

June 4, 2018

BY HAND DELIVERY & ELECTRONIC MAIL

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

RE: Docket 4775 - Long-Term Contracting for Renewable Energy Recovery Factor Responses to PUC Data Requests – Set 1

Dear Ms. Massaro:

I have enclosed ten copies of National Grid's¹ responses to the first set of data requests issued by the Public Utilities Commission in the above-referenced matter.

Thank you for your attention to this filing. If you have any questions regarding this filing, please contact me at 781-907-2121.

Very truly yours,



Raquel J. Webster

Enclosures

cc: Docket 4775 Service List
Leo Wold, Esq.

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

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4775
In Re: Long-Term Contracting For Renewable Energy Recovery Factor
For Effect July 1, 2018
Responses to Commission's First Set of Data Requests
Issued on May 18, 2017

PUC 1-1

Request:

Please provide any detail / explanation / rationale / documentation National Grid possesses regarding the ISO-NE decision to classify RI LFG Genco as an intermittent resource.

Response:

The February 27, 2018 letter from Broadrock Renewables LLC (Broadrock) stated that the reclassification as an intermittent resource was due to 'the facility's historic performance, and the lack of control that the facility has over its fuel supply.'¹ Broadrock's letter is provided as Attachment PUC-1-1.

For each Forward Capacity Auction, there is an Existing Capacity Challenge Window (Challenge Window). The Challenge Window is a five business day period during which a participant can challenge the calculation of the qualified capacity for an existing capacity resource. During the Challenge Window, a capacity resource such as RI LFG Genco may request a change to an Intermittent Power Resource if it meets the definition in Section I of the ISO-NE tariff. An Intermittent Power Resource is defined as a wind, solar, run of river hydro or other renewable resource that does not have control over its net power output.

¹ The Company's May 15, 2018 filing letter for Docket 4775 - Long-Term Contracting for Renewable Energy Recovery Factor incorrectly listed the date of Broadrock's letter as February 27, 2017.

Rhode Island LFG Genco LLC
40 Shun Pike
Johnston, RI 02919
Phone: (401-943-8350)

February 27, 2018

Mr. James Ruebenacker
Wholesale Electric Supply
nationalgrid
100 East Old Country Rd.
Hicksville, NY 11801
via email: james.ruebenacker@nationalgrid.com

Dear James,

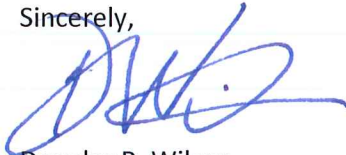
I am writing to update you on matters concerning the recently published ISO qualifications for FCA13 for our Johnston, RI landfill gas-fueled turbine facility.

In recognition of the facility's historic performance, and the lack of control that the facility has over its fuel supply, the turbine facility will be considered an Intermittent Resource effective June 1, 2018.

The summer qualification for FCA13 will be 20.492 MW and the winter qualification will be 24.058 MW. Calculation of these figures includes the facility's shake-down period in 2013 and early 2014. In particular, the summer qualification includes the 2013 summer period during which the facility only ran for a few days. It is anticipated that, as 2013 drops from the calculation after FCA13, the summer qualification will increase to a level closer to current plant performance.

If you have any questions on these matters, please feel free to call.

Sincerely,



Douglas R. Wilson
CEO
Rhode Island LFG Genco LLC

cc: T. Pagano
R. Ivers

The Narragansett Electric Company
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PUC 1-2

Request:

Is it likely that RI LFG Genco will remain classified as intermittent or is there an expectation that it will move to non-intermittent status?

Response:

As described in PUC 1-1, each Forward Capacity Auction has an Existing Capacity Challenge Window, which allows a capacity resource such as RI LFG Genco to challenge the calculation of its qualified capacity. In future Forward Capacity Auctions, RI LFG Genco may request a change from an Intermittent Power Resource to a Non-Intermittent Settlement Only Resource.

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PUC 1-3

Request:

What, if any, capacity revenue does National Grid expect to receive moving forward from the RI LFG Genco project?

Response:

Expected capacity revenues are shown below for each Forward Capacity Auction through May 2022.

Forward Capacity Auction 9 (June 2018 - May 2019)

| | | |
|-------|-----------|--|
| | 26 | Capacity Supply Obligation (MW) |
| X | 11.080 | 2018/2019 SEMA-RI Payment Rate (\$/kW-Month) |
| X | 12 | Number of Months |
| X | 1000 | Convert MW to kW |
| <hr/> | | |
| | 3,456,960 | Expected capacity revenue from ISO-NE |

Forward Capacity Auction 10 (June 2019 - May 2020)

| | | |
|-------|-----------|--|
| | 26 | Capacity Supply Obligation (MW) |
| X | 7.030 | 2019/2020 Southeast New England Payment Rate (\$/kW-Month) |
| X | 12 | Number of Months |
| X | 1000 | Convert MW to kW |
| <hr/> | | |
| | 2,193,360 | Expected capacity revenue from ISO-NE |

Forward Capacity Auction 11 (June 2020 - May 2021)

| | | |
|-------|-----------|--|
| | 26 | Capacity Supply Obligation (MW) |
| X | 5.297 | 2020/2021 Southeast New England Payment Rate (\$/kW-Month) |
| X | 12 | Number of Months |
| X | 1000 | Convert MW to kW |
| <hr/> | | |
| | 1,652,664 | Expected capacity revenue from ISO-NE |

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Forward Capacity Auction 12 (June 2021 - May 2022)

| | | |
|-------|-----------|--|
| | 26 | Capacity Supply Obligation (MW) |
| X | 4.631 | 2021/2022 Southeast New England Payment Rate (\$/kW-Month) |
| X | 12 | Number of Months |
| X | 1000 | Convert MW to kW |
| <hr/> | | |
| | 1,444,872 | Expected capacity revenue from ISO-NE |

Forward Capacity Auction 13 is held in February 2019. Expected capacity revenue will be calculated using the payment rate established in the auction and the intermittent summer and winter qualified capacity MW. RI LFG Genco summer qualification would decrease to 20.492 MW and the winter qualification would decrease to 24.058 MW.