

January 16, 2019

VIA HAND DELIVERY & ELECTRONIC MAIL

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

RE: Docket 4770 – Application of The Narragansett Electric Company d/b/a National Grid for Approval of a Change in Electric and Gas Base Distribution Rates Request for Proposals for an Energy Storage System to be located in Rhode Island

Dear Ms. Massaro:

On behalf of National Grid¹ enclosed for filing with the Rhode Island Public Utilities Commission (PUC) in the above-referenced docket is the Company's Request for Proposals (RFP) for an Energy Storage System to be located in Rhode Island. The RFP is attached to this letter as Attachment A.

Per the Amended Settlement Agreement, Docket No. 4770, the Company is to procure storage solutions through a competitive RFP process, which will set forth the technical requirements, and will request proposals for both a third party-owned system with a service agreement, and an Engineering Procurement and Construction delivered system owned by the utility. The Company has shared the enclosed RFP with stakeholders via the PST Advisory Group and has received their feedback, which has been incorporated into the attached draft RFP. As required by the Amended Settlement Agreement, the Company is filing the RFP with the PUC no fewer than 30 days before it is issued to ensure the PUC understands: (1) the barriers the energy storage system demonstration project is designed to overcome, and (2) the learnings the Company intends to obtain from the project.

As described in Section 3.2 (Project Objectives) of the RFP, the RFP is designed to address two of the major barriers to increased implementation of electric vehicle (EV) DC Fast Charging (DCFC) infrastructure in Rhode Island: (1) increased strain on the electric distribution system caused by increased use of DCFC; and (2) increased cost to EV drivers from peak demand charges. Currently, DCFC provides EV drivers with the fastest option for charging their EVs. The peak demand of DCFC stations, however, can be significantly higher than the peak demand of Level 2 EV infrastructure, potentially resulting in higher demand charges for EV drivers who use those stations and increased constraints on the electric distribution system by reducing the utilization of feeders. Although a single DCFC station may not in itself cause a larger strain on the distribution system, as the transportation sector in Rhode Island electrifies, the DCFC infrastructure will be built out accordingly, which will significantly increase peak demand. The typical way to accommodate increased peak demand is by traditional capital investments to increase the system's

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

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capacity. The energy storage system behind-the-meter demonstration project seeks to demonstrate the use of a behind-the-meter energy storage system to smooth out demand peaks sufficiently to avoid additional capital investments and decrease peak demand charges to EV drivers.

Through the RFP, the Company intends to gain knowledge on the following issues associated with the use of a behind-the-meter energy storage system to support DCFC: (1) whether and how the behind-the-meter energy storage system owner can ensure that adequate power is available from the energy storage system when needed to support the DCFC station; (2) ways to help animate the market for behind-the-meter energy storage systems co-located at DCFC stations (if (1) can be demonstrated); and (3) how to use a behind-the-meter energy storage system to reduce and smooth peak demand at DCFC stations to reduce both the demand charges for EV drivers and the strain on the electric distribution system. The Company also intends to gain knowledge about the relative benefits and costs of two ownership models for a behind-the-meter energy storage system: third-party ownership and Company ownership.

The Company respectfully requests confidential treatment of Attachment A in order to protect the competitive nature of the RFP and ensure no party receives an advantage ahead of the RFP's release. Accordingly, the Company requests that this letter serve as the Company's request for confidential treatment in accordance with PUC Rule 810-RICR-00-00-1.3 (H) and R.I. Gen. Laws§ 38-2-2(4)(B), and that the PUC grant protection from public disclosure of the RFP. National Grid also hereby requests that, pending entry of that finding, the PUC preliminarily grant National Grid's request for confidential treatment pursuant to Rule 810-RICR-00-00-1.3 (H)(2).

In compliance with PUC Rule 810-RICR-00-00-1.3 (H)(3), I have enclosed one complete and confidential copy of the RFP in a sealed envelope marked, "Contains Privileged Information - Do Not Release." I have also enclosed redacted copies for the public record.²

Thank you for your consideration of this request. If you have any questions, please contact me at 401-784-7288.

Very truly yours,

Jennifer Brooks Hutchinson

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Enclosures

cc: Docket 4770 Service List Christy Hetherington, Esq. Jonathan Schrag, Division John Bell, Division Carrie Gill, OER

² Note: The redacted copy only contains the cover page of the RFP (Attachment A).

The Narragansett Electric Company d/b/a National Grid RIPUC Docket No. 4770 Attachment A Page 1 of 2

REDACTED

Attachment A: Request for Proposals Rhode Island Power Sector Transformation – Energy Storage (Redacted Pages 2 through 135)

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nationalgrid

Request for Proposals

Rhode Island Power Sector Transformation – Energy Storage

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

<u>January</u> **16** 2019 Date

Docket No. 4770 - National Grid – Rate Application Service list updated 8/27/2018

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