



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Rhode Island Division of  
Public Utilities and Carriers  
89 Jefferson Blvd.  
Warwick RI 02888  
(401) 941-4500

December 28, 2017

Luly Massaro, Commission Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Blvd.  
Warwick, R.I. 02888

**In Re:** Docket No. 4763 – National Grid’s Standards for Connective Distributed  
Generation RIPUC No. 2180

Dear Luly,

Please find for filing with the Commission, an original and nine (9) copies of the State of Rhode Island Division of Public Utilities and Carriers, (the “Division”) Comments relating to the filing of National Grid in the above captioned docket.

I appreciate your anticipated cooperation in this matter.

Very truly yours,

Jon G. Hagopian, Esq.  
Deputy Chief Legal Counsel

# Memorandum

**To:** L. Massaro  
Commission Clerk  
**From:** Alfred Contente, Utility Analyst, Division of Public Utilities & Carriers  
**Date:** 12/28/2017

**Re:** Tariff Advice to Amend Electric Tariff, Entitled Standards for Connecting Distributed Generation, RIPUC No. 2180; Docket No. 4763

On October 31, 2017 National Grid (“NGrid”, or “Company”) filed with the Commission a proposed amendment to tariff RIPUC 2163. The proposed new tariff RIPUC 2180, along with other changes, would incorporate legislative mandates as prescribed in R.I.G.L. 39-26.3-4.1. The Rhode Island Division of Public Utilities and Carriers (“Division”) reviewed the said tariff proposal.

In the technical session held on November 28, 2017, Company representatives presented a line-by-line review of the tariff and highlighted the proposed changes with all parties in attendance including the Division. Input was offered and interaction was encouraged. The most notable suggestion was that language relating to the final accounting provisions currently set forth in the attachment (Exhibits to proposed tariff RIPUC 2180) could be inserted in the body of the tariff. As noted in Data Response from NGrid 1-4, the final accounting information is set forth in the attachment of the tariff, specifically in Exhibits F and G. The Company suggests that the final accounting provisions relate to those specific agreements that are actually signed by customers therefore NGrid deems it as unnecessary to set forth that language in the body of the tariff, however they would not be opposed to referencing it if the Commission orders such.

In the body of the tariff on Sheet 18, Section 3.4c as well as in several exhibits, that the Company observes that it may include Affected System costs within its study and collects said costs from the Interconnecting Customer. In prior practice, the Company may have identified other Affected Systems, which could include that of the transmission company’s, but as proposed, at NGrid’s discretion, the Company may bill the Interconnection Customer for those costs directly. This is a change not attributable to the current legislation but brought forth by NGrid.

The Company submitted a summary table which shows the recent legislation and the specific reference(s) within the proposed tariff. Within that summary are three more notable topics: (1) the requirement that NGrid credit the Interconnecting Customer any amount of depreciation of accelerated system modifications that benefit other customers if said modifications were required due to one customer’s requirements, (2) the Company would credit an Interconnecting Customer a prorated portion if another renewable customer benefits from the system modification within 10 years of the Interconnecting Customer’s initial payment, (3) various deadlines set forth in recent legislation and in R.I.G.L. 39-26.3 et seq. cannot be extended as long as the requirements of Table 1, Sheet 26 of RIPUC 2180 are met. These deadlines are part of a scheduling package that includes maximum periods allowed for system modifications.

After consideration and review of the tariff advice filing of National Grid and the Data Responses filed together with the recommendation here, the Division recommends the tariff advice be accepted as filed.

Cc: Service List