



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

PUBLIC UTILITIES COMMISSION
89 Jefferson Boulevard
Warwick, Rhode Island 02888
(401) 941-4500

Chairperson Margaret E. Curran
Commissioner Marion S. Gold
Commissioner Abigail Anthony

December 30, 2019

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

Re: Docket. No. 4973 – Petition of the Episcopal Diocese of Rhode Island for Dispute Resolution - Mediator's Interim Report

Dear Luly:

Attached for the Public Utilities Commission's (Commission) review is a Mediator's Report on the progress made by the parties to date on the Episcopal Diocese's Claim 3 which stated:

[Narragansett] has failed to demonstrate that the costs it has quoted the Diocese for interconnection are not for [Narragansett's] own system improvements that benefit other customers and are truly solely for system modifications to its electric power system that are specifically necessary for and directly related to the interconnection of the project.

No action is required by the Commission on the attached Mediator's Report. I am continuing to work on proposed recommendations to the parties on all other outstanding claims, with the exception of the Affected System Operator study dispute currently before the Commission in Docket No. 4981. The recommendations will be subject to the parties' acceptance or rejection. In the event of rejection, those recommendations will go before the Commission for its determination.

Please advise me if there are any questions.

Very truly yours,

A handwritten signature in blue ink that reads "Cindy Wilson-Frias".

Cynthia G. Wilson-Frias
Chief of Legal Services

Enclosure

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: PETITION OF THE EPISCOPAL DIOCESE : DOCKET NO. 4973
OF RHODE ISLAND FOR DISPUTE RESOLUTION :

MEDIATOR'S REPORT
(Eastern Array Impact Study – Claim 3)

1. The Episcopal Diocese of Rhode Island (Diocese) seeks to develop two solar projects on its property in the Glocester, Rhode Island.
2. The Diocese, a nonprofit entity, intends to enroll the projects in net metering to allocate net metering credits from the projects to various Diocese electric accounts.
3. For purposes of this proceeding, the two projects are called the Eastern Array and Western Array.
4. The Diocese applied to The Narragansett Electric Company d/b/a National Grid (Narragansett) for interconnection of the Eastern Array and Western Array through separate interconnection applications.
5. The Eastern Array was assigned Case Number RI-25728432 by Narragansett.
6. A dispute arose between Narragansett and the Diocese and that could not be resolved.
7. On September 12, 2019, the Diocese filed a Petition with the Public Utilities Commission (Commission) for Dispute Resolution (Petition) pursuant to Section 9 of Narragansett's Standards for Interconnecting Distributed Generation (Tariff).
8. On September 27, 2019, Narragansett submitted a Response to the Petition.
9. The Diocese and Narragansett agreed, pursuant to Section 9.2.b to engage the assistance of Commission staff (mediator).
10. Meetings between the Diocese, Narragansett and the mediator were held on October 4, 2019, November 25, 2019, and December 18, 2019.

11. The Diocese and Narragansett have provided responses to information requests to the mediator.
12. The Diocese's Petition included six stated claims for dispute resolution and five specific requests for relief.¹
13. Mediated discussions between Narragansett and the Diocese have been productive.
14. This report only addresses the Diocese' claim number 3 on page 4 of its Petition related to the Eastern Array:

[Narragansett] has failed to demonstrate that the costs it has quoted the Diocese for interconnection are not for [Narragansett's] own system improvements that benefit other customers and are truly solely for system modifications to its electric power system that are specifically necessary for and directly related to the interconnection of the project."²
15. There are still many other outstanding issues that need to be resolved or decided which are not addressed herein.
16. The Eastern Array was originally proposed by the Diocese as a 2.4 MW facility. Following the results of a 20-business day meeting and subsequent meetings, the Diocese has reduced the size of its project to 2.2 MW.
17. The Diocese originally disputed that the feeder Narragansett studied (Chopmist 34F2 feeder which feeds into the Chopmist substation) was the right feeder to study.
18. At the October 4, 2019 meeting, Narragansett provided the Diocese with other potential feeders and substations that could be studied along with high level costs.

¹ Following discussion at the October 4, 2019 meeting during which the mediator opined that she could not provide a ruling on one of the claims, the Diocese filed a Declaratory Judgment petition which was docketed by the Commission as Docket No. 4981 – In re: Petition of the Episcopal Diocese of Rhode Island for Declaratory Judgment on Transmission System Costs and Related “Affected System Operator” Studies.

² This report does not settle the second part of this claim related to transmission studies or upgrades.

19. After the exchange of additional information and a discussion between the Diocese and Pascoag Utility District, on November 8, 2019, the Diocese advised the mediator that it agreed the Eastern Array should continue to be studied on the 34F2 feeder leading into the Chopmist substation.
20. In August 2019, Narragansett provided the Diocese with a draft impact study for the Eastern Array (July 11, 2019 Draft Impact Study) and advised the Diocese that the cost to interconnect the Eastern Array sized at 2.2 MW to the distribution system, before considering any potential additional system upgrades resulting from the Affected System Operator study, was \$1,496,586.
21. At the November 25, 2019 meeting, the Diocese and Narragansett reviewed the July 11, 2019 Draft Impact Study with the mediator.
22. In discovery responses, on November 22, 2019, the Company had identified \$34,201 in costs that were being recategorized as system improvement costs not allocable to the Diocese.
23. In response to questions from the mediator, the Company reviewed the distributed generation interconnected or about to be interconnected on the feeder. Between the time of the July 11, 2019 Draft Impact Study and the November 25, 2019 meeting, the feeder distributed generation on the feeder had increased from 652 kW to 1452 kW, with the minimum load on the feeder at 1953 kW.
24. As a result of the change in the level of distributed generation saturation on the 34F2 feeder, the mediator requested Narragansett review the substation to determine if it would be subject to reprioritization for 3V0 investment through the FY 2021 Electric Infrastructure, Safety, and Reliability budget. Narragansett also agreed to refresh its estimates.

25. Following the November 25, 2019 meeting, Narragansett provided to the mediator and the Diocese an updated draft impact study for the Eastern Array dated December 3, 2019. (December 3, 2019 Draft Impact Study).

26. The December 3, 2019 Draft Impact Study included the following language:

The Interconnecting Customer's project requires additional analysis and/or study by Affected System operators (1) to evaluate the impact of this interconnection on the electric power system of the Affected System operator(s) and (2) to determine if there are any Affected System operator requirements or system modifications (and, if so, the estimated cost thereof) as a result. The Interconnecting Customer shall be responsible for any resulting Affected System operator(s) costs for its requirements, including, without limitation, modifications to the electric power system of the Affected System operator(s), operation and maintenance costs, and any costs for modified or additional Company studies and/or system modifications necessitated as a result of the Affected System operator requirements.

27. Narragansett has not issued a final impact study for the Eastern Array.

28. In developing the December 3, 2019 Draft Impact Study, Narragansett investigated whether one System Modification identified in the July 11, 2019 Draft Impact Study was triggered by the Diocese's proposed projects or was to address a pre-existing condition. Narragansett identified that a project ahead of the Diocese proposed project had reduced its size. This eliminated the need for certain System Modifications previously identified in the July 11, 2019 Draft Impact Study.

29. The December 3, 2019 Draft Impact Study also removed allocation of costs associated with 3V0. In response to the mediator's inquiry noted above in paragraph 24, the Company stated:

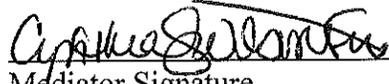
The Company has re-evaluated its existing 3V0 program list and has determined that the Chopmist Substation, including the proposed Episcopal Diocese projects, qualifies as a candidate for inclusion in the FY 2021 ISR investments. The Company has also determined that the investment list can be reprioritized so that Chopmist can be included in the FY21 capital plan without negatively impacting other customers or stations that are of higher priority on the list. Therefore, the cost

of 3V0 has been removed out of the study project estimate. The Diocese will still be subject to scheduling timeframes. While the Diocese's expected operational date is still unclear, the Company will do its best to meet required in service timelines, with a potential option of utilizing a MA mobile 3V0 unit as a temporary solution until the permanent protection scheme can be installed.

30. At the December 18, 2019 meeting, Narragansett indicated that the permanent 3V0 will be in FY 2021 construction schedule and should be completed by March 31, 2021.
31. At the December 18, 2019 meeting, Narragansett also advised that there is only one mobile 3V0 unit available at the necessary voltage. While Narragansett cannot guarantee its availability, it will use best efforts to borrow the mobile unit if the permanent 3V0 solution is not constructed in time for the Diocese's required in-service date.
32. The Diocese continues to dispute cost responsibility for any transmission or distribution system upgrades resulting from the transmission study. That is the subject of Docket No. 4981.
33. If the Diocese is required to pay for system modifications and a subsequent renewable energy or commercial customer relies on those modifications to connect to the distribution system within ten (10) years of the Diocese's payment, Narragansett will require that the subsequent customer make a prorated contribution toward the cost of the system modifications and will credit such amount to the Diocese as determined by the Commission.

This report is being submitted to the Commission per Section 9.2.b of the Tariff as a resolution of the discrete issue set forth in paragraph 14. The mediator finds that this document represents the facts and agreements related to the costs of the System Modifications related to the proposed Eastern Array as identified in the December 3, 2019 Draft Impact Study. It provides as much

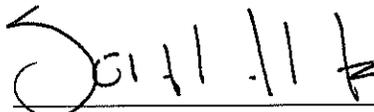
certainty as is possible at this time to allow the Diocese to make a decision of whether to proceed with the Eastern Array. The agreements contained herein do not require Commission action.



Mediator Signature

Assented to:
Episcopal Diocese of Rhode Island

The Narragansett Electric Company
d/b/a National Grid



Seth Handy, Esq. 12/26/19
Date

John K. Habib, Esq. Date

certainty as is possible at this time to allow the Diocese to make a decision of whether to proceed with the Eastern Array. The agreements contained herein do not require Commission action.

This Mediator's Report may be assented in counterparts, each of which shall be deemed an original and all of which together shall constitute one in the same document and will be binding on each party when the counterparts have been executed.

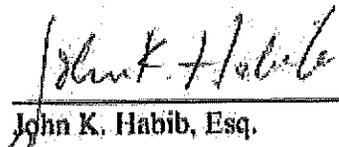


Cynthia G. Wilson-Frias, Mediator
December 23, 2019

Assented to:
Episcopal Diocese of Rhode Island

The Narragansett Electric Company
d/b/a National Grid

Seth Handy, Esq. Date

 12/27/19

John K. Habib, Esq. Date