

# The Rhode Island Energy Efficiency and Resource Management Council

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December 11, 2017

VIA ELECTRONIC MAIL AND HAND DELIVERY

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

RECEIVED  
2017 DEC 11 PM 3:00  
PUBLIC UTILITIES COMMISSION

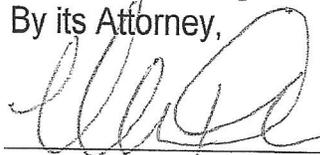
**RE: Docket #4756 - Responses to PUC Data Request, Set 1: National Grid's 2018 System Reliability Procurement Report**

Dear Luly,

The Energy Efficiency and Resource Management Council is pleased to submit this cover letter and attached responses to the Public Utility Commission's first set of data requests in the above-referenced docket for the PUC's review and consideration.

Please do not hesitate to contact me should you have any questions in this regard.

Respectfully submitted,  
Rhode Island Energy Efficiency  
Resource Management Council,  
By its Attorney,

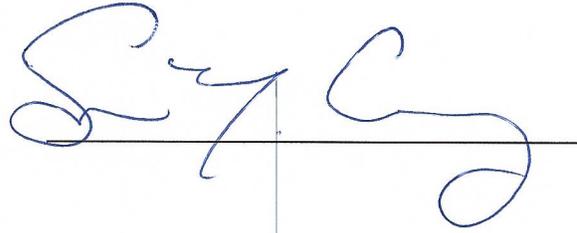


Marisa Desautel, Esq. (Bar #7556)  
Law Office of Marisa Desautel, LLC  
55 Pine St., 4<sup>th</sup> Floor  
Providence, RI 02903  
Tel: (401) 477-0023

CERTIFICATION

I hereby certify that I filed an original and nine (9) copies of the within Response and sent a true copy, via electronic mail, on this 8<sup>th</sup> day of December, 2017, to the Service List for Docket #4756 and to:

Luly.massaro@puc.ri.gov  
Luly E. Massaro, Commission Clerk  
Public Utilities Commission  
89 Jefferson Blvd.  
Warwick, RI 02888

A handwritten signature in blue ink is written over a horizontal line. The signature is stylized and appears to be 'Luly E. Massaro'. A vertical line extends downwards from the horizontal line, passing through the signature.

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION

IN RE: THE NARRAGANSETT ELECTRIC :  
COMPANY d/b/a NATIONAL GRID : DOCKET NO. 4756  
2018 SYSTEM RELIABILITY :  
PROCUREMENT REPORT :

COMMISSION'S FIRST SET OF DATA REQUESTS  
DIRECTED TO THE ENERGY EFFICIENCY AND  
RESOURCE MANAGEMENT COUNCIL (EERMC)

November 28, 2017

(Please respond by December 11, 2017)

- 1-1. Please calculate the following: add the cumulative deferral benefits in Table S-2 (Bates 41) and the projected benefits in the proposed 2018 SRP, divide this amount by the sum of cumulative costs of the pilot (\$1.9 million) plus the total projected costs of the battery storage project. Is this the appropriate benefit-cost analysis for the proposed battery storage project? Why or why not?

**Response: The EERMC has coordinated with both OER and the Division to prepare a response to this question. Please refer to the Division's response.**

- 1-2. Referring to Table 9 (Bates 27) please provide performance based metrics that hold the Company accountable to the demonstrated benefits of these actions.

**Response: The EERMC has coordinated with both OER and the Division to prepare a response to this question. Please refer to the Division's response.**

- 1-3. Why did the EERMC sign onto the 2018 System Reliability Procurement (SRP) Report? Please address in the response, the OER's and Division's November 20, 2018 joint comments filed with the PUC concerning potential refinements to the 2018 SRP Report.

**Response: The EERMC signed on to the 2018 SRP Report because the EERMC generally supports the elements of the 2018 SRP Report. Although the primary focus of the EERMC's work is energy efficiency, the Council more broadly is concerned with ensuring that Least Cost Procurement is implemented appropriately. The non-wires alternatives (NWAs) and related activities described in the SRP Report are important components of LCP.**

**With respect to the comments filed with the PUC by OER and the Division on November 20, while the Company originally provided minimal data from which to assess their compliance with Section 2.3F of the Standards, they did provide some information on the relative**

**benefits and costs of the project. Supplemental information provided recently by the Company addresses the suggested refinements and includes additional evidence that the Company met the requirements of Section 2.3F and that the battery storage project is cost-effective.**

1-4. Why is the 2018 SRP Report in the public interest?

**Response: The EERMC has coordinated with both OER and the Division to prepare a response to this question. Please refer to the Division's response.**

1-5. Is the EERMC working with the Company regarding the OER's and Division's November 20, 2018 joint comments concerning potential refinements to the 2018 SRP Report? Does the EERMC anticipate filing with the PUC amendments to the 2018 SRP Report?

**Response: As a collaborative body, the EERMC is always open to working with the Company and other relevant parties on important energy-related filings. If refinements or amendments to the 2018 SRP Report are warranted, the EERMC will engage in related discussions and, assuming concurrence can be reached, support such amendments. The EERMC feels that any filing should come from either the OER or Division.**