

October 9, 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
Response to OER Data Requests - Set 3**

Dear Ms. Massaro:

On behalf of National Grid¹, I enclose ten (10) copies of the Company's response to the third set of data requests, containing one question within the set, issued by the Office of Energy Resources (OER) on September 18, 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,



Celia B. O'Brien

Enclosures

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

¹ 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 9, 2015

Date

**Docket No. 4568 National Grid's Rate Design Pursuant to R.I. Gen. Laws Sec 39-26.6-24
Service List updated 10/2/15**

Parties' Name/Address	E-mail	Phone
National Grid Celia B. O'Brien, Esq. National Grid 280 Melrose Street Providence, RI 02907	Celia.obrien@nationalgrid.com ;	781-907-2153
	Joanne.scanlon@nationalgrid.com ;	
	Theresa.burns@nationalgrid.com ;	
	Jeanne.lloyd@nationalgrid.com ;	
	Ian.springsteel@nationalgrid.com ;	
	Timothy.roughan@nationalgrid.com ;	
	Peter.zschokke@nationalgrid.com ;	
Division of Public Utilities & Carriers (Division) Leo Wold, Esq. Karen Lyons, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	Lwold@riag.ri.gov ;	401-222-2424 Ext. 2218
	Klyons@riag.ri.gov ;	
	Jmunoz@riag.ri.gov ;	
	Dmacrae@riag.ri.gov ;	
	Steve.scialabba@dpuc.ri.gov ;	
	Al.contente@dpuc.ri.gov ;	
Richard Hahn Lacapra Associates 1 Washington Mall, 9th floor Boston, MA 02108	rhahn@lacapra.com ;	
	apereira@lacapra.com ;	
Office of Energy Resources (OER) Daniel W. Majcher, Esq. Dept. of Administration Division of Legal Services One Capitol Hill, 4 th Floor Providence, RI 02908	Daniel.majcher@doa.ri.gov ;	401-222-8880
Marion Gold, Commissioner Office of Energy Resources One Capitol Hill, 4 th Floor Providence, RI 02908	Marion.gold@energy.ri.gov ;	401-574-9113
	Nicholas.Ucci@energy.ri.gov ;	
	Danny.musher@energy.ri.gov ;	
	Christopher.kearns@energy.ri.gov ;	
Conservation Law Foundation (CLF) Jerry Elmer, Esq. Conservation Law Foundation 55 Dorrance Street Providence, RI 02903	jelmer@clf.org ;	401-351-1102 Ext. 2012

Acadia Center Mark E. LeBel Acadia Center 31 Milk Street Suite 501 Boston, MA 02108	mlebel@acadiacenter.org ;	617-742-0054 Ext. 104
	aanthony@acadiacenter.org ;	
	lmalone@acadiacenter.org ;	
Quentin Anthony, Attorney at Law 41 Long Wharf Mall Newport, RI 02840	qanthony@verizon.net ;	401-847-1008
Energy Efficiency Resources Mgmt. Council (EERMC) Marisa Desautel, Esq. Law Office of Marisa Desautel, LLC 55 Pine St. Providence, RI 02903	marisa@desautelesq.com ;	401-477-0023
Scudder Parker 128 Lakeside Avenue Suite 401 Burlington, VT 05401	sparker@veic.org ;	
Walmart Melissa M. Horne, Esq. Higgings, Cavanagh & Cooney, LLP 123 Dyer St. Providence, RI 02903	mhorne@hcc-law.com ;	401-272-3500
Stephen W. Chriss, Sr. Mgr. Regulatory Analysis Walmart 2001 Southeast 10 th St. Bentonville, AR 72716-5530	Stephen.chriss@walmart.com ;	479-204-1594
New England Clean Energy Council (NECEC) Joseph A. Keough, Jr., Esq. Keough & Sweeney 41 Mendon Ave. Pawtucket, RI 02861	jkeoughjr@keoughsweeney.com ;	401-724-3600
Sue AnderBois Janet Besser New England Clean Energy Council	sanderbois@necec.org ;	
	jbesser@necec.org ;	
Wind Energy Development (WED) Seth H. Handy Handy Law, LLC 42 Weybosset Street Providence, RI 02903	seth@handylawllc.com ;	401-626-4839
Michelle Carpenter Wind Energy Development, LLC 3760 Quaker Lane North Kingstown, RI 02852	md@wedenergy.com ;	
The Alliance for Solar Choice (TASC) Michael McElroy, Esq. Leah J. Donaldson, Esq. Schacht & McElroy PO Box 6721 Providence, RI 02940-6721	Michael@McElroyLawOffice.com ;	401-351-4100
	Leah@McElroyLawOffice.com ;	

Thadeus B. Culley, Esq. Keyes, FOX & Weidman LLP 401 Harrison Oaks Blvd., Suite 100 Cary, NC 27517	tculley@kfwlaw.com ;	510-314-8205
Gracie Walovich Carine Dumit Katie Sheldon Evan Dube	gracie@allianceforsolarchoice.com ; cdumit@solarcity.com ; ksheldon@solarcity.com ; evand@sunrunhome.com ;	
Dept. of the Navy (Navy) Allison Genco, Esq. NAVFAC HQ- Building 33 Dept. of the Navy 1322 Patterson Ave SE, Suite 1000 Washington Navy Yard, D.C. 20374-5065	allison.genco@navy.mil ;	
Dr. Kay Davoodi, P.E., Director Utility Rates and Studies Office NAVFAC HQ- Building 33 Dept. of the Navy 1322 Patterson Ave SE, Suite 1000 Washington Navy Yard, D.C. 20374-5065	Khojasteh.davoodi@navy.mil ;	
Larry R. Allen, Public Utilities Specialist Dept. of the Navy	Larry.r.allen@navy.mil ;	
File an original & 9 copies w/ PUC: 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 ;	401-780-2107
Linda George, RI Senate Policy	lgeorge@rilin.state.ri.us ;	
Matt Davey, Silver Sprint Networks	mdavey@silverspringnet.com ;	
Christopher Long	christopher.long@opower.com ;	
Douglas Gablinske, The Energy Council-RI	Doug@tecri.org ;	
Eugenia T. Gibbons, ECANE d/b/a Mass Energy & People's Power & Light	eugenia@massenergy.org ;	
Laurence Ehrhardt	replarry@gmail.com ;	

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 Office of Energy Resources' Third Set of Data Requests
Issued on September 18, 2015

OER 3-1

Request:

Please confirm that National Grid (the “Company”) will notify on or before September 24, 2015, by email and regular mail all Distributed Generation Standard Contracts (“DGSC”) and Renewable Energy Growth (“RE G”) standalone facility owners who were awarded DGSC contracts and REG tariffs between 2011 and 2015 and also all Net-Metered (“NM”) standalone facility owners with the following information:

- a) The Docket information (Docket # 4568 – Review of The Narragansett Electric Company d/b/a National Grid (NGrid) – Review of Electric Distribution Design Pursuant to R.I. Gen. Laws 39-26.6-24) for the Rhode Island Public Utility Commission (“Commission”) proceeding;
- b) The Company is proposing an “Access Fee” to standalone owners in its Rate Design filing before the Commission;
- c) The Company’s proposed formula to assess the “Access Fee” to standalone distributed generation facilities; and
- d) The Company’s projected “Access Fee” costs for the forty-four (44) distributed generation standalone facilities (submitted to the Commission under *PUC 1-18, Responses to Public Utilities Commission First Set of Data Requests Issued on August 12, 2015.*)

Response:

On September 29, 2015, Green Development, LLC d/b/a Wind Energy Development, LLC filed a motion for summary disposition regarding the proposed Access Fee. On September 30, 2015, Acadia Center, Conservation Law Foundation, New England Clean Energy Council and The Alliance for Solar Choice jointly filed a motion for summary disposition regarding the proposed Access Fee. In addition, on September 30, 2015, these five interveners jointly filed a motion to amend the procedural schedule, which the PUC granted. Given the second revised procedural schedule established by the PUC, which provides for the Company to file its objection to the motions for summary disposition by noon on October 13, 2015 and tentative oral argument on the motions for summary disposition scheduled for October 16, 2015 with an Open Meeting decision on the motions to follow, the Company has delayed notifying affected customers of the information identified in the request. To avoid customer confusion, the Company believes that it is in the best interest of the affected customers to wait until the PUC has rendered a decision on

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OER 3-1, page 2

the motions for summary disposition regarding the Access Fee before sending out the notification letters containing the information described in the question above. (A copy of the letter template is provided as Attachment OER 3-1.) Therefore, the Company has asked the PUC for an extension of time until Monday, October 19, 2015 to file its response to OER 3-1 and anticipates a response early next week. The Company left a voicemail message for counsel for OER requesting OER's concurrence with this approach.

[date]

VIA U.S. MAIL & ELECTRONIC MAIL

[Name]
[Company Name]
[Street]
[City, State Zip Code]

Dear [Name],

On July 31, 2015, National Grid¹ filed a revenue-neutral electric distribution rate design proposal with the Rhode Island Public Utilities Commission (PUC) as required by Chapter 26.6 of Title 39 the Rhode Island General Laws (the Renewable Energy Growth Program). The PUC docketed the Company's filing as Docket 4568. As part of its proposal, the Company has proposed a fixed monthly charge applicable to stand-alone distributed generators, which are units, like yours, that are directly connected to the distribution system and have no associated on-site load at the same service location.

Proposed Fixed Monthly Charge Applicable to Stand-Alone Distributed Generators

The proposed charge, referred to as an Access Fee in the Company's filing, is based upon the size of the facility and the voltage level at which the facility is connected (primary or secondary) to the Company's distribution system. This proposed fixed monthly charge is designed so that customers who utilize the distribution system for the purpose of delivering electricity to the energy market contribute toward the support for the distribution system that the facility relies upon for movement of generated energy. The proposed Access Fee also ensures that the customer is contributing towards ongoing operation, maintenance, and replacement costs of interconnection equipment at your location.

How the Proposed Access Fee Will be Assessed

The proposed Access Fee is \$5.00 per kW per month for units connected at primary voltage and \$7.25 per kW per month for units connected at secondary voltage. Monthly kW demand will be determined as your unit's nameplate capacity multiplied by a factor that reflects the unit's expected coincidence with the distribution system peak. This availability factor represents the likelihood that your unit will be generating at the time of the distribution system peak. The factor for solar generation is 40%; for other technologies, the factor is still being developed and will be proposed at a later date.

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

[Name]
[Company Name]
[Date]
[Page 2 of 2]

Based on the nameplate capacity of [X] kW for your [type of generation] project at [project address], the Access Fee, if approved by the PUC, that would be applicable to your project will be \$[XXX.XX] per month, calculated as follows:

$$\text{Nameplate Capacity (X)} \times 40\% \times \$7.25 = \$[XXX.XX] \text{ per month.}$$

*The availability factor for non-solar projects is currently an estimate. The Company will communicate the final factor when it is developed.

Where You Can Find Documents Associated With Docket 4568

The Company's rate re-design proposal, including the proposed Access Fee, is subject to the review and approval of the PUC. The Company's filing and the procedural schedule are posted on the PUC's website at <http://www.ripuc.org/eventsactions/docket/4568page.html>. A decision on the Company's proposal is expected on or before March 1, 2016. The approved rates will be implemented on or after April 1, 2016.

For Further Information

If you have questions or would like further information, please contact either Tim Roughan at 781-907-1628 or John Isberg at 401-784-7516.

Sincerely,

Timothy R. Roughan
Director of Energy and
Environmental Policy

John F. Isberg
Director of Community and
Customer Management