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September 5, 2017

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

Re: Docket No. 4600-A

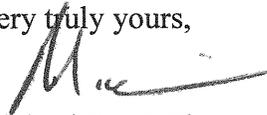
Dear Luly:

As you know, this office represents the Lieutenant Governor of the State of Rhode Island. Attached are an original and nine copies of the Lieutenant Governor's comments on the draft guidance document in this docket.

Copies have been sent electronically to the service list. Hard copies are being sent to you.

If you need any further information, please let me know.

Very truly yours,



Michael R. McElroy

cc: Service List



State of Rhode Island and Providence Plantations
Office of the Lieutenant Governor

Daniel J. McKee
Lieutenant Governor

August 31, 2017

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

Re: Docket No. 4600-A

Dear Ms. Massaro:

As the Lieutenant Governor of the State of Rhode Island, I welcome this opportunity to offer data, views and arguments on the draft Guidance Document in Docket No. 4600-A.

The view I am offering is that of a frequent intervening party in National Grid's cases. As the Chairperson of the Small Business Advocacy Council pursuant to R.I.G.L. § 42-91-2(a), I have intervened primarily on behalf of small business ratepayers and residential ratepayers in several past National Grid rate cases, and I expect to do so in the future.

My office has reviewed the above-referenced draft Guidance Document.

We have concluded that the draft Guidance Document in its current form will serve as a major barrier to parties who would otherwise intervene in rate cases.

On page 3, the Guidance Document states that the goals, principles and framework of this document will apply to all parties in cases that affect National Grid's electric rates, not just to the utility:

Unfortunately, the document goes on to present a mountain of requirements that would simply be insurmountable for just about any party except National Grid.

The sheer volume of goals, principles, and framework elements assures that only National Grid, and in some cases well-funded special interest parties, will have the capability to adhere to the requirements of this Guidance Document.

This effectively shuts out all other parties, particularly those who represent ratepayers.

For one thing, parties other than National Grid simply lack the tools, expertise, and data to meet the requirements of the framework.

Over and above this lack, the sheer magnitude of goals, considerations, and categories are close to impossible to get one's arms around. In many cases, they are arbitrary and not transparent, making them impossible for ratepayers to understand.

Here are the specifics of this mountain of requirements that this document will impose on intervening parties:

- 7 factors (two of which are very broad and/or vague)
- 8 goals
- 12 principles (the last of which is open to any interpretation a party wishes to make)
- 35 categories in the benefit-cost framework...
 - 9 of which require interval or advanced metering
 - 19 of which require detailed economic modeling
 - 2 of which require analysis of actual power flows
 - 9 of which require detailed planning studies
 - 1 of which requires tracking of ISO nodal prices
 - 4 of which require customer surveys
 - 1 of which requires a distribution system safety loss/gain study
- 62 system attribute benefit/cost drivers (most of which require specialized expertise and access to data and tools such that in practice only National Grid can produce these)

This is a bewildering array of requirements. It represents an insurmountable obstacle to most intervenors.

In fact, this may turn out to be unduly burdensome on National Grid itself, particularly since it is likely that other parties will lean heavily on the Company's resources using data requests.

But it's worse than that.

Assume for the moment that all of this information is produced, how is anybody going to be able to make sense of it all?

Imagine what it would be like to be on the receiving end of a filing that adheres to all of these requirements.

Not only is it something that only National Grid can produce, it's also something that only National Grid can understand.

Please consider the plight of any regulator, public official, or ratepayer who tries to make sense of what this incomprehensible mountain of “stuff” means.

In other words, it would also be nearly impossible to reach a decision that is coherent, comprehensive, and clearly understood. And that could serve to erode confidence in the outcome of rate cases.

And think of the possibilities for second-guessing and appeals because such and such factor was not evaluated or such and such principle was left out of the decision.

The arguments will be endless.

In the end, could anyone effectively navigate this labyrinth, and emerge with a ruling that truly rests on solid ground?

Therefore, in consideration of the facts and arguments presented herein, I respectfully request that these requirements be significantly relaxed for intervening parties, particularly those who represent ratepayer groups.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Daniel J. McKee".

Daniel J. McKee
Lieutenant Governor

**Docket No. 4600 - Investigation Into the Changing Distribution System
Service List updated 6/6/17**

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