



4/20/2020

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

Re: Proposed Edits to the SRP Standards

Dear Ms. Massaro:

The Rhode Island Office of Energy Resources (OER) and Division of Public Utilities & Carriers (DPUC) have made substantial progress in joint discussions on proposed edits to the state's System Reliability Procurement (SRP) Standards. Our proposed revisions stemming from the April 9, 2020 Technical Session are as follows:

1. In section 1.1.C, OER had interpreted the following sentence to mean that the use of System Benefit Charge funds could be proposed in other filings outside of SRP and EE filings: "To the extent possible, these standards shall apply to any System Reliability Procurement and Energy Efficiency and Conservation Procurement as defined below, including proposals of such procurement *outside of* the System Reliability Procurement Plans and Energy Efficiency and Conservation Procurement Plans described below." However, we have since realized that this language could cause confusion about when/where the LCP Standards should be applied. Both OER and the Division would like to ensure that the LCP Standards are only applicable when National Grid proposes an investment that utilizes System Benefit Charge (SBC) funds. If an investment does not use SBC funds, OER and the Division do not think the LCP Standards should be applicable. OER will propose language to this effect in its further proposed revisions.
2. In section 1.2.C, OER recommends that our initial redline be amended as follows: "System Reliability Procurement: ~~Identification, planning and/or procurement~~ of a non-traditional investment resource that...". We recognize that "Identification" and "planning" could be interpreted to replicate efforts undertaken in ISR. OER does not wish to replicate these efforts. Instead OER would like these efforts to be described at a high-level within the SRP filings. OER believes a description can be detailed and required within Chapter 4 of the LCP Standards rather than mentioned (in a possibly confusing manner) within the SRP definition.
3. In Section 1.2.E, OER recommends that references to certain investment categories in the definition of "Distribution System Needs" be removed. OER's previous revisions could be interpreted as a requirement to apply LCP Standards to distribution investment areas that are not applicable. OER will propose language with the exact deletions in its further proposed revisions.
4. In sections 1.2.J and 1.3.H, OER realizes the term "Cost of Supply" is confusing. OER would recommend that this be changed to "Cost of the Alternative". This will allow this term to be applicable to EE, conservation, and SRP while mitigating current confusion.

Please note, these comments summarize further proposed edits by OER to Chapter 1 of the LCP Standards based on its discussions with the Division and the Division's consultants. The Division has indicated to OER that the Division continues to reserve all of its rights to provide comments regarding the final proposed version of the LCP Standards in the Notice and Comment Period that the Commission has indicated that it will afford to the parties in Docket No. 5015.

Thank you for your consideration.

Sincerely,

Becca Trietch

Becca Trietch
Administrator, Energy Efficiency
Rhode Island Office of Energy Resources