

September 20, 2018

**BY HAND DELIVERY AND ELECTRONIC MAIL**

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

**RE: Docket 4847 - 2018 Renewable Energy (RE) Growth Program Factor Filing Responses to PUC Data Requests – Set 3**

Dear Ms. Massaro:

I have enclosed ten (10) copies of the Company's<sup>1</sup> responses to the third set of data requests issued by the Public Utilities Commission in the above-referenced docket.

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

Very truly yours,



Raquel J. Webster

Enclosures

cc: Docket 4847 Service List  
Leo Wold, Esq.  
Jon Hagopian, Esq.  
John Bell, Division

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

PUC 3-1

Request:

Referencing Attachment PUC 2-2 Revised (attached), please explain why the project that is four from the bottom, rated at 14.4 kW DC is being paid at the Small-Scale Solar I rate of 34.4 cents per kWh rather than the Small-Scale Solar II rate of 27.75 cents per kWh. Please also explain why it was provided a 15-year tariff instead of 20-year tariff.

Response:

This project should have been categorized as a Small Scale Solar II project, with a 20 Year tariff, and a Performance Based Incentive (PBI) of 27.75 cents per kWh. A notification and correction has gone out to the customer, and the Company's account maintenance group has corrected the error in the billing system. This was a human error that resulted from the numerous revisions the developer submitted for this application.

The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 4847  
In Re: 2018 Renewable Energy Growth Program Factor Filing  
Responses to Commission's Third Set of Data Requests  
Issued on September 17, 2018

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PUC 3-2

Request:

Please indicate where in the tariff the Company explains the sizing convention for projects that fall between category cutoffs (for example, a project that is 10.24 kW DC or 10.88 kW DC where the system size cutoffs end at 10 kW for one category and start at 11 kW for the next category).

Response:

In each tariff, the Tariff Supplement for each program year's tariff rates for different RE Growth classes lists the classes by using whole kW figures, as does the RE Growth Act in defining the required class categories at Section 39-26.6-7. The convention of starting the next size class at the next whole kW was developed with input and review of the Distributed Energy Board (Board) and the Office of Energy Resources, so that the Company could appropriately implement the rates and classes proposed by the Board. If the PUC believes it would be more appropriate to start each new size class at a fraction of a kW rather than at the whole kW (for example, Small Solar I would be from 0.01 kW to 10.00 kW and Small Solar II would start at 10.01 kW and apply up to 25.00 kW), the Company can make this change for the 2019 Program Year Tariff Supplement in the RE Growth tariff filing, which the Company will file with the PUC on November 15, 2018.

PUC 3-3

Request:

Please explain where in the Renewable Energy Growth Act or approved tariffs, the Company had explicit authority to exceed a class target in 2017. Please explain whether there were any statutory changes applicable to the 2018 Renewable Energy Growth Program Year.

Response:

The Company presents analysis and quotes from three sections of the Renewable Energy Growth Program Act (RE Growth Act), Ch. 39, Section 26.6, for the PUC's review and consideration. The Company is not aware of any statutory changes applicable to the 2018 program year in regards to the matter of annual enrollments.

First, R.I. Gen. Laws § 39-26.6-12(b) lays out the creation of annual targets, enrollment targets, class targets, and the Company's ability to reallocate megawatts of capacity between classes, with agreement of the Board and the Office of Energy Resources, without PUC approval. This has occurred in all prior program years. The section also provides that the annual target may not be exceeded "except as provided in § 39-26.6-7:

***§ 39-26.6-12. Annual bidding and enrollments.***

*(b) During each program year, the tariff enrollments shall have both an annual targeted amount of nameplate megawatts ("annual MW target") and a nameplate megawatt target for each separate enrollment event ("enrollment MW target"). The enrollment MW target shall comprise the specific portion of the annual MW target sought to be obtained in that enrollment. The enrollment MW targets shall be recommended by the board each year, subject to commission approval. The board shall also recommend a megawatt target for each class ("class MW target") that comprises a specified portion of the enrollment MW target, subject to commission approval. If the electric-distribution company, the office, and the board mutually agree, they may reallocate megawatts during an enrollment from one class to another without commission approval if there is an over-subscription in one class and an under-subscription in another, provided that the annual MW target is not being exceeded, except as provided in § 39-26.6-7.*

However, R.I. Gen. Laws § 39-26.6-7: does not address exceeding annual limits. Instead, R.I. Gen. Laws § 39-26.6-7: addresses the creation of technology and class sizes for pricing and target purposes based on nameplate kW.

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**§ 39-26.6-7. Solar project size categories.**

*(a) Tariff(s) shall be proposed for each of the following solar-distributed generation classes:*

- (1) Small-scale solar projects;*
- (2) Medium-scale solar projects;*
- (3) Commercial-scale solar projects; and*
- (4) Large-scale solar projects.*

*(b) Such classes of solar distributed-generation projects shall be established based on nameplate megawatt size as follows:*

- (1) Large scale: solar projects from one megawatt (1 MW), up to and including, five megawatts (5 MW) nameplate capacity;*
- (2) Commercial scale: solar projects greater than two hundred fifty kilowatts (250 kW), but less than one megawatt (1 MW) nameplate capacity;*
- (3) Medium scale: solar projects greater than twenty-five kilowatts (25 kW), up to and including, two hundred fifty kilowatts (250 kW) nameplate capacity; and*
- (4) Small scale: solar projects, up to and including, twenty-five kilowatts (25 kW) nameplate capacity.*

*(c) Other classifications of solar projects may also be proposed by the board, subject to the approval of the commission. After the second program year, the board may make recommendations to the commission to adjust the size categories of the solar classes, provided that the medium-scale solar projects may not exceed two hundred fifty kilowatts (250 kW); and/or allocated capacity to community distributed-generation facilities, allowing them to compete or enroll under a distinct ceiling price.*

The Company believes that there is a technical/typographical error in the law, and that § 39-26.6-12 meant to refer to R.I. Gen. Laws § 39-26.6-17 rather than R.I. Gen. Laws § 39-26.6-7.

Section 17 provides that that the Company is not required to award bids in excess of the annual target for the applicable program year for the protection of the Company and its customers from unreasonable requirements, but may voluntarily do so with approval of the PUC. Specifically, Section 17 provides:

**§ 39-26.6-17. Excess enrollment not required.**

*The electric-distribution company shall not be required to award bids in excess of the annual target for the applicable program year and shall not be required to procure projects in excess of any limit set by the board and approved by the commission for a given enrollment. However, the electric-distribution company, in consultation with the board and the office, may voluntarily exceed an enrollment period limit as long as it does not exceed an annual target for the*

PUC 3-3, page 3

*applicable program year. At its election, the electric-distribution company may exceed an annual target for the applicable program year after review by the board and approval by the commission. (emphasis added)*

In reviewing small-scale solar applications, the Company, following its practice of putting applications on “hold” in the interconnection process, as described in the interconnection tariff, when they required technical corrections and changes in review process (e.g., requiring an applicant applying for Simple interconnection to reapply via the Expedited process due to system sizing or impact), accepted and enrolled applicants that were on hold after the small-scale solar size was fully subscribed. Although the RE Growth Act provides the Company with the flexibility to exceed the program year’s annual target, the Company recognizes that it should have utilized the consultation and review process set forth in R.I. Gen. Laws § 39-26.6-17, which includes the review of the Board, and approval of the PUC prior to issuance of those COEs.

Finally, the RE Growth Act provides that it is “intended to achieve at least an aggregate amount of one hundred sixty (160) nameplate megawatts over five (5) years, plus any shortfall amount added in pursuant to subsection (e) of this section.”<sup>1</sup> As such, the RE Growth Act envisioned the possibility that the Company, in agreement with the Board and with approval of the PUC, could exceed the annual targets, and indeed the aggregate 160 MW target of the initial five years of the program, and that all other aspects of the RE Growth Act would apply to those excess enrollments as they do to the initial 160 MW, including full cost recovery of all performance based incentive payments, incremental costs of administration, and remuneration associated with the payments to those enrolled customers. The Company here formally asks for approval of the over-enrollment, and full recovery of the costs associated with such enrolled facilities, as allowed by the Act.

The Company is currently reviewing internal processes and possible tariff revisions to ensure that its requirements for customers that are on hold are clear to customers and those working on implementation of the RE Growth program, and to ensure that the Company follows the procedures set forth in the RE Growth Act concerning exceeding annual targets. Such changes could be more restrictive than current Company practice, if the PUC so desires, and could be reflected in tariff changes to be filed with the PUC in November. Alternatively, the Company could keep with its current practice, but consult with the Board, and seek approval from the Commission, before issuing COEs that exceed the annual target.

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<sup>1</sup> The Renewable Energy Growth Program Act, § 39-26.6-12. Annual bidding and enrollments. Subsection (i).

PUC 3-4

Request:

Please provide Attachment PUC 2-2 Revised to include additional columns representing estimates for each column over the full 15-year tariff life.

Response:

Please see Attachment PUC 3-4 for the requested revised version of Attachment PUC 2-2 Revised. Attachment PUC 3-4 includes the following additional columns:

- Column (u), which estimates total output per project for the length of each tariff term
- Column (v), which estimates Total PBI payments per project over the full tariff term
- Column (w), which estimates total remuneration amounts per project over the full tariff term

Please note that the Performance Based Incentive (PBI) price shown on Line (13), Column (n) has been revised to 27.75¢ to reflect the correction described in PUC 1-4.

Case Number (a)	Legacy App ID (b)	Submission Date (c)	Conditional Approval Date (d)	Connected Date (e)	Incentive (f)	Case Record Type (g)	DG Fuel Source (h)	Status (i)	BillRate (j)	Total AC Rating(kW) (k)	Total DC Panel Rating (kW) (l)	Contract Term (m)	Standard Performance Based Incentive (n)	Actual Total PBI Payments through March 31, 2018 (o)	Calculated 1.75% Remuneration of Actual PBI Payments (p)	Estimated kWh generated during PY18 (q)	Estimated PBI Payments through March 31, 2019 (r)	Estimated Total PBI Payments through PY18 (s)	Total Remuneration (t)	Estimated Tariff Term Total kWh generated (u)	Estimated Tariff Term Total PBI Payments (v)	Estimated Tariff Term Total Remuneration (w)
(1)	00161513	25081984	10/2/2017 1:00	10/27/2017	12/29/2017	Re-Growth Application	Solar	Connected	A16	10	9.3	15yrs	34.75	\$364.18	\$6.37	11406	\$3,963.59	\$4,327.77	\$6.37	171,083	\$59,451	\$1,040.39
(2)	00162495	25126144	10/6/2017 1:00	10/31/2017	12/20/2017	Re-Growth Application	Solar	Connected	A16	6.5	8.32	15yrs	34.75	\$450.02	\$7.88	10204	\$3,545.89	\$3,995.91	\$7.88	153,055	\$53,187	\$930.77
(3)	00161428	25058331	9/27/2017 1:00	10/31/2017	1/29/2018	Re-Growth Application	Solar	Connected	A16	5	6.12	15yrs	34.75	\$99.39	\$1.74	7506	\$2,608.34	\$2,707.73	\$1.74	112,584	\$39,123	\$684.65
(4)	00162356	25122052	10/6/2017 1:00	11/1/2017	12/20/2017	Re-Growth Application	Solar	Connected	A16	7.75	9.92	15yrs	34.75	\$329.08	\$5.76	12166	\$4,227.69	\$4,556.77	\$5.76	182,488	\$63,415	\$1,109.76
(5)	00162494	25125548	10/6/2017 1:00	11/1/2017	12/15/2017	Re-Growth Application	Solar	Connected	A16	6	7	15yrs	34.75	\$265.14	\$4.64	8585	\$2,983.29	\$3,248.43	\$4.64	128,772	\$44,748	\$783.09
(6)	00161522	25098532	10/3/2017 1:00	11/1/2017	12/15/2017	Re-Growth Application	Solar	Connected	A16	5	6	15yrs	34.75	\$290.17	\$5.08	7358	\$2,556.91	\$2,847.08	\$5.08	110,376	\$38,356	\$671.23
(7)	00162308	25278575	10/30/2017 1:00	11/7/2017	12/29/2017	Re-Growth Application	Solar	Connected	A16	4.64	5.84	15yrs	34.75	\$193.90	\$3.39	7162	\$2,488.80	\$2,682.70	\$3.39	107,433	\$37,333	\$653.33
(8)	00162341	25100192	9/19/2017 1:00	11/7/2017	2/27/2018	Re-Growth Application	Solar	Connected	A16	7.6	6.56	15yrs	34.75	\$0.00	\$0.00	8045	\$2,795.64	\$2,795.64	\$0.00	120,678	\$41,936	\$733.88
(9)	00165708		10/2/2017 15:02	11/14/2017	1/12/2018	Re-Growth Application	Solar	Connected	A16	8	10.24	15yrs	34.75	\$504.57	\$8.83	12558	\$4,363.91	\$4,868.48	\$8.83	188,375	\$65,460	\$1,145.55
(10)	00161526	25065928	9/27/2017 1:00	11/15/2017	1/25/2018	Re-Growth Application	Solar	Connected	A16	7.6	8.7	15yrs	34.75	\$348.54	\$6.10	10670	\$3,707.83	\$4,056.37	\$6.10	160,045	\$55,616	\$973.28
(11)	00162202	25272212	10/27/2017 1:00	12/6/2017	3/26/2018	Re-Growth Application	Solar	Connected	A16	7.14	8.26	15yrs	34.75	\$0.00	\$0.00	10130	\$3,520.18	\$3,520.18	\$0.00	151,951	\$52,803	\$924.05
(12)	00165837		9/29/2017 13:49	12/6/2017	2/14/2018	Re-Growth Application	Solar	Connected	A16	8.5	10.88	15yrs	34.75	173.75	\$3.04	13343	\$4,636.69	\$4,810.44	\$3.04	200,148	\$69,551	\$1,217.14
(13)	00165703		10/26/2017 12:52	12/11/2017	1/23/2018	Re-Growth Application	Solar	Connected	A16	13.6	14.4	20yrs	27.75	\$238.39	\$4.17	17660	\$4,900.65	\$5,139.04	\$4.17	353,203	\$98,014	\$1,715.25
(14)	00161100	24799756	8/2/2017 1:00	1/2/2018	1/30/2018	Re-Growth Application	Solar	Connected	A16	3	3.58	15yrs	34.75	\$155.68	\$2.72	4391	\$1,525.87	\$1,681.55	\$2.72	65,858	\$22,886	\$400.51
(15)	00161113	24823681	8/25/2017 1:00	1/8/2018		Re-Growth Application	Solar	Approval	A16	3.8	4.68	15yrs	34.75	\$0.00	\$0.00	5740	\$1,994.65	\$1,994.65	\$0.00	86,093	\$29,917	\$523.55
(16)	00160968	24795904	8/11/2017 1:00	2/1/2018	2/26/2018	Re-Growth Application	Solar	Connected	A16	5	5.5	15yrs	34.75	<u>\$9.38</u>	<u>\$0.16</u>	<u>6745</u>	<u>\$2,343.89</u>	<u>\$2,353.27</u>	<u>\$0.16</u>	<u>101,178</u>	<u>\$35,159</u>	<u>\$615.28</u>
(17)	<b>Totals</b>													<b>\$3,422.19</b>	<b>\$59.89</b>	<b>153,669</b>	<b>\$52,163.78</b>	<b>\$55,585.97</b>	<b>\$59.89</b>	<b>2,393,320</b>	<b>\$806,955</b>	<b>\$14,121.71</b>

PUC 3-5

Request:

Please provide Attachment PUC 2-2 Revised as if the PBI payments were based on the 2018 Program Year ceiling prices, including additional columns representing estimates for each column over the full 15-year tariff life.

Response:

Please see Attachment PUC 3-5 for the requested revised version of Attachment PUC 2-2 Revised. The Performance based Incentive (PBI) prices in Column (n) have been revised to reflect applicable 2018 Program Year ceiling prices. Attachment PUC 3-5 includes the following additional columns:

- Column (u), which estimates total output per project for the length of each tariff term
- Column (v), which estimates Total PBI payments per project over the full tariff term
- Column (w), which estimates total remuneration amounts per project over the full tariff term

Case Number (a)	Legacy App ID (b)	Submission Date (c)	Conditional Approval Date (d)	Connected Date (e)	Incentive (f)	Case Record Type (g)	DG Fuel Source (h)	Status (i)	BillRate (j)	Total AC Rating(kW) (k)	Total DC Panel Rating (kw) (l)	Contract Term (m)	Standard Performance Based Incentive - PY18 Ceiling Price (n)	Actual Total PBI Payments through March 31, 2018 (o)	Calculated 1.75% Remuneration of Actual PBI Payments (p)	Estimated kWh generated during PY18 (q)	Estimated PBI Payments through March 31, 2019 (r)	Estimated Total PBI Payments through PY18 (s)	Total Remuneration (t)	Estimated Tariff Term Total kWh generated (u)	Estimated Tariff Term Total PBI Payments (v)	Estimated Tariff Term Total Remuneration (w)
(1)	00161513	25081984	10/2/2017 1:00	10/27/2017	12/29/2017	Re-Growth Application	Solar	Connected	A16	10	9.3	15yrs	32.25	\$364.18	\$6.37	11,406	\$3,678.44	\$4,042.62	\$6.37	171083	\$55,174.00	\$965.55
(2)	00162495	25126144	10/6/2017 1:00	10/31/2017	12/20/2017	Re-Growth Application	Solar	Connected	A16	6.5	8.32	15yrs	32.25	\$450.02	\$7.88	10,204	\$3,290.79	\$3,740.81	\$7.88	153055	\$49,360.00	\$863.80
(3)	00161428	25058331	9/27/2017 1:00	10/31/2017	1/29/2018	Re-Growth Application	Solar	Connected	A16	5	6.12	15yrs	32.25	\$99.39	\$1.74	7,506	\$2,420.69	\$2,520.08	\$1.74	112584	\$36,308.00	\$635.39
(4)	00162356	25122052	10/6/2017 1:00	11/1/2017	12/20/2017	Re-Growth Application	Solar	Connected	A16	7.75	9.92	15yrs	32.25	\$329.08	\$5.76	12,166	\$3,923.54	\$4,252.62	\$5.76	182,488	\$58,852	\$1,029.91
(5)	00162494	25125548	10/6/2017 1:00	11/1/2017	12/15/2017	Re-Growth Application	Solar	Connected	A16	6	7	15yrs	32.25	\$265.14	\$4.64	8,585	\$2,768.66	\$3,033.80	\$4.64	128,772	\$41,529	\$726.76
(6)	00161522	25098532	10/3/2017 1:00	11/1/2017	12/15/2017	Re-Growth Application	Solar	Connected	A16	5	6	15yrs	32.25	\$290.17	\$5.08	7,358	\$2,372.96	\$2,663.13	\$5.08	110,376	\$35,596	\$622.93
(7)	00162308	25278575	10/30/2017 1:00	11/7/2017	12/29/2017	Re-Growth Application	Solar	Connected	A16	4.64	5.84	15yrs	32.25	\$193.90	\$3.39	7,162	\$2,309.75	\$2,503.65	\$3.39	107,433	\$34,647	\$606.32
(8)	00162341	25100192	9/19/2017 1:00	11/7/2017	2/27/2018	Re-Growth Application	Solar	Connected	A16	7.6	6.56	15yrs	32.25	\$0.00	\$0.00	8,045	\$2,594.51	\$2,594.51	\$0.00	120,678	\$38,919	\$681.08
(9)	00165708		10/2/2017 15:02	11/14/2017	1/12/2018	Re-Growth Application	Solar	Connected	A16	8	10.24	15yrs	32.25	\$504.57	\$8.83	12,558	\$4,049.96	\$4,554.53	\$8.83	188,375	\$60,751	\$1,063.14
(10)	00161526	25065928	9/27/2017 1:00	11/15/2017	1/25/2018	Re-Growth Application	Solar	Connected	A16	7.6	8.7	15yrs	32.25	\$348.54	\$6.10	10,670	\$3,441.08	\$3,789.62	\$6.10	160,045	\$51,615	\$903.26
(11)	00162202	25272212	10/27/2017 1:00	12/6/2017	3/26/2018	Re-Growth Application	Solar	Connected	A16	7.14	8.26	15yrs	32.25	\$0.00	\$0.00	10,130	\$3,266.93	\$3,266.93	\$0.00	151,951	\$49,004	\$857.57
(12)	00165837		9/29/2017 13:49	12/6/2017	2/14/2018	Re-Growth Application	Solar	Connected	A16	8.5	10.88	15yrs	32.25	173.75	\$3.04	13,343	\$4,303.12	\$4,476.87	\$3.04	200,148	\$64,548	\$1,129.59
(13)	00165703		10/26/2017 12:52	12/11/2017	1/23/2018	Re-Growth Application	Solar	Connected	A16	13.6	14.4	20yrs	29.45	\$238.39	\$4.17	17,660	\$5,200.87	\$5,439.26	\$4.17	353,203	\$104,018	\$1,820.32
(14)	00161100	24799756	8/2/2017 1:00	1/2/2018	1/30/2018	Re-Growth Application	Solar	Connected	A16	3	3.58	15yrs	32.25	\$155.68	\$2.72	4,391	\$1,416.10	\$1,571.78	\$2.72	65,858	\$21,239	\$371.68
(15)	00161113	24823681	8/25/2017 1:00	1/8/2018		Re-Growth Application	Solar	Approval	A16	3.8	4.68	15yrs	32.25	\$0.00	\$0.00	5,740	\$1,851.15	\$1,851.15	\$0.00	86,093	\$27,765	\$485.89
(16)	00160968	24795904	8/11/2017 1:00	2/1/2018	2/26/2018	Re-Growth Application	Solar	Connected	A16	5	5.5	15yrs	32.25	\$9.38	\$0.16	6,745	\$2,175.26	\$2,184.64	\$0.16	101,178	\$32,630	\$571.03
(17)	<b>Totals</b>													<b>\$3,422.19</b>	<b>\$59.89</b>	<b>153,669</b>	<b>\$49,063.77</b>	<b>\$52,485.96</b>	<b>\$59.89</b>	<b>2,393,320</b>	<b>\$761,955</b>	<b>\$13,334.21</b>