



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
Department of Administration
DIVISION OF LEGAL SERVICES
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January 23, 2017

Via U.S. Mail

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

**Re: Docket No. 4685 - The Narragansett Electric Co. d/b/a National Grid -
Tariff Advice to Amend Street and Area Lighting - Customer Owned Equipment
Provision, RIPUC No. 2142 (S-05) (filed 12/29/16)**

Dear Ms. Massaro:

Enclosed for filing in the above-referenced docket, please find a letter of support executed by the Office of Energy Resources ("OER"). Also enclosed are 10 copies of OER's letter of support.

If you have any questions or concerns, please do not hesitate to contact me at 401.222.3417 or at Andrew.Marcaccio@doa.ri.gov.

Sincerely,

Andrew S. Marcaccio
Legal Counsel

Enclosures



January 23, 2017

Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, Rhode Island 02888

Dear Chairperson Curran, Commissioner DeSimone, and Commissioner Gold:

The Rhode Island Office of Energy Resources (OER) expresses its support for the tariff amendments filed by National Grid in Docket #4685, Street and Area Lighting – Customer Owned Equipment Provision, RIPUC No. 2142 (S-05) (Tariff). Adoption of the amended tariff will further enable public sector entities – in particular, State agencies – to advance important economic, energy and environmental policy goals through the deployment of high-efficiency light-emitting diodes (LED) and lighting controls. In doing so, public entities can significantly reduce the energy burden and carbon footprint associated with roadway lighting.

On December 8, 2015, Governor Gina M. Raimondo signed Executive Order 15-17: State Agencies to Lead by Example in Energy Efficiency and Clean Energy. The Lead by Example Executive Order (LBE EO) sets robust energy reduction targets and clean energy goals for State agencies consistent with the Governor's broader policy goals that include clean energy industry and job growth; reducing public sector energy costs; diversifying the State's energy mix; and reducing public sector greenhouse gas emissions. Consistent with LBE EO goals, OER has been working in partnership with the Rhode Island Department of Transportation (DOT) to convert all state-owned highway lighting to LEDs with lighting controls. These technology upgrades are poised to save the State millions of dollars in energy and operating costs.

During 2016, DOT converted 6,200 state-owned highway lights across major Rhode Island arteries, representing more than 70 percent of state roadway lighting assets.¹ As this project developed, approximately 2,400 unmetered lighting assets were identified as being utility-owned. OER and DOT are actively collaborating with National Grid to assess the potential for transferring ownership of those assets to the State in 2017, and subsequently converting them to LEDs. Should that occur, the availability of this amended tariff will enable the State to fully realize the anticipated energy and operational cost reduction benefits derived from its investment.

In closing, we would like to acknowledge National Grid's efforts to bring these amendments to your attention, and for working with OER to extend tariff applicability not only to State agencies and fire districts, but also to municipal water utility boards, Kent County Water Authority, Rhode Island Airport Corporation, Commerce RI, Quonset Development Corporation, and the Narragansett Bay Commission.

¹ This project is being supported by OER-administered state RGGI dollars leveraged with utility-administered energy efficiency program incentives.

RI Office of Energy Resources
One Capitol Hill
Providence, RI 02908



STATE OF RHODE ISLAND

**OFFICE OF
ENERGY RESOURCES**

Commissioner Carol J. Grant

This is a positive outcome that will further enable energy efficiency investments across Rhode Island's public sector, and we strongly encourage the Commission to allow the revised tariff to go into effect on February 1, 2017.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Carol J. Grant". The signature is written in a cursive style.

Carol J. Grant
Commissioner