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August 2, 2021

### VIA E-MAIL AND FIRST CLASS MAIL

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

# Re: Docket No. 5151 – Needs Advisory Opinion to EFSB regarding Revolution Wind, LLC

Dear Ms. Massaro:

Enclosed for filing in the above-referenced docket is an original and nine (9) copies of Revolution Wind, LLC's ("Revolution Wind") responses to the Record Requests issued by the Public Utilities Commission at the public hearing on July 26, 2021.

Thank you for your attention to this matter.

Very truly yours,

Alo Jung

Adam M. Ramos

AMR:cw Enclosures

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## Docket No. 5151 – Needs Advisory Opinion to EFSB regarding Revolution Wind, LLC Service List update 6/25//2021

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#### RECORD REQUEST NO. 1

Request:

Provide a copy of the LGIA once fully executed.

Response:

The Large Generator Interconnection Agreement ("LGIA") between Revolution Wind, LLC, New England Power Company d/b/a National Grid and ISO-NE is currently being finalized for execution. The LGIA is expected to be completed by the end of the 3rd quarter of 2021 and will be provided once fully executed.

#### **RECORD REQUEST NO. 2**

Request:

Describe how imputed costs will be calculated in regard to the LGIA.

#### Response:

In preparing this response, Revolution Wind, LLC ("Revolution Wind") is interpreting "imputed costs" to mean the ongoing annual operating and maintenance ("O&M") charges Revolution Wind is responsible for as stipulated in Article 10.2 of the ISO-NE Pro Forma Large Generator Interconnection Agreement ("LGIA"). Revolution Wind will own the costs and risks associated with the build-out of transmission related to its facilities and the ongoing O&M connected with the transmission assets associated with the Revolution Wind Project (the "Project"). Revolution Wind notes that such costs will have no impact on the price set forth in the Power Purchase Agreement between The Narragansett Electric Company d/b/a National Grid and Revolution Wind.

Revolution Wind must pay to New England Power Company d/b/a National Grid ("National Grid") an ongoing annual Direct Assignment Facilities Charge ("DAF Charge") that is calculated in accordance with the formula set forth in Schedule 21 – NEP, Attachment DAF of the ISO-NE Open Access Transmission Tariff. The DAF Charge assigns a representative portion of National Grid's annual transmission expenses to the Project.

This ongoing annual DAF Charge is calculated by multiplying:

- (A) The gross transmission investment amount associated with the Project by
- (B) A carrying charge percentage. The carrying charge percentage is the ratio of National Grid's applicable actual revenue requirements divided by the balance of gross transmission plant. The revenue requirements are currently primarily composed of (1) O&M expenses, (2) administrative and general expense, and (3) municipal taxes. These balances are taken from the FERC Form No. 1.