

February 15, 2019

VIA HAND DELIVERY & ELECTRONIC MAIL

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

RE: Docket 4915 - Proposed FY 2020 Electric Infrastructure, Safety, and Reliability Plan Responses to PUC Data Requests – Set 1

Dear Ms. Massaro:

On behalf of National Grid,¹ I have enclosed ten (10) copies of the Company's response to PUC 1-7.

This transmittal completes the Company's responses to the Public Utilities Commission's First Set of Data Requests in the above-referenced docket.

Thank you for your attention to this transmittal. If you have any questions, please contact me at 401-784-7288.

Very truly yours,



Jennifer Brooks Hutchinson

Enclosures

cc: Docket 4915 Service List
John Bell, Division
Greg Booth, Division
Leo Wold, Esq.
Christy Hetherington, Esq.
Al Contente, Division

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

PUC 1-7

Request:

Referencing Attachment 1 on page 77, please provide details of the increase of forecasted spending over budgeted for FY 2019 for the line item Distributed Generation. Please also indicate whether this increase was related to load relief or distributed generation.

Response:

The Distributed Generation (DG) program is included within the Customer Requests/Public Requirements category and is considered non-discretionary as the work is done solely at the request of third parties (i.e. customers) and is therefore highly unpredictable.

The Company collects Contribution In Aid of Construction (CIAC) from interconnecting customers in advance of constructing the system modifications necessary for the continued safe and reliable operation of the electric power system. Per the Interconnection Tariff, RIPUC 2180, customers are afforded payment plans where CIACs exceed \$25,000. The first payment (for engineering design and permitting) is required upon execution of the interconnection service agreement and the balance is due prior to the start of construction. (For projects with CIACs exceeding \$1 million, the Company has allowed three payments with the last payment still due prior to construction.) Consequently, it is possible that payments received will span calendar years and, likewise, based on the complexity of the interconnection, it is also possible the expenses incurred will span multiple calendar years. In general, Company forecasted spending can be delayed by customer delays in making CIAC payments, in obtaining necessary permitting and easements, in providing site access, etc. Thus, differences between when a CIAC is collected and actual engineering and construction expenses are incurred in a given calendar year for a particular project, and, specifically across the broader distributed generation (DG) portfolio, are expected and make forecasting difficult.

The DG budget line item on Attachment 1 of page 77 represent only those projects that are estimated to exceed \$100,000 of capital spend. The FY 2019 budget assumed spending on three projects for \$0.3 million against anticipated net engineering costs and CIACs (i.e. credits) of (\$1) million. The Company updates the forecasted spending for projects monthly and the current forecast for FY 2019 for the portfolio of DG projects is \$2.1 million. These variances highlight the unpredictable nature of customer construction and customer contributions. In this case, the current year forecast is driven by DG not load relief.

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

February 15, 2019
Date

Docket No. 4915 - National Grid's Electric ISR Plan FY 2020
Docket No. 4857 - Performance Incentives Pursuant to R.I.G.L. §39-1
27.7.1(e)(3)

Service List as of 1/4/2019

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