



**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS**

**Department of Administration**  
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November 15, 2019

**SENT VIA FIRST CLASS MAIL AND ELECTRONIC MAIL:**

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

**Re: PUC Docket No. 4980 - 2020 System Reliability Procurement Plan**

Dear Ms. Massaro:

Enclosed for filing in the above referenced docket, please find an original and nine copies of the Rhode Island Office of Energy Resources' comments.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Daniel W. Majcher, Esq.

DWM/njr

Enclosure

c. Docket 4980 Service List



November 15, 2019

Chairperson Margaret E. Curran  
Commissioner Marion Gold  
Commissioner Abigail Anthony  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, Rhode Island 02888

**Re: Docket #4980 – 2020 System Reliability Procurement Plan Comments**

Dear Commissioners:

The Rhode Island Office of Energy Resources (OER) submits these comments regarding National Grid's proposed 2020 System Reliability Procurement (SRP) Plan (the Plan), as filed on October 15, 2019.

OER supports the content of the SRP Plan as submitted by National Grid. The proposed Plan is consistent with Least-Cost Procurement and the Standards and is aligned with Docket 4600 principles. Additionally, the 2020 SRP Plan shows progress along several dimensions:

1. The Company's expanded planning process, which included more stakeholder engagement and opportunities for review, along with the willingness of the Company to incorporate stakeholder comments and questions resulted in a 2020 SRP Plan that is much clearer and more transparent than in previous years. In addition, the formatting of the Plan generally and Table 2 specifically was successful in making the Plan easier to review.
2. The Company has described coordination of System Reliability Procurement generally with other business activities, including Energy Efficiency; Power Sector Transformation; Infrastructure, Safety, and Reliability; and Grid Modernization. OER finds these descriptions along with the forward-looking nature of Table 3 very helpful.
3. The 2020 SRP Plan provides an additional level of clarity regarding the distribution system planning process and non-wires solutions. While we are disappointed that a cost-effective non-wires solution could not be developed for the Narragansett 17F2 system need, OER is pleased to see a stated commitment to continuing to pursue non-wires solutions and "alternative solution pathways" for the South Kingstown system needs. OER is also pleased to see the Company's reevaluation of the East Bay and Providence system needs and their commitment to pursue non-wires solutions. This reevaluation and subsequent proposed action demonstrate a critical feedback loop within the distribution system planning process that allows the Company to continually pursue cost-effective solutions to system needs.

Rhode Island Office of Energy Resources  
One Capitol Hill, 4th Floor  
Providence, RI 02908



STATE OF RHODE ISLAND  
**OFFICE OF  
ENERGY RESOURCES**  
*Commissioner Carol J. Grant*

4. OER supports continued work to improve the System Data Portal and the Company's continued outreach to the developer community. The System Data Portal is an important tool to increase transparency about grid needs and elucidate locations for distributed energy resources that may provide grid benefits.

However, there are two important outstanding questions on which OER is looking for resolution:

First: As stated in Section 4, the Company found an accounting error that they attempt to correct with the 2020 SRP Factor. Through discussions with the Company, both OER and the Division of Public Utilities and Carriers are looking for more clarity and analysis on what the implications of the accounting error are and whether the proposed SRP Factor does indeed correct the error. That this error occurred in the first place demonstrates a deficiency in the Company's internal accounting processes, and we will rely on the Division of Public Utilities and Carriers to provide guidance on how to bolster accounting and reporting practices to prevent errors like this from occurring in the future. We also encourage the Company to commit to notifying the appropriate bodies within a shorter timeframe if an accounting error occurs in the future.

Second: OER would like more clarity on the specific cost-benefit categories used and their quantification in the economic evaluation of the non-wires solution proposals received. We are at a point where the Company's integration of non-wires solutions is maturing, with issuing RFPs and evaluating proposals becoming built into the Company's distribution system planning process. This is a critical time to check that this process meets expectations. The Company did not advance any non-wires solutions in the proposed 2020 SRP Plan. OER would like to make sure that their exclusion is appropriate through a thorough review of the Company's evaluation process.

While OER looks forward to resolving these two issues through continued dialogue, we encourage the Commission to approve the contents of the proposed 2020 SRP Plan.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Carol J. Grant". The signature is written in a cursive style and is positioned above the printed name.

Carol J. Grant

Commissioner