid to the owner for energy, capacity and RECs during the preceding 12 consecutive months.

2.8. Assume for this hypothetical a stand-alone generator that is a single wind turbine with a nameplate capacity of 3.5 MW and a capacity factor of 21% that is compensated at the rate approved by the PUC in Docket 4536-B. Show the monthly net and gross revenue flow for the owner under the current rate design and what the monthly gross and net revenue would be under National Grid's proposed new rate design.

2.9. Witnesses Zschokke and Lloyd refer [at National Grid's July 31, 2015 filing, at page 63, lines 12-14] to: "The advent of allowing net metered customers to allocate excess credits to other accounts also causes changes in our customer service and billing needs." On July 31, 2015, how many net metered customers in Rhode Island allocated excess credits to other accounts? For each of those customers, what was the eligible renewable energy technology of the facility, and what was the dollar value of the excess credits so assigned during the preceding 12 consecutive months?