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July 1, 2021

## **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**

Dear Ms. Massaro:

Pursuant to Rule 810-RICR-00-00-1.10(C) of the Rhode Island Public Utilities Commission's ("PUC") Rules of Practice and Procedure, National Grid<sup>1</sup> submits this tariff advice to request approval of revisions to the Company's Direct Current Fast Charging ("DCFC") Discount Pilot Provision ("DCFC Tariff"), effective August 1, 2021. This revised tariff, R.I.P.U.C. 2247, would supersede R.I.P.U.C. No. 2212.

### Key Tariff Provisions

The DCFC Tariff was approved in Dkt. 4770, and governs the operation of the Company's Discount Pilot for DCFCs (the "Pilot"). The DCFC Tariff offers a time-limited discount on the electric bills for dedicated DCFC electric accounts. The discount is available on a first come, first served basis, and allows a customer to receive the discount on their monthly bill for a period of three (3) years beginning with the first bill issued that includes the DCFC discount and ending with the bill representing the 36<sup>th</sup> DCFC discount credited to the account. As drafted, the DCFC Tariff states that accounts eligible to receive the discount must apply and complete enrollment in the Pilot between September 1, 2018 and August 31, 2019.

The Pilot was approved in accordance with Section 17 of the Company's Amended Settlement Agreement ("ASA"), approved in Dkt. 4770. The ASA authorized the Pilot with the annual value of the discounts capped at \$300,000 per year (ASA, Section 17(a)(iii)). Any existing or new customers with General C&I Rate G-02 or Large Demand Rate G-32 for dedicated DCFC purposes are eligible for the discount, provided that twenty five percent (25%) of the stations receiving the discount shall be in stations that enable electric public transit (id.).

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<sup>1</sup> The Narragansett Electric Company d/b/a National Grid ("National Grid" or "Company").

The discount for participants who enroll in RY 1 was equal to one hundred percent (100%) of the distribution demand charge for a period of three (3) years from the start of service (*id.*). Sixty (60) days prior to enrollment for RY2 and RY3, the Company is required to make, as part of the Electric Transportation Evaluation and Annual Program Modification Report (the “ETI Report”), a recommendation for the appropriate level of discount for new participants in such Rate Year (“RY”) based on enrollment data and lessons learned, for approval by the PUC (*id.*).

#### DCFC Pilot Budget and Enrollment to Date

The budget for RY1 and RY2 of the Pilot was \$274,272 (RY2 ETI Report at 17, Table 4 (October 30, 2020)). As of date of the RY 2 ETI Report, the Company had spent a total of \$35,107 of that budget, leaving a variance of \$239,165 (*id.*). In RY2 there were two customers approved for the Discount Pilot for DCFC Station Accounts, which allowed them to be eligible for credits on their electric bills equal to one hundred percent (100%) of the distribution demand charge for a period of three years from the start of service (*id.* at 15 (Section 2.3.1)). During RY2, one of the customers chose to switch to a different rate class, which is not eligible for this Pilot (*id.*). Therefore, at the end of RY2, one customer is enrolled in the Pilot (*id.*).

As noted in the ETI Report, for RY3 the Company proposed to maintain the current discount level (100% for a period of three years) because DCFC vendors and customers believe the Pilot addresses a key concern associated with DCFC stations (ETI Report at 15). The discount is intended to work together with both the Company’s Charging Demonstration Program and the State’s “Electrify RI” Program to help site hosts install and operate DCFC stations across RI (*id.*). The Company expected increased participation in the Program in RY3, as more DCFC stations will be built with support from these two programs (*id.*). Lastly, the Company noted its intention to comply with the ASA requirement that “twenty five percent (25%) of the stations receiving the discount shall be in stations that enable electric public transit” through continued collaboration with Rhode Island’s Public Transit Authority (“RIPTA”), as well as cities and towns interested in purchasing electric school buses (*id.* at 15-16).

#### Need to Amend Tariff

Recently, the Company learned that the RIPTA is interested in enrolling in the Pilot. The Company seeks to amend the DCFC Tariff to align it with the Company’s Amended Settlement Agreement (“ASA”), Section 17(a)(iii), approved in Dkt. 4770. As noted above, Section 17(a)(iii) of the ASA contemplates the DCFC pilot program allowing enrollment through RY3. For example, Section 17(a)(iii) provides that the discount for participants who enroll in Rate Year 1 will be equal to one hundred percent (100%) of the distribution demand charge for a period of three (ASA, Section 17(a)(iii)). In addition, Section 17(a)(iii) also provides that, “sixty (60) days *prior to enrollment for Rate Year 2 and Rate Year 3...*”(emphasis added), the Company shall make recommendations in the ETI Report for appropriate discount levels during those rate years (*id.*). As currently drafted, however, the DCFC Tariff allows enrollment only in RY1.

The Company has revised the DCFC Tariff to remove references to the original enrollment period of September 1, 2018 through August 31, 2019. The revised DCFC Tariff now

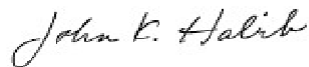
allows for enrollment through the effective date of base distribution rates approved by the Commission in the Company's next general rate case. In addition, the DCFC Tariff has been revised to allow customer accounts that complete enrollment in the Pilot to receive the DCFC discount on their monthly bills for a period of three (3) years beginning with the first bill issued that includes the DCFC discount and ending with the bill representing the 36<sup>th</sup> DCFC discount credited to the account, even if the enrollment occurs during the last month of the Pilot.

Accordingly, the Company requests to revise the DCFC Tariff to align with the ASA and to allow for additional customers to enroll. The Company has included a marked and clean version of these proposed changes for the PUC's review. Thank you for your attention to this filing. If you have any questions or concerns, please contact me at 617-951-1400.

Respectfully Submitted,

**THE NARRAGANSETT  
ELECTRIC COMPANY d/b/a  
NATIONAL GRID**

By its attorney,



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Cc: Dkt. 4770 Service List  
Bonnie Raffetto, Esq.

**National Grid Docket No. 4770 (Rate Application) & Docket No. 4780 (PST)  
 Combined Service list updated 4/1/2021**

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THE NARRAGANSETT ELECTRIC COMPANY  
DCFC DISCOUNT PILOT PROVISION

The provisions of this tariff govern the operation of the Discount Pilot for Direct Current Fast Charging (“DCFC”) Stations (“DCFC Discount Pilot” or “Pilot”).

The Company shall offer a time-limited discount on the electric bills for dedicated DCFC electric accounts through the DCFC Discount Pilot as approved by the Commission.

The DCFC Discount Pilot is available on a first come, first served basis. Accounts eligible to receive the discount under the DCFC Discount Pilot must apply and complete enrollment in the Pilot between September 1, 2018 and the effective date of base distribution rates approved by the Commission in the Company’s next general rate case and receive Retail Delivery Service on either General C&I Rate (G-02) (“Rate G-02”) or Large Demand Rate (G-32) (“Rate G-32”).

The discount provided through the DCFC Discount Pilot for customer accounts that complete enrollment in the Pilot shall be based upon the monthly billing demand as defined in Rate G-02 and Rate G-32 and used to bill the distribution demand charge on the account. The discount per-kW shall be a credit value equal to the distribution demand charge per-kW in effect and as may change from time to time as approved by the Commission. Customer accounts that complete enrollment in the Pilot shall receive the DCFC discount on their monthly bills for a period of three (3) years beginning with the first bill issued that includes the DCFC discount and ending with the bill representing the 36<sup>th</sup> DCFC discount credited to the account.

Should the customer of record of an enrolled account change such that the enrolled account is terminated and a new customer of record initiates service at the same location, the enrolled account will no longer be eligible to receive the DCFC discount.

THE NARRAGANSETT ELECTRIC COMPANY  
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The DCFC Discount Pilot is available on a first come, first served basis. Accounts eligible to receive the discount under the DCFC Discount Pilot must apply and complete enrollment in the Pilot between September 1, 2018 and ~~the effective date of base distribution rates approved by the Commission in the Company’s next general rate case August 31, 2019~~ and receive Retail Delivery Service on either General C&I Rate (G-02) (“Rate G-02”) or Large Demand Rate (G-32) (“Rate G-32”).

The discount provided through the DCFC Discount Pilot for customer accounts that complete enrollment in the Pilot ~~during September 1, 2018 through August 31, 2019~~ shall be based upon the monthly billing demand as defined in Rate G-02 and Rate G-32 and used to bill the distribution demand charge on the account. The discount per-kW shall be a credit value equal to the distribution demand charge per-kW in effect and as may change from time to time as approved by the Commission. Customer accounts that complete enrollment in the Pilot ~~during September 1, 2018 through August 31, 2019~~ shall receive the DCFC discount on their monthly bills for a period of three (3) years beginning with the first bill issued that includes the DCFC discount and ending with the bill representing the 36<sup>th</sup> DCFC discount credited to the account.

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