

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

Petition of the Episcopal Diocese of Rhode Island for Declaratory Judgment on Transmission System Costs and related “Affected System Operator” Studies

Docket No. 4981

AGREED FACTS

PETITION OF THE EPISCOPAL DIOCESE FOR DECLARATORY JUDGMENT

1. The Diocese’s planned project is located on the grounds of the Episcopal Conference Center and Camp in Glocester. The Project would generate rent to save the Diocese’s summer camp for disadvantaged youth, currently operating with an annual deficit in excess of \$250,000, while providing net metering credits to all their parishes and other non-profit, religious organizations in Rhode Island and fulfilling the Diocese mission of creation care.
2. The Diocese intends to develop two solar arrays on the camp property, the Eastern and Western projects bifurcated by Reservoir Road, using about 40 acres of remote portions of the Diocese property that consists of approximately 184 acres of former farmland.
3. The Diocese has received Master Plan approval and a special use permit from Glocester.
4. The Diocese received feasibility study results for the interconnection of each array from TNEC in April 2018 that estimated a cost of \$602,000 for each site. The feasibility study for the east array included the following statement:

The proposed generation capacity, when combined with the existing and proposed distributed generation value on the feeder queue, reaches near the feeder capacity limits at this time. Be advised that the proposed generation capacity may require substantial system modifications effecting the customer’s budget and schedule planned.

The feasibility study for the west array included a similar statement, as follows:

The proposed generation capacity, when combined with the existing and proposed distributed generation value on the feeder queue, exceeds the feeder capacity limits at this time. Be advised that the proposed generation capacity may be infeasible or may require substantial system modifications effecting the customer's budget and schedule planned.

Both feasibility studies also indicated that further engineering review by TNEC would be required in the form of ISRDRG to move forward with the interconnection.

5. The Diocese applied for Impact Studies on both projects. And paid the requisite fees on 8 June, 2018.

6. On April 17th, 2019, NGrid informed the Diocese that interconnection would not be possible unless the Project was limited to 3MW or less and the Diocese paid for significant upgrades to several circuits and a substation (hereinafter "re-conductoring") at a projected cost of \$3 to 3.5 million.

7. The Diocese asked NGrid's technical team how much capacity it could put on the system without re-conductoring. NGrid modeled that and said their system could only handle 2 MW without re-conductoring. The Diocese, concerned that 2 MW for \$650,000 would be difficult to finance, requested 2.2 MW, and NGrid declared that 2.2MW would be feasible without re-conductoring.

8. In June 2019, NGrid first informed the Diocese that the 2.2MW Eastern Array would be subject to a Transfer Analysis for Transmission Impacts Study. NGrid's affiliate, New England Power (NEP) would administer the study the cost of which would be allocated to the Diocese and other interconnecting customers in its cluster and which was estimated to take 6 to 9 months to perform.

9. The transfer study could result in a need for further, longer transmission studies and an assessment of additional costs for transmission system upgrades and the ongoing costs of

maintaining those upgrades before a final cost of interconnecting the project and project economics can be predicted.

10. NGrid has advised developers that it has changed its practice and now submits its generator notification forms to ISO during the impact study phase of interconnection rather than upon completion of system modifications when the project seeks final authorization to interconnect.

11. In August 2019, NGrid produced an Impact Study for the Eastern Array.

12. In August 2019, NGrid issued a “Final Impact Study” on the Western Array. That study said that the "expected least-cost interconnecting circuit would be the circuit adjacent to the site, which is the 34F2, a 12.47 kV regulated, three-phase, 4 wire, wye, effectively-grounded, radial distribution circuit that originates out of the Company’s Chopmist No. 34 Substation, in Foster, RI” but "no amount of system modifications could be performed on this circuit that would make this interconnection feasible. The Company can conduct further study on another circuit, which would require a new impact study.”

13. The Diocese project will be a Qualified Facility and has indicated its intent to take service under the net metering tariff.

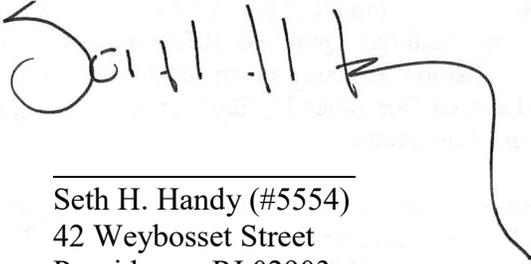
14. The Diocese Project will not sell its energy to ISO-NE markets and will either produce electric energy to be consumed only on site of the project or sell 100% of its output as a

Qualifying Facility to the interconnecting utility.

**THE EPISCOPAL DIOCESE OF
RHODE ISLAND**

By its attorneys,

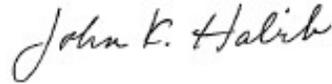
HANDY LAW, LLC

A handwritten signature in black ink, appearing to read "Seth H. Handy", with a long, sweeping underline that extends to the right and then curves downwards.

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**THE NARRAGANSETT ELECTRIC
COMPANY d/b/a NATIONAL GRID**

By its attorney,

A handwritten signature in black ink, appearing to read "John K. Habib", written in a cursive style.

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