

December 11, 2015

**BY HAND DELIVERY AND ELECTRONIC MAIL**

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

**RE: Docket 4589-A-Proposed 2016 Renewable Energy Growth Program Tariff and Rule Changes and Proposed SolarWise Program Responses to PUC Data Requests – Set 1**

Dear Ms. Massaro:

I have enclosed ten copies of National Grid's<sup>1</sup> responses to the first set of data requests issued by the Public Utilities Commission in the above-referenced docket.

Thank you for your attention to this filing. If you have any questions, please contact me at 781-907-2121.

Very truly yours,



Raquel J. Webster

Enclosure

cc: Docket 4589 Service List  
Karen Lyons, Esq.  
Jon Hagopian, Esq.  
Steve Scialabba, Division

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<sup>1</sup> The Narragansett Electric Company d/b/a National Grid (National Grid or 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.

The 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

December 11, 2015

Date

**Docket No. 4589-A National Grid 2016 Renewable Energy Growth Program Tariff and Rule Changes and Proposed SolarWise Program; and**

**Docket No. 4589-B RI Distributed Generation Board (DG Board) Report and Recommendation Regarding 2016 Renewable Energy Growth Classes, Ceiling Prices and Targets**

**Service List updated 11/20/15**

<b>Parties' Name/Address</b>	<b>E-mail</b>	<b>Phone</b>
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The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 4589-A  
In Re: Renewable Energy Growth Program and SolarWise Proposal  
Responses to Commission's First Set of Data Requests  
Issued on November 20, 2015

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COMM 1-1

Request:

Red-lined Residential Tariff, Sheet 3 (Paragraph C, Project Segmentation). Explain why the Company feels this edit is necessary. Include whether the rejection of a project based on segmentation, as per the 2015 First Open Enrollment, provided the impetus for this change. Include in your response the name of the project that was rejected in the first enrollment due to anti-segmentation.

Response:

The Company revised Paragraph C of the Residential Tariff (Sheet 3) to further clarify the statutory prohibition on project segmentation. Similar to other clarifying edits the Company made to the RE Growth Program tariffs, the Company is of the opinion that this was an area that could be further clarified upon review of the tariffs and its experience with the first year of the program. The Company's rejection of a wind project from the first enrollment based on segmentation was part of the reason for this change.

The Narragansett Electric Company  
d/b/a National Grid  
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COMM 1-2

Request:

Red-lined Residential Tariff, Sheet 3. Explain why the Company feels it is necessary to clarify with this amendment that any project receiving compensation pursuant to the net metering provision is not eligible to participate in the RE Growth Program.

Response:

The Renewable Energy (RE) Growth statute<sup>1</sup> requires that, in order to be eligible to participate in the RE Growth Program, a DG project must be a new resource that has not begun operation. Therefore, any projects that are already operating and receiving net metering credits are not eligible to participate in the RE Growth Program. The Company added this clarification to the tariff to address any confusion that current net metering customers may have regarding eligibility for the RE Growth Program.

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<sup>1</sup> R.I. Gen. Laws § 39-26.6-3(4)(i).

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COMM 1-3

Request:

Red-lined Residential Tariff, Sheet 5, Paragraph F(a). Explain why the edit relating to NEPOOL asset registration is necessary.

Response:

The Company added the edit relating to NEPOOL asset registration because projects seeking certification from the PUC as an Eligible Renewable Energy Resource must obtain a NEPOOL-GIS asset ID in order to receive final certification. Although this implies that registration with the NEPOOL-GIS is required, the Company added the reference for clarification purposes to avoid any confusion for customers.

Please note that Section E of the Residential Tariff already includes a provision that requires projects to register with the NEPOOL-GIS. As noted above, the reference was added to Section F(a) for further clarification.

The Narragansett Electric Company

d/b/a National Grid

RIPUC Docket No. 4589-A

In Re: Renewable Energy Growth Program and SolarWise Proposal

Responses to Commission's First Set of Data Requests

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COMM 1-4

Request:

This question refers to the Red-lined Residential Tariff, Sheet 4 (Paragraph E) and the Red-lined Non-Residential Tariff, Sheet 7 (Paragraph 7). Provide the reason(s) why the Company feels these edits are necessary. Specifically, why is it necessary to strike the phrase "shall assume the obligation" and add "Applicant is required to cooperate with."

Response:

The Company cannot qualify a DG Project without the owner's cooperation to provide the necessary information and approvals required in each instance. The edit clarifies that, although it is the Company's obligation to qualify the DG Project under other renewable portfolio standards, this cannot be accomplished without the project owner's cooperation.

The Narragansett Electric Company  
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COMM 1-5

Request:

Non-Residential Red-lined Tariff, Sheet 7, Paragraph 7(b). Explain why the edits contained in this entire paragraph (including all 3 subparagraphs) are necessary. Include whether the edits are substantive changes to the program or just clarifications of existing provisions.

Response:

The edits contained in paragraph 7(b) (Sheet 7) of the non-residential tariff (including all 3 subparagraphs) are clarifications of existing provisions of the program.

Subparagraph (1) clarifies what was already contained in the Tariff and Section 2.4.2 of the "Solicitation and Enrollment Process Rules for Solar (Greater than 25kW), Wind, Hydro and Anaerobic Digester Projects". The second paragraph was added in response to the Company receiving PUC approval to act as Aggregator Owner on behalf of small-scale solar projects, and clarifies that those projects must complete the Renewable Energy Certificate Assignment and Aggregation Form, authorizing the Company to act on the project's behalf for those purposes.

Subparagraphs (2) and (3) clarify provisions that are already contained in the "Solicitation and Enrollment Process Rules for Solar (Greater than 25kW), Wind, Hydro and Anaerobic Digester Projects".

The Narragansett Electric Company

d/b/a National Grid

RIPUC Docket No. 4589-A

In Re: Renewable Energy Growth Program and SolarWise Proposal

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Issued on November 20, 2015

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COMM 1-6

Request:

Non-Residential Red-lined Tariff, Sheet 9 (Paragraph 8a) Is this a substantive change to the program or clarification of existing provisions?

Response:

The change to paragraph 8(a), Sheet 9 of the non-residential tariff was added in response to the Company receiving PUC approval to act as Aggregator Owner on behalf of small-scale solar projects, and clarifies that those projects can demonstrate completion of conditions two and three by completing the Renewable Energy Certificate Assignment and Aggregation Form.

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COMM 1-7

Request:

Non-Residential Tariff, Sheet 11. "The Company reserves the right to audit customers for compliance with commitments made to qualify for SolarWise Bonus Payments." Describe in detail the audit that is contemplated by this sentence, providing specific examples of the types of information the Company might seek from a customer in order to verify compliance.

Response:

The Company would like to revise the phrase "reserves the right to audit customers" to "reserves the right to review non-residential customers for completion of all committed energy savings measures within the following year . . . ." This would best reflect the intent of the Company to monitor whether non-residential customers that have used committed measures to qualify for a bonus performance-based incentive have indeed followed through with all of those investments and actions. The Company will set a deadline for implementation of all committed energy savings measures of one year from the date of bonus approval. The review will consist of examining customer project records in the Company's *InDemand* system, which tracks all energy efficiency project activity for National Grid at the customer level.

The Narragansett Electric Company

d/b/a National Grid

RIPUC Docket No. 4589-A

In Re: Renewable Energy Growth Program and SolarWise Proposal

Responses to Commission's First Set of Data Requests

Issued on November 20, 2015

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COMM 1-8

Request:

NG-3, page 3 of 15, Paragraph 1 (Small Scale Solar Rules, Red-lined). This section states that non-residential customers may apply on a first come first served basis. Please confirm that the term "non-residential customers" in this section refer to non-residential customers with small scale solar projects. B) Explain why the Company felt this edit was necessary.

Response:

The term "non-residential customers" in this section refers to non-residential customers with small-scale solar projects. The Company made this clarifying edit because it noticed that the preceding paragraph was specific to residential customers, and the second paragraph was meant to be specific to non-residential customers only.

COMM 1-9

Request:

NG-3, page 3 of 15, Paragraph 1.2.2.3.1 (Small Scale Solar Rules, Red-lined). A) Provide specific examples of the types of information the Company might require customers to produce in order to verify eligibility for the RE Growth Program.

Response:

To verify eligibility for the Renewable (RE) Growth Program with respect to project segmentation, the Company has requested that applicant's provide assessor's maps for an initial review of whether an applicant has projects on the same parcel or contiguous parcels of land. To the extent the assessor's maps are insufficient, or raise additional questions or concerns with respect to project segmentation, the Company may request that applicants provide additional property information such as the property deeds and plans recorded with the applicable land evidence records.

Further, to the extent it is determined that there is more than one project proposed on the same parcel or contiguous parcels of land, the Company would then review whether such projects belong to a single project developer. R.I. Gen. Laws section 39-26.6-9 does not define what constitutes "a project developer". Therefore, to verify eligibility, the Company might seek assurances and documentation from the developer that adjacent projects are not owned by the developer, or any of its affiliates, including subsidiaries.

The determination of whether a project is eligible under the RE Growth Program with respect to project segmentation requires a thorough knowledge of the developer and the property (and surrounding properties) upon which the facilit(ies) are proposed. Applicants, not the Company, should have direct knowledge of, and/or access to, this information and are, therefore, in the best position to ensure that their proposed projects comply with the segmentation rules. As such, although the Company may request and review information to verify project segmentation, and developer status, the Company relies upon the representations and assurances of the applicant (and any person acting on or behalf of applicant). Applicants have the paramount responsibility to ensure that their projects are fully compliant with all applicable statutes and PUC rules, regulations, and directives relative to eligibility for the RE Growth Program. Failure to comply with such requirements could affect the eligibility of the project.

The Narragansett Electric Company

d/b/a National Grid

RIPUC Docket No. 4589-A

In Re: Renewable Energy Growth Program and SolarWise Proposal

Responses to Commission's First Set of Data Requests

Issued on November 20, 2015

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COMM 1-10

Request:

NG-3, page 6 of 15, Paragraph 1.2.2.3.2 (Small Scale Solar Rules, Red-lined) Is this a substantive change to the program or clarification of existing provisions?

Response:

The edits to Schedule NG-3, page 6 of 15, paragraph 1.2.2.3.2 are a clarification of existing provisions. Specifically, the edit restate a provision already contained in the "Introduction" Section of the Residential and Non-Residential Tariffs.

COMM 1-11

Request:

Describe in detail National Grid's role and responsibilities in the Non-Profit Affordable Housing Income Eligible Pilot.

Response:

Since May 2015, the Rhode Island Office of Energy Resources (OER) held five meetings of the Non-Profit Affordable Housing Income Eligible Working Group (Working Group). National Grid has a representative on the Working Group, and this representative provides the Working Group with information regarding the Company's existing income eligible programs in its Energy Efficiency Program, as a means of sharing its expertise in reaching this customer group. Aside from this role, the Company had no direct role in the development of the Non-Profit Affordable Housing Income Eligible Pilot (Pilot).

The Company understands, based on discussions at meetings of the Distributed Generation (DG) Board, that the OER will be offering a Request for Proposals to procure income/entity verification services, and that the OER will manage that vendor. The Company understands that the intent is for that vendor to approve individuals and entities as eligible for the proposed Pilot tariff rate. At this time, National Grid has not discussed with either the OER or the DG Board how that eligibility approval will be transferred, or for how long such eligibility will be valid.

During the Pilot's development process, as information became available about the Working Group's recommendations, National Grid provided the DG Board with comments regarding the Pilot by sending a letter to the DG Board, a copy of which is provided as Attachment COMM 1-11. The Company did not see any study or other evidence pointing to a need for the Pilot.



**Ian Springsteel**  
Director, Regulatory Policy for Clean Energy  
U.S. Regulation & Pricing

September 30, 2015

**BY ELECTRONIC MAIL**

Mr. Kenneth Payne  
Chairman  
Rhode Island Distributed Generation Board  
One Capitol Hill  
Department of Administration, 4<sup>th</sup> Floor  
Providence, RI 02908

Dear Chairman Payne and Distributed Generation Board Members:

National Grid<sup>1</sup> respectfully submits the following comments regarding the finalization of the 2016 Megawatt (MW) Allocation Plan and Ceiling Price Recommendations. These comments are based on the Company's experience with the Renewable Energy (RE) Growth Program as implemented in 2015, recent recommendations on ceiling prices, and recently determined eligibility considerations for some of the new pricing categories that have been under consideration.

**(1) Allocations – Set MW Allocations based on market participation and least cost technology**

As you are aware, to date, the customer uptake of capacity in the 2015 RE Growth Program Small and Medium Solar classes has been very modest. As initially proposed this summer, before experience with the program was available, the MW Allocation Plan calls for double the amount of capacity to be set aside for projects in these classes. The proposed MW targets for Small and Medium Solar are simply too large and will likely lead to significant under-subscription for the program in 2016. Based on the Company's experience, this would leave National Grid in the position of having to seek guidance on reallocation in the middle of enrollments, if allowed, which would be difficult given the tight timing of the program. Accordingly, based on the Company's experience thus far, National Grid recommends that the 2016 allocations be reduced from 7.25 MW total for Small Solar and 7 MW total for Medium Solar to 3 MW for Small Solar and 2 MW for Medium Solar. The 9.25 MW of capacity that will be freed up should be reallocated to the Large Solar class, which has seen the most applications and the lowest prices. Analysis of applications and contracted capacity from the Distributed Generation Standard Contract Program and the applications in the recent RE Growth solicitation is attached to provide context for this recommendation.

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

Similarly, for the Wind class allocation, National Grid believes that an allocation of 8.5 MW will neither produce competition nor result in a fully subscribed class in 2016. Wind is now the most expensive technology that must submit competitive bids to participate in the RE Growth Program. Given the difficult dynamics of wind development in Rhode Island, the lack of competition seen thus far, and the high price of wind per kilowatt hour, National Grid suggests that the Board reduce the allocation to the Wind class to 6 MW, and reallocate the freed up 2.25 MW to the Large Solar class. If more small and medium solar or wind does apply, and there is capacity available from another under-subscribed class, existing flexibility rules would allow such applications to be considered.

**(2) Ceiling Prices – Simplify ceiling price structure for effective program management and incent cost-effective renewable energy development**

The Company appreciates that additional ceiling prices for Small and Medium Solar were developed to help customers in particular situations to invest in solar. Specifically, the “Non-Profit and Affordable Housing” price class was developed for non-profit entities that do not pay taxes, such as housing non-profits, schools and churches. Such entities cannot directly avail themselves of either the federal Investment Tax Credit (ITC) or tax depreciation benefits. Also, the Company recently learned that this price class is to be extended to residential customers with up to 100% of median income in the state, as recommended by the Low Income and Multi-Family Working Group (LIMFWG) at its September 24, 2015 meeting.

National Grid respectfully submits that this price class should not be extended to any residential customers. At many income levels, customers are not able to utilize the ITC fully for a variety of reasons, such as large deductions or the imposition of the Alternative Minimum Tax. In addition, no residential customers are able to utilize the depreciation benefits, which are meant for businesses. The solar industry has responded with various solutions, such as leases and Power Purchase Agreements (PPAs), where the installation company monetizes and passes the tax benefits to customers through the lease or PPA price. In addition, the ITC for residential customers is scheduled to expire for any residential systems not installed by the end of 2016. As a result of these two factors, this price class is not needed. It would mainly serve as a means to redistribute income to customers below the median income

level, which is not the purpose of the RE Growth program. As such, National Grid recommends that the Board not include individual residential customers in the “Non-Profit and Affordable Housing” price class. In addition, due to the availability of leasing and PPA structures to help non-taxable entities realize such federal tax benefits, such price class may not be needed at all, and the Company encourages the Board to review evidence of such need from the LIMFWG before making such determination.

Finally, the Board has developed a separate lower price class for residential customers in communities that exclude solar property from property taxes, and a higher price class for residential customers in communities that include solar property in property taxes. While National Grid understands the goal of reducing the cost of the program when a community decides to exclude solar property from taxation, creating a higher price for communities that include solar property in taxation does the opposite and only makes the program more expensive. National Grid believes the Board should adopt one set of prices for

residential customers that include a low amount of property tax. This would allow communities that exempt solar property from taxation to differentiate themselves from those that do not, and provide an incentive to communities that levy property tax to either reduce or eliminate such levies on solar property going forward. Since RE Growth prices do not change once they are awarded, the current two price approach would lead to significant increases in return for solar owners in communities that in the future decide to exclude solar property from taxation. Offering a single, low price will reduce this windfall opportunity and help simplify the administration of this program.

Thank you for your consideration of these recommendations.

Sincerely,

A handwritten signature in black ink, appearing to read "Ian Springsteel". The signature is written in a cursive, flowing style.

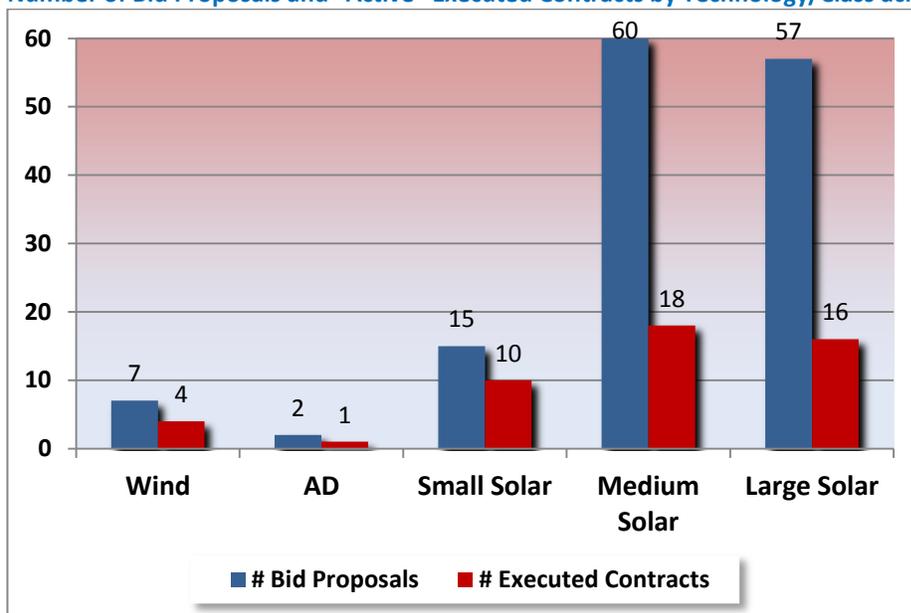
Ian Springsteel

Cc: Sue AnderBois, Vice-Chair, DG Board; Marion Gold, Commissioner, Office of Energy Resources; Chris Kearns, Office of Energy Resources

## Analysis of DG Program Participation

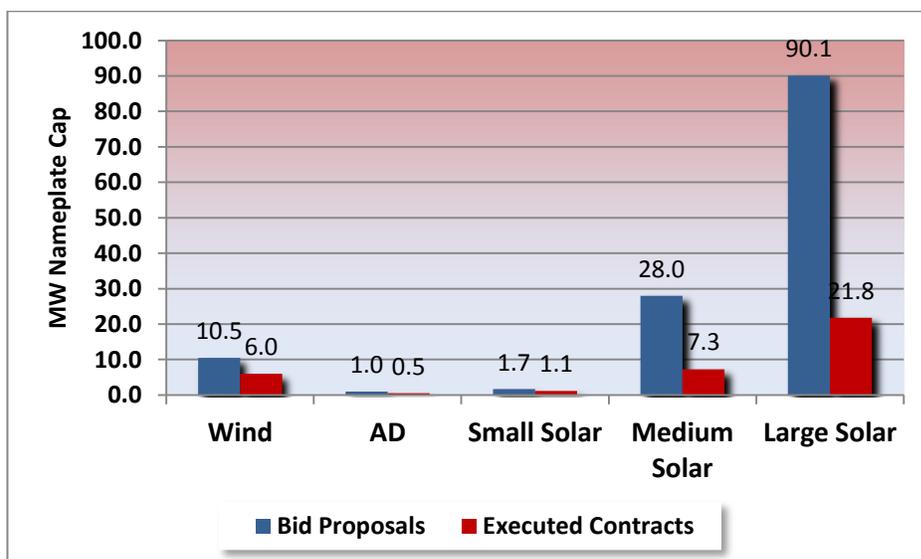
### 2011-2014 RI DG Standard Contracts Program Summary – Bids and Contracts by Technology Class

**Number of Bid Proposals and “Active” Executed Contracts by Technology/Class across all Open Enrollments (OE)**

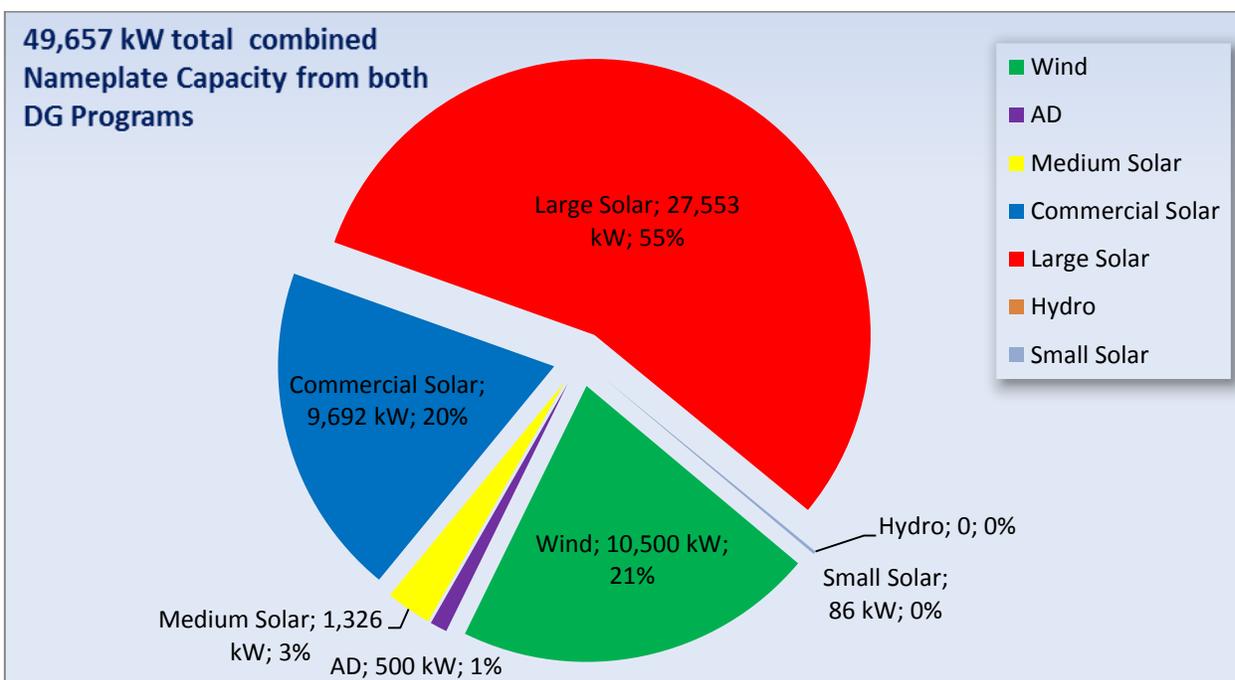


Note: The Small Solar class nameplate definition in the DG Program for 2014 was 50-200 kW DC. The Medium Solar class in the DG Standards Contract program was from 201-500 kW.

**MW of Bid Proposals and “Active” Executed Contracts by Technology/Class across all Open Enrollments (OE)**



Note: The Small Solar class nameplate definition in the DG Program for 2014 was 50-200 kW DC. The Medium Solar class in the DG Standards Contract program was from 201-500 kW.



Note: Technology Classes reflect RE Growth Program nameplate capacity size definitions

The Narragansett Electric Company

d/b/a National Grid

RIPUC Docket No. 4589-A

In Re: Renewable Energy Growth Program and SolarWise Proposal

Responses to Commission's First Set of Data Requests

Issued on November 20, 2015

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COMM 1-12

Request:

Why are the edits contained in NG-3, page 9 of 15 (Paragraph 2.5.4, Qualification of RECs) necessary? Include whether this edit is a substantive change to the program or clarification of existing provisions.

Response:

The edits contained in Schedule NG-3, page 9 of 15 (Paragraph 2.5.4, Qualification of RECs) were added in response to the Company receiving PUC approval to act as Aggregator Owner on behalf of all small-scale solar projects. The Company will qualify the project as an eligible renewable energy resource, but the project must cooperate with the Company to obtain such qualifications.

COMM 1-13

Request:

NG-3, page 10 of 15.

- A) How long has the link in Paragraph 3.1 (Contact Information) been operating and available to customers?
- B) How would you describe the level of questions and feedback from customers regarding the RE Growth Program since inception in terms of both volume and content of questions. Address whether the feedback met or exceeded Company expectations and how well the Company has handled these questions. Provide reasons to support your answer.
- C) Has the Company identified any issues or areas of concern with the administration of the RE Growth Program, including specifically customer awareness and understanding of the RE Growth Program. If so, what steps are being taken to address these concerns?
- D) Identify the individual or individuals within the Company who are responsible for answering questions from the public about the process of becoming eligible to participate in the RE Growth Program and/or how to start receiving incentive payments. Include the title, mailing address, phone number and email address for each individual, and the length of time that these individual(s) have assumed this responsibility.

Response:

- A) The email address has been operating and available to customers since the inception of the Renewable Energy (RE) Growth Program. It is the same email address used to administer the Distributed Generation (DG) Standard Contracts Program.
- B) To date, the nature of the questions regarding the RE Growth Program have been commensurate with consumer familiarity with the program. During the initial program launch, there were less than a dozen questions related to the technical requirements and requests for clarification related to how performance-based incentive (PBI) payments are calculated and subsequently paid. However, the frequency in which the Company is receiving questions regarding the RE Growth Program has declined, as the Program has gained popularity. Overall, based on the current pace and type of questions the Company has received from prospective and current participants in the RE Growth Program, the Company believes that there is increased understanding of the program among customers, solar installers, and solar developers/marketers.

COMM 1-13, page 2

- C) Two areas of the RE Growth Program are the focus of recurring topics of questions. One, customers and installers seek clarification on how the PBIs are paid in terms of the calculation and recognition of bill credits, payment for generation in excess of usage, and payments for generation in excess of a future period of customer usage. Second, customers and installers have questions about the physical interconnection requirements of the RE Growth Program, in particular, the need for a second meter and the connection of the system on the utility side of the customer usage meter, when installed at a location having an existing load customer.
- a. The Company has several channels to provide answers to such questions, and has done a good job in providing this information when customers seek it. First, the Company manages a comprehensive RE Growth Program webpage. The Company answers customer questions by email, via telephone calls, and by maintaining a Frequently Asked Questions document. In addition, the Company has hosted three DG Seminars this year to educate customers and installers about the program requirements, payment calculation examples, and the application process. To build RE Growth Program awareness, the Company has developed one-page summary documents to share with customers. The Company has also hosted multiple webinars to inform customers about the RE Growth Program and application process. The webinars were recorded and posted to the RE Growth Program webpage for later viewing by customers. Additionally, the Company developed a screenshot document of the web application for larger DG system applicants, and posted it to the RE Growth Program webpage so that customers may preview the steps in completing an application in advance of completing it. Finally, representatives from the Company have spoken to solar industry stakeholders about the specifics of the RE Growth Program at meetings and seminars organized by Commerce RI and the Office of Energy Resources. Based on these recurring questions, the Company is developing additional information for customers that focuses on the areas that have more complexity to further facilitate customer and stakeholder comprehension.

COMM 1-13, page 3

- b. Internal administration of the program has had minor issues with the initial roll out of the program. Some of the initial meters installed at residential customer locations for RE Growth Program were not programmed to produce readings correctly and were subsequently replaced with different meters. In addition, the programming of the billing system to calculate and display the bill credits associated with displaced energy and to initiate payments to customers for remaining PBI amounts was completed approximately three and a half months after the initial launch of the program. This resulted in the delay of billing and the calculation and processing of payments to two customers that were among the first customers to install systems under the program. All billing system and payment functionality has been in place since early October, and all meter exchanges have been made.
- D) The [renewablecontracts@nationalgrid.com](mailto:renewablecontracts@nationalgrid.com) mailbox is used for market communications regarding the RE Growth Program, including responding to customer questions. The mailbox is maintained by three employees who, for approximately one year each, have assumed the responsibility for answering questions from the public about the process of becoming eligible to participate in the RE Growth Program and/or how to start receiving incentive payments:

Corinne DiDomenico  
Manager, Environmental Transactions  
100 East Old Country Road  
Hicksville, NY 11801  
516-545-5435  
[corinne.didomenico@nationalgrid.com](mailto:corinne.didomenico@nationalgrid.com)

James Calandra  
Lead Program Manager, Environmental Transactions  
100 East Old Country Road  
Hicksville, NY 11801  
516-545-5433  
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The Narragansett Electric Company  
d/b/a National Grid  
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COMM 1-13, page 4

In addition, customers inquiring about the small-scale solar program and the interconnection process are directed to [distributed.generation@nationalgrid.com](mailto:distributed.generation@nationalgrid.com). The individuals listed below manage the mailbox and have done so since the inception of the RE Growth Program:

Keyette Joiner  
Analyst, Customer Solutions  
40 Sylvan Rd, E2.577  
Waltham MA, 02451  
781-907-1862  
[keyette.joiner@nationalgrid.com](mailto:keyette.joiner@nationalgrid.com)

Richard Johnson  
Senior Representative, Customer Solutions  
40 Sylvan Rd, E2.576  
Waltham MA, 02451  
781-907-3477  
[richard.johnson2@nationalgrid.com](mailto:richard.johnson2@nationalgrid.com)

Jorge Sousa  
Manager, Customer Solutions  
40 Sylvan Rd, E3. 576  
Waltham MA, 02451  
781-907-3422  
[jorge.sousa@nationalgrid.com](mailto:jorge.sousa@nationalgrid.com)

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COMM 1-14

Request:

NG-4, page 8 of 20 (Solar Rules, Greater than 25kW, Red-lined) (Paragraph 2.2.2 (Interconnection Progress Prior to Enrollment). Did any particular circumstances give rise to this edit? If yes, describe.

Response:

Yes, the Company has received inquiries regarding what constitutes a valid Interconnection Service Agreement. Although it may be implied that a valid agreement is signed by both parties, the Company has added this edit for clarification purposes based on the inquiries it has received.

COMM 1-15

Request:

Ian Springsteel, page 22, lines 11-20. How does a customer demonstrate proof of achieving the required EE savings? Is the customer expected to use monthly distribution bills in order to report total versus past consumption?

Response:

Customers will demonstrate proof of achieving the SolarWise Eligibility Criteria, outlined in Attachment IS-1, Bates pages 165 – 166, Tables 1 and 2, by submitting to National Grid, copies of documentation from the respective EE vendor along with a SolarWise Application.

Residential New Construction Projects will submit a copy of a signed Home Energy Rating System (HERS) Report indicating the percentage of annual energy savings (in BTUs) compared to the Rhode Island User Defined Reference Home (UDRH). Customers of existing residential homes will submit a copy of the Home Energy Assessment Report, prepared upon the completion of a home energy assessment, indicating the deemed annual kilowatt-hour (kWh) savings from EE measures directly installed as well as the deemed kWh savings of other installed EE upgrade measures (i.e., insulation, air sealing, appliances, heating equipment and cooling equipment). Existing homes must also submit installation receipts for EE upgrade measures.

For residential customers in existing homes, the percentage of energy savings will be calculated by dividing the energy savings achieved through the applicable EE savings by the baseline energy use, which for EE savings purposes is the 12-month usage history, or annualized available history if less than 12 months.

Non-residential customers will submit an engineering analysis of proposed EE measures demonstrating percentage of annual energy savings over the baseline, and a signed contract with an installer, or letter of commitment stating intention of completing the measures. For non-residential customers, the Company will review customer records to determine compliance with the committed measures identified in the commitment letters, contracts or other commitment documentation. The baseline for new construction will be from building energy code based on annual kilowatt-hour savings, and existing buildings will be from last 12 months of energy usage based on annual kilowatt-hour savings, or annualized 12-month usage if less than 12 months of history is available.

The customer is not expected to use monthly distribution bills in order to report total versus past consumption. For customers receiving SolarWise solar screenings, the baseline usage will be

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COMM 1-15, page 2

calculated for the customer location being screened, from the Company's billing records. Looking forward, all savings will be based on pre-determined average savings associated with specific measures or actions, as established by the specific EE programs as described above, which are also used to determine the amount of savings achieved by the EE programs each year. Actual future energy usage would be expected to be different than the baseline usage less the deemed savings due to changes in weather, usage patterns, or other services and technologies utilized at a given customer premise.

COMM 1-16

Request:

Ian Springsteel, page 21, line 20; page 22, line 11; Attachment IS-1, pages 4 and 6 of 8. Provide a duplicate copy of the Solarwise application form which the Company intends to use, and state how it will be accessible to the public. Provide the website link where it will be located, if applicable.

Response:

The SolarWise application form is currently being developed. The form will be available through several websites, including the National Grid Rhode Island Renewable Energy Growth Program site ([https://www.nationalgridus.com/narragansett/business/energyeff/4\\_dist\\_gen.asp](https://www.nationalgridus.com/narragansett/business/energyeff/4_dist_gen.asp)), and the National Grid/EnergySage site (specific address to be determined).

The purpose of the form will be to capture data that confirms the customer has satisfied the energy savings criteria outlined in Attachment IS-1, page 165, Table 1.

The form will capture data including:

- Date
- Customer name
- Account number
- Address
- Email address
- Phone number
- Proof of achieving energy efficiency eligibility criteria (the Company is currently developing the process and documentation for this purpose)

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COMM 1-17

Request:

IS-2, page 1 of 1. Please confirm that the estimated per customer cost of the Solarwise program, in the first year, is \$453.00.

Response:

As shown in Attachment IS-2, the estimated net costs of the SolarWise program activities are \$144,555 for the program year beginning April 2016. When divided by the estimated 319 participants anticipated to receive a bonus PBI, as shown in Attachment IS-4, this equals a net cost of \$453 per participant. If divided by the total number of participants that are expected to receive a solar screening and the invitation to participate in the SolarWise Marketplace and its educational content, estimated at approximately 12,000 customers in 2016, plus the estimated 20,000 customers that participated in energy efficiency audits in 2014 and 2015 that will receive an emailed version of solar screening outreach from the Company, totaling 32,000 participants, then the estimated net cost is \$4.52 per participant (\$144,555 divided by 32,000).

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COMM 1-18

Request:

NG-5, Sheet 4, RE Growth Cost Recover Provision, Red-lined Version. Please estimate the total administrative costs to be incurred and billed to customers in the first year of the SolarWise Program.

Response:

As shown in the SolarWise 2016 Program Year Estimated Budget provided in Attachment IS-2 to the Company's filing (Bates page 170), the Company is estimating the total internal and external administrative costs at present to be \$77,500 for Set-Up Costs (first year only) and \$174,313 for Operating Costs. Of these amounts, \$25,000 is for internal Set-Up Costs and \$57,000 is for internal Operating Costs, reflecting application processing and program management. Only labor costs that are incremental, and not already collected through other rate or charges, would be recovered through the RE Growth Factor and the RE Growth Reconciliation Factor, as set forth in in the proposed Renewable Energy Growth Program Cost Recovery Provision. Final estimates for recovery in these factors will be made in their respective filings.

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COMM 1-19

Request:

Estimate the impact of the Solarwise Program on the RE Growth Factor. Holding all else constant, will the Solarwise Program likely cause the factor to increase, decrease or stay the same? Provide the amount of the estimated increase numerically, if applicable.

Response:

Holding all else constant, the estimated net cost of the proposed SolarWise Program Year 2016 is \$144,555, as indicated in Attachment IS-2, Page 1, line 5 of the Company's November 16, 2015 filing in this proceeding. Please see Attachment COMM 1-19 for an illustrative impact of this estimated incremental cost on the current RE Growth Factor and the RE Growth Reconciliation Factor.

**Renewable Energy Growth Program Cost Recovery**

Illustrative Renewable Energy Growth Program Factors including Estimated SolarWise Program Cost

Line No.	<u>Total</u> (a)	<u>Residential</u> <u>A16 / A60</u> (b)	<u>Small</u> <u>Commercial &amp;</u> <u>Industrial</u> <u>C-06</u> (c)	<u>General</u> <u>Commercial &amp;</u> <u>Industrial</u> <u>G-02</u> (d)	<u>Large Demand</u> <u>B32 / G32</u> (e)	<u>Optional Large</u> <u>Demand</u> <u>B62 / G62</u> (f)	<u>Street Lighting</u> <u>S10 / S14</u> (g)
(1) Estimated SolarWise Program Cost	\$144,555						
(2) Total Rate Base (\$000s)	\$561,737	\$296,489	\$54,542	\$82,460	\$77,651	\$21,309	\$29,286
(3) Percentage of Total	100.00%	52.78%	9.71%	14.68%	13.82%	3.79%	5.21%
(4) Allocated Expense	\$144,541	\$76,296	\$14,036	\$21,221	\$19,978	\$5,479	\$7,531
(5) Forecasted Number of Bills	7,139,873	5,250,413	593,944	97,341	12,593	138	1,185,444
(6) Illustrative Incremental RE Growth Factor - monthly per bill/luminaire charge		\$0.01	\$0.02	\$0.21	\$1.58	\$39.70	\$0.00
(7) Uncollectible Percentage	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%
(8) Total Illustrative Incremental RE Growth Factor		\$0.01	\$0.02	\$0.21	\$1.60	\$40.20	\$0.00
(9) Current RE Growth Factor		\$0.17	\$0.26	\$2.46	\$17.78	\$347.07	\$0.07
(10) Total Illustrative Re Growth Factor		\$0.18	\$0.28	\$2.67	\$19.38	\$387.27	\$0.07

Line Descriptions:

- (1) RIPUC Docket No. 4589-A, Attachment IS-2, Page 1 of 1
- (2) per RIPUC 4323, Compliance Attachment 3A, (Schedule HSG-1), page 2, Line 10
- (3) Line (2) ÷ Line (2) Total Column
- (4) Line (1) Total Column x Line (3)
- (5) per Company forecast for the period April 1, 2016 through March 31, 2017; for Streetlighting number represents individual fixtures
- (6) Line (4) ÷ Line (6), truncated to 2 decimal places
- (7) Uncollectible Percentage approved in RIPUC Docket No. 4323
- (8) Line (6) ÷ (1- Line (7))
- (9) Per Current Tariff
- (10) Line (8) + Line (9)