

February 20, 2020

BY HAND DELIVERY AND ELECTRONIC MAIL

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

**RE: Docket 4983 - 2020 Renewable Energy Growth Program Tariff and Rule Changes
Responses to Record Requests**

Dear Ms. Massaro:

On behalf of National Grid,¹ I have enclosed the Company's responses to record requests issued at the PUC's Evidentiary Hearing on February 6, 2020 in the above-referenced docket.

Thank you for your attention to this matter. If you have any questions, please contact me at 781-907-2121.

Very truly yours,



Raquel J. Webster

Enclosures

cc: Docket 4983 Service List
Leo Wold, Esq.
Jon Hagopian, Esq.
John Bell, Division

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

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 20, 2020

Date

Docket No. 4983– Renewable Energy Growth Program for Year 2020
RI Distributed Generation Board and National Grid
Service List updated 2/20/2020

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Record Request No. 1

Request:

If there is only one rider per bill account, and community net metering or CRDG in RE Growth is a rider, can a customer on an A-60 rate which is also a rider be automatically billed when on both CNM/CRDG and A-60? Or will we have to manually bill them?

Response:

First, the Company must clarify that a rider is not required to place a customer on Rate A-60.

Under Net Metering's Community Remote Net Metering (CRNM) program, the host account (the account which earns renewable net metering credits) is assigned a rider that identifies it as a net metering account. Accounts that receive transferred net metering credits (Eligible Credit Recipients or satellite accounts) are not assigned a rider to receive net metering credits.

Under the Renewable Energy Growth Program's Community Remote Distributed Generation (CRDG) program, the host account (the account which accumulates generated kWh to be transferred) is assigned a rider that identifies it as a RE Growth account (similar to CRNM). Accounts that receive transferred kWh from the host account (Bill Credit Recipients) are also assigned a rider identifying it as a RE Growth account.

It is possible for a single Rate A-60 account to receive an allocation of net metering credits under CRNM (which neither requires nor allows the account to be assigned a rider) and to also receive an allocation of generated kWh under RE Growth's CRDG (which would require the account to be assigned a rider).

To date, there currently are no active CRDG projects transferring generated kWh. The Company has not yet developed the functionality to automate the transfer and billing of generated kWh on Bill Credit Recipient accounts. The Company has automated the process for CRNM. Theoretically, both can be billed through an automated process once the Company has developed the functionality for CRDG.

Record Request No. 2

Request:

If customers receiving bill credits are treated like net metering customers for purposes of sizing, why aren't they treated like net metering customers for purposes of the statutory credit?

Response:

Using the sizing requirements of the Company's Net Metering Tariff, the Company developed the RE Growth tariff language for solar projects that provide bill credits to accounts on site such that the applicant could continue to receive credits under net metering once the term in RE Growth was completed. The Company proposed the tariff language that set the credit value in RE Growth to include all components of the net metering credit in an effort to make the RE Growth bill credit easy for customers to understand. This structure of the bill credit was not set in statute.

Record Request No. 3

Request:

Why did the Company derate the customer's load by $\frac{3}{4}$ for assigning bill credits rather than scale the billing credit factors by $\frac{3}{4}$?

Response:

If the Company were to scale bill credit amounts from a host CRDG account to a subscribing customer that is served on the A-60 rate, it would be in conflict with the way that the tariff sets out how the Company will track and allocate credits, which is on a volumetric basis based on subscriber usage. A further complexity is that each CRDG recipient can have a different credit rate between the minimum rate and the default rate. A host may opt to provide minimal credits to the subscriber (e.g., at 2 cents per kWh of use each month), and not collect any payment from the subscriber. If this amount were derated to 70% or 75% of the value, it could be the same as providing the subscriber a smaller credit. Under the tariff currently, the remainder of the PBI would be paid to the host in cash for the allocated credits. For Shared Solar participants, scaling the bill credit rate would have the same impact as derating their annual average usage baseline, but may require a change to the billing system in order to bill automatically, whereas the derating of annual average use does not require any billing system changes.

Record Request No. 4

Request:

Relating to community remote distributed generation, regarding the A60 rate, is there any technical or policy reasons why National Grid would not deem derated credits to the customer as fully allocated?

Response:

If the Company treated the 25 or 30 percent amount of reduced allocation (per the Company's proposal) like allocated credits, the Company would need to manually calculate the total amount of such credits at the end of each year, and compare that to the amount of remaining unallocated credits in the host customer account. In addition, the Company would not know the amount to pay the host for the deemed-as-allocated credits and no such proposal has been made in this proceeding. In addition, the facility owner would not need to sign as many customers up to be fully enrolled in this circumstance, with the result that the benefits of the CRDG portion of the RE Growth program would be available to fewer customers.