



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Rhode Island Division of
Public Utilities and Carriers
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June 5, 2018

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

In Re: Docket No. 4790 – National Grid - Net Metering Provision, RIPUC No. 2207

Dear Luly,

Please find for filing with the Commission, the State of Rhode Island Division of Public Utilities and Carriers, (the “Division”) Memorandum in response to National Grid’s filing in the above captioned docket.

On January 26, 2018 National Grid filed a tariff advice filing in docket 4790 to request approval of the Company’s electric tariff, entitled Net Metering Provision RIPUC No. 2207, which replaces the Company’s Net Metering Provision, RIPUC No. 2178. A summary of those proposed revisions is set-forth in this Memorandum.

The revisions proposed by National Grid are in response to amendments to the Net Metering Law, R.I. Gen. Laws § 39-26.4-2 and § 39-26.4-3(Net Metering Law), which were signed into law by Governor Raimondo in June 2017. These amendments expanded the eligibility for community remote net metering to include educational institutions, hospitals and nonprofit corporations and added educational institutions, the federal government, hospitals and nonprofits to the list of net metering finance arrangements exempted from the 30 MW cap on community remote net metering systems.

Thereafter, on March 2, 2018, The Coalition for Community Solar Access (“CCSA”) after being granted intervention, filed comments, which included proposed further revisions to the tariff. CCSA’s proposal would extend the 24-month deadline to reach commercial operation

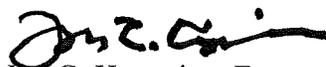
after securing an allocation of the Community Remote Net Metering Cap. Solar, anaerobic digestion, and small-scale hydro projects would start with 24-month, 36-month and 48-month deadlines, respectively, however these could be extended by 6-months twice for a total extension of 12 months. Additionally, if there were a legal challenge to getting a government permit outside the control of the Customer, the deadline would be extended for the length of the legal challenge.

Subsequently, National Grid, the Division, OER and CCSA met to discuss the proposal of CCSA. The parties considered the concerns of CCSA and received input from National Grid, the Division and the OER. Finally, by agreement of the parties, on April 27, 2018, National Grid filed supplemental tariff pages reflecting additional revisions to Section II of Net Metering Provision, RIPUC No. 2207 to provide for an extension of the Cap Expiration Date for community remote net metering, as defined in the tariff.

After reviewing the original revisions proposed by National Grid, I find that these changes are reasonable and necessary based on the amendments to the Net Metering Law. I also find that the additional revisions set-forth in the supplemental tariff pages reflecting additional revisions to Section II of Net Metering Provision, RIPUC No. 2207 agreed upon by the parties are also reasonable.

I appreciate your attention in this matter.

Very truly yours,



Jon G. Hagopian, Esq.
Deputy Chief Legal Counsel