

November 3, 2017

BY HAND DELIVERY AND ELECTRONIC MAIL

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

**RE: Docket 4707 - 2017 Renewable Energy (RE) Growth Program Factor Filing
National Grid Comments**

Dear Ms. Massaro:

On behalf of National Grid,¹ I write to submit comments in response to the PUC's expressed interest in changing the timing of the RE Growth Program Factor filing and separating it from the filing of the reconciliation factor. The PUC has indicated that its goal is to set the program year factor at the start of the program year on April 1 and allow the Company to file the reconciliation factor after the close of the program year. Currently, pursuant to the RE Growth Statute,² the reconciliation is filed on June 30 – three months after the end of the RE Growth Program Year (April through March); the factor, which recovers estimated program costs on a concurrent basis (Factor), is filed at the same time but the factor is billed during the period October 1 through September 30.

National Grid does not have any objections to the PUC's proposal to change the filing schedule for the RE Growth Program Factor and the reconciliation factor. However, National Grid offers the comments below for the PUC's consideration.

Statutory Requirement:

As previously noted, the current timing of the RE Growth Program Factor and reconciliation factor filing is governed by the RE Growth Statute – R.I. Gen. Laws § 39-26.6-25(b). Therefore, as the PUC recognizes, a change in the filing schedule for the RE Growth Program Factor and the reconciliation factor will likely require a legislative change. The Company would not object to proposed legislation for such a change.

¹ The Narragansett Electric Company d/b/a National Grid (National Grid or Company).

² The RE Growth Statute provides that “[w]ithin three (3) months after the end of each program year, the electric-distribution company shall reconcile the total amount recovered from distribution customers against the total of net payments and costs for the program year. The electric-distribution company shall file the reconciliation with a report, along with a new forecast of payments to be made for the next twelve-month (12) period, net of forecasted revenues for the resale of energy, renewable-energy certificates, or any other market attributes sold by the electric distribution company. The forecast shall be used to set a new rate in the same manner as set forth above and the new rate shall remain in effect until rates are reset in the next annual reconciliation and the reconciliation balance shall be reflected in the new rate. R.I. Gen. Laws § 39-26.6-25(b) (emphasis added).

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Clarifying Comment:

In its correspondence to the service list in Docket 4707 dated October 13, 2017, the PUC notes that the reconciliation would be filed on June 30 for effect either August 1 (simultaneous with ISR) or October 1. Please note that the factors resulting from the reconciliation filing become effective October 1. The Company files the factors for the ISR Plan reconciliation on August 1, and the factors also become effective October 1.

Thank you for your attention to this matter. If you have any questions, please contact me at 781-907-2121.

Sincerely,



Raquel Webster

cc: Docket 4707 Service List
Leo Wold, Esq.
Steve Scialabba

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

November 3, 2017
Date

Docket No. 4707 – National Grid’s 2017 Renewable Energy (RE) Growth Program Factor Filing - Service List updated 8/28/17

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