
Memorandum

TO: LULY E. MASSARO, COMMISSION CLERK, RHODE ISLAND PUBLIC UTILITIES COMMISSION

FROM: JENNIFER KALLAY, SYNAPSE ENERGY ECONOMICS (SYNAPSE), ON BEHALF OF THE DIVISION OF PUBLIC UTILITIES AND CARRIERS (DIVISION)

DATE: SEPTEMBER 23, 2016

RE: DOCKET 4628 - NATIONAL GRID'S TARIFF ADVICE FILING TO AMEND TARIFFS RIPUC NOS. 2110, 2011, AND 2012 COMPANY-OWNED LED STREETLIGHTING PROPOSAL

On July 1, 2016, National Grid (the Company) filed Company-Owned LED Streetlighting Tariffs with the Rhode Island Public Utilities Commission (Commission). The Division reviewed the filing and submitted discovery questions in this docket on August 3, 2016. On August 12, 2016, the Washington County Regional Planning Council and the Partnership for RI Streetlight Management (PRISM) filed comments on the filing, identifying costs of LED conversions and lack of lighting controls as key areas of concern. On August 18, 2016, National Grid supplied responses to the Division's discovery questions. On September 12, 2016 the Division had a conference call with its consultants, Jennifer Kallay and Tim Woolf of Synapse Energy Economics, Division staff, and National Grid staff, to discuss additional questions on the filing. Concurrently, the Division reviewed the Company's first and second drafts of its 2017 Energy Efficiency Plan, released on August 17, 2016 and September 19, 2016, respectively.

The Division understands the filed effective date is October 1 and the Docket will be on the open meeting agenda before the end of September. The Division recommends that the Commission suspend the tariff to allow time for further investigation. While the Division is supportive of the addition of tariffs for LEDs to the Company-Owned Streetlighting Tariffs, we do not have complete information on, for example, the costs of the LED conversions, the lack of lighting controls, and the coordination between these tariffs and the Company's Energy Efficiency Plan.

Installation of LED streetlights is an effective way to achieve cost-effective savings in energy consumption. In fact, the Company offers a program to convert customer-owned streetlights as part of its Energy Efficiency Plan. It is important that the Company-Owned Streetlighting Tariffs are coordinated with the initiatives in the Company's Energy Efficiency Plan. This is the most efficient and effective way to encourage all streetlighting customers to adopt all cost-effective efficiency technologies and practices. Together, the Customer- and Company-Owned LED Streetlighting Tariffs and the Energy Efficiency Plans can accomplish the State's efficiency goals in a holistic, integrated way. As a result, it is important to take this opportunity to get the tariff right.

Pending Commission approval of the Division's request to suspend this filing, the Division will continue to review the tariff filing, and may issue further discovery and have further discussions with the

Company. The Division will issue a more detailed memo with its final comments and recommendation after completing its review, no later than December 1, 2016, and will make every effort to file our comments sooner if possible.

