

January 7, 2022

BY ELECTRONIC MAIL

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

RE: Docket 5206 - DG Interconnection Projects
Review of Administrative Issues Related to Interconnection Process
Responses to PUC Data Requests – Set 1 (Complete Set)

Dear Ms. Massaro:

I have enclosed an electronic version of National Grid's¹ complete set of responses to the Rhode Island Public Utilities Commission's ("PUC") First Set of Data Requests in the above-referenced matter.²

Please be advised that the Company is requesting confidential treatment of Attachment PUC 1-1. The customer-related information contained in Attachment PUC 1-1 is confidential and commercially sensitive information of the type that National Grid would not ordinarily make public. Therefore, the Company has provided a redacted and confidential version of Attachment PUC 1-1 and has requested confidential treatment pursuant to R.I. Gen. Laws § 38-2-2(4)(B) and (E) and Rule 1.3(H)(3) of the PUC's Rules of Practice and Procedure.

Thank you for your attention to this matter. If you have any questions, please contact me at 781-472-0531.

Very truly yours,



Raquel J. Webster

Enclosures

cc: Docket 5205 & 5206 Service Lists
John Bell, Division
Jon Hagopian, Esq.

¹ The Narragansett Electric Company d/b/a National Grid (National Grid or Company).

² Per a communication from Commission counsel on October 4, 2021, the Company is submitting an electronic version of this filing followed by six (6) hard copies filed with the Clerk within 24 hours of the electronic filing.

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.

Joanne M. Scanlon

January 7, 2022
Date

Docket No. 5205 - Review of the Cost Allocation and Recovery of Ongoing Operation and Maintenance Expenses Related to the Interconnection of Distributed Generation Projects (National Grid)

Docket No. 5206 - Review of Administrative Issues Related to the Interconnection Process (National Grid)

Service List as of 12/28/2021

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**STATE OF RHODE ISLAND
RHODE ISLAND PUBLIC UTILITIES COMMISSION**

_____)
)
In Re: Review of Administrative Issues)
Related to the Interconnection Process)
(Non-Decisional Staff Review))
)
_____)

Docket No. 5206

**NATIONAL GRID’S MOTION FOR PROTECTIVE
TREATMENT OF CONFIDENTIAL INFORMATION**

National Grid¹ respectfully requests that the Rhode Island Public Utilities Commission (PUC) grant protection from public disclosure certain confidential, competitively sensitive, and proprietary information submitted in this proceeding, as permitted by Rule 810-RICR-00-00-1.3(H) of the PUC’s Rules of Practice and procedure (Rule 1.3(H)) and R.I. Gen. Laws § 38-22(4)(B) and (E) . The Company also requests that, pending entry of that finding, the PUC preliminarily grant the Company’s request for confidential treatment pursuant to Rule 1.3(H)(2).

I. BACKGROUND

On December 6, 2021, the PUC served its first set of data requests upon the Company in this matter. In responding to Data Request PUC 1-1, the Company has included attachments that include confidential customer project information. Therefore, in accordance with Rule 1.3(H)(3), National Grid has provided redacted public versions and confidential unredacted versions Confidential Attachments PUC 1-1-1 and PUC 1-1-2 pursuant to Rule 1.3(H).

¹ The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

II. LEGAL STANDARD

Rule 1.3(H) provides that access to public records shall be granted in accordance with the Access to Public Records Act (APRA), R.I. Gen. Laws § 38-2-1, *et seq.* Under the APRA, all documents and materials submitted in connection with the transaction of official business by an agency is deemed to be a “public record,” unless the information contained in such documents and materials falls within one of the exceptions specifically identified in R.I. Gen. Laws § 38-2-2(4). To the extent that information provided to the PUC falls within one of the designated exceptions to the public records law, the PUC has the authority under the terms of APRA to deem such information as confidential and to protect that information from public disclosure.

In that regard, R.I. Gen. Laws § 38-2-2(4)(B) provides that the following types of records shall not be deemed public:

Trade secrets and commercial or financial information obtained from a person, firm, or corporation which is of a privileged or confidential nature.

The Rhode Island Supreme Court has held that this confidential information exemption applies where the disclosure of information would be likely either (1) to impair the government’s ability to obtain necessary information in the future; or (2) to cause substantial harm to the competitive position of the person from whom the information was obtained. *Providence Journal*, 774 A.2d 40 (R.I. 2001).

The first prong of the test is satisfied when information is provided to the governmental agency and that information is of a kind that would customarily not be released to the public by the person from whom it was obtained. *Providence Journal*, 774 A.2d at 47.

In addition, R.I. Gen. Laws § 38-22(4)(E) provides that the following information shall not be deemed public: “Any records that would not be available by law or rule of court to an opposing party in litigation.” The customer project information reflected in Attachments PUC 1-1-1 and PUC 1-1-2 is not the type of information that would be available by law or rule of court to an opposing party in litigation.

III. BASIS FOR CONFIDENTIALITY

The project information included in Attachments PUC 1-1-1 and PUC 1-1-2 is confidential and commercially sensitive customer information of the type that National Grid would not ordinarily make public. In addition, this information would not be available by law or rule of court to an opposing party in litigation. As such, the information should be protected from public disclosure. Public disclosure of such information could cause harm to National Grid’s customers and impair National Grid’s ability to effectively administer Distributed Generation projects. Accordingly, National Grid requests that the PUC grant protective treatment of the Confidential Responses and that the PUC preliminarily grant the Company’s request for confidential treatment pursuant to Rule 1.3(H)(2) pending a final decision with respect to this motion.

IV. CONCLUSION

For the foregoing reasons, National Grid respectfully requests that the PUC grant its Motion for Protective Treatment of Confidential Information.

[SIGNATURE ON NEXT PAGE]

Respectfully submitted,

**THE NARRAGANSETT ELECTRIC
COMPANY d/b/a NATIONAL GRID**

By its attorney,

A handwritten signature in blue ink, appearing to read "Raquel Webster".

Raquel J. Webster, Esq. (Bar #9064)
40 Sylvan Road
Waltham, MA 02451
Tel. 781-472-0531
Raquel.Webster@nationalgrid.com

Dated: January 7, 2022

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d/b/a National Grid
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(Non-Decisional Staff Review)
Responses to the Commission's First Set of Data Requests
Issued on December 6, 2021

PUC 1-1

Request:

Please provide two examples of final accountings in public format. These should be for projects with two different levels of complexity and cost. They should be for real projects and contain all information that would be sent to an Interconnecting Customer. However, they should protect the identity of the Customer and should not allow for someone other than that Customer to be able to readily identify the project.

Response:

Please see Attachments PUC 1-1-1 and PUC 1-1-2. The Final Accounting Report (FAR) is the summary of Company's extensive cost reconciliation review and is shared with the customer.

Please note that these attachments contain confidential information. Therefore, the Company has included redacted and confidential versions of these attachments and a motion for confidential treatment.

REDACTED



Final Accounting Report	3,000 kW (AC) Solar Interconnection Projects		Interconnection Application:
	Prepared by: Richard Harnedy	08/18/2021	Revision 3.0

Request for Final Accounting

On 01/13/2021, [REDACTED] ("Interconnecting Customer") requested that National Grid ("Company") provide a final accounting report of the project associated with distributed generation applications [REDACTED]. This project is a 3,000 kW (AC) solar facility located at [REDACTED]. National Grid completed construction associated with this project on 09/29/2020.

Impact Study and Estimated System Modification Costs

For this project, National Grid estimated system modification costs of \$1,009,962.85 +/- 25%, which included a tax gross-up adder of \$96,698.85 on the capital portion of these costs. The Company offered the Interconnecting Customer a payment plan, as described in attachment 3 of the ISA. To date, the Interconnecting Customer has paid \$1,019,962.85.

Summary of Final Accounting (Actual Costs)

	Impact Study	System Modifications	Substation
Labor, Expenses and Fringes	\$5,047.91	\$92,401.01	\$272,954.57
Materials and Handling	\$0.00	\$191,534.72	\$43,155.06
Transportation	\$0.00	\$4,709.34	\$30,509.16
Outside Services	\$20,664.63	\$132,204.61	\$162,964.47
Overheads	\$3,297.54	\$58,317.58	\$87,607.80
Proration Due to CAP WO	\$0.00	\$0.00	\$0.00
Proration Due to CAP A&G	\$0.00	\$0.00	\$0.00
SUB TOTAL	\$29,010.08	\$479,167.26	\$597,191.06
Tax Gross-Up Adder	\$0.00	\$0.00	\$0.00
Income Tax	\$2,457.41	\$45,550.59	\$43,532.79
Property Tax	\$0.00	\$0.00	\$0.00
Sales Tax	\$0.00	\$0.00	\$0.00
TOTAL	\$31,467.49	\$524,747.85	\$640,732.85

Adjustments & Assumptions

- Actual costs include adjustment for Administrative & General costs based on the rate(s) in effect at the time the work was performed.

Reconciliation Result

Interconnecting Customer's previous aggregate payments to the Company:	\$1,019,962.85
Interconnecting Customer's cost responsibility under the ISA for the actual cost of the associated Impact Study and System Modifications:	\$1,196,939.20
Fee and/or cost adjustment in accordance with the interconnection tariff	\$0.00
Amount to be invoiced:	\$21,467.49

Per National Grid's findings, the actual cost of the study and construction is: \$1,196,939.20. To date, the Interconnecting Customer has paid \$1,019,962.85. As per Interconnection Tariff, the Company is required to inform the Interconnecting Customer about overspend on System Modifications prior to start of the construction. As the Company did not inform about the overspend, we will not be charging Interconnecting Customer for overspend on system modifications and substation modifications. The Company will invoice **\$21,467.49** for study overruns within forty-five (45) business days of the date of this report: (10/22/21)

REDACTED



Final Accounting Report	875 kW(AC) Solar Interconnection Project		Interconnection Application:
	Prepared by: Felicia Marcello	September 22, 2021	Revision 1.0

Request for Final Accounting

On May 14, 2021, [REDACTED] ("Interconnecting Customer") requested that National Grid ("Company") provide a final accounting report of the project described in the Interconnection Service Agreement ("ISA") associated with distributed generation application [REDACTED]. This project is an 875 kW (AC) Solar facility located at [REDACTED]. This project has been withdrawn.

Impact Study

For this project, National Grid executed an Impact Study delivered 4/22/2021. No Interconnection Service Agreement ("ISA") was executed, in turn estimated system modification costs are being actively excluded from this report, as no Construction charges were incurred.

Summary of Final Accounting (Actual Costs)

	Impact Study
Labor, Expenses and Fringes	\$3,694.83
Materials and Handling	\$0.00
Transportation	\$0.00
Outside Services	\$10,580.14
Overheads	\$29.45
SUB TOTAL	\$14,304.42
Tax Gross-Up Adder ¹	\$0.00
TOTAL	\$14,304.42

Adjustments & Assumptions

- Actual costs include adjustment for Administrative & General costs based on the rate(s) in effect at the time the work was performed.

Reconciliation Result

Interconnecting Customer's previous aggregate payments to the Company:	\$5,000
Interconnecting Customer's cost responsibility under the ISA for the actual cost of the associated Impact Study and System Modifications:	\$14,304.42
Fee and/or cost adjustment in accordance with the interconnection tariff	
Amount to be invoiced/refunded:	\$9,304.42

Per National Grid's findings, the actual cost of studies and system modifications is: \$14,304.42. To date, the Interconnecting Customer has paid \$5,000. Accordingly, the Company will invoice \$9,304.42 within forty-five (45) business days of the date of this report: September 22, 2021.

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d/b/a National Grid
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Responses to the Commission's First Set of Data Requests
Issued on December 6, 2021

PUC 1-2

Request:

Please provide a link to the Electric Services Bulletin (ESB). If it is this link: <https://www.nationalgridus.com/pronet/technical-resources/electric-specifications>, are there any parts that apply to DG Interconnections different from load projects? If so, please explain.

Response:

The identified link accurately connects to the National Grid website that contains subsequent links to the Company's Electric Service Bulletins (ESB) series, which contain the Company's technical and operating requirements. Specifically, ESB 756 Appendix D pertains to the connection of parallel generation for the state of Rhode Island, which can be found at the following link: https://www.nationalgridus.com/media/pronet/shared_constr_esb756.pdf

The requirements in ESB 756 are supplemental requirements specific to distributed generation interconnections that would not otherwise pertain to a load customer due to the nature of the interconnection. Requirements of all other ESBs for general service arrangement, meter installation, etc. apply as they would for a load customer.

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PUC 1-3

Request:

Please describe in detail the process by which the ESB is updated, including at a minimum the things that cause the ESB to be updated, how those updates are vetted internally, how those updates are communicated to customers/contractors, and whether those updates apply prospectively or retroactively.

Response:

The Electric Service Bulletin (ESB) 756, pertaining to parallel generation connecting to National Grid, is updated annually. The process involves an internal DG policy group dedicated to the ESB update effort, who engages internal stakeholders for discussion and review of proposed updates. This includes internal planning sessions and extended discussion and/or working groups as needed depending on the extent of the updates. Feedback from external stakeholders (eg. DG Developers) over the normal course of business is also taken into consideration. After coordination with internal stakeholders, the ESB revisions are submitted for executive review and approval prior to publishing. Updated documents are publicly posted to the company's website (<https://ngus.force.com/servlet/servlet.FileDownload?file=0150W00000Cqbm4>) and reference to these documents is made to the public at regularly scheduled customer outreach presentations via on-going DG seminars the Company hosts and will be part of the newly formed Interconnection Technical Standards Committee. The changes are prospective.

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PUC 1-4

Request:

The RIPUC No. 2244, Standards for Connecting Distributed Generation (DG Tariff) at Section 9.4 sets forth a description of how the ESB will be updated: The Company will from time to time change or amend its technical standards, specifications, and provisions of the electric service bulletin (ESB) for interconnection applications covered in this Interconnection Tariff and for electric service in general. When the Company is considering changes that are likely to materially impact proposed Facilities or future applications in this Interconnection Tariff, the Company shall provide a draft of the proposed changes to its standards to the ITSC and Interconnecting Customers with potentially impacted applications prior to those changes going into effect. In non-emergency scenarios, the Company will make reasonable efforts to provide such proposed changes no less than ninety (90) calendar days prior to implementation, and where practicable the Company will take into consideration feedback from the ITSC about how such changes would impact Interconnecting Customers. Unless specifically prohibited by the Rhode Island Public Utilities Commission, the Company may make any changes to its technical standards that are aligned with Good Utility Practice or otherwise necessary to comply with its obligations to provide safe and reliable electric service as a regulated entity.

- a. Is this description of the process consistent with the process used in Massachusetts? If so, how long has it been in place? If the answer to the first two questions is in the affirmative, does the Company believe that the process has been effective in assisting Interconnecting Customers in the design of their projects without needing to file amendments to their interconnection applications?
- b. If the new tariff language does reflect the process in Massachusetts, does the Company have any data to show whether Massachusetts projects require fewer amendments to their interconnection applications as a result of the process set forth above? If so, please explain.
- c. Is the description of the process new for Rhode Island?
- d. Is the ESB, or any changes thereto, filed with the Massachusetts Department of Public Utilities for its review and approval?

Response:

- a. The Company plans on making the process similar to the Massachusetts process. The Massachusetts process encourages collaboration between National Grid and external stakeholders for any appreciable modifications to the current ESB, should they be deemed necessary by the Company. However current Massachusetts processes do not specifically require a process as outlined herein. Although not required, in an effort to maintain transparency with external stakeholders, major modifications to the ESB have historically

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been reviewed with the Massachusetts Technical Standards Review Group for discussion and collaboration and have been for the past several years.

- b. The Company has not investigated this aspect of the changes in ESB 756. The requirement for changes in interconnection technical standards is being forced by the sheer volume of interconnections being requested and is critical to maintain safe and reliable operation of the distribution system for the neighbors of DG projects as well as the DG projects themselves.
- c. No, the description of the process to update an ESB is not different for RI. Refer to PUC 1-3 for further detail on the National Grid process for updating the ESB.
- d. Filing of the ESB with the Massachusetts Department of Public Utilities is not required.

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PUC 1-5

Request:

Has the Interconnection Technical Standards Committee (ITSC) DG Tariff been created? If not, what is the status of creating the ITSC?

Response:

Yes. The Company had a call with NECEC, OER, and interested members of the DG technical community on November 16, 2021 to discuss how best to set up the group. A kickoff meeting is scheduled for January 18, 2022 to determine appropriate participants, develop an initial agenda and schedule of meetings for the group. The RI PUC was inadvertently left off the initial invite for the November 16th call, but has been invited to the January 18th call.