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(By Email)

December 10, 2019

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

Re: Docket No. 4980 – National Grid – 2020 System Reliability Procurement Report

Dear Ms. Massaro:

Thank you, on behalf of Acadia Center, for the opportunity to provide a letter of support for the 2020 System Reliability Procurement (SRP) Report (“the 2020 Report” or “the Report”) in Docket No. 4980. Acadia Center is a non-profit research and advocacy organization committed to advancing the clean energy future and is at the forefront of efforts to build clean, low-carbon, and consumer-friendly economies.

Acadia Center participated extensively in the development of the 2020 Report through the SRP Technical Working Group, which includes a variety of stakeholders and advocates. Acadia Center cannot overstate the value of using a robust, collaborative process to leverage diverse areas of expertise and incorporate a broad array of priorities into a plan advancing proven climate solutions.

The development of the 2020 SRP Report provided important insights into National Grid’s (The Company) distribution system planning activities, including the evaluation process for non-wires alternatives (NWA) opportunities. While the Company did not advance any NWAs as part of the 2020 SRP Report, Acadia Center looks forward to working with National Grid and other stakeholders to advance alternative solutions which meet the least cost procurement standards, including the requirement for proposed projects to be environmentally responsible.

Additionally, Acadia Center commends National Grid for committing to several important activities, including:

- The Company’s commitment to study non-pipeline alternatives (NPAs) for the first time as part of the next update in the Three-Year Review;
- Investigating additional NWA pathways for the Narragansett 42F1 and South Kingstown opportunities;
- Pursuing additional NWA opportunities resulting from reevaluation of the East Bay and Providence area studies; and,
- Continued efforts to update the System Development Portal by adding layers of useful information to assist energy industry developers propose NWA solutions.

Acadia Center also appreciates the Company's efforts to inform stakeholders regarding the challenges and opportunities faced in implementing the SRP program, which revealed the following areas for improvement:

- **Narragansett 17F2:** Acadia Center is disappointed the Narragansett 17F2 opportunity did not generate viable bids for a non-wire alternative and that the Company will now proceed with the wired solution. Continued industry development, market education, and outreach should lead to a more robust interest and expertise among vendors in providing viable, cost-effective, and environmentally responsible non-wire solutions in the future.
- **Internal Processes:** Acadia Center is concerned by the Company's internal processes that enabled the error in the Energy Efficiency/System Reliability Procurement fund balance tracking sheets and the lack of internal reviews that should have discovered the error more quickly. The Company should take all necessary steps to review internal policies and processes to ensure that such an oversight does not occur in the future.

In conclusion, the SRP process provides significant insights into National Grid's Distribution System Planning. The Company is poised to pursue additional (NWA) opportunities in the future and Acadia Center looks forward to continued collaborations. As a settling party, Acadia Center believes the 2020 SRP Report meets its obligation under the Least Cost Procurement statute and respectfully urges the Commission to approve it.

Respectfully,



Hank Webster
Policy Advocate & Staff Attorney