

Jennifer Brooks Hutchinson Senior Counsel

January 18, 2017

VIA HAND DELIVERY & ELECTRONIC MAIL

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

RE: Docket 4672 - Proposed 2017 Renewable Energy Growth Program Tariff and Rule Changes <u>Responses to Division Data Requests – Set 1</u>

Dear Ms. Massaro:

On behalf of National Grid,¹ I have enclosed the Company's responses to the first set of data requests issued by the Rhode Island Division of Public Utilities and Carriers in the above-referenced docket.

Thank you for your attention to this matter. If you have any questions, please contact me at 401-784-7288.

Very truly yours,

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Jennifer Brooks Hutchinson

Enclosures

cc: Docket 4672 Service List Leo Wold, Esq. Jon Hagopian, Esq. Steve Scialabba, Division

¹ 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

January 18, 2017 Date

Docket No. 4672 – Renewable Energy Growth Program for Year 2017 RI Distributed Generation Board and National Grid

Service List updated 1/5/17

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Division 1-1

Request:

Please explain why parcels separated by a public way that are not owned by the same owner may not participate in the shared solar program?

Response:

The provision to limit the sharing of bill credits with bill credit recipients on the same or adjacent parcels contained in Section 2.6 of the proposed Solicitation and Enrollment Process Rules, Section 6.c of RIPUC No. 2151-C (Residential), Sheet 6, and Section 8.c of RIPUC 2152-C (Non-Residential), Sheet 10 is consistent with the express purpose of the statute, which is to "facilitate the adoption of solar by customers in multifamily structures, campuses, multi-structure business parks, multi-tenant or multi-owner commercial facilities...." Although not impossible for such facilities to be separated by a public way, they are of the type more likely to be located on the same or adjacent parcels if participating in a shared solar arrangement. The Company believes that the intent of the shared solar provision is to limit the sharing of renewable energy growth bill credits to those accounts that could be configured to receive directly kWh from the renewable generator.

Such requirement is also consistent with the Company's existing business practice not to extend facilities across a public way as stated in the Company's Standards for Connecting Distributed Generation, RIPUC 2163, Sheet 9, wherein the Company has included language prohibiting an interconnecting customer from crossing a public way with any equipment for public safety reasons.

Division 1-2

Request:

Please provide all studies and analysis the Company has conducted to determine that parcels separated by a public way cannot participate in the shared solar program together.

Response:

The Company has not conducted any studies or analysis to determine that parcels separated by a public way cannot participate in the shared solar program together. Please see the Company's response to Division 1-1.