

February 14, 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 2

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") Second Set of Data Requests in the above-referenced matter.²

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.

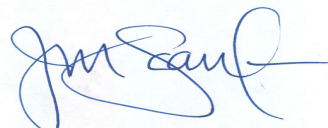
¹ The Narragansett Electric Company d/b/a National Grid (National Grid or Company).

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

February 14, 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)

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The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 5206
In Re: Review of Administrative Issues
Related to the Interconnection Process
(Non-Decisional Staff Review)
Responses to the Commission's Second Set of Data Requests
Issued on January 19, 2022

PUC 2-1

Request:

Referencing National Grid's response to PUC 1-3 and the explanation that the Electric Services Bulletin (ESB) "changes are prospective," what point in the interconnection process (e.g., completed application, completed study, etc.) defines whether the ESB changes will apply to an interconnection or not? Please explain why this point in the process has been chosen.

Response:

The ESB applies to any new applications received after the effective date of the ESB. This point in the process was chosen to fairly apply any updated requirements to new applications only. This point in the process also allows those applications that have already entered the queue to maintain their requirement expectations that were in place when they began the process.

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PUC 2-2

Request:

Referencing National Grid's description in response to PUC 1-3 that it seeks feedback from external stakeholders over the course of normal business, please provide a more detailed description of what happens in this part of the process.

Response:

National Grid identifies Electric Service Bulletin ("ESB") updates as part of quarterly customer outreach sessions, at which time National Grid addresses customer comments and questions. In addition, National Grid engages the customer community regarding substantive ESB changes through the Technical Standards Review Group ("TSRG") in Massachusetts for technical discussion and input on ESB updates. Although it is a Massachusetts-based group, the TSRG involves many developers that work throughout New England and provides valuable expertise and input from industry experts. The technical requirements of ESB 756 for Massachusetts and Rhode Island are similar in content and technical requirements, so coordination through the TSRG effectively impacts both Massachusetts and Rhode Island ESBs.

As referenced in PUC 1-4, moving forward, with the Interconnection Technical Standards Committee ("ITSC") being established in Rhode Island, it is expected that the ITSC will be the primary means for communicating and coordinating on ESB updates going forward.

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PUC 2-3

Request:

Referencing National Grid's explanation of the publication of changes to the ESB in response to PUC 1-3 and 1-4, please provide a timeline with a brief description for each step outlined in PUC 1-3 and in RIPUC No. 2224 Section 9.4.

Response:

The reference to R.I.P.U.C. No. 2224 in this data request appears to be a typo. The Company assumes that the intended reference was R.I.P.U.C. No. 2244, The Narragansett Electric Company Standards for Connecting Distributed Generation, Section 9.4, Interconnection Technical Standards Committee ("ITSC").

As the ITSC is a new organization in Rhode Island, the below timeline reflects the process going forward on an annual basis:

- Jan-Mar: Organization of updates
 - National Grid DG Policy Team assesses known required ESB updates based on internal feedback received but not fully addressed in the previous year's updates. Internal task groups are formed as needed, depending on the nature and complexity of the change.
- Apr: First Draft Created
 - National Grid creates first draft of edits to the ESB.
- May: Solicit First Draft Feedback
 - First draft of ESB shared with internal stakeholders for feedback.
- Jun: Second Draft Created
 - Internal stakeholder comments are due. Internal stakeholder comments are then incorporated into second draft.
- Jul: Solicit Second Draft Feedback
 - Second draft of ESB shared with internal stakeholders for feedback.
 - Moving forward, with the newly formed ITSC, National Grid to share second draft with ITSC for external feedback.
- Aug: Final Draft Creation
 - All second draft comments due and incorporated into the final draft.
- Sept: Solicit Final Draft Approvals
 - Final draft circulated for internal executive approval.
- Oct: Finalize ESB Edits
 - Executive level comments due and incorporated into final version.

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PUC 2-3, page 2

- Nov-Dec: Customer Outreach
 - National Grid performs informational outreach to customers on ESB changes during regularly scheduled quarterly customer seminar. At these sessions, National Grid would address any questions from customers.
- Dec: Official Release
 - Official publication of updated ESB, which applies to all new applications received after the official release date.
 - Updated ESB document is posted to the Company's website.