

GEORGE W. WATSON III

One Financial Plaza, 14th Floor Providence, RI 02903-2485 Main (401) 709-3300 Fax (401) 709-3399 gwatson@rc.com Direct (401) 709-3351

Also admitted in Massachusetts and Connecticut

July 1, 2021

#### BY HAND DELIVERY AND ELECTRONIC MAIL

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

RE: Docket No. 5151 - Revolution Wind Advisory Opinion

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a National Grid ("Company"), enclosed please find five copies the Company's responses to the First Set of Data Requests issued by the Public Utilities Commission in the above-referenced matter.

Thank you for your attention to this filing. If you have any questions, please contact me at 401-709-3351.

Very truly yours,

George W. Watson III

**Enclosures** 

cc: 5151 Service List

## **CERTIFICATE OF SERVICE**

I here by certify that on July 1, 2021, I delivered a true copy of the foregoing document to the Service List by electronic mail.

Heidi J. Seddon

# Docket No. 5151 – Needs Advisory Opinion to EFSB regarding Revolution Wind, LLC Service List update 5/12/2021

Name/Address	E-mail	Phone
Adam Ramos, Esq.	aramos@hinckleyallen.com;	401-457-5278
Robin Main		
Christine Dieter Hinckley, Allen, & Snyder, LLP	rmain@hinckleyallen.com;	
100 Westminster Street, Suite 1500 Providence, RI 02903	cdieter@hinckleyallen.com;	
	cwhaley@hinckleyallen.com;	
Marvin Bellis	ehanson@hinckleyallen.com;	
Eversource Investment, LLC 107 Selden Street	pstroke@hinckleyallen.com;	
Berlin, CT	marvin.bellis@eversource.com;	860-665-5685
Charles R. Scott Orsted North America, Inc.	chsco@orsted.com;	617-373-0749
399 Boylston Street, 12 <sup>th</sup> Floor		
Boston, MA 02116		
George Watson, Esq.	Gwatson@rc.com;	781-907-1834
Robinson & Cole LLP		
One Financial Plaza, 14 <sup>th</sup> Floor		
Providence, RI 02903	Mark.rielly@nationalgrid.com;;	
Mark Rielly, Esq., Senior Counsel National Grid	Rachel.Thomas@nationalgrid.com;	
Christy Hetherington, Esq.	Christy.hetherington@dpuc.ri.gov;	
Division of Public Utilities and Carriers	Jon.hagopian@dpuc.ri.gov;	
	John.bell@dpuc.ri.gov;	_
	Margaret.1.hogan@dpuc.ri.gov	
Albert Vitali, Esq. (OER)	Albert.Vitali@doa.ri.gov;	
Dept. of Administration Division of Legal Services	Nancy.russolino@doa.ri.gov;	
One Capitol Hill, 4 <sup>th</sup> Floor Providence, RI 02908	Nicholas.Ucci@energy.ri.gov;	

	Carrie.Gill@energy.ri.gov;	
	Becca.Trietch@energy.ri.gov;	
Statewide Planning Department	Roberta.Groch@doa.ri.gov;	401-222-4720
	Kevin.Nelson@doa.ri.gov;	
Town of North Kingstown	jalyward@northkingstown.org;	
Jeannette Alyward Town Council	TownCouncil@northkingstown.org;	
	matt@callaghanlawri.com;	
Luly E. Massaro, Commission Clerk	Luly.massaro@puc.ri.gov;	401-780-2107
John Harrington, Commission Counsel	John.Harrington@puc.ri.gov;	
<b>Public Utilities Commission</b>	Alan.nault@puc.ri.gov;	
89 Jefferson Blvd.	Todd.bianco@puc.ri.gov;	
Warwick, RI 02888		

IN RE: REVOLUTION WIND :

ADVISORY OPINION : Docket No. 5151

# NATIONAL GRID'S RESPONSES TO THE PUBLIC UTILITIES COMMISSION

## **DATA REQUEST NO. 1-1a:**

Referencing Confidential Exhibit A included in Revolution Wind's May 24<sup>th</sup> filing:

a. Is it National Grid's understanding that all costs in Exhibit A will be borne by Revolution Wind?

## **RESPONSE**:

The Company is unable to respond to the question because it does not have access to Exhibit A.

IN RE: REVOLUTION WIND :

ADVISORY OPINION : Docket No. 5151

# NATIONAL GRID'S RESPONSES TO THE PUBLIC UTILITIES COMMISSION

## **DATA REQUEST NO. 1-1b**:

Will any of the costs on Exhibit A be borne by, charged to or assessed to National Grid and/or its ratepayers? If yes, please identify the costs and explain how National Grid intends to recover the costs.

## **RESPONSE:**

The Company is unable to respond to the question because it does not have access to Exhibit A.

IN RE: REVOLUTION WIND :

ADVISORY OPINION : Docket No. 5151

# NATIONAL GRID'S RESPONSES TO THE PUBLIC UTILITIES COMMISSION

## **DATA REQUEST NO. 1-2:**

Will National Grid incur any costs related to the Project that are not paid for by Revolution Wind? Please itemize the costs and explain how National Grid intends to recover the costs.

#### **RESPONSE**:

No, National Grid will not incur any construction costs related to the Project that are not paid for by Revolution Wind.

IN RE: REVOLUTION WIND :

ADVISORY OPINION : Docket No. 5151

# NATIONAL GRID'S RESPONSES TO THE PUBLIC UTILITIES COMMISSION

#### DATA REQUEST NO. 1-3a:

Regarding the portions of the Project that are located adjacent to the existing Davisville Substation (onshore substation and interconnection facility), please explain:

a. Which entity will own the new facilities after construction?

#### **RESPONSE:**

Revolution Wind will construct, and The Narragansett Electric Company will own the new six-breaker ring bus, adjacent to the existing Davisville Substation. Revolution Wind will be responsible for ongoing charges in accordance with the Tariff and the formula set forth in Schedule 21 – NEP, Attachment DAF of the OATT as may be in effect from time to time, for the new facilities after construction.

IN RE: REVOLUTION WIND :

ADVISORY OPINION : Docket No. 5151

# NATIONAL GRID'S RESPONSES TO THE PUBLIC UTILITIES COMMISSION

#### DATA REQUEST NO. 1-3(b):

Regarding the portions of the Project that are located adjacent to the existing Davisville Substation (onshore substation and interconnection facility), please explain:

b. Which entity will be responsible for maintenance and repairs on the new facilities?

#### **RESPONSE**:

The Narragansett Electric Company will be responsible for maintenance and repairs on the new facilities located adjacent to the existing Davisville Substation; however, Revolution Wind will be responsible for those costs. <u>See</u> National Grid's responses to data requests PUC 1-10 and 1-11 in RIPUC Docket No. 4929, provided as Attachment PUC 1-3(b)-1.

The Narragansett Electric Company d/b/a National Grid Docket No. 5151 In Re: Revolution Wind Advisory Opinion Attachment PUC 1-3(b)-1 Page 1 of 2

#### PUC 1-10

#### Request:

Please explain if any costs associated with the operations and maintenance (O&M) of the Delivery Facility would be passed on to Rhode Island or regional ratepayers through Local or Regional Network Service.

#### Response:

Article 10.2 of the ISO-NE pro forma Large Generator Interconnection Agreement (LGIA) requires that "Interconnection Customer shall be responsible for all reasonable expenses including overheads, associated with: (1) owning, operating, maintaining, repairing, and replacing Interconnection Customer's Interconnection Facilities; and (2) operation, maintenance, repair and replacement of Interconnecting Transmission Owner's Interconnection Facilities, Stand Alone Network Upgrades and Distribution Upgrades." As the Interconnection Customer in this instance is the owner of the Delivery Facility, said owner will be responsible for such O&M costs, and these would not be passed on to Rhode Island or regional ratepayers through Local or Regional Network Service.

The Narragansett Electric Company d/b/a National Grid Docket No. 5151 In Re: Revolution Wind Advisory Opinion Attachment PUC 1-3(b)-1 Page 2 of 2

#### <u>PUC 1-11</u>

#### Request:

Please explain what entities would pay the cost of any Distribution Upgrades, Stand-Alone Network Upgrades, Network Upgrades, or any other upgrade costs considered in the Schedules of Section II of the ISO New England Inc. (ISO-NE) Transmission Markets, and Services Tariff (Open Access Transmission Tariff or OATT)? Please explain if these entities would bear incremental O&M costs associated with those upgrades.

#### Response:

Please see the response to PUC 1-9. Incremental O&M costs associated with such upgrades are assigned by the ISO-NE Tariff to the Generation Owner (in this case DWW), unless such upgrades are identified as Regional Benefit Upgrades in the ISO-NE regional plan. ISO-NE OATT, Schedule 11, Sec. 5. National Grid does not anticipate that any upgrades needed to accommodate the offshore wind project will be identified as Regional Benefit Upgrades in the ISO-NE regional plan.

IN RE: REVOLUTION WIND :

ADVISORY OPINION : Docket No. 5151

# NATIONAL GRID'S RESPONSES TO THE PUBLIC UTILITIES COMMISSION

#### DATA REQUEST NO. 1-3c:

Regarding the portions of the Project that are located adjacent to the existing Davisville Substation (onshore substation and interconnection facility), please explain:

c. Will National Grid collect any rent or fees from Revolution Wind for use of the land where the new facilities are being constructed?

#### **RESPONSE:**

No, because the land adjacent to its Davisville Substation is owned in fee by The Narragansett Electric Company and The Narragansett Electric Company will own and operate the new interconnection facilities once constructed.

IN RE: REVOLUTION WIND :

ADVISORY OPINION : Docket No. 5151

# NATIONAL GRID'S RESPONSES TO THE PUBLIC UTILITIES COMMISSION

## **DATA REQUEST NO. 1-4:**

Will National Grid collect any fees from Revolution Wind for use of its rights-of-way?

# **RESPONSE**:

No. Revolution Wind will not be utilizing any of National Grid's rights-of-ways for Revolution Wind facilities.