

October 17, 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 4743 - In Re: Petition of Tesla, Inc. and Sunrun, Inc.
For Declaratory Judgment or an Advisory Ruling on R.I. Gen. Laws § 39-26.4
Responses to PUC Data Requests – Set 1**

Dear Ms. Massaro:

I have enclosed ten (10) copies of National Grid's¹ responses to the Rhode Island Public Utilities Commission's first set of data requests in the above-referenced docket.

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

Sincerely,



Raquel J. Webster

Enclosures

cc: Docket 4743 Service List
Jon Hagopian, Esq.
Steve Scialabba, Division

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

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

October 17, 2017
Date

**Tesla, Inc. & Sunrun, Inc – Petition for Declaratory Judgment –
Docket No. 4743**

List updated 10/7/17

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The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4743
In Re: Petition of Tesla, Inc. and Sunrun, Inc.
For Declaratory Judgment or an Advisory Ruling on
R.I. Gen. Laws § 39-26.4, The Net Metering Act
Responses to Commission's First Set of Data Requests
Issued on October 6, 2017

PUC 1-1

Request:

Please explain how the size of the solar system with storage would be sized in compliance with R.I. Gen. Laws § 39-26.4-5(11).

Response:

For a project to be eligible for net metering, the estimated annual generation from the eligible renewable energy resource must not exceed the customer's average electric usage over a three-year window. Since Tesla, Inc. and Sunrun, Inc.'s petition in this docket proposes a paired system that requires that any storage can be charged only from the solar, provided that the solar project has been sized appropriately, the proposed paired solar system with storage would likely comply with R.I. Gen. Laws § 39-26.4-5(11).

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PUC 1-2

Request:

Please explain whether the limit on the solar system with storage where the customer-host does not take electric supply under a time varying or time of use rate would apply to just standard offer service customers or to other customers. Please explain.

Response:

The time of use rate limitation should apply to all customers (whether the customer takes standard offer service or commodity service from a competitive energy supplier) in order to prevent gaming of net metering credit valuations. When a customer takes standard service from the Company, or takes commodity service from a competitive energy supplier using the Complete Billing Option (Company bills for both commodity and delivery service), the Company can implement a time of use rate restriction. However, for customers who are billed for commodity service directly by a competitive energy supplier, there is no way for the Company to police whether a customer with a competitive energy supplier has a time varying rate. As such, to effectively implement any rate restrictions, customers with paired battery storage and solar facilities should be required to use the Complete Billing Option if the PUC determines that such facilities are eligible to receive net metering services.

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PUC 1-3

Request:

If the answer to PUC-1-2 is that the limitation will only apply to standard offer service customers and/or customers on complete billing, please explain why this is different from those taking competitive supply and how the net metering credit would be applied.

Response:

The time of use rate limitation should apply to all customers.

Please see the response to PUC 1-2.