# nationalgrid

Celia B. O'Brien Assistant General Counsel and Director

October 28, 2015

## VIA HAND DELIVERY & ELECTRONIC MAIL

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

#### RE: Docket 4568 – The Narragansett Electric Company d/b/a National Grid Review of Electric Distribution Rate Design Pursuant to R.I. Gen. Laws § 39-26.6-24 Responses to Division Data Requests – Set 3

Dear Ms. Massaro:

On behalf of National Grid<sup>1</sup>, I enclose ten (10) copies of the Company's responses to the third set of data requests issued by the Division of Public Utilities and Carriers (Division) on October 7, 2015 in the above-referenced docket.

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

Very truly yours,

Cilia B. OBrien

Celia B. O'Brien

Enclosures

cc: Docket 4568 Service List Leo Wold, Esq. Karen Lyons, Esq. Steve Scialabba

<sup>&</sup>lt;sup>1</sup> The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

#### 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.

Paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.

Joanne M. Scanlon

October 28, 2015 Date

#### Docket No. 4568 National Grid's Rate Design Pursuant to R.I. Gen. Laws Sec 39-26.6-24 Service List updated 10/23/15

Parties' Name/Address	E-mail	Phone
National Grid	Celia.obrien@nationalgrid.com;	781-907-2153
Celia B. O'Brien, Esq.	Joanne.scanlon@nationalgrid.com;	
National Grid	Theresa.burns@nationalgrid.com;	
280 Melrose Street	Jeanne.lloyd@nationalgrid.com;	
Providence, RI 02907	Ian.springsteel@nationalgrid.com;	
	Timothy.roughan@nationalgrid.com;	
	Peter.zschokke@nationalgrid.com;	
Nick Horan, Esq.	NHoran@keeganwerlin.com;	
Jack Habib, Esq.		
Keegan Werlin LLP	JHabib@keeganwerlin.com;	
Division of Public Utilities & Carriers (Division)	Lwold@riag.ri.gov;	401-222-2424
Leo Wold, Esq.	Klyons@riag.ri.gov;	Ext. 2218
Karen Lyons, Esq.	Jmunoz@riag.ri.gov;	
Dept. of Attorney General	Dmacrae@riag.ri.gov;	
150 South Main St. Drovidence, BL 02002	Steve.scialabba@dpuc.ri.gov;	
riovidence, Kr 02903	Al.contente@dpuc.ri.gov;	-
Richard Hahn	rhahn@lacapra.com;	
Lacapra Associates		
1 Washington Mall, 9th floor	apereira@lacapra.com;	
Boston, MA 02108		
Office of Energy Resources (OER)	Daniel.majcher@doa.ri.gov;	401-222-8880
Daniel W. Majcher, Esq.		
Dept. of Administration		
Division of Legal Services		
One Capitol Hill, 4 <sup>th</sup> Floor		
Providence, RI 02908		
Marion Gold, Commissioner	Marion.gold@energy.ri.gov;	401-574-9113
Office of Energy Resources	Nicholas.Ucci@energy.ri.gov;	
One Capitol Hill, 4 <sup>ui</sup> Floor	Danny.musher@energy.ri.gov;	
Providence, RI 02908	Christopher.kearns@energy.ri.gov;	

<b>Conservation Law Foundation (CLF)</b>	jelmer@clf.org;	401-351-1102
Jerry Elmer, Esq.		Ext. 2012
Conservation Law Foundation		
55 Dorrance Street		
Providence, RI 02903		
Acadia Center	mlebel@acadiacenter.org;	617-742-0054
Mark E. LeBel		Ext. 104
Acadia Center	aanthony@acadiacenter.org;	
31 Milk Street Suite 501		
Boston, MA 02108	lmalone@acadiacenter.org;	
Quentin Anthony, Attorney at Law	qanthony@verizon.net;	401-847-1008
41 Long Wharf Mall		
Newport, RI 02840		
<b>Energy Efficiency Resources Mgmt. Council</b>	marisa@desautelesq.com;	401-477-0023
(EERMC)		
Marisa Desautel, Esq.		
Law Office of Marisa Desautel, LLC		
55 Pine St.		
Providence, RI 02903		
Scudder Parker	sparker@veic.org;	
128 Lakeside Avenue		
Suite 401		
Burlington, VT 05401		
Walmart	mhorne@hcc-law.com;	401-272-3500
Melissa M. Horne, Esq.		
Higgings, Cavanagh & Cooney, LLP		
123 Dyer St.		
Providence, RI 02903		
Stephen W. Chriss, Sr. Mgr. Regulatory Analysis	Stephen.chriss@walmart.com;	479-204-1594
Walmart		
2001 Southeast 10 <sup>th</sup> St.		
Bentonville, AR 72716-5530		
New England Clean Energy Council (NECEC)	jkeoughjr@keoughsweeney.com;	401-724-3600
Joseph A. Keough, Jr., Esq.		
Keough & Sweeney		
41 Mendon Ave.		
Pawtucket, RI 02861		
Sue AnderBois	sanderbois@necec.org;	
Janet Besser	ibesser@necec.org:	
New England Clean Energy Council	,,	
Wind Energy Development (WED)	seth@handylawllc.com;	401-626-4839
Seth H. Handy		
Handy Law, LLC		
42 Weybosset Street		
Providence, RI 02903		
Michelle Carpenter	md@wedenergy.com;	
Wind Energy Development, LLC		
3760 Quaker Lane		
North Kingstown, RI 02852		
The Alliance for Solar Choice (TASC)	Michael@McElroyLawOffice.com;	401-351-4100
Michael McElroy, Esq.		
Leah J. Donaldson, Esq.		

Schacht & McElroy	Leah@McElroyLawOffice.com;	
PO Box 6721		
Providence, RI 02940-6721		
Thadeus B. Culley, Esg.	tculley@kfwlaw.com;	510-314-8205
Keyes, FOX & Weidman LLP	· · · · · · · · · · · · · · · · · · ·	
401 Harrison Oaks Blvd., Suite 100		
Carv. NC 27517		
Gracie Walovich	gracie@allianceforsolarchoice.com:	
Carine Dumit	cdumit@solarcity.com:	
Katie Sheldon	ksheldon@solarcity.com:	
Evan Dube	evand@sunrunhome.com:	
	evand e sum annome.com,	
Dept. of the Navy (Navy)	allison.genco@navy.mil:	
Allison Genco, Esq.		
NAVFAC HO- Building 33		
Dept. of the Navy		
1322 Patterson Ave SE, Suite 1000		
Washington Navy Yard, D.C. 20374-5065		
Dr Kay Davoodi P.E. Director	Khojasteh davoodi@navy mil·	
Utility Rates and Studies Office	<u>mojustomauvooure nuvy.mm</u> ,	
NAVFAC HO- Building 33		
Dent of the Navy		
1322 Patterson Ave SE Suite 1000		
Washington Navy Vard D C 20374-5065		
Washington Navy Taid, D.C. 20574-5005		
Larry R. Allen, Public Utilities Specialist	Larry.r.allen@navy.mil;	
Dept. of the Navy		
Maurice Brubaker	mbrubaker@consultbai.com;	636-898-6726
P.O. Box 412000		
St. Louis, Missouri 63141-2000		
636-898-6726		
Ali Al-Jabir	aaljabir@consultbai.com;	361-994-1767
5106 Cavendish Drive		
Corpus Christi, TX 78413		
File an original & 9 copies w/ PUC:	Luly.massaro@puc.ri.gov;	401-780-2107
Luly E. Massaro, Commission Clerk	Cynthia.wilsonfrias@puc.ri.gov;	
Public Utilities Commission	Alan.nault@puc.ri.gov;	
89 Jefferson Blvd.	Todd.bianco@puc.ri.gov;	
Warwick, RI 02888		
Linda George, RI Senate Policy	lgeorge@rilin.state.ri.us;	
Matt Davey, Silver Sprint Networks	mdayey@silverspringnet.com:	
Christopher Long	christopher long@opower.com:	
Christopher Long	<u>eninstopher.tong@opower.com,</u>	
Douglas Gablinska, The Energy Council PI	Doug@toori org:	
Douglas Gabiniske, The Energy Council-Ki	Doug@tecn.org,	
Eugenia T. Cibbons, ECANE d/b/s Mass Engress 9-	augania @massanarge: arge	
Eugenia 1. Gibbons, ECANE 0/0/a Mass Energy &	eugema@massenergy.org;	
reopie's Power & Ligni		
Laurence Ehrhardt	replarry@gmail.com;	

# Division 3-1

# Request:

For contracts pursuant to which the Company purchases the output of a distributed generator, please specify definition of the Delivery Point.

# Response:

The definition of the term "Delivery Point" set forth in the Distributed Generation Standard Contracts Program Power Purchase Agreement is as follows:

**"Delivery Point"** shall mean the Facility's busbar on Seller's side of the interconnection point with Buyer's distribution system located within the Facility substation, the currently contemplated location of which is shown as the revenue meter location in Appendix A to the Cover Sheet hereto."

The Delivery Point is the point at which the Company's revenue meter is installed.

## Division 3-2

#### Request:

For any existing generator that is connected to and injects power into the Company's distribution system, does the Company purchase all of the output of these existing generators on behalf of Rhode Island customers? If so, please provide the name and location of the generator, its size, and the delivery point at which the Company takes title to the power and energy. If not, please provide the portion purchased by the Company and the disposition of the remainder, if known.

## Response:

Yes, the Company purchases all of the output of existing stand-alone distributed generators on behalf of Rhode Island customers to further the public policy goals of the State of Rhode Island<sup>1</sup>. Please see the Company's response to PUC 1-18 for the name, location, and size of these generators. As discussed in the Company's response to Division 3-1, the delivery point at which the Company takes title to the power and energy is the point at which the Company's revenue meter is installed.

Similarly, the Company also purchases all of the output of existing net-metered generators (i.e., generators that are not stand-alone and serve some or all of a customer's on-site electric load) on behalf of all Rhode Island customers to further public policy goals of the State of Rhode Island. The amount of exported energy varies by customer and by the size of the on-site generation. The remainder of the generated energy is the amount that is consumed on-site. The delivery point at which the Company takes title to the power and energy is the point at which the Company's revenue meter is installed. The meter that is used for net-metered generators measures only the netted amount of generated energy to on-site usage. Without additional metering, it is not possible to determine the exact amount of energy generated or the exact amount of energy consumed on-site for existing net-metered generators. The Company compensates the generator, on behalf of all Rhode Island customers, for the kWhs of generated energy that is offset by kWhs of on-site electric usage at the average value of the rates in effect during the billing month for the rate class applicable to the net-metered generator known as displaced electricity. The Company compensates the generator, on behalf of all Rhode Island customers, for all Rhode Island customers, for the exported energy that is offset by kWhs of on-site electric usage at the average value of the rates in effect during the billing month for the rate class applicable to the net-metered generator known as displaced electricity. The Company compensates the generator, on behalf of all Rhode Island customers, for the sland customers, for the exported energy by

<sup>&</sup>lt;sup>1</sup> The Company does not purchase the output from these generators for the same purpose as it purchases power for providing standard offer service or transmission service to its customers. The Company purchases the output from the stand-alone distributed generators and net-metered generators because the Company is required to do so to further public policy goals of the State of Rhode Island. The Company then sells this output to mitigate the cost of buying it on behalf of all Rhode Island customers.

# Division 3-2, page 2

multiplying the negative, or excess, kWh<sup>2</sup> 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. This exported energy is often referred to as excess electricity or excess generation. For purposes of determining whether the generator'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 Company reviews the 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 revalue the excess generation at the standard offer service rate, as required by the Company's Net Metering Provision, RIPUC No. 2150, 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.

As an example of how this works, using the chart below, which was provided in the Company's response to CLF 1-7, the electricity under the "Average May hourly use for A-16" curve and the "Average May hourly PV production for a 5.4 kW array" curve is the displaced electricity. The electricity above the "Average May hourly PV Production for a 5.4 kW array" curve is the excess electricity.

 $<sup>^2</sup>$  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.

The Narragansett Electric Company d/b/a National Grid RIPUC Docket No. 4568 In Re: Review of Electric Distribution Rate Design Pursuant to R.I. Gen. Laws § 39-26.6-24 Responses to the Division of Public Utilities and Carriers' Third Set of Data Requests Issued on October 7, 2015



Division 3-2, page 3

# Division 3-3

#### Request:

Are there any existing generators that are connected to and inject power into the Company's distribution system whose output is sold to entities outside of Rhode Island? If so, please provide the name and location of the generator, and its size.

#### Response:

The Company is not aware of any generator that is connected to, and injects power into, the Company's distribution system that sells its output to entities outside of Rhode Island.