

**Steere Electric LLC**  
15 Drawbridge Road  
Westford, MA 01886  
(617) 794-4100

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PUBLIC UTILITIES COMMISSION

RI PUC Commissioners,  
C/O Luly Massaro, Clerk  
RI Public Utilities Commission  
89 Jefferson Blvd  
Warwick, RI 02888

**RE: Docket No. 4568, Review of Electric Distribution Design Pursuant to  
R.I. Gen. Laws 39-26.6-24**

Dear Public Utilities Commissioners:

I am writing to oppose the proposed Access Fee that National Grid seeks to impose on our solar energy project. This project was awarded a Power Purchase Agreement in 2013 through the DG Standard Contract Program for an approximately 72 kW (AC) Project located in Chepachet, Rhode Island. This project began operating on March 18, 2015. Please accept these comments into your record in opposition to the Access Fee proposal. My reasons are explained below.

1. The PPA required us to bid a fixed price for electricity being sold for the next 17 years. As part of that process we had to identify and project out all costs to determine feasibility. We were never informed there would be an additional access fee imposed in the later years of the contract. We consider it a breach of good faith negotiations for National Grid to now turn around and start adding additional charges that were not declared and stated during this process that induced us to sign a contract with them. The proposed charge that National Grid estimates for our project (\$2,500 per year) amounts to almost 10% of our expected gross yearly revenues, and over the 17 year life of the contract would add two more years to our ROI timeframe.
2. If this is allowed to pass, then the entire renewable energy program in Rhode Island is in jeopardy in my opinion, because it will be clear to us that this will just be the first of many additional charges that National Grid will impose in the future. This uncertainty for future charges will make planning impossible and severely impact the decisions of those seeking to enter the market. My solar system hasn't even been operational for a year yet, and I am now facing a major negative impact to the financial viability of the project by this unfair proposal.
3. I am very concerned that National Grid's intent is to defeat green energy. This is completely antithetical to the national goal of energy independence and carbon emissions reduction. In my opinion, the executives at National Grid should be more concerned with taking steps to support these national goals, which are reflected in the Rhode Island

renewable energy laws and policies. Their approach is short-sighted and, if approved, I strongly believe this will be an embarrassment to Rhode Island and the country.

3. This charge is supposed to be for ongoing improvements to substations and infrastructure. However, as part of any project National Grid already does a study to discover any needed substation and infrastructure upgrades and we are already forced to pay for anything that is needed. In my case, the substation did not need upgrading, but I had to pay substantial funds to replace one phone pole and have another pole installed along with three transformers. Even this relatively minor work was estimated at \$20,000 and took over 2 weeks to complete. Imposing such excessive charges for this minor work leads me to be very suspicious when National Grid says it needs to increase its charges to pay for its network. Despite that hurdle, the larger point to be made is that we have already paid once for any upgrades needed, we should not be charged twice!

4. I am very concerned that National Grid is proposing this change only to help improve their profits and to impose further hurdles to defeat green energy. From my experience with the company, it seems that they could easily improve their profit margin by better managing the company and managing internal costs. On my project alone, workers showed up for several hours and then were seen in the coffee shop for the rest of the day. What could have taken a few hours were stretched to several weeks. The initial planning for the entire project could have been completed in a few weeks rather than a year had National Grid been willing to simply forgo all the posturing and assist us through the process.

5. Let me cite a simple example - incoherent forms that ask for one's address many times. There is no distinction or clarification on the forms whether the address should be the home address of the company, the town address of the property, the location of the solar panels themselves on that property, or the address of the meter that we are tying the solar panels into. In my situation, all four of those addresses are different. The project was delayed several months and almost dropped because no one at National Grid would clarify the forms and I entered the wrong address in several places. That one little issue was a major hurdle that National Grid couldn't/wouldn't work with me to overcome. That one little issue must have cost the ratepayers so much more than necessary. My point is that if National Grid wants to save money, they should look to their own internal operations and mismanagement.

5. In summary, if this proposal is allowed to go forward, it will have a chilling affect on all future green energy projects in Rhode Island, and drastically affect all current projects. I will consider it a breach of contract and will review whatever remedies are available to me to protect my investment in this project.

Thank you for allowing me the opportunity to comment about the proposed Access Fee proposal.

Sincerely yours,

A handwritten signature in cursive script that reads "Randall Steere".

Randall Steere, Member  
Steere Electric LLC