

September 27, 2016

**VIA HAND DELIVERY & ELECTRONIC MAIL**

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

**RE: Docket 4628 - National Grid's Tariff Advice Filing to Amend Tariffs  
RIPUC Nos. 2110, 2111, and 2112 (Company-Owned Streetlighting Tariffs)  
Company-Owned LED Streetlighting Proposal  
Reply to Memorandum of Division of Public Utilities and Carriers**

Dear Ms. Massaro:

On behalf of National Grid,<sup>1</sup> I respectfully submit this letter to reply to the Memorandum filed by Jennifer Kallay of Synapse Energy Economics (Synapse) on behalf of the Division of Public Utilities and Carriers (Division) on September 23, 2016 with respect to National Grid's proposed Company-Owned LED Streetlighting Offering (LED Offering) in the above-referenced docket. The purpose of this letter is to clarify the difference between the LED Offering and the separate and distinct Energy Efficiency Plan, and to emphasize that National Grid needs to have its LED Offering available to customers as soon as possible. In short, the LED Offering is a simple and straightforward filing to meet customer demand.

The LED Offering is *not* an energy efficiency program. The Division is conflating the goals of the LED Offering and National Grid's proposed 2017 Energy Efficiency Plan, which are separate and distinct from each other. The goal of the LED Offering is simply to provide a cost effective LED option that is not presently available to Company-Owned Streetlighting customers. National Grid has received numerous requests from municipal customers for such an option. On the other hand, the primary goal of National Grid's Energy Efficiency Plan is to create energy and economic cost savings for Rhode Island customers through energy efficiency, as required by the Least Cost Procurement Law, R.I. Gen. Laws § 39-1-27.7. Any suggestions regarding how the LED Offering fits into the Energy Efficiency Plan should be made through discussions in connection with the Energy Efficiency Plan, not by suspending the LED Offering to make it a coordinated effort with the proposed Energy Efficiency Plan.<sup>2</sup> The LED Offering is not reliant on the Energy Efficiency Plan; the Company-Owned Streetlighting Tariffs can and will be updated as

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

<sup>2</sup> In fact, the Company-Owned Streetlighting Tariffs are already included in the collaborative discussions for the Energy Efficiency Plan. National Grid does *not* include energy efficiency incentives in its tariffs because the energy efficiency incentives can change every year.

Luly E. Massaro, Commission Clerk  
Tariff Advice Filing to Amend RIPUC Nos. 2110, 2111, and 2112  
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customer needs and technology change. Working the LED Offering into the Energy Efficiency Plan should not be cause for delay of the implementation of the long-awaited LED Offering on October 1, 2016.

National Grid addresses any questions concerning the costs of the LED conversions and lighting controls in its tariff advice filing dated July 1, 2016 and responses to the Division's data requests dated August 18, 2016.<sup>3</sup> Synapse's remarks regarding such issues derive from the comments submitted by the Washington County Regional Planning Council, Partnership for RI Streetlight Management (PRISM) on August 12, 2016. PRISM offers an alternative option to National Grid in a different tariff, for Street and Area Lighting – Customer-Owned Equipment Rate (S-05), RIPUC No. 2142. In other words, PRISM is a competitor to National Grid with respect to customer-owned streetlights, so its comments have the commercial incentive to criticize the costs of the LED Offering. Notably, PRISM did not intervene in this docket.

Finally, there has been ample time for review of the LED Offering. National Grid filed the LED Offering as a tariff advice on July 1, 2016 for implementation three months later, on October 1, 2016. More than two months of additional time would further delay the availability of the customer-requested LED option and the potential savings for customers.

In sum, National Grid would like to make its LED Offering available to its customers as soon as possible to fill a need expressly requested by the customers. If the LED Offering goes into effect as proposed on October 1, 2016, National Grid is willing to continue to work with the Division and Synapse thereafter regarding additional energy efficiency options and updates to the Company-Owned Streetlighting Tariffs.

Thank you for your attention to this matter. If you have any questions regarding this filing, please contact me at 401-784-7415.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'RH', followed by a long horizontal flourish.

Robert J. Humm

cc: Docket 4628 Service List  
Leo Wold, Esq. Division  
Steve Scialabba, Division

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<sup>3</sup> Additionally, the issue of lighting controls is addressed in Public Utilities Commission Docket No. 4513, the proceeding to establish a metering pilot program for municipal-owned streetlights.

### 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

September 27, 2016

Date

**Docket No. 4628 - National Grid – Company-Owned LED Streetlighting  
Proposal  
Service List updated 8/15/16**

| <b>Name/Address</b>   | <b>E-mail Distribution</b>   | <b>Phone</b>              |
|---|--|---------------------------|
| Raquel Webster, Esq.<br>National Grid<br>40 Sylvan Rd.<br>Waltham, MA 02451   | <a href="mailto:Raquel.webster@nationalgrid.com">Raquel.webster@nationalgrid.com</a> ;                   | 781-907-2121              |
|   | <a href="mailto:Celia.obrien@nationalgrid.com">Celia.obrien@nationalgrid.com</a> ;                       |                           |
|   | <a href="mailto:Joanne.scanlon@nationalgrid.com">Joanne.scanlon@nationalgrid.com</a> ;                   |                           |
|   | <a href="mailto:Robert.humm@nationalgrid.com">Robert.humm@nationalgrid.com</a> ;                         |                           |
|   | <a href="mailto:Raymond.sheridan@nationalgrid.com">Raymond.sheridan@nationalgrid.com</a> ;               |                           |
|   | <a href="mailto:Jeanne.lloyd@nationalgrid.com">Jeanne.lloyd@nationalgrid.com</a> ;                       |                           |
|   | <a href="mailto:Robin.Pieri@nationalgrid.com">Robin.Pieri@nationalgrid.com</a> ;                         |                           |
| Leo Wold, Esq.<br>Dept. of Attorney General<br>150 South Main St.<br>Providence, RI 02903   | <a href="mailto:Lwold@riag.ri.gov">Lwold@riag.ri.gov</a> ;   | 401-274-4400<br>Ext. 2218 |
|   | <a href="mailto:Steve.scialabba@dpuc.ri.gov">Steve.scialabba@dpuc.ri.gov</a> ;                           |                           |
|   | <a href="mailto:Al.contente@dpuc.ri.gov">Al.contente@dpuc.ri.gov</a> ;                                   |                           |
|   | <a href="mailto:James.lanni@dpuc.ri.gov">James.lanni@dpuc.ri.gov</a> ;                                   |                           |
|   | <a href="mailto:Joseph.shilling@dpuc.ri.gov">Joseph.shilling@dpuc.ri.gov</a> ;                           |                           |
|   | <a href="mailto:jmunoz@riag.ri.gov">jmunoz@riag.ri.gov</a> ;   |                           |
|   | <a href="mailto:dmacrae@riag.ri.gov">dmacrae@riag.ri.gov</a> ;   |                           |
| Tim Woolf<br>Jennifer Kallay<br>Synapse Energy Economics<br>22 Pearl Street<br>Cambridge, MA 02139  | <a href="mailto:twoolf@synapse-energy.com">twoolf@synapse-energy.com</a> ;                               |                           |
|   | <a href="mailto:jkallay@synapse-energy.com">jkallay@synapse-energy.com</a> ;                             |                           |
| <b>File an original &amp; 9 copies w/:</b><br>Luly E. Massaro, Commission Clerk<br>Public Utilities Commission<br>89 Jefferson Blvd.<br>Warwick, RI 02888 | <a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a> ;                                   | 401-780-2017              |
|   | <a href="mailto:Cynthia.WilsonFrias@puc.ri.gov">Cynthia.WilsonFrias@puc.ri.gov</a> ;                     |                           |
|   | <a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov</a> ;                                       |                           |
|   | <a href="mailto:Todd.bianco@puc.ri.gov">Todd.bianco@puc.ri.gov</a> ;                                     |                           |
| Chris Kearns, Chief Program Development<br>RI Office of Energy Resources (OER)  | <a href="mailto:Christopher.Kearns@energy.ri.gov">Christopher.Kearns@energy.ri.gov</a> ;                 | 401-574-9113              |
|   | <a href="mailto:Nicholas.ucci@energy.ri.gov">Nicholas.ucci@energy.ri.gov</a> ;                           |                           |
| Jeff Broadhead, Executive Director<br>Washington County Regional Planning<br>Council & PRISM  | <a href="mailto:jb@wcrpc.org">jb@wcrpc.org</a> ;   |                           |
|   | <a href="mailto:dan@rileague.org">dan@rileague.org</a> ;   |                           |
|   | <a href="mailto:george.woodbury@lightsmartconsulting.com">george.woodbury@lightsmartconsulting.com</a> ; |                           |
| Seth Handy, Esq.  | <a href="mailto:seth@handylawllc.com">seth@handylawllc.com</a> ;   |                           |