



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

**Rhode Island Division of
Public Utilities and Carriers
89 Jefferson Blvd.
Warwick RI 02888
(401) 941-4500**

May 26, 2021

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

**IN RE: -- CONSIDERATION OF PERFORMANCE BASED REMUNERATION IN
REGROWTH R.I. GEN. LAWS § 39-26.6-12 -----DOCKET NO. 5150**

Dear Luly,

Attached please find for filing with Public Utilities Commission the responses of the Division to the Commissions First Set of Data Requests.
Thank you for your attention in this matter

Very truly yours,

A handwritten signature in black ink, appearing to read "Jon G. Hagopian".

Jon G. Hagopian
Deputy Chief Legal Counsel

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

**IN RE: CONSIDERATION OF PERFORMANCE :
BASED REMUNERATION IN REGROWTH : DOCKET NO. 5150
(R.I. GEN. LAWS § 39-26.6-12) :**

**COMMISSION'S FIRST SET OF DATA REQUESTS
DIRECTED TO NATIONAL GRID, THE DIVISION OF PUBLIC UTILITIES AND
CARRIERS, AND THE OFFICE OF ENERGY RESOURCES
(Issued May 5, 2021)**

The Commission has issued a straw proposal on tying National Grid's remuneration, at least in part, to low income enrollment in CRDG projects, and has conducted a technical session to identify undefined elements of the straw proposal. We have some more specific follow-up questions and respectfully request that the parties each answer for their own organization instead of working together on joint responses.

Customer Eligibility

- 1-1. What does the respondent think the income eligibility should be based on? Ex: A-60 enrollment or some other eligibility identifier. If it is something else, please provide the incremental cost of identifying and qualifying those customers, or, if quantification is not possible right now, at least describe the process you might expect to be followed.

The Division believes that eligibility should be tied to those customers enrolled in the A-60 rate class. This offers simplicity and limited need for National Grid to obtain data from outside agencies or other sources in order to identify and solicit participation from target customers. Furthermore, the Division supports pursuing a longer-term goal of migrating all or substantially all CRDG bill credit recipients to low- to moderate-income customers. This could be accomplished over time by increasing the targeted percentage of bill credit recipients in any new CRDG programs and by requiring that any existing bill credit recipients that terminate participation in old CRDG projects be replaced by a low-income customer. This has multiple potential benefits, both for low-income customers in the form of bill credits and for all rate payers in the fact that this may eliminate or significantly reduce the need for a premium for CRDG projects going forward and will provide benefits in the form of reduced arrearages, reduced terminations and disconnections, and reduced bad debt write-offs.

Prepared By Michael Brennan

- 1-2. Should there be additional eligibility criteria? Ex: participation in EE, participation in payment plan or budget billing, etc. Please explain the reasons for your responses.

The Division would support additional requirements and prioritization of enrollment as follows:

- 1) Requiring home energy audits as a condition of enrollment

- 2) Prioritizing those on payment plans and/ or budget billing for the first wave of enrollments
- 3) Potentially offer an incentive in the form of an extended term for customers that also participate in other EE programs

Prepared By Michael Brennan

- 1-3. Should there be an eligibility disqualification? Ex: customer not in good standing, etc. Please explain the reason for your responses.

The Division believes that a customer must remain in good standing to remain in this program for the following reasons:

- 1) Fairness element if participation is limited and other potential customers that are in good standing are waiting to be able to participate
- 2) This provides a “participation” element – customer must make the effort to remain in good standing to continue participation and to recognize the value of the credits in helping them remain in good standing. This is especially important if automatically enrolled

Other considerations

Pending legislation related to the percentage of income payment program (PIPP) may impact the final rules on eligibility for this program.

Pending legislation related to the expansion of the community remote net metering (CRNM) program, including the potential set aside for low- to moderate-income households, may impact the final rules on eligibility for this program.

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Term of Off-taker Enrollment

- 1-4. What should the term of off-taker eligibility be? For example, it could be the entire tariff term of the facility; monthly for a period of months or years; it could be a one-time bill credit; or it could be something else. Please explain the reason for your preference.

The duration of participation in this program should be limited to a set period of months or years, ideally tied to the typical duration of payment plans. Monthly credits should be used as this maximizes visibility and awareness of this being tied to an operating facility and reinforces the importance of maintaining good standing to keep earning credits.

Other considerations –

Participation in this program could potentially be impacted by the PIPP and CRNM legislation noted above and should be considered in the final rules related to eligibility and term.

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Crediting to Customers during enrollment

- 1-5. Should customers be allocated kWh credits or a fixed bill amount? Please explain the reasons for your preference.

Recognizing that CRDG is a bill crediting arrangement for credit recipients and not a solar program, the Division believes that there is no reason to use a different approach for low-income customers than is currently used for all bill credit recipient and therefore supports retain the current CRDG approach using kWh based credits.

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Administration of the Credits

- 1-6. How should the crediting be administered? Ex: Should it be similar to CRDG crediting now where customers are enrolled and issued credits as they become available or, could National Grid wait until a project is operational, build up credits and then enroll through an annual disbursement plan, or something else? Please explain the reasons for your preference.

Retain the current CRDG approach for the LMI adder – enroll and issue credits as produced for the same reasons stated above in answer to Question 1-5.

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Intake of Participating Facilities

- 1-7. If National Grid is the entity enrolling customers into CRDG projects, could (or should) facilities smaller than commercial size participate? Please explain the reasons for your answer.

The Division does not believe that projects smaller than the Commercial Class should participate. One key element of CRDG projects are the upfront costs associated with recruiting and retaining customers things up which influences ceiling prices and project viability. Even with potentially lower costs if National Grid is enrolling low- to moderate-income customers in this program, these costs will still be an important factor. Larger projects will be better able to absorb these added costs in a way that minimizes the overall costs of the program and would better allow for more participation in this program by low- to moderate-income customers.

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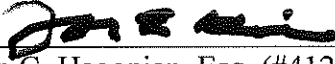
Cost of Administration of the CRDG projects (Directed to National Grid only)

- 1-8. If National Grid is using its access to its customer lists to enroll customers in CRDG projects, what would be the administrative tasks and costs? Please describe with as much detail as can be determined now.

A – N/A

Prepared By Michael Brennan

Division of Public Utilities and
Carriers
By its attorney,




Jon G. Hagopian, Esq. (#4123)
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State of Rhode Island
Division of Public Utilities and Carriers
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Dated: May 26, 2021

CERTIFICATE OF SERVICE

I hereby certify that on the 26 th day of May 2021 that I transmitted an electronic copy of the within Data Responses to the attached service list and to Luly Massaro, Division Clerk via electronic mail.



**Docket No. 5088– Renewable Energy Growth Program for Year 2021
National Grid & RI Distributed Generation Board**

Service List updated 4/20/2021

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