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November 23, 2015

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

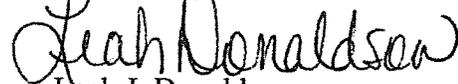
In Re: Review of Electric Distribution Design Pursuant to R.I.G.L. § 39-26.6-24
Docket No. 4568

Dear Luly:

Enclosed for filing are an original and 9 copies of Caroline Golin's direct testimony related to the proposed Access Fee on behalf of The Alliance for Solar Choice in this matter.

If you have any questions, please feel free to call.

Very truly yours,


Leah J. Donaldson

MRMc:tmg
cc: Service List

*Alliance Motion to Intervene*³

THE ALLIANCE FOR SOLAR CHOICE
RIPUC DOCKET NO. 4568
REVIEW OF DISTRIBUTION RATE DESIGN
ACCESS FEE TESTIMONY
WITNESS: CAROLINE GOLIN

**PRE-FILED DIRECT TESTIMONY
OF
CAROLINE GOLIN
ON THE ACCESS FEE PROPOSAL**

ON BEHALF OF THE ALLIANCE FOR SOLAR CHOICE

NOVEMBER 23, 2013

1 **I. INTRODUCTION**

2 **Q. PLEASE STATE FOR THE RECORD YOUR NAME, POSITION, AND**
3 **BUSINESS ADDRESS.**

4 A. My name is Caroline Golin. I am the CEO and principal consultant of the consulting and
5 analysis firm, The Greenlink Group. My business address is 565 Harold Ave, Atlanta,
6 GA 30307.

7
8 **Q. ARE YOU THE SAME CAROLINE GOLIN THAT PREVIOUSLY SUBMITTED**
9 **PRE-FILED DIRECT TESTIMONY ON BEHALF OF THE ALLIANCE FOR**
10 **SOLAR CHOICE IN OPPOSITION TO NATIONAL GRID'S PROPOSED**
11 **TIERED CUSTOMER CHARGE IN THIS PROCEEDING?**

12 A. Yes.

13
14 **Q. WHAT IS THE PURPOSE OF THIS TESTIMONY?**

15 A. On July 31, 2015, Narragansett Electric Company d.b.a. National Grid (the Company),
16 submitted a proposal for a "Distribution Rate for Stand-Alone Generators," also called
17 an "Access Fee" for the Commission's approval. The purpose of this testimony is to
18 explain the unprecedented, unsubstantiated, and highly discriminatory nature of the
19 Access Fee and to highlight the negative impacts the Access Fee could have on the
20 market for distributed generation.

21

1 **Q. WHAT ARE YOUR RECOMMENDATIONS TO THE COMMISSION**
2 **REGARDING THE PROPOSED ACCESS FEE?**

3 A. The Commission should reject the Company's proposal for an Access Fee for stand-alone
4 distributed generation.

5

6 **II. REGULATORY CONTEXT OF AN ACCESS FEE**
7 **ON STAND-ALONE GENERATORS**

8 **Q. IS THE PROPOSED ACCESS FEE IN LINE WITH HOW DISTRIBUTION-**
9 **LEVEL GENERATOR INTERCONNECTIONS ARE TREATED**
10 **THROUGHOUT THE COUNTRY?**

11 A. No. The imposition of a distribution Access Fee of this nature is unprecedented. The
12 Company's proposed Access Fee is novel and has not been tested for its policy or legal
13 merits in other jurisdictions or before the Federal Energy Regulatory Commission. I have
14 examined several regulatory proceedings and rate structures throughout the country and I
15 am unaware of any similar measure being levied on stand-alone distributed generators in
16 any other jurisdiction. The fact that this charge applies to stand-alone facilities suggests
17 that it will apply to generators engaged in wholesale sales, with the exception of virtual
18 net metering facilities that are not directly connected to customer load. Moreover, this
19 charge appears to apply both to generators engaged in wholesale sales directly with the
20 Company and to generators that need to use the Company's system to deliver energy and
21 capacity to the wholesale market.

22

THE ALLIANCE FOR SOLAR CHOICE
RIPUC DOCKET NO. 4568
REVIEW OF DISTRIBUTION RATE DESIGN (ACCESS FEE)
WITNESS: CAROLINE GOLIN

1 **Q. ARE THERE EXAMPLES OF OTHER JURISDICTIONS THAT HAVE**
2 **WHOLESALE DISTRIBUTION TARIFFS FOR GENERATORS THAT WANT**
3 **TO SELL IN THE WHOLESALE MARKET?**

4 A. Yes. For example, all three of California’s major investor-owned utilities have a
5 wholesale distribution access tariff for distribution-level interconnections, which governs
6 the transport of energy and capacity from the distribution system providers system to the
7 Independent System Operator grid. In such tariffs, it is common for the rates for
8 distribution service to be based solely on the cost of the distribution system facilities used
9 to transport the energy and capacity from the generator to the market.¹ This takes the
10 form of a monthly facilities charge and demand charge on the generator. Both charges are
11 determined by calculating the annual revenue requirement for the facilities identified as
12 necessary to accomplish the transportation of energy and capacity for that facility.²

13
14 **Q. DOES THE PROPOSED ACCESS FEE WORK IN A SIMILAR WAY?**

15 A. No. The Company’s Access Fee applies to all stand-alone generators, regardless of
16 whether the grid is used or not to facilitate the underlying transaction. For the types of
17 generators discussed in the Company’s application and testimony, this type of charge is
18 inappropriate. Generators participating in a state-approved program, who do not seek to

¹ See, e.g., Southern California Edison Company Wholesale Distribution Access Tariff Section 21.2.1, available at https://www.sce.com/wps/wcm/connect/cb3a3a5c-93d1-4bf2-a481-ef0a758a3b1a/WholesaleDistributionAccessTariffMainDocument_sections1-24.pdf?MOD=AJPERES&projectid=9a0fc25f-5906-48b7-bda1-fa53d7db3483&projectid=9a0fc25f-5906-48b7-bda1-fa53d7db3483&projectid=9a0fc25f-5906-48b7-bda1-fa53d7db3483.

² Id.

THE ALLIANCE FOR SOLAR CHOICE
RIPUC DOCKET NO. 4568
REVIEW OF DISTRIBUTION RATE DESIGN (ACCESS FEE)
WITNESS: CAROLINE GOLIN

1 participate in the wholesale market, do not need the Company's grid to transport energy
2 or capacity.

3
4 **Q. DOES A STAND-ALONE GENERATOR THAT IS NOT SELLING INTO THE**
5 **WHOLESALE MARKET MAKE USE OF THE COMPANY'S GRID?**

6 A. Not necessarily. In most cases, the Company will purchase or otherwise take possession
7 of the electricity at the site of generation and then deploy that electricity as it sees fit. As
8 a result, the Company owns the electricity generated from stand-alone distributed
9 generation before it is transmitted throughout the distribution system. These stand-alone
10 generators are not individually utilizing the grid to wheel power to customers or to the
11 market. Furthermore, since the Company is selling the power generated by these
12 distributed generation resources to its customers for the full retail rate they are fully
13 recovering the costs of distribution services from those customers.

14
15 Any distribution-related cost incurred by the Company to facilitate that wholesale
16 transaction should be captured within its purchase price with the stand-alone generator. If
17 the Company can identify and quantify any integration costs associated with a system,
18 those costs could be a decrement to the contract price. In that case, the Company should
19 bear the burden of proof in demonstrating causality and in substantiating the cost of an
20 integration charge for a particular generator or class of generators.

21

THE ALLIANCE FOR SOLAR CHOICE
RIPUC DOCKET NO. 4568
REVIEW OF DISTRIBUTION RATE DESIGN (ACCESS FEE)
WITNESS: CAROLINE GOLIN

1 **Q. FOR GENERATORS THAT DO MAKE USE OF THE GRID TO SELL THEIR**
2 **POWER IN THE WHOLESALE MARKET, COULD THE ACCESS FEE**
3 **FUNCTION LIKE A WHOLESALE DISTRIBUTION TARIFF?**

4 A. No, I do not believe that it could. First, it is my understanding that wholesale distribution
5 access tariffs must be filed with and approved by the Federal Energy Regulatory
6 Commission. While I do not offer a legal opinion on the jurisdiction of the Commission
7 to approve the Access Fee, there appears to be a threshold legal question of whether the
8 Federal Energy Regulatory Commission has exclusive jurisdiction over this type of
9 charge when it applies to generators engaged in sales for resale. Second, unlike Southern
10 California Edison's "Wholesale Distribution Access Tariff," the proposed monthly
11 Access Fee charge is not based on the facilities that are identified for a specific project
12 and does not reflect cost-causation for the identifiable facilities that will actually be used
13 to accommodate the stand-alone generator's transaction.

14
15 In fact, it is unclear what distribution costs the Company's proposal is based on. The
16 Company is anticipating the need to redistribute any potential incurred revenue collected
17 from the Access Fee to offset the distribution costs for all grid customers through its
18 Revenue Decoupling Mechanism. If the Access Fee is based on actual incurred costs to
19 facilitate a particular stand-alone generator, there would be no need to anticipate the use
20 of the Revenue Decoupling Mechanism. It is clear that the proposed Access Fee is not
21 reflective of any quantified or specific identified cost associated with the facilities
22 incurring this cost.

THE ALLIANCE FOR SOLAR CHOICE
RIPUC DOCKET NO. 4568
REVIEW OF DISTRIBUTION RATE DESIGN (ACCESS FEE)
WITNESS: CAROLINE GOLIN

1 **Q. ARE THERE POTENTIAL BENEFITS TO THE OPERATION OF THE GRID**
2 **THAT STAND-ALONE GENERATION MIGHT PROVIDE THAT MITIGATE**
3 **AGAINST IMPOSITION OF A CHARGE FOR GRID ACCESS?**

4 A. Yes. For example, in 2009 the Commonwealth Edison Company eliminated its wholesale
5 distribution charge for distributed generation after conducting studies that
6 “demonstrate[d] that reverse flows from renewable generators may benefit ComEd’s
7 system by reducing congestion and line loading in some conditions.”³

8

9 **Q. DID THE COMPANY PERFORM ANY SIMILAR ANALYSIS TO DETERMINE**
10 **WHETHER REVERSE FLOWS FROM STAND-ALONE GENERATORS MAY**
11 **BE A BENEFIT TO THEIR SYSTEM?**

12 A. No. As discussed in my testimony on the tiered customer charge proposal, the Company
13 did not perform any analysis of the benefits of distributed generation to its grid.

14

15 **Q. DOES THE PROPOSED ACCESS FEE OTHERWISE ADHERE WITH**
16 **CURRENT FEDERAL REGULATORY POLICY?**

17 A. No. In my opinion, the proposed Access Fee is contrary to the Public Utilities Regulatory
18 Policies Act of 1978 (“PURPA”),⁴ which guarantees grid access to small generators and
19 prevents utilities from charging discriminatory rates to qualifying facilities.⁵ The Access

³ *Commonwealth Edison Co.*, 129 FERC ¶ 61,185, at P 8 (2009).

⁴ 16 U.S.C. § 824a-3 *et seq.*; 16 U.S.C. § 2601 *et seq.*

⁵ *See, e.g.*, 18 C.F.R. 292.306(a) (“Obligation to pay. Each qualifying facility shall be obligated to pay any interconnection costs which the State regulatory authority (with respect to any electric utility over which it has ratemaking authority) or nonregulated electric utility may assess against

THE ALLIANCE FOR SOLAR CHOICE
RIPUC DOCKET NO. 4568
REVIEW OF DISTRIBUTION RATE DESIGN (ACCESS FEE)
WITNESS: CAROLINE GOLIN

1 Fee raises the specter of unjust discrimination because it is levied on some distributed
2 generation customers, and not on others, without any justification for making the
3 distinction from a cost-causation basis. Additionally, the Access Fee discriminates among
4 different qualifying facilities, as qualifying facilities that are connected to and serving an
5 onsite load do not face similar charges.

6
7 **Q. DOES THE COMPANY’S PROPOSED ACCESS FEE ADHERE TO THE**
8 **INTENT AND REQUIREMENTS OF RHODE ISLAND GENERAL LAWS §39-**
9 **26.6 OR 39-26.4?**

10 A. No, for several reasons.

- 11 • The Company did not submit sufficient evidence to support a cost shift in regards to the
12 operation, maintenance, and investment in the distribution system. As such the Company
13 did not provide evidence that distribution costs “were properly and prudently incurred,”
14 as required by R.I.G.L. § 39-26.6-13.
- 15 • The Company did not account for the benefits of distributed generation in any of its
16 filings as required by R.I.G.L. §39-26.6-24.
- 17 • The Access Fee is highly discriminatory and does not align system costs with cost
18 recovery, making it inconsistent with sound, equitable ratemaking principles, including
19 the proper allocation of costs, as required by R.I.G.L. § 39-26.6-13.

the qualifying facility on a nondiscriminatory basis with respect to other customers with similar load characteristics”); 18 C.F.R. 292.305 (Rates for Sales); 18 C.F.R. 292.304 (Rates for Purchases).

THE ALLIANCE FOR SOLAR CHOICE
RIPUC DOCKET NO. 4568
REVIEW OF DISTRIBUTION RATE DESIGN (ACCESS FEE)
WITNESS: CAROLINE GOLIN

- 1 • The Access Fee does not promote the economic development of customer-sited
2 renewable generation [R.I.G.L. §§ 39-26.4-1, 39-26.6-1] because it hinders the market for
3 investment in distributed generation and sets a precedence that if expanded to all Net
4 Metered customers, or any customer with load, could drastically damage the future
5 distributed market.

6
7 **Q. IS THE ACCESS FEE CONSISTENT WITH THE POLICY GOALS OF RHODE**
8 **ISLAND AND DOES IT ADHERE TO THE TENETS OF THE RENEWABLE**
9 **GROWTH PROGRAM?**

10 A. No. The purpose of the Renewable Energy Growth Program is to “facilitate and promote
11 installation of grid-connected generation of renewable-energy; support and encourage
12 development of distributed renewable energy generation systems... [and] stimulate
13 economic development.”⁶ The proposed Access Fee undercuts the cost-competitiveness
14 of stand-alone facilities as it increase the install cost and reduces the payback potential of
15 those systems over their lifespan. It also sets precedent that, if expanded to distributed
16 generation customers that use their facilities to serve onsite load, would drastically
17 impact the return on investment and negatively impact the future market for distributed
18 generation.

19
20 **Q. IS ONE OF THE GOALS OF THE RENEWABLE GROWTH PROGRAM TO**
21 **REDUCE DISTRIBUTION SYSTEM COSTS?**

⁶ R.I.G.L. § 39-26.6-1.

1 A. Yes, and to date the Company has shown no evidence that distribution system costs have
2 changed (i.e., increased or decreased) with the addition of distributed resources.
3

4 **Q. HAS THE COMPANY PROVIDED ANY ANALYSIS TO SUBSTANTIATE THE**
5 **NEED TO LEVY A DISTRIBUTION CHARGE ON QUALIFYING**
6 **DISTRIBUTED GENERATING FACILITIES?**

7 A. No.
8
9

10 **III. IMPACT OF THE PROPOSED ACCESS FEE ON THE MARKET FOR**
11 **DISTRIBUTED GENERATION**

12 **Q. HOW WOULD THE SOLAR ACCESS FEE IMPACT THE MARKET FOR**
13 **DISTRIBUTED GENERATION?**

14 A. The full extent of how the Access Fee would impact the market for stand-alone facilities
15 is unclear based on the record at the time of this testimony. My analysis shows that the
16 Access Fee would increase the install costs by 15% on average.⁷ This number could be
17 much larger depending on the specific finances of each facility. However, if the Access
18 Fee were to expand and be levied on net metered customers, or any customer with load,
19 the Access Fee would drastically and negatively impact the market for solar distribution.

⁷ This analysis compares the levelized cost of energy before and after the levied Access Fee over a 20-year period. The analysis assumes a 5% discount rate and a \$3.30/W install cost. The analysis shows a range of impact, depending on system size, but on average, the Access Fee increases the install cost between 10-20%.

1 For example, if the Access Fee were to be levied on a net metered customer at the
2 Secondary Voltage Level, the return on investment would decrease by nearly 50%.⁸
3

4 **IV. THE PROPOSED ACCESS FEE IN THE CONTEXT OF STATE**
5 **INTERCONNECTION POLICY**

6 **Q. DID THE COMPANY DISCLOSE ANY ACTUAL COSTS THE COMPANY HAS**
7 **FACED IN HAVING TO INSTALL GRID UPGRADES ASSOCIATED WITH**
8 **DISTRIBUTED GENERATION THAT WERE NOT PAID BY THE**
9 **DISTRIBUTED GENERATOR UNDER THE INTERCONNECTION RULES?**

10 A. No.

11
12 **Q. IF AN INTERCONNECTION REQUEST REQUIRES ANY EQUIPMENT**
13 **UPGRADE TO ACCOMMODATE THE INTERCONNECTION CONSISTENT**
14 **WITH SAFETY AND RELIABILITY STANDARDS, DOES THE**
15 **INTERCONNECTION APPLICANT BEAR THE COST?**

16 A. Yes.⁹ In fact, the need for upgrades to accommodate a system can be determinative of
17 whether a project is pursued. Developers will complete the required interconnection study
18 process or seek out relevant information from utilities to determine appropriate, low-cost
19 locations for interconnection. This currently serves as a limiting principle that encourages
20 efficient siting of projects to circuits with suitable hosting capability.
21

⁸ This analysis is comparing the return on investment on a 20 kW system, with load, before and after the imposition of an access fee.

⁹ R.I.G.L. § 39-26.3-4.

1 **Q. WOULD CUSTOMERS STILL PAY FOR INTERCONNECTION COSTS IN**
2 **ADDITION TO THE PROPOSED ACCESS FEE?**

3 A. Yes.¹⁰
4
5

6 **V. RECOMMENDATIONS AND CONCLUSION**

7 **Q. WHAT ARE YOUR RECOMMENDATIONS TO THE COMMISSION?**

8 A. The proposed Access Fee is unsubstantiated, discriminatory and could significantly
9 damage the market for renewable generation and future investments in distributed
10 resources. The proposed Access Fee stands contrary to the tenets of the Renewable
11 Growth Program, Rhode Island's larger policy objectives, and the Public Utilities
12 Regulatory Policies Act. Finally, the proposed Access Fee would set a path for regulatory
13 policy in Rhode Island that has not been seen anywhere in the country. Therefore, I
14 recommend that the proposal be rejected in its entirety. Alternatively, I recommend that
15 the Commission move to address this proposal in the Company's next full rate case.
16

17 **Q. DOES THIS CONCLUDE YOUR TESTIMONY ON THE ACCESS FEE?**

18 A. Yes.

¹⁰ Joint Pre-filed Direct Testimony of Peter T. Zschokke and Jeanne A. Lloyd, at 64-65.

**Docket No. 4568 National Grid's Rate Design Pursuant to R.I. Gen. Laws Sec 39-26.6-24
Service List updated 11/16/15**

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