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November 23, 2015

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

**Re: Docket 4568**

Dear Ms. Massaro:

Enclosed please find an original and nine copies of the following document:

1. Direct Testimony of Janet Gail Besser, Vice President, Policy and Government Affairs, Northeast Clean Energy Council.

Please note that an electronic copy of this document has been provided to the service list.

Thank you for your attention to this matter.

Sincerely,



Joseph A. Keough, Jr.

JAK/kf  
Enclosures  
cc: Docket 4568 Service List (*via electronic mail*)

**STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

**IN RE: REVIEW OF THE NARRAGANSETT ELECTRIC COMPANY D/B/A  
NATIONAL GRID'S RATE DESIGN PURSUANT TO R.I. GEN. LAWS § 39-26.6-4**

**Docket NO. 4568**

**PREFILED DIRECT TESTIMONY**

**OF**

**JANET GAIL BESSER  
VICE PRESIDENT, POLICY AND GOVERNMENT AFFAIRS,  
NORTHEAST CLEAN ENERGY COUNCIL**

**November 23, 2015**

**Introduction And Qualifications of Janet Gail Besser**

**Q. Please state your name and business address?**

A. My name is Janet Gail Besser and my business address is 250 Summer Street, 5<sup>th</sup> Floor,  
Boston, Massachusetts 02210.

**Q. Are you the same Janet Gail Besser who provided direct testimony on October 23, 2015, in  
this Docket?**

A. Yes I am.

**Q. What is the purpose of your testimony?**

A. The purpose of my testimony is to address the proposed distribution rate for stand-alone  
generators or "Access Fee" submitted by the Narragansett Electric Company, d/b/a National  
Grid ("National Grid" or the "Company") in this proceeding (See National Grid Joint Pre-Filed  
Direct Testimony, Bates 59-65).

**Q. On whose behalf are you submitting testimony in this proceeding?**

A. I am submitting testimony on behalf of the Northeast Clean Energy Council ("NECEC",  
formerly the New England Clean Energy Council).

**Q. How is your testimony organized?**

A. My testimony is organized into three sections. Section I of my testimony addresses National  
Grid's proposal to impose an Access Fee retroactively on customers with stand-alone  
generation that is net metering, participating in the Distributed Generation ("DG") Standard  
Contract program and participating in the Renewable Energy Growth ("REG") Program. Section  
II of my testimony addresses the Company's proposal to impose an Access Fee on future  
distributed generation projects that net meter or participate in the REG program. Section III

summarizes my recommendation to the Commission regarding the Access Fee in this proceeding.

**I. National Grid's Proposal to Impose an Access Fee on Stand-Alone Distributed Generation Retroactively**

**Q. What is your view on National Grid's proposal to impose an Access Fee retroactively on customers with stand-alone generation?**

A. National Grid's proposal to impose an Access Fee on stand-alone distributed generators that net meter, and/or participate in the DG Standard Contract Program and the REG Program should not be approved.

**Q. Please elaborate.**

A. The Company's proposal to impose an Access Fee on "(i) on net metering customers, (ii) customers and generators who qualified for a standard contract under the Distributed Generation Standard Contracts program and (iii) customer and generators who qualified or will qualify under terms of the Renewable Energy Growth ("REG") program tariffs that are established before the effective date of the access fee" should be disposed of as a matter of law as argued in the Motion for Summary Disposition by Acadia Center, Conservation Law Foundation, New England Clean Energy Council (now Northeast Clean Energy Council), and The Alliance for Solar Choice filed on September 29, 2015.

Moreover, the Commission should not approve National Grid's proposal to impose an access fee retroactively because it is inconsistent with Rhode Island state policy, the REG Statute (RIGL §39-26.6) and well-established ratemaking principles.

**II. National Grid's Proposal to Impose an Access Fee on Stand-Alone Distributed Generation Prospectively**

**Q. What is your view on National Grid's proposal to impose an Access Fee prospectively on customers with stand-alone generation?**

A. National Grid's proposal to impose an Access Fee on stand-alone distributed generation prospectively is not appropriate for the following reasons:

- The Access Fee is not consistent with the purposes of the REG statute, state policy goals and well-established ratemaking principles.
- National Grid has not provided evidence or support for its stated purpose for imposing the Access Fee and how the Access Fee will achieve this purpose.
- In fact, National Grid's statements that the Access Fee would be "reimbursed" to DG customers participating in the REG program would appear to undermine its stated purpose in imposing it.
- Finally, National Grid has not provided sufficient information to support the level of the proposed Access Fee.

I will address each of these issues in more detail herein below.

**Q. Would you please elaborate on why National Grid's proposed Access Fee is not consistent with the purposes of the REG statute?**

A. Yes. The first stated purpose of the REG statute is "to facilitate and promote installation of grid-connected generation of renewable energy" and the second stated purpose is to "support and encourage development of distributed renewable energy generation systems." (RIGL §39-26.6-1) Imposition of an Access Fee on stand-alone generation will undermine these purposes by discouraging grid-connected renewable energy and distributed renewable energy generation systems by adding to their costs.

In addition, the proposed Access Fee is not consistent with well-established ratemaking

principles, several of which the REG statute requires the Commission to take into account “[i]n establishing any new rates.” These include equitability and cost causation. (RIGL §39-26.6—24)

**Q. Please elaborate.**

A. National Grid’s proposed Access Fee does not treat stand-alone generators equitably and in a non-discriminatory manner. The proposed Access Fee is also inconsistent with the ratemaking principle of cost causation. This can be seen from the differential impacts of the Access Fee on individual stand-alone generators.

National Grid estimates that if its proposed Access Fee had been in effect for 12 months for three stand-alone Qualifying Facilities, one stand-alone net metered facility and three of 20 stand-alone DG Standard Contract projects, it would range from \$9,570 to \$62,640 per year. (N. Grid Response to PUC 2-3, Bates 20)

In and of itself, this range is not necessarily a problem if it is correlated with the size or output of individual facilities, but this is not the case. These estimated Access Fees represent between 6% and 66% for three stand-alone Qualifying Facilities, 30% for the one stand-alone net-metered facility, and between 5.8% and 9.6% of annual project revenues for the first three of the 20 stand-alone DG Standard Contract projects listed in CLF 2-7. (Calculation based on N. Grid Response to PUC 2-3, Bates 20-21 and CLF 2-7, Bates 14-15.) In addition, basing the Access Fee on nameplate capacity adjusted for an availability factor penalizes projects with higher capacity factors, contrary to what one would expect would be the objective.

**Q. Are there other issues with National Grid’s proposed Access Fee?**

A. Yes. National Grid has not provided evidence or support for how imposing the Access Fee will achieve its stated purpose in doing so. While the Company asserts that the Access Fee is intended to “contribute towards the support for the distribution system that the DG facility

1 relies upon for the movement of generated energy from the site of generation to other  
2 locations, as well as contributing towards the recovery of ongoing operations, maintenance and  
3 replacement costs of interconnection equipment” (National Grid Joint Pre-Filed Direct  
4 Testimony, Bates 62), it does not explain or provide support for what these costs are and why  
5 they are not covered under charges that stand-alone generators do pay. Stand-alone net  
6 metering DG customers are billed and pay the monthly customer charge under the Small  
7 Commercial and Industrial Rate C-06 (“Rate C-06”). (National Grid Joint Pre-Filed Direct  
8 Testimony, Bates 61) They also pay interconnection and upgrade costs associated with their  
9 interconnection to the distribution system.

10  
11 **Q. Are there other indications that call into question the purpose of the Access Fee and**  
12 **whether this purposed is achieved?**

13 A. Yes. National Grid’s discussion about how some stand-alone generators would be  
14 “reimbursed” for the Access Fee through participation in the REG program would appear to  
15 undermine the stated purpose in imposing it – having stand-alone DG customers “contribute  
16 towards the support for the distribution system that the DG facility relies upon.” (National Grid  
17 Joint Pre-Filed Direct Testimony, Bates 61) In addition to raising questions about the stated  
18 purpose of imposing the Access Fee, “reimbursement” to stand-alone generators that  
19 participate in the REG Program and not other stand-alone generators would be discriminatory.

20  
21 **Q. Please explain.**

22 A. National Grid indicates that the costs of the Access Fee for stand-alone distributed  
23 generators participating in the REG program could be “reimbursed” by including them among  
24 the other costs incorporated in the calculation of the REG “performance based incentive.” (N.  
25 Grid Responses to PUC 2-2 (Bates 19), PUC 2-4 (Bates 1), PUC 2-5 (Bates 22)) If the Access Fee  
26 costs are reimbursed to stand-alone generators in the REG program by increasing the  
27 performance based incentive, then the claimed Access Fee contribution from these generators

1 to cover the costs of using the distribution system is obviated. The only effect then of  
2 imposition, and subsequent reimbursement, of the Access Fee on REG program participants  
3 would be to increase the apparent costs of the REG program by allowing National Grid to move  
4 revenue from one bucket to another.

5  
6 **Q. Please elaborate.**

7 A. An increase in payments to stand-alone generators under the REG program would be  
8 recovered through the fixed monthly charge per customer used to recover the costs of the REG  
9 program. (RIGL §39-26.6-25) National Grid plans to treat the increase in revenues from any  
10 allowed Access Fee as a credit to the Revenue Decoupling Mechanism ("RDM") (National Grid  
11 Response to PUC 2-6, Bates 23), a charge that is credited or recovered from customers on a  
12 kWh basis. In essence, imposition of the Access Fee on REG stand-alone generators and  
13 reimbursement of its costs to them through the performance incentive only shifts  
14 costs/revenues from the variable RDM charge to the fixed REG Program charge. This would be  
15 a further shift from variable to fixed charges on top of the Company's tiered customer charge  
16 proposal, which I addressed in my October 23, 2015 testimony in this proceeding. Moreover,  
17 allowing National Grid to make the REG Program appear more expensive would be inconsistent  
18 with the purpose of the REG statute.

19  
20 **Q. What is your view of the basis for the level of the proposed Access Fee?**

21 A. In addition to not providing a reasonable and appropriate rationale for imposition of an  
22 Access Fee, National Grid has not provided sufficient information to support the level of the  
23 proposed Access Fee.

24  
25 **Q. Please elaborate.**

26 A. National Grid describes its rationale and the level of the proposed Access Fee in its Joint Pre-  
27 Filed Direct Testimony (Bates 59-65) and Schedule NG-11 (Bates 141). National Grid provides



1 some additional information on an estimate of ongoing operation and maintenance (“O&M”)  
2 costs “in the range of 5-8% of initial construction costs” and uses 6% to calculate ongoing O&M  
3 costs of \$165,710 per year for the 10 largest stand-alone DG facilities in its response to DIV 1-23  
4 at Bates 31-33. (This figure represents only .07% of National Grid’s total revenue requirement  
5 of \$251 million as reported in Schedule NG-10, Bates 139.) National Grid stated, “No other  
6 schedules or workpapers were used in the development of the proposed Access Fees.” (N. Grid  
7 Response to DIV 1-23, Bates 32) It does not appear that National Grid conducted detailed  
8 analysis of the Access Fee as the Company has not provided any such analyses to the  
9 Commission.

10  
11 National Grid does not explain the degree to which stand-alone DG customers compensate the  
12 Company for these costs through the payment of customer charges under Rate C-06,  
13 interconnection and system upgrade costs. The Company notes that Rate C-06 does not  
14 currently compensate it for the cost of interval metering equipment but does not quantify this  
15 cost nor explain why it would not be included in the cost of service in its next rate case. While  
16 the Company asserts that management of DG on the distribution system requires changes to its  
17 operations, planning, and billing and customer systems, it does not quantify the costs of these  
18 changes. (National Grid Joint Pre-Filed Direct Testimony, Bates 62-63) Without this  
19 information, the Commission does not have a sufficient basis to conclude that imposition of an  
20 Access Fee would be appropriate ratemaking.

### 21 22 **III. Recommendations**

#### 23 **Q. What is your recommendation to the Public Utilities Commission?**

24 A. I recommend that the Commission not approve National Grid’s Access Fee proposal for the  
25 reasons discussed in my testimony.

26  
27 Imposition of an Access Fee retroactively on “(i) on net metering customers, (ii) customers and

1 generators who qualified for a standard contract under the Distributed Generation Standard  
2 Contracts program and (iii) customer and generators who qualified or will qualify under terms  
3 of the Renewable Energy Growth (“REG”) program tariffs that are established before the  
4 effective date of the access fee” should be disposed of as a matter of law as argued in the  
5 Motion for Summary Disposition by Acadia Center, Conservation Law Foundation, New England  
6 Clean Energy Council (now Northeast Clean Energy Council), and The Alliance for Solar Choice  
7 on September 29, 2015. Moreover, imposition of an Access Fee retroactively is not consistent  
8 with Rhode Island state policy and the purposes of the REG statute which include  
9 encouragement of distributed renewable energy generation. Rather, imposition of a  
10 retroactive Access Fee would discourage investment in renewable energy generation, and  
11 investment in Rhode Island more broadly, because of the uncertainty it would create for  
12 customers, developers and those who finance such investments.

13  
14 National Grid’s proposal to impose the Access Fee prospectively is also not consistent with  
15 Rhode Island state policy, the purposes of the REG Statute and well-established ratemaking  
16 principles. In particular, National Grid’s proposal would not treat DG and other customers  
17 equitably and it would discriminate between DG customers participating in the REG program  
18 and those who do not.

19  
20 National Grid has not supported its stated purpose for imposing the Access Fee and how it will  
21 achieve this purpose. In fact, National Grid’s statements that the Access Fee would be  
22 “reimbursed” to DG customers participating in the REG program would appear to undermine  
23 its stated purpose in imposing it. Moreover, National Grid has not provided sufficient  
24 information to support the level of the proposed Access Fee.

25  
26 **Q. Does this conclude your testimony?**

27 A. Yes.

### CERTIFICATION

I hereby certify that on November 23, 2015, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Luly Massaro, Commission Clerk, by electronic mail and regular mail.

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