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April 19, 2022

**VIA HAND DELIVERY & ELECTRONIC MAIL**

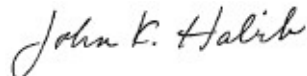
Luly E. Massaro, Commission Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

**RE: Docket 5235 – Revity Energy LLC Petition for Declaratory Judgment**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a National Grid (“the Company”), enclosed are the Company’s responses to the First Set of Data Requests issued by the Division of Public Utilities and Carriers to the Company in the above-referenced proceeding.

Sincerely,



John K. Habib  
Bar # 7431

Cc: Dkt. 5235 Service List  
Andrew Marcaccio, Esq.

**Revity Energy LLC - Petition for Declaratory Judgment – Docket No. 5235**  
**Service List Updated 4/1/2022**

| <b>Name/Address</b>   | <b>E-mail</b>  |              |
|---|--|--------------|
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Division 1-1

Request:

Is it National Grid's intention that any funds it receives from Revity for a portion of the Green self-performed interconnection facilities donated to National Grid would be reimbursed to Green? If not, explain in detail why any portion of the funds would not be reimbursed to Green.

Response:

Yes. National Grid's intent is to cost share the portion of the manhole and duct system installed by Green Development that would be utilized to interconnect Revity's project on a pro-rated megawatt share basis.

Division 1-2

Request:

Explain in detail why National Grid during Docket No. 5077 did not propose new language in the interconnection tariff which would clarify the entire process for any self-performed interconnection facility construction including how the party self-performing construction of interconnecting facilities would be reimbursed by National Grid for funds obtained from other parties utilizing a portion of the self-performed interconnection facility construction?

Response:

The Company has been implementing self-build for small scale civil work (UG duct and manhole systems) required for DG projects on a case by case for the past 5 years. Given that the work being performed is on the Company's side of the point of common coupling with distributed generation projects, the terms and conditions of such work are akin to those that apply when the Company uses its own contractors to perform such work. The terms of the interconnection tariff apply to services offered to the Company's retail customers, not to parties contracted by the Company to perform work on its distribution system. Accordingly, it is not necessary to propose new language to the interconnection tariff to address or clarify this process.

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Division 1-3

Request:

Is National Grid responsible for 100 percent of all future operation and maintenance costs including repair or replacement (if necessary) of the Green self-performed interconnection facilities which were donated to National Grid by Green?

Response:

Yes, once it was donated it becomes part of the larger electric distribution system.

Division 1-4

Request:

Explain in detail how the decision was made that Green would self-perform the duct bank construction in such a manner as to accommodate other interconnecting parties. Include in the explanation, a) if the other parties were involved in the decision process; b) if the other parties were made aware of each party's cost sharing responsibility; c) why each party who would be allowed to share in the utilization of the self-performed duct bank facilities did not execute a commitment for its share of the construction costs prior to the facilities being transferred to National Grid; and d) what right or obligation Green or National Grid has to allow other parties to utilize self-performed interconnection facilities when Green constructed the facilities and then donated them to National Grid for Green's purposes.

Response:

(a) and (b):

Green Development (GD) requested to self-perform the civil work necessary to facilitate and provide for the cable installation to interconnect their project located at 899 Nooseneck Hill Road, West Greenwich, RI.

On or around the same time that GD's interconnection application (queue date 2/12/2019) was progressing through the interconnection process the Company received applications for two other large stand-alone solar generation projects that would also require an underground interconnection solution. The Company determined the minimum build requirement for the manhole and duct system to accommodate all three developers' projects and future growth. This is common engineering best practice to minimize disrupting municipal public ways and avoid permitting issues with local cities and towns.

It was communicated to GD that, given the scope and scale of this project and the direct benefits to other developers with distributed generation projects in the vicinity, Narragansett would attempt to broker cost sharing with the other developers.

As Revity's and EDP's projects progressed they were made aware of the costs of GD's civil construction work that would be applied to their projects, as detailed within associated Interconnection Service Agreements (ISA). Both Revity and EDP also requested to self-perform the civil work (manhole and duct system) associated with their projects. In particular, an extension of the GD-built manhole and duct bank system must be constructed to service Revity's project in the area. EDP's project would benefit from that extended manhole and duct bank

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system. Accordingly, all three developers would benefit from these related civil projects and, in order to minimize costs for each developer, should share the costs of that work in an equitable manner.

(c) At present, the Company does not have a formal process whereby an Interconnecting Customer would execute a formal agreement that would commit the Interconnecting Customer to either cost share proposed or existing infrastructure that had been donated to the Company nor does the Company have in place a formal process to provide policy and guidelines around DG developers' self-performance of civil work.

(d) Once Green donates the civil work to the Company, the Company has the right to utilize that infrastructure for the benefit of its customers, including other DG developers. However, the Company does have an obligation to allow access to its system at least cost. Accordingly, in this instance, where multiple developers will benefit from the civil work constructed by GD, the Company is attempting to broker a cost sharing arrangement with GD and Revity (and, in the future, potentially EDP) to avoid having to construct additional civil work in the area to serve these projects, at higher costs to each developer, and with greater disruption to the public ways in the area.



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Division 1-5

Request:

To National Grid's knowledge, did Green enter any contractual obligation to allocate a portion of its self-performed interconnection facilities for Revity's exclusive use prior to Green's donating the facilities to National Grid?

Response:

The Company has no information of any contractual obligation between Green Development and Revity with respect to the civil work in question. Both parties, however, have stated that they are discussing a potential agreement.

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Division 1-6

Request:

Does National Grid have a contractual obligation to offer a portion of Green's self-performed interconnection facilities specifically to Revity?

Response:

No, National Grid is not obligated contractually to offer a portion of Green's self-performed civil work to Revity.

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Division 1-7

Request:

If an interconnecting party refuses to pay the fully allocated cost to share self-performed interconnection facilities, does National Grid believe it has the right to deny interconnection?

Response:

No, however, if an interconnecting party refuses to pay share in costs for self-performed facilities, the Company would have to charge them for additional study time to determine another solution to connect their project as well as the likely higher costs and additional time to construct another solution. If they refuse to pay these incremental costs, the Company will withdraw the project from the interconnection process and the project would have to re-apply for interconnection.

Division 1-8

Request:

If an interconnecting party self-performs construction of interconnecting facilities for that party's benefit now or in the future and donates those facilities to national Grid, what right does National Grid have to share those self-performed facilities with other parties absent an explicit release to do so from the party who self-performed the construction of the donated facilities? Additionally, explain how Section 2.0 of the Interconnection Tariff (which allows an interconnecting customer to self-perform) also allows National Grid to share these facilities with another interconnecting customer without some form of release or permission from the interconnecting customer who constructed the facilities for its own benefit?

Response:

Once the Company accepts any self-performed work, the facilities involved become the property of the Company and therefore the Company has the right to use it as it sees fit to serve other customers as it would for any other Company owned facility.

Division 1-9

Request:

Does National Grid believe it must share a portion of the duct bank capacity with Revity even though Green self-performed the construction of the duct bank facilities? If it does, explain in detail why it does. If it does not, explain in detail why it does not. Also, what gives Revity a right to part of the duct bank capacity over Green, the self-performing party, or any other requesting party?

Response:

No, the Company does not believe it must share a portion of the duct bank with Revity. As discussed in response to data request Division 1-7, once the Company has accepted the work, it becomes Company property and is not owned or controlled by the initial entity who constructed it. If this new Company facility provides the most cost-effective way to provide service to another customer, the Company would propose its use for that purpose to the new customer. Accordingly, the Company is attempting to broker a cost sharing arrangement in this instance in order to provide each benefitting party a cost-effective means to utilize the duct bank facilities. Otherwise, additional duct bank facilities may have to be constructed in the area to serve these projects individually, at greater cost to each and with greater disruption to the public roads in the area.

Division 1-10

Request:

Could Green have constructed the self-performed duct bank system to provide for its needs exclusively? If yes, why was the self-performed construction of the interconnecting facilities not constructed just for Green at a lower cost?

Response:

The design that National Grid developed was the most efficient and least cost overall option for all parties. If the duct bank system was constructed solely to serve Green Development, later expansion of the system to serve EDP and Revity would be significantly more expensive and time-consuming than if constructed at the same time. When excavating near an existing duct bank, mechanical digging is not allowed, and hand-digging or vacuum excavation would be required. The roadway would need to be dug up and repaved for each expansion, with significant construction and traffic impacts.

Division 1-11

Request:

Provide a list of each occurrence of an interconnection agreement in which the interconnecting party self-performed some portion of the interconnecting facilities and transferred the ownership of those facilities to National Grid for the past 10 years. Include the name of the party self-performing construction, a description and scope of work for the self-performed facilities, and the cost of those self-performed facilities and for each occurrence,

- a) List all other interconnecting parties which shared in the utilization of the self-performed interconnection facilities.
- b) List whether National Grid received any funds from interconnecting parties that shared in the utilization of the self-performed interconnection facilities. Include the calculations to determine the cost allocation to each party; and
- c) List whether National Grid reimbursed all, or a portion of funds received from interconnection parties that shared in the utilization of the self-performed interconnection facilities to the party responsible for the self-performed facilities.

Response:

See Attachment Div. 1-11.

| Case   | Project                | Address                                | Scope of work   | Costs         | A   | B  | C   |
|--|------------------------|--|---|---------------|---|--|-----|
| 176434   | GD Coventry Wind       | 561 Flat-River Rd, Coventry RI         | Install 79 manholes and 44,000' of conduit and duct system                                  | Not Available | N/A   | N/A  | N/A |
| 178177, 178178, 178197,<br>178206, 178207, 178208,<br>178209, 178210, 178211 | GD Exeter - Ten Rod Rd | Ten-Rod Rd, Exeter RI                  | Install 15 manholes, and approximately 10,000' of conduit                                   | Not Available | EDP - Ten-Rod Rd (178246)* EDP<br>- Dry Bridge (177529, 177530,<br>177531, 177532)* | Negotiated between Developers, NGRID<br>was not involved | N/A |
| 186401, 186403, 186406,<br>186409  | GD Iron Mine           | 1115 Iron Mine Hill Rd N.Smithfield RI | Install 14 manholes, 50' of 3-6" conduit, 150' of 2-6" conduit, and 450' of<br>2-5" conduit | Not Available | N/A   | N/A  | N/A |
| 177298, 177300   | Revity - Lippitt Ave   | 186 Lippitt Ave, Cranston RI           | Install 6 manholes and approximately 2,175' of conduit                                      | Not Available | Enerparc Inc - Hope Rd (176346)   | N/A  | N/A |

\*Pending Transfer

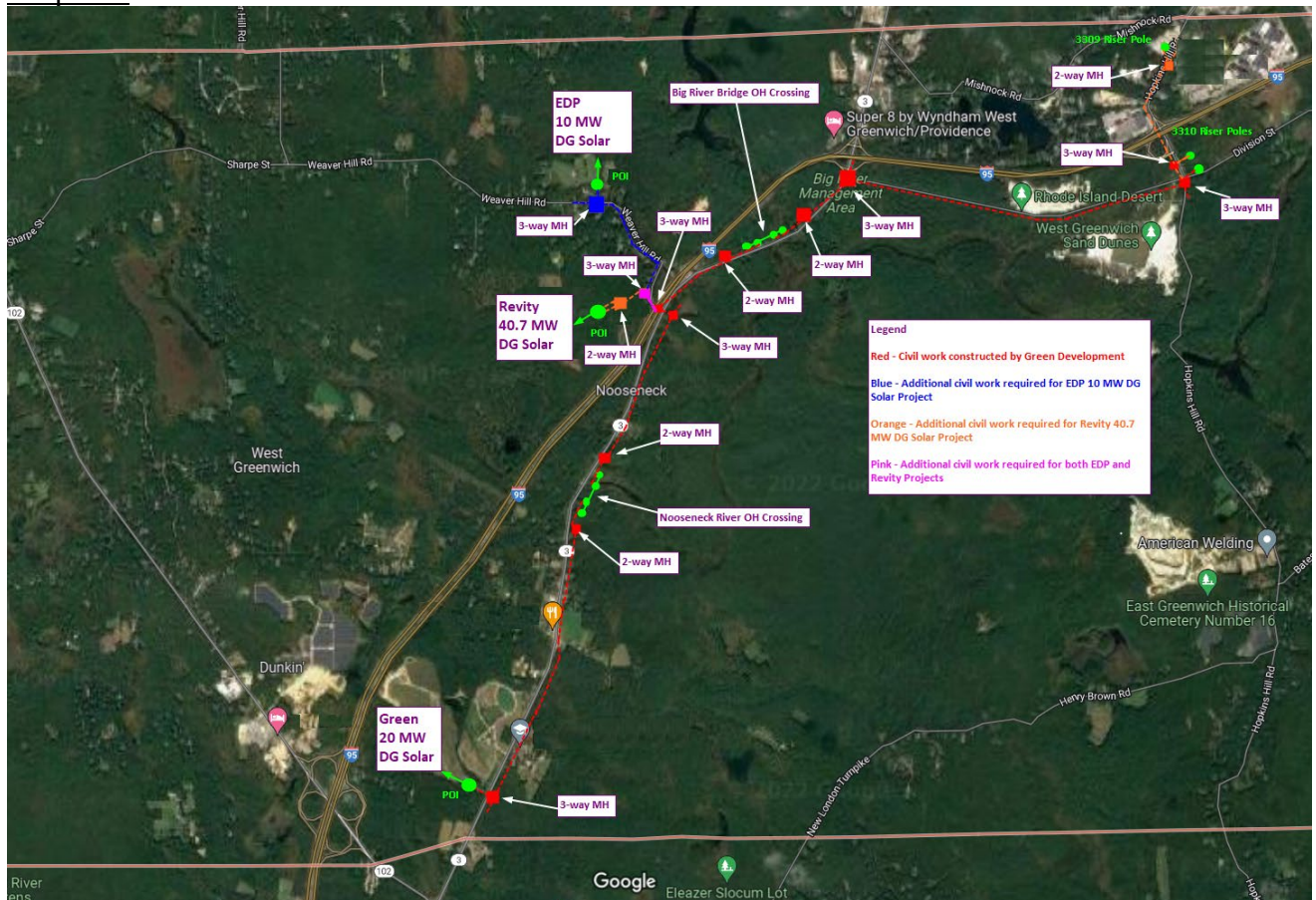


Division 1-12

Request:

Provide a detailed diagram of Green's self-performed civil work relative to the point of interconnection for the Weaver Hill Road project.

Response:



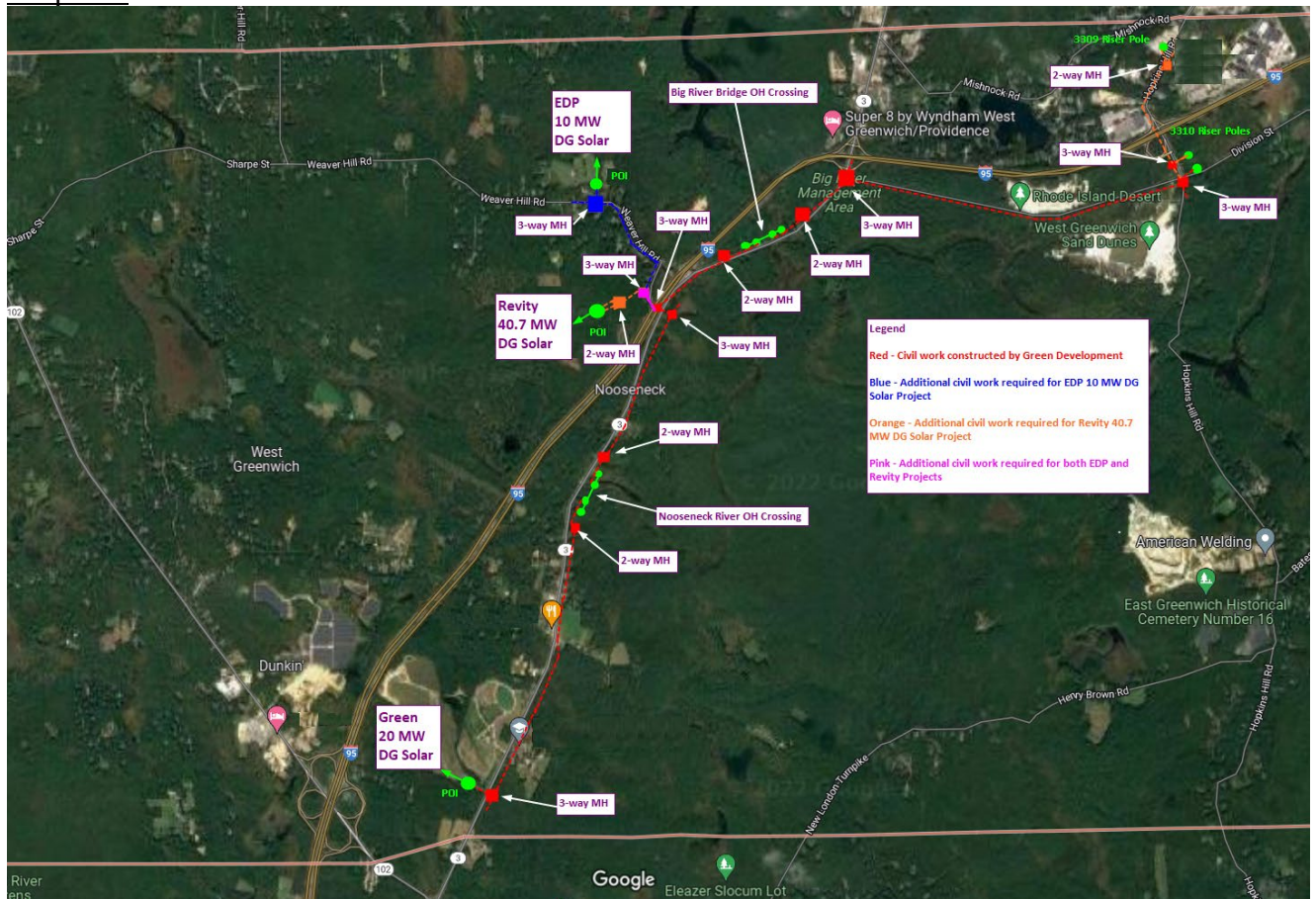
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Division 1-13

Request:

On the diagram provided in Div 1-1, depict Green's, Revity's and EDP's respective portions of Green's self-performed work.

Response:



Division 1-14

Request:

Of the self-performed work performed by Green, identify in % (ft & MW):

- a) Green's portion;
- b) Revity's portion; and
- c) EDP's portion.

Response:

The duct bank to be constructed by Green Development will span a total length of 28,169 ft. Of this distance:

14,602 ft (51.8%) is required for Green, Revity and EDP

89 ft (0.3%) is required solely for Revity (for the 3309 circuit to cross the Big River Bridge)

13,478 ft (47.9%) is required solely for the benefit of Green

The aggregate nameplate rating for all three projects is 70.7 MW, and is split as follows:

Green Development: 20 MW (28.3% of total)

Revity: 40.7 MW (57.6% of total)

EDP: 10 MW (14.1% of total)

Division 1-15

Request:

What was National Grid's reimbursement policy for self-performed, common duct bank work for the following periods:

- a) Before July 1, 2017?
- b) July 1, 2017 and September 1, 2021?
- c) After September 1, 2021?

Response:

The concept of cost sharing facilities installed by or self-performed by others and then donated to the Company is very new. Prior to the Green Development Nooseneck Hill Solar project the Company did not broker cost sharing arrangements with developers that self-built the Company's infrastructure because the cost to be shared would be very difficult to determine given that work was performed by others without the Company's involvement.

Because the manhole and duct system that GD is in the process of constructing and ultimately donating to the Company was known to also provide benefits to Revity and EDP, the Company determined, that brokering a cost sharing agreement was fair and equitable. The Company requested GD to provide estimates of their civil work costs that could be utilized in cost share calculations with Revity (EDP has not progressed to ISA to date). The Company also informed GD that a detailed accounting of the civil work would be required and that it would undergo an audit once the project was completed.

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Division 1-16

Request:

On what date(s) did Green commence and then complete the Weaver Hill Road duct bank work including common duct bank work?

Response:

Green commenced the common duct bank work in September 2021 and is on track to be completed by the end of April 2022. No work has commenced to the duct bank work on Weaver Hill Road at this time.

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Division 1-17

Request:

Did National Grid change its “cost-sharing policy” regarding its treatment of self-performed interconnection work? If yes, identify the date National Grid elected to change the policy and explain the basis for the change in policy.

Response:

The Company does not (and did not) have a formal cost sharing policy. In this instance, it determined that brokering a cost sharing agreement among beneficiaries of the civil work in question was fair and equitable to each developer, minimized costs for each developer and avoided the construction of additional civil work in the area to serve projects individually.

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Division 1-18

Request:

Provide all documents that reflect the change of policy identified in response to Div 1-17.

Response:

Please see response the Company's response to data request Division 1-17.

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Division 1-19

Request:

Identify the names, titles of all National Grid employees who participated in that change in policy, and identify how each individual participated in that change of policy.

Response:

Please see the Company's response to data request Division 1-17.



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Division 1-20

Request:

Provide all communications (correspondence, e-mails, text messages, *etc.*) between Reivity and National Grid that relate to change of policy identified in response to Div 1-17.

Response:

Please see the Company's response to data request Division 1-17.

John Kennedy spoke with Ralph Palumbo from Reivity where the term "policy changed" was used. The discussion was about a Reivity project in West Cranston where it had built the civil work, donated the property to the Company, and another developer was ultimately able to connect thereafter. The Company did not attempt to broker a cost sharing agreement in that instance. The opportunity for Reivity to build the civil work for that project was realized well after the Interconnection Service Agreement for their distributed generation project was executed.

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Division 1-21

Request:

Does National Grid possess the discretion under the policy change to allocate common costs for self-performed work on a “case-by-case” basis? If yes, describe what safeguards National Grid has in place to assure that National Grid does not abuse its discretion?

Response:

As noted in response to data request Division 1-17, the Company did not formally change a policy regarding the ability for an Interconnecting Customer to build a portion of the Company's infrastructure to serve its distributed generation project as part of the rationale for the pause on further self-build, the Company understands a critical part of review will be to come up with an proposed allocation methodology going forward.

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Division 1-22

Request:

Describe what safeguards are in place to assure Revity and EDP that their allocated cost shares of Green's self-performed work are reasonable, just and proper.

Response:

The Company will develop criteria for cost-sharing projects constructed by developers that benefit multiple Interconnecting Customers and ultimately donated to the Company. The Company will vet its recommendations with the DPUC. Any review will require specific as-built costs to be submitted by the entity who initially constructed the upgrade to be able to sustain regulatory scrutiny.

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Division 1-23

Request:

Provide and/or describe all forms of general and/or specific notice that National Grid has provided to the developer community and/or individual developers informing them of the change of policy regarding National Grid's treatment of self-performed interconnection work.

Response:

Please see the Company's response to data request Division 1-17 response. The Company notified the developers individually in this instance regarding its intent to broker a cost-sharing agreement for the civil work constructed by Green Development.

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Division 1-24

Request:

Does National Grid believe the policy change regarding its treatment of cost sharing for self-performed work effected in January of 2021 was timely? Please explain.

Response:

Please see the Company's response to data request Division 1-17. The Company's determination in this instance that cost sharing civil work would be equitable was timely. In prior years where there was less saturation of distributed generation, civil work self-performed by an Interconnecting Customer was not contemplated by the Company as having specific benefits to other developers. With continuing high saturation of DG, however, and with new applications occurring in areas where developers are self-building civil work for their own projects, the Company determined that it was timely to assess the potential equities of brokering cost sharing arrangements among developers that will directly benefit from such civil work.