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September 18, 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 New England Clean Energy Council's First Set of Data Requests to National Grid.

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 AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION**

**IN RE: REVIEW OF THE NARRAGANSETT :  
ELECTRIC CO. D/B/A NATIONAL GRID RATE : DOCKET No. 4568  
DESIGN PURSUANT TO RIGL §39-26.6-24 :**

**THE NEW ENGLAND CLEAN ENERGY COUNCIL'S FIRST SET OF DATA REQUESTS  
TO THE NARRAGANSETT ELECTRIC CO. D/B/A NATIONAL GRID  
(Issued September 18, 2015)**

1. In Response CLF 1-1, the Company states that: "Customers who are participating in the Renewable Energy Growth Program and have two meters will be placed into the appropriate tier based on the gross consumption reflected on the meter that measures the customer's on-site use. Customers that have a single net meter will be placed in the appropriate tier based on net consumption." Besides the availability of metering, is there a distinction that warrants different treatment of net-metered and REG Program customers?
2. Has the Company done any evaluation of the value of distributed generation (i.e., benefits) to the distribution grid? If so, please provide the data, assumptions and analysis results.
3. Has the Company done any evaluation of the value of distributed generation (i.e., benefits) to the broader energy system? If so, please provide the data, assumptions and analysis results.
4. Has the Company assessed the relationship between overall monthly consumption (in kWh) and local (including circuit) and regional system peaks? Has the company analyzed the relationship based on net consumption, gross consumption or both? Please provide the data, assumptions and all analysis results.
5. In response to CLF 1-5, the Company stated that they were "heavily involved in the Distributed Generation Working Group (DGWG) that developed New England-wide forecasts of PV." Did the Company provide capacity numbers to ISO-NE? And if so, what numbers did they provide? If those numbers were less than the annual capacity allowances in the REG program, why were they discounted?
6. Are distribution costs allocated by circuit to those customers on the circuit or allocated to customers by circuit type based on an average cost for that circuit type across the system?
7. In response to PUC 1-16, the Company asserts that National Grid's peak occurs in September for all rate classes except G-62. However, in response to PUC 1-14 the Company indicated that the highest percentages of individual peaks were in January, July, and August for A-16 and C-06 customers. Please explain what is driving the September peak in those rate classes.
8. Has the Company estimated its costs to upgrade its billing systems to accommodate the proposed rate design changes? Please provide any early estimates of the costs it will incur to make these changes and the time it would take to implement.

9. In several of the Company's responses (including CLF 2-8 and PUC 1-18), the Company cites capacity factors for distributed generation. How do they determine these capacity factors, and how do they plan to determine them going forward? For example, in CLF 2-8, the company uses a 40% capacity factor for wind, but the REG program uses a capacity factor of 21%. Why the difference?
10. In PUC 1-3, the Company cites the kW currently enrolled in DG and/or Net Metering programs. Are these number cited the nameplate capacity? On page 60 of the Company's testimony, they state that "The Access Fee will be based upon the nameplate capacity of the DG facility, adjusted for expected availability capacity." How will the Company determine the capacity factor for various technologies? If it differs from the capacity factor used by the DG Board, please explain why.
11. In response to CLF 1-10, the Company states that "the savings in the distribution component of the bill produced by the combination of reduced monthly kwh use and placement in a tier with a lower customer charge...approximately equal to the savings produced based on current rates." Over what time frame are these charges "approximately equal"? The Company acknowledges that savings are "not realized immediately", but in what timeframe are they realized?
12. Are the "per unit demand-related revenue requirements" mentioned in response to CLF 1-12 unique to generators or for all customers?
13. Please provide a line item comparison of a customer's bill under the current rate structure with that customer under the new structure (include all applicable access charges & tiered customer charges) for the following types of customers:
  - a. G-32 rate class with a behind the meter, net-metered DG project that produces 80% of their gross consumption
  - b. C-06 rate class with a behind the meter, net metered DG project that produces 80% of their gross consumption.
  - c. C-06 rate class customer receiving service at their remote meter, virtually net metering a DG project that produces 80% of their gross consumption.
  - d. G-02 rate class with a behind the meter, net metered DG project that produces 80% of gross consumption
  - e. G-02 rate class receiving service at their remote meters with a virtually net metered DG project that produces 80% of gross consumption.

## CERTIFICATION

I hereby certify that on September 18, 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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