



DIVISION OF PUBLIC UTILITIES & CARRIERS

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April 29, 2021

Luly Massaro, Clerk
Public Utilities Commission
89 Jefferson Blvd.
Warwick, RI 02888

Docket No. 5077

Dear Ms. Massaro,

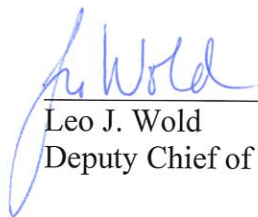
On April 22, 2021, The Narragansett Electric Company, d/b/a National Grid (“National Grid” or “Company”) submitted the Pre-Filed Testimony of Timothy R. Roughan and Attachment 1 that includes a summary and rationale for the proposed consensus revisions to R.I.P.U.C. No. 2244 (“Tariff”). The Division’s expert consultant, Gregory L. Booth, PE, PLS, has reviewed the testimony and Attachment 1 as well as a red-lined Tariff circulated on April 20, 2021. While the Company recognizes that is not appropriate to include the Ombudsperson role in the Tariff (and, thus, has removed the provision from the Tariff), the Company “agrees with the construct of an Ombudsperson role as it provides a third-party review of the interconnection tariff in addition to internal elevation of a complaint per Section 9 of the tariff.” *Roughan at 6*. For the reasons expressed to the Commission by the Division in the Technical Conference on February 16, 2021, the Division does not believe that an Ombudsperson reflects a workable solution for resolving interconnection disputes or facilitating administration of the interconnection process. *See 2/16/2021 Transcript of Hearing, pp. 154-158*.

With this qualification regarding the Company’s Direct Testimony, the Division concurs with the proposed consensus Tariff revisions and explanations for those revisions contained in Mr. Roughan’s April 22, 2021 testimony. These revisions reasonably address the concerns expressed by Mr. Booth on behalf of the Division in correspondence dated January 8, 2021.

The Division, therefore, recommends that the Commission approve the revisions as discussed by Mr. Roughan in his testimony. The Division reserves all of its rights to comment on the submissions of the other parties to this docket.

Respectfully submitted,

Division of Public Utilities and Carriers



Leo J. Wold
Deputy Chief of Legal Services