

May 11, 2022

**BY ELECTRONIC MAIL**

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

**RE: Docket 5205 - DG Interconnection Projects**  
**Review of Cost Allocation and Recovery of Ongoing O&M Expenses**  
**Corrected Response to PUC 2-4**

Dear Ms. Massaro:

I have enclosed an electronic version of National Grid's<sup>1</sup> corrected response to PUC 2-4.<sup>2</sup> The Company is providing a redlined version of PUC 2-4 showing the correction.

Thank you for your attention to this matter. If you have any questions, please contact me at 401-784-4263.

Very truly yours,



Andrew S. Marcaccio

Enclosures

cc: Docket 5206 Service List  
John Bell, Division  
Jon Hagopian, Esq.

---

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

<sup>2</sup> 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.

The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 5205  
In Re: Review of Cost Allocation and Recovery of  
Ongoing Operation and Maintenance Expenses  
Related to the Interconnection of Distributed Generation Project  
(Non-Decisional Staff Review)  
Responses to the Commission’s Second Set of Data Requests  
Issued on April 19, 2022

---

PUC 2-4 (Revised)

Request:

Please provide a listing of all DAF in Rhode Island, including the party responsible for the payment of the annual DAF charges.

- a. For each, please explain whether the customer is connected directly to the transmission system or to the distribution system.
- b. Where the customer is Narragansett Electric, please identify whether the facility is designed to serve only one customer (or site) and provide a simple diagram showing whether the facility is a direct connect to the transmission system and whether the facility serves one or more retail customers.
- c. How does Narragansett Electric determine whether a DAF should be recovered from all retail customers or from a single customer (ignoring Block Island’s statutory allocations)? If applicable, this question is not limited to distributed generation facilities.

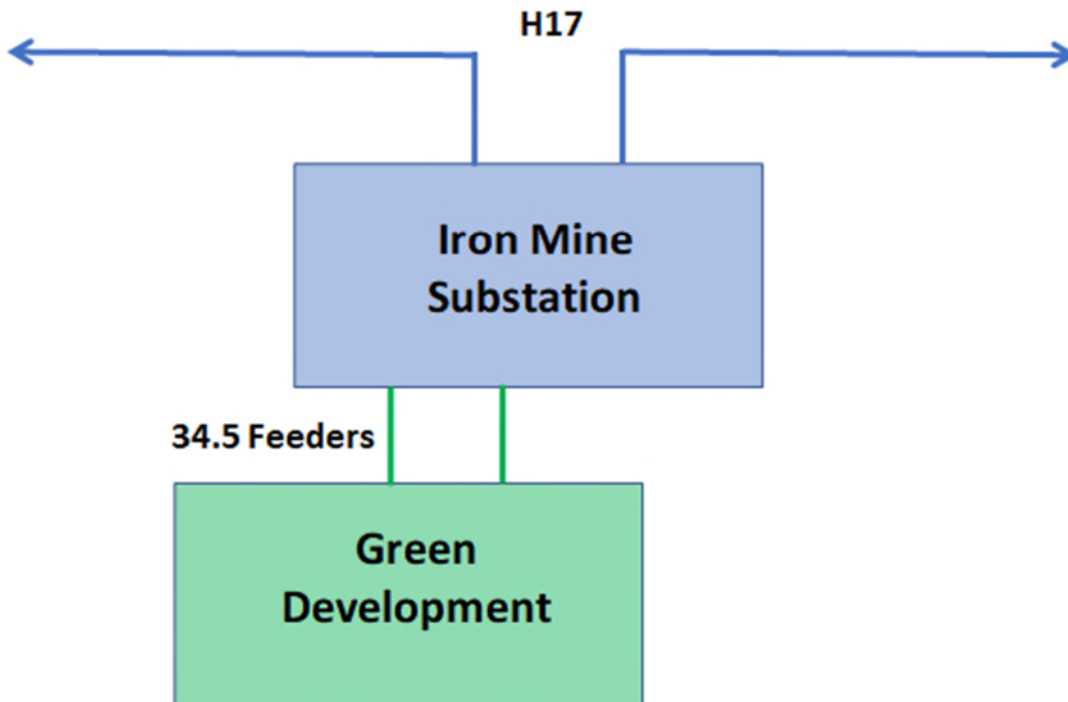
Response:

- a. As provided to The Narragansett Electric Company (NECO) by New England Power Company (NEP), below please see a list of all DAF charges for NEP customers in Rhode Island. The list includes the party responsible for the payment and whether the customer is connected directly to the transmission system or to the distribution system.

<b>DAF Customer</b>	<b>Connection Type</b>
Pascoag Utility District	Distribution
Broadrock Rhode Island Generation, LLC (SGIA)	Distribution
Block Island Power Company	Distribution
Deepwater Wind Block Island LLC	Distribution
Pawtucket Power Associates	Distribution
Broadrock Rhode Island Central Genco, LLC (Genco)	Transmission
Entergy Rhode Island State Energy L.P	Transmission
TransCanada Power (Ocean State)	Transmission
Tiverton Power LLC (Cogentrix Energy)	Transmission
Dominion Energy Manchester Street, Inc.	Transmission
The Narragansett Electric Company	Transmission

PUC 2-4, page 2

- b. The Direct Assignment Facilities Charge for NECO are related to transmission assets operated by NEP and installed at the request of NECO to enable NECO to continue to reliably serve its retail load customers while also effectuating the interconnection of a large, third party owned distributed energy project (the “Green Development Project”) to the NECO 34.5 kV distribution system. The facilities that underpin the Direct Assignment Facilities Charge to NECO are the Iron Mine Substation transmission assets that directly connect to the existing H17 115 kV transmission line and the new NECO 34.5 kV distribution feeder assets that currently only serve the Green Development Project. See below for a simple diagram of the Green Development Project interconnection and associated direct assignment facilities.



The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 5205  
In Re: Review of Cost Allocation and Recovery of  
Ongoing Operation and Maintenance Expenses  
Related to the Interconnection of Distributed Generation Project  
(Non-Decisional Staff Review)  
Responses to the Commission's Second Set of Data Requests  
Issued on April 19, 2022

---

PUC 2-4, page 3

- c. In the case of a distributed generation project that includes transmission system modifications, NECO's cost allocation principle is consistent with PUC cost causation precedent in that consistent with principles of equity, a party causing costs to be incurred will bear all the costs they cause. As a result, if a distributed generation project interconnecting pursuant to the NECO interconnection tariff triggers the need for transmission system upgrades, and their associated DAF charges, all those DAF costs borne by NECO will be allocated to the distributed generation project, to the extent the distributed generation project interconnection agreement allows for such allocation. This paradigm applies to the Iron Mine project for which ~~Narragansett will bill a DAF to Green Development~~ Narragansett will pass on its DAF costs to the Green Development Project.

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.



\_\_\_\_\_  
Andrew S. Marcaccio

May 11, 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 1/6/2022**

<b>Name/Address</b>	<b>E-mail Distribution</b>	<b>Phone</b>
Andrew.Marcaccio, Esq. National Grid 280 Melrose St. Providence, RI 02907	<a href="mailto:Andrew.Marcaccio@nationalgrid.com">Andrew.Marcaccio@nationalgrid.com</a> ;	401-784-7288
	<a href="mailto:Raquel.webster@nationalgrid.com">Raquel.webster@nationalgrid.com</a> ;	
	<a href="mailto:celia.obrien@nationalgrid.com">celia.obrien@nationalgrid.com</a> ;	
	<a href="mailto:jhabib@keeganwerlin.com">jhabib@keeganwerlin.com</a> ;	
Raquel Webster, Esq. Celia O'Brien, Esq. Jack Habib, Esq.	<a href="mailto:Joanne.scanlon@nationalgrid.com">Joanne.scanlon@nationalgrid.com</a> ;	
	<a href="mailto:Ali.atash@nationalgrid.com">Ali.atash@nationalgrid.com</a> ;	
Ali Atash Theresa Burns Brooke Skulley John Isberg Eric Hanlon John Kennedy Kevin Kelly Kathy Castro Timothy Roughan	<a href="mailto:Theresa.Burns@nationalgrid.com">Theresa.Burns@nationalgrid.com</a> ;	
	<a href="mailto:brooke.skulley@nationalgrid.com">brooke.skulley@nationalgrid.com</a> ;	
	<a href="mailto:john.isberg@nationalgrid.com">john.isberg@nationalgrid.com</a> ;	
	<a href="mailto:eric.hanlon@nationalgrid.com">eric.hanlon@nationalgrid.com</a> ;	
	<a href="mailto:john.kennedy@nationalgrid.com">john.kennedy@nationalgrid.com</a> ;	
	<a href="mailto:kevin.kelly2@nationalgrid.com">kevin.kelly2@nationalgrid.com</a> ;	
	<a href="mailto:kathy.castro2@nationalgrid.com">kathy.castro2@nationalgrid.com</a> ;	
	<a href="mailto:Timothy.roughan@nationalgrid.com">Timothy.roughan@nationalgrid.com</a> ;	
Division of Public Utilities (Division) Jon Hagopian, Esq. 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:jon.hagopian@dpuc.ri.gov">jon.hagopian@dpuc.ri.gov</a> ;	
	<a href="mailto:John.bell@dpuc.ri.gov">John.bell@dpuc.ri.gov</a> ;	
	<a href="mailto:Margaret.l.hogan@dpuc.ri.gov">Margaret.l.hogan@dpuc.ri.gov</a> ;	

	<a href="mailto:Linda.george@dpuc.ri.gov">Linda.george@dpuc.ri.gov</a> ;	
Gregory L. Booth, PE, PLS Mike Brennan Bill Watson Linda Kushner	<a href="mailto:gboothpe@gmail.com">gboothpe@gmail.com</a> ;	
	<a href="mailto:Mikebrennan099@gmail.com">Mikebrennan099@gmail.com</a> ;	
	<a href="mailto:wfwatson924@gmail.com">wfwatson924@gmail.com</a> ;	
	<a href="mailto:Lkushner33@gmail.com">Lkushner33@gmail.com</a> ;	
Office of Energy Resources (OER) Al Vitali Nick Ucci Chris Kearns Carrie Gill Shauna Beland	<a href="mailto:Albert.vitali@doa.ri.gov">Albert.vitali@doa.ri.gov</a> ;	
	<a href="mailto:Nicholas.ucci@energy.ri.gov">Nicholas.ucci@energy.ri.gov</a> ;	
	<a href="mailto:Christopher.Kearns@energy.ri.gov">Christopher.Kearns@energy.ri.gov</a> ;	
	<a href="mailto:Carrie.gill@energy.ri.gov">Carrie.gill@energy.ri.gov</a> ;	
	<a href="mailto:Shauna.beland@energy.ri.gov">Shauna.beland@energy.ri.gov</a> ;	
SEA Advantage Jim Kennerly Stephan Wollenburg Witter Swanson Andrew Lidington Tobin Armstrong Cal Brown Tim Michelman	<a href="mailto:jkennerly@seadvantage.com">jkennerly@seadvantage.com</a> ;	
	<a href="mailto:swollenburg@seadvantage.com">swollenburg@seadvantage.com</a> ;	
	<a href="mailto:wswanson@seadvantage.com">wswanson@seadvantage.com</a> ;	
	<a href="mailto:alidington@seadvantage.com">alidington@seadvantage.com</a> ;	
	<a href="mailto:tarmstrong@seadvantage.com">tarmstrong@seadvantage.com</a> ;	
	<a href="mailto:cbrown@seadvantage.com">cbrown@seadvantage.com</a> ;	
	<a href="mailto:tmichelman@seadvantage.com">tmichelman@seadvantage.com</a> ;	
Newport Solar Doug Sabetti	<a href="mailto:doug@newportsolarri.com">doug@newportsolarri.com</a> ;	
Energy Development Partners Frank Epps	<a href="mailto:frank@edp-energy.com">frank@edp-energy.com</a> ;	
Heartwood Group Fred Unger	<a href="mailto:unger@hrtwd.com">unger@hrtwd.com</a> ;	
Kearsarge Energy LP Patricia Fennessey Alex Young	<a href="mailto:pfennessey@kearsargeenergy.com">pfennessey@kearsargeenergy.com</a> ;	
	<a href="mailto:Ayoung@kearsargeenergy.com">Ayoung@kearsargeenergy.com</a> ;	
Green Development Matt Sullivan	<a href="mailto:ms@green-ri.com">ms@green-ri.com</a> ;	
<b>File an original w/:</b> Luly E. Massaro, Commission Clerk Cynthia Wilson-Frias, Esq. Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a> ;	401-780-2107
	<a href="mailto:Cynthia.WilsonFrias@puc.ri.gov">Cynthia.WilsonFrias@puc.ri.gov</a> ;	
	<a href="mailto:Todd.bianco@puc.ri.gov">Todd.bianco@puc.ri.gov</a> ;	
	<a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov</a> ;	
PPL Electric Utilities Ronald Reybitz Stephen Breininger	<a href="mailto:rjreybitz@pplweb.com">rjreybitz@pplweb.com</a> ;	
	<a href="mailto:skbreininger@pplweb.com">skbreininger@pplweb.com</a> ;	
ISO-NE Kerry Schlichting	<a href="mailto:kschlichting@iso-ne.com">kschlichting@iso-ne.com</a> ;	

Tori Scott	<a href="mailto:Victoria.Scott@governor.ri.gov">Victoria.Scott@governor.ri.gov;</a>	
Christian Capizzo, Esq.	<a href="mailto:ccapizzo@psh.com">ccapizzo@psh.com;</a>	