

## Massaro, Luly (PUC)

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**From:** Russolino, Nancy (DOA)  
**Sent:** Thursday, May 27, 2021 10:10 AM  
**To:** Massaro, Luly (PUC)  
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**Subject:** RE: Docket 5150 - Sent on behalf of Albert J. Vitali III Esq.  
**Attachments:** Docket 5150 - REG Remuneration DRs - OER (05-27-2021).pdf

Luly:

Good morning. Attached for filing, please find the responses to the Commission's First Set of Data Requests [re. Docket 5150] sent to you on behalf of Albert J. Vitali III, Esq and the Office of Energy Resources.

Thank you,

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**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.**

Customer eligibility criteria and qualification for participation in community solar should be simple, easy-to-understand and available to a wide range of customers regardless of income. The current community solar market subscription model widely available to National Grid ratepayers attempts to do this by offering no credits checks, no cancellation fees, and a guarantee of a 10% reduction in utility bill costs. If this straw proposal were to move forward ease of participation is critically important because low and moderate (LMI) customers do not receive any additional benefit to participating in community solar through the CRDG program, other than what is offered to all program participants. Should National Grid become the subscriber management company assigning LMI customers to participate in community solar simplicity of enrollment is critical for ease of enrollment, verification, and communication with customers.

If a customer is asking National Grid for help to pay their electricity bill, help should be provided with a minimum of verification needed to prove their need for assistance. Customers should need to provide proof of income eligibility only once throughout the term of enrollment. Income eligibility should include but not be limited to:

1. Participation in an arrearage management plan
2. Enrollment in the income eligible electricity rate
3. Enrollment in the Low-Income Home Energy Assistance Program, Supplemental Nutrition Assistance Program, or Medicaid.

4. Verification of living in affordable housing
5. Completion of a self-attestation form indicating the participating customer is at or below 150% of the federal poverty level.

OER would not support any proposal related to income verification related to a customer's credit score or credit history.

OER would defer to National Grid on determining the incremental cost of identifying and qualifying customers for each eligibility requirement. However, OER recognizes that some of these eligibility criteria may be more costly and possibly administratively burdensome than others. A possible process for verification for each of these eligibility criteria could include:

1. Participation in an arrearage management plan – National Grid call center staff could provide information about enrollment in a community solar project and for customers who are enrolled in an arrearage management plan, add them to a list to be included on a future Schedule B for a CRDG project. However, clear communication would be critical as timing related to future bill saving from participation in a CRDG project are outside of National Grid's control. They will need to rely on the community solar market to build and interconnect new CRDG projects for customer participation.
2. Enrollment in the income eligible rate is completely controlled by National Grid and could work similarly to item 1 above.
3. Enrollment in a federal assistance program could be as simple as requesting a photo or screenshot of a recent (within 6 months) monthly benefits statement or as complicated as requesting a physical copy of benefits sent via mail. Verification would likely need to be taken at the customer's word. However, confidence may be assured if the benefits are in the electric account holder's name.
4. Verification of living in affordable housing. National Grid should be able to work with RI Housing to develop a list of all affordable housing units across the state to verify a customer's address is on the list. RI Housing would provide an updated list with newly added units and developments at a regular, pre-determined interval (quarterly, annually, etc.).
5. Completion of a self-attestation form indicating the participating customer's household is at or below 150% of the federal poverty level is an important option to make available because some customers cannot provide documentation or may not exactly meet the requirements in items 1-4 above.

OER recommends that the eligibility list and process for enrollment go out to public comment. In fact, OER offers to assist National Grid in the public comment process. In February 2021, OER won an Inclusive Shared Solar Initiative grant from the National Association of State Energy Offices (NASEO)<sup>1</sup>. Working with the RI LIHEAP office and utilizing the framework and resources this grant will provide, OER is able to include public outreach and comment on this straw proposal to LMI customers and the community-based organizations that help support

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<sup>1</sup> <https://www.naseo.org/issues/solar/issi>

disadvantaged populations. Additionally, OER and the DG Board could work with Sustainable Energy Advantage in future program years to include additional public comments from various stakeholders.

Additionally, most programs developed to serve LMI populations include an “opt-out” option. OER recommends development of process for opting out and not an automatic enrollment in a CRDG project. A customer should be able to review and sign an agreement or contract with National Grid prior to enrollment. This process for opting out should also be included in the public comment process.

**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.**

There may be additional eligibility criteria identified by stakeholders through the public comment process. However, OER does not have additional criteria to add in addition to those outlined in 1-1 at this time.

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

There are actions by a customer that would result in disqualification from enrollment in a CRDG project and those should be made clear in the contract or agreement between the customer and National Grid. The most obvious is not residing in National Grid’s Rhode Island service territory or moving outside of National Grid’s RI service territory after enrollment. National Grid should be clear with customers in the contract or agreement about what would happen to enrollment benefits if a customer moves outside of the RI service territory or within RI (example: moving from one apartment to another).

Currently, National Grid requires that net metering be in good standing in order to receive bill credits. Participating in an arrearage management plan is considered to be compliant with this requirement. Despite this, OER would recommend that customers not be required to be in good standing in order to enroll as an LMI customer in a CRDG project. The idea of providing assistance to customers who need it is the core idea behind this CRDG straw proposal. One of the goals of this concept is to provide a financial incentive to customers who need it and track how many customers are able to realize enough savings to reliably enter into an arrearage management plan and successfully complete it and/or no longer need assistance from National Grid while on the income eligible rate.

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.**

Currently, the subscriber management companies currently completing in the Rhode Island community solar market are offering long or even indefinite terms. Arcadia, for example, has language in their contract<sup>2</sup> which states:

The Subscription Term (the “Term”) will commence as of the Effective Date and continue indefinitely until terminated by either Party. You may cancel this Agreement for any reason with no fee or penalty by notifying Seller. Following your notice to cancel, we will promptly direct the utility to cease allocating Credits to you from the System. In our experience, it could take the utility up to 180 days to process the cancellation. You may also transfer this Agreement to another utility account provided that we determine that such account is eligible to receive Credits from the System, and the owner of such account accepts the terms of this Agreement.

As the community solar market already supports indefinite terms, OER recommends that customer benefits continue for the life of the PV project, the customer cancels the contract or agreement, or the customer is no longer living in National Grid’s RI service territory.

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.**

OER does not have a preference for how customers receive the discount on their electric bill. However, whatever is decided should be clearly defined on the electric bill as savings resulting from participating in a community solar project.

Additionally, customers participating in a community solar project should know where the community solar project is located that they are receiving bills savings from. If this is not clear on the electricity bill, it should be included in the contract or agreement between the customer and National Grid. Community solar has the added benefit of giving program participants a sense of place and choice about where they receive their electricity, even if they are not directly benefiting from RECs and greenhouse gas emission reductions. One of the first community solar projects developed in Massachusetts in July 2014 started from the Solarize Newton program ran by the Massachusetts Clean Energy Center. Residents and neighbors who could not install solar on their rooftops or who lived in apartments created a group that ultimately came together to develop, build, and install the system. The project idea originated in the community, was built in Newton, and participating residents were able to realize electricity savings from the system. While not as lucrative as installing PV on their own homes, this sense of ownership and place was important to the customers and brought the community together in a way that defined “community” in community solar. The idea of “community” in community solar should be a core component in any community solar program design.

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**

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<sup>2</sup> Arcadia provided OER a copy of a subscription agreement in 2020 and terms may have changed.

**and then enroll through an annual disbursement plan, or something else? Please explain the reasons for your preference.**

OER strongly recommends that National Grid develop a list of options for crediting and go out to public comment for feedback on preferences.

**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.**

Yes, all size systems above small scale should be able to participate in CRDG. One of the first interconnected CRDG projects, Echo Valley Solar, is a roof mounted 474kW project located on an affordable housing development. There may slightly smaller rooftops on affordable housing developments and other commercial locations that could support a CRDG project. Most medium scale projects through the REG program are roof mounted projects. Allowing medium scale projects to participate in CRDG would address two of OER's public policy objectives, encouraging PV on already built locations and expanding access of community solar to LMI customers.