

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION**

IN RE: TARIFF ADVICE TO AMEND )	
ELECTRIC TARIFF, ENTITLED STANDARDS )	
FOR CONNECTING DISTRIBUTED )	
GENERATION, RIPUC NO. 2180 )	Docket 4763
)	

**NEW ENERGY RHODE ISLAND'S  
FIRST SET OF DATA REQUESTS TO NATIONAL GRID**

**NERI 1-1** How does National Grid (NGrid) respond to the observation on pages 16-18 of the Transforming the Power Sector report (TPS) on the Utility Business Model that

the primary financial means through which the utility can grow its business and enhance earnings for shareholders is to invest in capital projects. This bias, created by the regulatory framework rather than by the utility itself, discourages the utility from seeking more efficient solutions that do not depend on large capital investments (p. 16). . . the current regulatory framework does not incent the utility to maximize integration of DER, which would reduce customer exposure to increasing wholesale supply costs and also increase the region's energy security (p. 18)

particularly as that finding relates to NGrid's administration of the interconnection of renewable energy projects.

**NERI 1-2** Please provide any records related to any interconnection dispute or disagreement between NGrid and any interconnecting renewable energy customer occurring or dated after December 1, 2016.

**NERI 1-3** Please provide records related to any interconnection impact studies conducted for an interconnecting renewable energy customer since December 1, 2016, where the impact study fee established under R.I. Gen. Laws §39-26.3-4 did not cover the reasonable cost of an impact study for a given non-residential project under R.I. Gen. Laws §39-26.3-4(c), including but not limited to itemized records of any audits of the actual costs of any such impact studies.

**NERI 1-4** Please provide any records related to any accounting of actual costs of interconnection versus estimated and prepaid costs of interconnection performed for any interconnecting renewable energy customers on or after December 1, 2016.

**NERI 1-5** Is NGrid aware of any jurisdiction in the United States where an independent third party has been assigned a role of overseeing a utility's administration of the interconnection of renewable energy customers?

**NERI 1-6** Did NGrid participate in the TPS proceedings and provide input on the performance-based incentives related to interconnection? If so, what were NGrid's recommendations?

**NERI 1-7** The PST report on utility business model mentions that the interconnection performance area "is expected to be addressed in an upcoming Commission docket." Do you know which docket was intended by that reference?

**NERI 1-8** Has NGrid proposed any "improvements over past practice" targets for the TPS's proposed performance based incentive for interconnection or proposed any other performance based incentive on interconnection?

**NERI 1-9** Has NGrid considered partnering with Grid Unity or a similar service to automate the bulk of interconnection study efforts or otherwise endeavored to use commercially available services to automate parts of the interconnection study process in order to make the entire process faster, more efficient, more accurate and less costly for all involved? If so, what was resolved?

**NERI 1-10** Has NGrid conducted project conferences as addressed in the Commission's November 12, 2014 Order 22957?

**NERI 1-11** Please describe any "commercially reasonable efforts" NGrid has taken to resolve any interconnection delays imposed by third parties pursuant to R.I. Gen. Laws §39-26.3-4.1(d) since December 1, 2016, and the results of any such efforts.

**NERI 1-12** Has National Grid ever issued any rules regarding how their queue system works for interconnection? If so, please produce them and explain why are they not included in this proposed interconnection tariff?

**NERI 1-13** Please describe and provide records related to any examples where NGrid has determined that an improvement to the distribution system was a “system improvement” (a modification benefiting other customers) rather than a “system modification” (a modification necessary for and directly related to the interconnection).

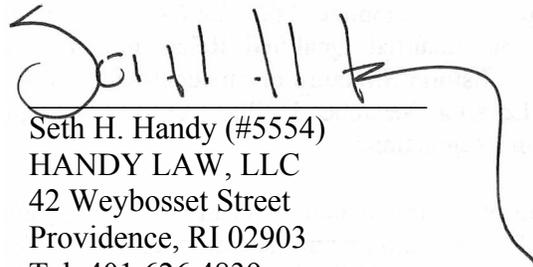
**NERI 1-14** Please provide records related to and a summary account of any contribution in aid of construction tax (also referred to as “donated property taxes,” “tax gross-up adders” and “tax liability”) NGrid has paid to the Internal Revenue Service on projects in Rhode Island since December 1, 2014.

**NERI 1-15** Please provide records related to and a summary account of all contribution in aid of construction taxes (also referred to as “donated property taxes,” “tax gross-up adders” and “tax liability”) paid to NGrid by interconnecting renewable energy customers since December 1, 2016.

Respectfully submitted,

**NEW ENERGY RHODE ISLAND**

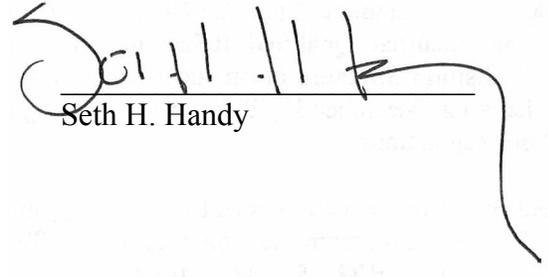
By their attorney,

A handwritten signature in black ink, appearing to read 'Seth H. Handy', is written over a horizontal line. A long, sweeping arrow-like flourish extends from the end of the signature to the right.

Seth H. Handy (#5554)  
HANDY LAW, LLC  
42 Weybosset Street  
Providence, RI 02903  
Tel. 401.626.4839  
E-mail [seth@handylawllc.com](mailto:seth@handylawllc.com)

CERTIFICATE OF SERVICE

I hereby certify that on December 22, 2017, I sent a true copy of the document by electronic mail to the PUC and the service list and filed the original pleading and 9 photocopies with the PUC.

A handwritten signature in black ink, appearing to read "Seth H. Handy", is written over a horizontal line. The signature is stylized and includes a large flourish on the left side and a long, sweeping tail on the right side.

Seth H. Handy