



November 12, 2015

Chairperson Margaret E. Curran
Commissioner Paul J. Roberti
Commissioner Herbert F. DeSimone, Jr.
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, Rhode Island 02888

Re: Docket #4568 – Review of the Narragansett Electric Company d/b/a National Grid Rate Design Pursuant to R.I. Gen. Laws Sec 39-26.6-24

Dear Commissioners:

The Washington County Regional Planning Council, the Rhode Island League of Cities and Towns, and the Partnership for RI Streetlights Management (PRISM) are writing to express our serious concerns with National Grid's proposed Rate Design filing that would negatively impact the state's energy efficiency and renewable energy goals. As you know, municipalities play an integral role in addressing these goals.

We are in complete agreement with several of the intervening parties to this docket proceeding, including the Office of Energy Resources and the New England Clean Energy Council. The proposed tier charges would impact the value that energy efficiency improvements to municipal facilities provide to our municipal budgets. We are especially alarmed by National Grid's proposal of an "Access Fee" which adds additional cost to existing and new renewable energy developments and which can ruin the tight economics of such projects. It could make otherwise beneficial projects infeasible, and could have far worse, and grossly unfair, effects on existing project that are fully financed and operational.

This "Access Fee" proposal would impact many planned and existing municipal energy projects. Three large and well-known projects include the Town of Portsmouth's wind turbine that is scheduled to be replaced this upcoming year, the economics for the Town of West Warwick's three-turbine project (approved by voter referendum this past summer.) and the existing and expanding (awarded a 4 Megawatt Renewable Energy Growth Tariff in August) solar facility in the City of East Providence. There are also a number of "public entity" net-metered projects that have released RFPs or that have pending interconnection studies with National Grid that did not forecast any additional fees being placed on their projects.

We respectfully request that the Commission not approve National Grid's filing.

Sincerely,

Dan Beardsley
Executive Director
RI League of Cities and Towns

Jeff Broadhead
Executive Director
Washington County Regional Planning Council
Partnership for RI Streetlights Management (PRISM)