

**STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

<hr/>	)	
<b>In Re: The Narragansett Electric</b>	)	
<b>Company d/b/a National Grid's System</b>	)	<b>Docket No. 5080</b>
<b>Reliability Procurement 2021-2023</b>	)	
<b>Three-Year Plan</b>	)	
<hr/>	)	

**Rhode Island Office of Energy Resources' Position on  
Motion for Protective Treatment of Rhode Island Non-Wires Alternative  
Benefit-Cost Analysis Model**

The Rhode Island Office of Energy Resources (“OER”) respectfully submits the following supplemental information related to National Grid’s Motion for Protective Treatment (“the Motion”) of Rhode Island Non-Wires Alternative Benefit-Cost Analysis Model (“BCA Model”) in Docket 5080 regarding System Reliability Procurement (SRP). The intent of this information is to clarify the term “evaluation criteria weightings,” argue that these weightings are not included explicitly in the redacted Excel workbook submitted by National Grid and in consideration of protective treatment, and reiterate remarks regarding state purchasing regulations as an example of procurement best practice from OER’s comment letter on the 2020 SRP Year-End Report. Overall, OER believes the Commission should not grant protective treatment to SRP evaluation criteria weightings.

**Background**

Several parties submitted comments in Docket 5080 following National Grid’s filing of the 2021-2023 SRP Three- Year Plan related to transparency of procurement and evaluation of non-wires alternatives, and the BCA Model specifically in some cases (see comments from the Energy Efficiency and Resource Management Council (EERMC), Acadia Center, Seth Handy, and National Grid’s Response Comments).

On June 1, 2021, National Grid filed a revised motion for protective treatment for their BCA Model. The Motion also includes a discussion of what National Grid calls “detailed scoring criteria”, which references a MA DPU Order and Table 7 in the SRP Three-Year Plan entitled *National Grid USA Evaluation Categories for NWA Solution Proposals* (“Table 7”) (pages 6-7 of the Motion).

**Clarification of “evaluation criteria weighting”**

In its comments on the 2020 SRP Year-End Report, OER references “evaluation criteria weightings.” OER uses the term “evaluation criteria weightings” to mean the total possible points a proposal may receive for each criterion used to evaluate the proposal’s merits.

Referencing Table 7 in the 2020 SRP Year-End Report, weightings would be the pre-determined maximum point total for each row of the table. As an illustrative example, a given proposal may be awarded up to five points for *Proposal Content and Presentation* and may be awarded up to thirty points for *Developer Experience*. In this example, the evaluation criteria weightings are five points and thirty points, respectively.

In OER's experience, evaluation criteria weightings do not refer to the specific scores any given proposal actually earns during the evaluation process, nor do they refer to the specific quantitative parameters and inputs used to calculate a benefit-cost ratio.

National Grid seems to suggest their term "detailed scoring criteria" is synonymous with "evaluation criteria weighting" because of National Grid's reference to Table 7.

### **Evaluation criteria weightings are not included in the BCA Model**

National Grid submitted a redacted Excel workbook for consideration for protective treatment. This workbook has no clear or obvious tab that would provide evaluation criteria weightings if it were not redacted. Instead, the workbook contains a tab called *Proposals Comparison* which may include specific scores earned by each proposal – these are not what OER is referencing when using the term "evaluation criteria weightings." Furthermore, it is not clear or obvious how National Grid's discussion of "detailed scoring criteria" is relevant to the BCA Model they are moving for confidential treatment.

### **OER reiterates comments on best practice**

In OER's comments on the 2020 SRP Year-End Report, OER encouraged making evaluation criteria weightings public. To clarify, OER would like National Grid to disclose the total maximum number of points a proposal may earn for each row in Table 7 (or equivalently, the proportion of total points each row may earn). Doing so will allow bidders to ensure their proposals are as responsive as possible to the criteria being evaluated. Furthermore, doing so would not expose specific scores of individual proposals nor would it allow bidders to "game" the system.

OER also cited the example of state purchasing regulations as indicative of best practice:

State purchasing regulations describe requirements and recommendations for ensuring fair and competitive bid processes, which National Grid may consider for guidance regarding transparency of evaluation coring criteria weighting. See for example: [Competitive Bid and Competitive Sealed Bid Review and Source Selection](#) (220-RICR-30-00-5): "Solicitations shall be prepared in a manner and form which enables suppliers to submit fully responsive and knowledgeable offers, and which clearly define the criteria to be used in evaluating responses" (Section 5.4.C) where "'proposal evaluation criteria' means factors, usually weighted, relating to management capability, technical capability, manner of meeting performance requirements, price and other considerations used to evaluate which proposer in a competitive negotiations has made the most advantageous offer" (Section 5.1.N). Furthermore, "wherever possible, the Request for Proposal... shall

set forth specific criteria to be utilized in evaluation of offers” (Section 5.11.D.2) and “the evaluation of offers, including the weight assigned to various aspects of the offerors, and all award determinations, including the reasons for a selection recommendation, shall be fully documented” (Section 5.11.D.5).

## **Conclusion**

Disclosure of “evaluation criteria weightings,” also seemingly referred to as “detailed scoring criteria” by National Grid, is not clearly within the document National Grid moves to keep confidential, and is therefore a moot point of consideration for their Motion.

Furthermore, OER continues to assert that evaluation criteria weightings should be disclosed in accordance with state purchasing regulations and general best practices for procurement.